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Oregon
Theodore R. Kulongoski, Governor

Department of State Lands
775 Summer Street NE, Suite 100
Salem, OR 97301-1279
(503) 378-3805
FAX (503) 378-4844
www.oregonstatelands.us.

State Land Board

Theodore R. Kulongoski
Governor

Bill Bradbury
Secretary of State

Randall Edwards
State Treasurer

January 28, 2004

JV02
MR MAT CUSMA
SCHNITZER STEEL PRODUCTS COMPANY
PO BOX 10047
PORTLAND OR 97296

RE: Site on Lower Willamette, previously Premier Edible Oils

Dear Mat:

I've been reviewing our inventory of sites on the Lower Willamette. I've attached an aerial photo showing a structure in front of Tax Lot 300 that I believe was previously occupied by Premier Edible Oils. Tax assessor records show Schnitzer Investment Corporation as the current owner of the upland adjacent to the structure, which I circled. Pursuant to OAR 141-082-0040 any structure occupying state owned submerged and submersible lands and not exclusively engaged in wharfing activities, must be authorized by the Department of State Lands (DSL) through the issuance of a waterway lease. The structure may have been classified as a wharf from past activities but if it is not being currently used as a wharf, it requires a waterway lease to be in compliance with state statutes and DSL rules.

I am enclosing a waterway lease application along with a copy of our Waterway Leasing rules. A $750 application fee should accompany your waterway lease application along with the required documentation as itemized in the application.

If you have any questions, please call me at 503-378-3805, extension 245, or my assistant Jenni Vickers, extension 242.

Sincerely,

Cyril J. Young
Property Manager

Enclosed Aerial photo
Waterway Lease application packet

J:\Property Manager Cy\Leases\Letters\Schnitzer dock_TxLt 300_Prem Oil.doc

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Oregon
John A. Kitzhaber, M.D., Governor

Department of Environmental Quality
Northwest Region Portland Office
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987
(503) 229-5263
FAX (503) 229-6945
TTY (503) 229-5471

July 20, 2001

Tom Zelenka
Schnitzer Investment Corporation
P.O. Box 10047
Portland, Oregon 97296-0047

RE: Voluntary Agreement
Former Premier Edible Oils Site
Portland, Oregon
DEQ ECSI # 2013

Dear Mr. Zelenka:

The Department of Environmental Quality (DEQ) received the two copies of the Voluntary Agreement for the referenced site and is returning a fully executed copy to you for your records. If you have any questions, please do not hesitate to contact me at 229-5011.

Sincerely,

Alicia C. Voss

Alicia C. Voss, Project Manager
Portland Harbor and Voluntary Cleanup Section

Enclosure

cc: Eric Blischke, NWR/DEQ

DEQ-ECI

VOLUNTARY AGREEMENT FOR UPLAND
REMEDIAL INVESTIGATION/FEASIBLITY STUDY AND SOURCE CONTROL MEASURES

DEQ NO. ECDVC-NWR-01-06

BETWEEN: Schnitzer Investment Corp. (Schnitzer)

AND: Oregon Department of Environmental Quality (DEQ)

EFFECTIVE DATE: March 6, 2001

Pursuant to ORS 465.260(2) and (4), the Director, Oregon Department of Environmental Quality (DEQ), enters this Agreement with Schnitzer Investment Corp. (Schnitzer). This Agreement contains the following provisions:

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I. RECITALS

A. Schnitzer is a "person" under ORS 465.200(20).

B. The Premier Edible Oils (PEO) site, which belongs to Schnitzer, consists of the north and south parcels and occupies approximately 18.5 acres at 10400 N. Burgard Way, Portland, Oregon and is referred to hereinafter as the "PEO Site". A vicinity map and a site map are included as Figures 1 and 2 in Attachment A to this Agreement, and are incorporated herein by reference. The PEO site does not include other adjoining property at 12005 N. Burgard Road that is also owned by Schnitzer

and that is subject to a similar Voluntary Agreement For Remedial Investigation and Source Control Measures by Schnitzer.

C. The PEO Site is located within or near what is known as the Portland Harbor, a six-mile reach of the Willamette River between Sauvie Island and Swan Island. A 1997 study by DEQ and the U.S. Environmental Protection Agency identified elevated levels of hazardous substances in shallow, near-shore sediments throughout the Portland Harbor.

D. Schnitzer has owned the PEO Site since 1972 and leased it to Premier Edible Oils (previously known as Palmco) and C&T Qunicy Foods from 1973 until 1998. The Premier Edible Oils site operations have included edible oil processing, storing and shipping. Prior to 1972, the site was sequentially owned by several parties and used 1) by a chemical company, 2) as part of the World War II shipyards, and 3) for storage of bulk petroleum products. Site investigations have detected petroleum hydrocarbons, chlorinated solvents, and edible oils in site soil. Petroleum and chlorinated solvents have been detected in site groundwater. Petroleum product has been documented in a monitoring well near the southwest corner of the property, near the Willamette River.

E. Materials used and stored on the PEO Site included petroleum products, solvents, and edible oils. Wastes from the edible oil operation included wastewater, storm water, waste oils, spent catalysts and solvents, and solid wastes.

F. Limited sediment investigations at the PEO Site have disclosed heavy oil and PAH contamination. Investigations have also disclosed the following contaminants in the soil and groundwater at the PEO Site: gasoline, diesel fuel, heavy oils (i.e. edible oils), PAHs, and VOCs.

The substances described in this section are "hazardous substances" under ORS 465.200(15), with the exception of edible oils. The presence of hazardous substances in soil, groundwater, and sediments at or near the site constitutes a "release" or "threat of release" into the environment under ORS 465.200(21). The PEO Site and the contaminated sediments at or near the PEO Site are a "facility" under ORS 465.200(12).

G. DEQ considers the activities required by this Agreement to be necessary to protect public health, safety, and welfare and the environment.

II. AGREEMENT

The parties agree as follows:

A. Work

1. Remedial Investigation

Schnitzer shall perform a remedial investigation satisfying OAR 340-122-0080, the terms and schedule of a DEQ approved work plan developed by Schnitzer, and applicable elements of the Scope of Work contained in Attachment B to this Agreement. Schnitzer may specify, in the proposed work plan, elements of the Scope of Work that Schnitzer considers inapplicable or unnecessary to the remedial investigation for the facility. Schnitzer may propose to perform the work in phases or operable units.

2. Source Control Measures

For any unpermitted discharge or migration of contaminants to the Willamette River or sediments identified in the remedial investigation, Schnitzer shall evaluate such discharge or migration, and then develop and implement source control measures in accordance with the Scope of Work.

3. Feasibility Study

Schnitzer shall perform a feasibility study satisfying OAR-340-122-090, using the terms and schedule of a DEQ-approved work plan developed by Schnitzer, and the applicable elements of the Scope of Work contained in Attachment B to this Agreement.

4. DEQ-Review

DEQ shall provide review, approvals/disapprovals, and oversight in accordance with the schedule set forth in the Scope of Work, or as soon as thereafter practicable in the event staff resources or workload prevent compliance with the schedule. Any DEQ delay shall correspondingly extend Schnitzer's schedule for a related deliverable or activity.

5. Additional Measures

Schnitzer may elect at any time during the term of this Agreement to undertake remedial measures other than those required under this Agreement necessary to address a release or threatened release of hazardous substances at the

facility. Such other measures shall be subject to prior approval by DEQ. Prior approval shall not be required in emergencies where Schnitzer reasonably believes a delay in undertaking a particular action will threaten human health, safety, or the environment; provided that Schnitzer notifies DEQ of the emergency and action as soon as is practicable.

6. Dredging Activities

Schnitzer shall notify the DEQ project manager at least sixty (60) days before undertaking any dredging or other activity that might disturb sediments at or near the PEO Site. In its notice of dredging or other activity, Schnitzer shall: (a) Evaluate the concentration of hazardous substances present in and below the affected sediments based on sampling and analyses performed in advance of the notice; (b) Document the steps to be taken to ensure that both the activity and the subsequent management and disposal of dredged spoils will be conducted in a manner protective of human health and the environment; and (c) Evaluate the effect of the activity on the Portland Harbor Remedial Investigation and Feasibility Study. Dredging may proceed under existing permits subject to the above notice and implementation of any additional dredging or management practices required by DEQ. DEQ shall also be notified of and copied on any permit application to the Oregon Division of State Lands or United States Army Corps of Engineers for dredging or other activity disturbing sediments adjacent to the Schnitzer site. Notwithstanding the foregoing, Schnitzer may conduct dredging or other activities that might disturb sediments at or near the facility without giving DEQ 60 days' notice, if such activities are conducted in accordance with an effective Dredging Agreement between Schnitzer and DEQ that describes the notification and sampling requirements, dredging, management, and disposal practices, and any other measures that Schnitzer will take to ensure that all activities within the scope of the Dredging Agreement are conducted in a manner that is protective of human health and the environment and consistent with Harbor-wide cleanup work.

7. Site Access

Schnitzer will obtain or use its best efforts to obtain access to property not owned or controlled by Schnitzer as necessary to perform the work required under this Agreement. If Schnitzer is not able to obtain site access agreements within 30 days of its formal request to another property owner, DEQ may use its statutory authority to obtain access to property on behalf of Schnitzer if DEQ determines that access is

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necessary and that Schnitzer has exhausted all good faith efforts to obtain access.

B. Public Participation

Upon execution of this Agreement, DEQ will provide public notice of this Agreement through issuance of a press release, at a minimum to a local newspaper of general circulation, describing the measures required under this Agreement. Copies of the Agreement will be made available to the public. DEQ shall provide Schnitzer a draft of such press release and consider any comments by Schnitzer on the draft press release, before publication.

C. DEQ Access and Oversight

1. Schnitzer shall allow DEQ to enter all portions of the PEO site at all reasonable times for the purposes, among other things, of inspecting records relating to work under this Agreement; observing Schnitzer's progress in implementing this Agreement; conducting such tests and taking such samples as DEQ deems necessary; verifying data submitted to DEQ by Schnitzer; and, using camera, sound recording, or other recording equipment for purposes relating to work under this Agreement. Upon Schnitzer's verbal request, DEQ shall make available to Schnitzer a split or duplicate of any sample or recording taken by DEQ pursuant to this Agreement. DEQ shall use its best efforts, but not be obligated, to provide reasonable advance notice before entering the facility. DEQ shall adhere to all health and safety requirements of the facility, as identified in the applicable Health and Safety Plan, including, but not limited to, requirements in portions of the PEO site where outside visitors must be accompanied by company personnel.

2. Schnitzer shall permit DEQ to inspect and copy all records, files, photographs, documents, and data in connection with work under this Agreement, except that Schnitzer shall not be required to permit DEQ inspection or copying of items subject to attorney-client or attorney work product privilege. DEQ shall use its best efforts, but not be obligated, to provide reasonable notice before records inspection and copying requests.

3. Attorney-client and work product privileges may not be asserted with respect to any records required under Paragraphs II.G.1 and II.G.2 of this Agreement. Schnitzer shall identify to DEQ--by addressor-addressee, date, general subject matter, and distribution--any document, record, or

item withheld from DEQ on the basis of attorney-client or attorney work product privilege. DEQ reserves its rights under law to obtain documents DEQ asserts are improperly withheld by Schnitzer.

D. Project Managers

1. To the extent possible, all reports, notices, and other communications required under or relating to this Agreement shall be directed to:

DEQ Project Manager:	Schnitzer Project Manager:
Alicia C. Voss Voluntary Cleanup and Portland Harbor Section 2020 SW Fourth, Suite 400 Portland, Oregon 97204 503-229-5011	Tom Zelenka Schnitzer Investment Corporation P.O. Box 10047 Portland, Oregon 97296-0047 503-224-9900

2. Schnitzer's and DEQ's Project Managers shall be available and have the authority to make day-to-day decisions necessary to complete the Scope of Work under this Agreement.

E. Notice and Samples

Schnitzer shall make every reasonable attempt to notify DEQ of any excavation, drilling, or sampling to be conducted under this Agreement at least five (5) working days before such activity but in no event less than twenty-four (24) hours before such activity. Upon DEQ's verbal request, Schnitzer shall make available to DEQ a split or duplicate of any sample taken pursuant to this Agreement. DEQ shall make every effort to complete analysis of any split or duplicate sample on a schedule consistent with Schnitzer's schedule for related activities. DEQ shall provide Schnitzer with copies of all analytical data from such samples as soon as practicable.

F. Quality Assurance

Schnitzer shall conduct all sampling, sample transport, and sample analysis in accordance with the Quality Assurance/ Quality Control (QA/QC) provisions approved by DEQ as part of the work plan. All plans prepared and work conducted as part of this Agreement shall be consistent with DEQ's "Quality Assurance Policy No. 760.00". Schnitzer shall ensure that each laboratory used by Schnitzer for analysis performs such analyses in accordance with such provisions.

G. Records

1. In addition to those technical reports and documents specifically required under this Agreement, Schnitzer shall provide to DEQ within thirty (30) days of DEQ's written request copies of documents generated in connection with the work required under this Agreement, including QA/QC memoranda and QA/QC audits, draft and final deliverable plans, final reports, task memoranda, field notes, and laboratory analytical data that have undergone data quality validation.

2. If DEQ determines that review of raw data or preliminary laboratory reports is necessary in order to ensure protection of public health, safety, and welfare and the environment, that information will be provided by Schnitzer within ten (10) days of DEQ's written request.

3. Schnitzer and DEQ shall preserve all records and documents in possession or control of Schnitzer and DEQ, respectively, or their employees, agents, or contractors that relate in any way to activities under this Agreement for at least five (5) years after termination under Subsection II.R. of this Agreement; provided that after such 5-year period, Schnitzer and DEQ shall provide the other sixty (60) days notice before destruction or other disposal of such records and make them available for inspection and copying.

4. Schnitzer may assert a claim of confidentiality regarding any documents or records submitted to or copied by DEQ pursuant to this Agreement. DEQ shall treat documents and records for which a claim of confidentiality has been made in accordance with ORS 192.410 through 192.505. If Schnitzer does not make a claim of confidentiality at the time the documents or records are submitted to or copied by DEQ, the documents or records may be made available to the public without notice to Schnitzer.

H. Progress Reports

During each quarter of this Agreement, Schnitzer shall deliver to DEQ on or before the fifteenth (15th) day following the end of the calendar quarter two, (2) copies of a progress report containing the following items. DEQ anticipates that the progress report will not exceed 2 pages in length.

1. Actions taken under this Agreement during the previous quarter;

2. Actions scheduled to be taken in the next quarter;

3. Sampling, test results, and any other data generated by Schnitzer during the previous quarter; and

4. A description of any problems experienced during the previous quarter and the actions taken to resolve them.

I. Other Applicable Laws

Subject to ORS 465.315(3), all actions under this Agreement shall be performed in accordance with all applicable federal, state, and local laws and regulations. Without limiting the foregoing, all action under this Agreement shall be performed in accordance with any applicable federal, state, and local laws and regulations related to archeological objects and sites and protection thereof. If archeological objects or human remains are discovered during any investigation, removal or remedial activities at the PEO Site, Schnitzer shall at a minimum (a) stop work immediately in the vicinity of the find, (b) provide any notifications required by ORS 97.745 and ORS 358.920, (c) notify Kim Cox, Portland Harbor Project Coordinator at 503.229.6590 or the DEQ project manager for the PEO Site within 24 hours of the discovery, and (d) use best efforts to ensure that Schnitzer and its employees, contractors, counsel, and consultants keep the discovery confidential, including but not limited to, refraining from contacting the media or any third party or otherwise sharing information regarding the discovery with any member of the public, and immediately notifying DEQ of and directing any inquiry from the media or public regarding the discovery to DEQ.

J. Reimbursement of DEQ Oversight Costs

1. Prior to entry of this Agreement, DEQ shall submit to Schnitzer an invoice for costs incurred by DEQ for the PEO site prior to March 6, 2001. The total for DEQ costs incurred prior to March 6, 2001 is $14,489.82.

2. Upon entry of this Agreement, DEQ shall submit to Schnitzer an estimate for costs actually and reasonably incurred by DEQ for preparation and negotiation of this Agreement and an estimate of future DEQ oversight costs associated with Schnitzer's implementation of this Agreement.

3. DEQ shall submit to Schnitzer a monthly statement of costs incurred after issuance of this Agreement by DEQ in connection with oversight of Schnitzer's implementation of this Agreement. Each invoice will include a summary of costs billed to date. DEQ's invoice for direct costs will include a direct labor summary showing the persons charging time, the amount of time, and the nature of the work performed.

4. DEQ or State of Oregon oversight costs payable by Schnitzer shall include both direct and indirect costs. Direct costs shall include site-specific expenses, DEQ contractor costs, and DEQ legal costs. Indirect costs shall include those general management and support costs of the DEQ and of the applicable administering division (e.g. Waste Prevention and Management Division, Environmental Cleanup Division, Northwest Region) that are allocable to DEQ oversight of this Agreement and not charged as direct, site-specific costs. Indirect costs shall be based on a percentage of direct personal service costs. DEQ oversight costs also shall include the surcharge required by ORS 465.333.

5. Within thirty (30) days of receipt of a DEQ statement, Schnitzer shall pay the amount of costs billed by check made payable to the "State of Oregon, Hazardous Substance Remedial Action Fund". Schnitzer shall pay simple interest of 9% per annum on the unpaid balance of any oversight costs, which interest shall begin to accrue at the end of the 30-day payment period.

K. Force Majeure

1. If any event occurs that is beyond Schnitzer's reasonable control and that causes or might cause a delay or deviation in performance of the requirements of this Agreement, Schnitzer shall promptly notify DEQ's Project Manager verbally of the cause of the delay or deviation and its anticipated duration, the measures that have been or will be taken to prevent or minimize the delay or deviation, and the timetable by which Schnitzer proposes to carry out such measures. Schnitzer shall confirm in writing this information within five (5) working days of the verbal notification.

2. If Schnitzer demonstrates to DEQ's satisfaction that the delay or deviation has been or will be caused by circumstances beyond the reasonable control and despite the due diligence of Schnitzer, DEQ shall extend times for performance of related activities under this Agreement as appropriate. Circumstances or events beyond Schnitzer's control might include but are not limited to acts of God, unforeseen strikes or work stoppages, fire, explosion, riot, sabotage, or war. Increased cost of performance or changed business or economic circumstances shall be presumed not to be circumstances beyond Schnitzer's reasonable control.

L. Prior Approval

Where DEQ review and approval is required for any plan or activity under this Agreement, Schnitzer shall not proceed to implement the plan or activity until DEQ approval is received. Any DEQ delay in granting or denying approval shall correspondingly extend the time for completion by Schnitzer. Prior approval shall not be required in emergencies where Schnitzer reasonably believes a delay in undertaking a particular action will threaten human health, safety, or the environment; provided that Schnitzer notifies DEQ of the emergency and action as soon as is practicable.

M. Dispute Resolution

In the event of disagreement between Schnitzer and DEQ regarding implementation of this Agreement, Schnitzer and DEQ shall, in the following order: 1) make a good faith effort to resolve the dispute between Project Managers; 2) if necessary, refer the dispute for resolution by the immediate supervisors of the Project Managers; 3) if necessary, provide each other their respective positions in writing and refer the dispute for resolution by DEQ's Administrator of the Waste Prevention and Management Division or the appropriate Region Administrator and Schnitzer's Project Manager; and 4) if necessary, refer the dispute for resolution by DEQ's Director and Schnitzer's General Counsel. DEQ's final decision after such dialogue shall be enforceable under this Agreement. The time required for dispute resolution shall correspondingly extend Schnitzer's schedule for all pending, affected deliverables or activities.

N. Enforcement of Agreement and Reservation of Rights

1. In the event of Schnitzer's failure to comply with this Agreement (including any failure to reimburse oversight costs), DEQ may enforce this Agreement as an order under ORS 465.260(5) or may terminate this Agreement after thirty (30) days written notice to Schnitzer.

2. In the event of DEQ's failure to provide oversight in accordance with this Agreement, Schnitzer may terminate this Agreement after thirty (30) days written notice to DEQ. Costs incurred or obligated by DEQ before the effective date of any termination of this Agreement shall be owed under the Agreement notwithstanding such termination.

3. Schnitzer does not admit any facts (including those recited herein), legal issues, liability, or violation of law by virtue of entering this Agreement.

4. Except as otherwise provided in Subsection II.O., nothing in this Agreement shall prevent Schnitzer from exercising any rights of contribution or indemnification Schnitzer might have against any person, including the State of Oregon, regarding the activities or release(s) that are the subject of this Agreement; provided Schnitzer waives any right it might have under ORS 465.260(7) to seek reimbursement from the Hazardous Substance Remedial Action Fund for costs incurred under this Agreement.

5. Schnitzer agrees not to litigate, in any proceeding brought by DEQ to enforce this Agreement, any issue other than Schnitzer's or DEQ's compliance with this Agreement.

6. The PEO Site is part of the Portland Harbor that was listed on the federal National Priority List (NPL) site in December 2000. DEQ remains the lead agency with respect to the PEO Site. If EPA orders any conflicting or overlapping activities, this Agreement shall be modified, as necessary, to prevent conflicting or duplicative obligations. Any other additional EPA-imposed obligations may be addressed by modification of this Agreement under Subsection II.Q or by separate agreement or order.

O. Hold Harmless

1. Schnitzer shall save and hold harmless the State of Oregon and its commissions, agencies, officers, employees, contractors, and agents, and indemnify the foregoing, from and against any and all claims arising from acts or omissions related to this Agreement of Schnitzer or its officers, employees, contractors, agents, receivers, trustees, or assigns. DEQ shall not be considered a party to any contract made by Schnitzer or its agents in carrying out activities under this Agreement.

2. To the extent permitted by Article XI, Section 7, of the Oregon Constitution and by the Oregon Tort Claims Act, the State of Oregon shall save and hold harmless Schnitzer and its officers, employees, contractors, and agents, and indemnify the foregoing, from and against any and all claims arising from acts or omissions related to this Agreement of the State of Oregon or its commissions, agencies, officers, employees, contractors, or agents (except for acts approving or omissions constituting approval of any activity of Schnitzer under this Agreement). Schnitzer shall not be considered a party to any contract made by DEQ or its agents in carrying out activities under this Agreement.

P. Parties Bound

This Agreement shall be binding on the parties and their respective successors, agents, and assigns. The undersigned representative of each party certifies that he or she is fully authorized to execute and bind such party to this Agreement. No change in ownership or corporate or partnership status relating to the facility shall in any way alter Schnitzer's obligations under this Agreement, unless otherwise approved in writing by DEQ.

Q. Modification

DEQ and Schnitzer may modify this Agreement by mutual written agreement.

R. Duration and Termination

Upon completion of work under this Agreement, Schnitzer shall submit to DEQ a written notice of completion. This Agreement shall be deemed satisfied and terminated upon payment of all oversight costs owed and upon DEQ's issuance of a letter acknowledging satisfactory completion of activities in accordance with this Agreement. Such letter shall be issued within sixty (60) days of receipt of notice of completion evidencing satisfactory completion of activities in accordance with this Agreement and payment of outstanding DEQ oversight costs, or as soon thereafter as is reasonably practicable. In the event that DEQ is unable to issue such letter within sixty days of receipt of Schnitzer's written notice of completion, DEQ shall provide Schnitzer with a written schedule upon which DEQ anticipates review of Schnitzer's work and issuance of that letter.

Schnitzer Investment Corp.

By: Tom Zelenka (Name) Date: 7/16/01

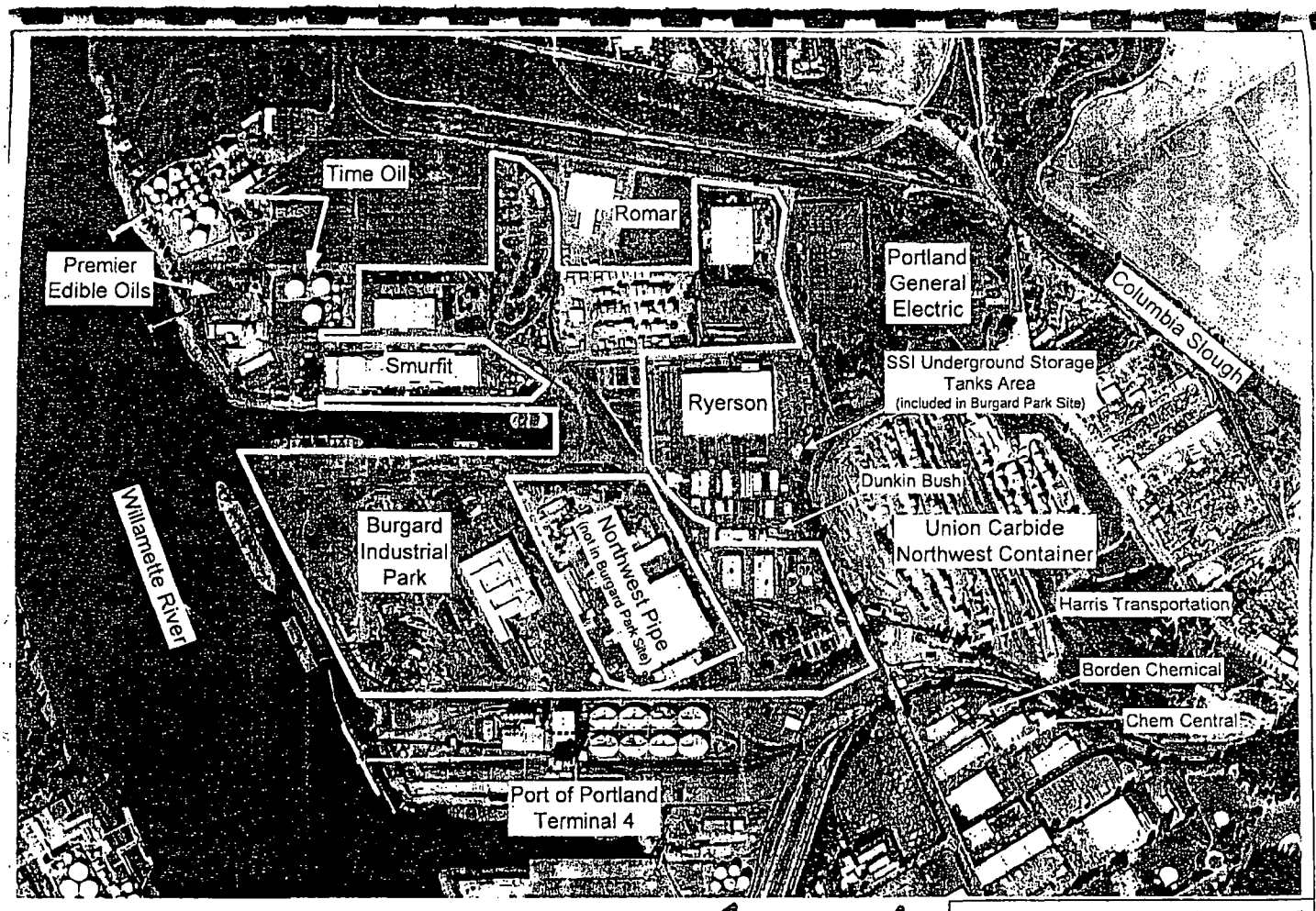
Mgr Environmental Affairs (Title)

STATE OF OREGON
DEPARTMENT OF ENVIRONMENTAL QUALITY

By: Michael C. Rosen (Name) Date: 7/19/01

for Neil McFarlane, Regional Administrator (Title)

KBB/GEN30415



Appendix A

Figure 1- 2
September 2000 Aerial Photograph
Burgard Industrial Park

BRIDGEWATER GROUP, INC.

SCHN00259898

ATTACHMENT B

SCOPE OF WORK FOR
REMEDIAL INVESTIGATION/FEASIBLIITY STUDY AND SOURCE CONTROL MEASURES

I. SCHEDULE

Respondent shall submit for DEQ review and approval Remedial Investigation (RI), Risk Assessment (RA), and Source Control Measures (SCM), and Feasibility Study (FS) work plans and reports which address all elements of this Scope of Work (SOW). Elements of the SOW may be addressed by alternative means or by using existing data or information to the extent that the data are applicable, meet the objectives of the RI, and are of acceptable QA/QC.

All work completed under this Agreement shall proceed in accordance with the schedule below:

RI Proposal	A RI proposal will be submitted to DEQ within 30 days of issuance of this Agreement or as otherwise agreed.
DEQ Review and Comment	To Respondent within 30 days of receipt of RI Proposal.
Draft RI Work Plan	To DEQ within 45 days of receipt of DEQ comments on RI Proposal.
DEQ Review and Comment	To Respondent within 30 days of receipt of draft RI Work Plan.
Final RI Work Plan	To DEQ within 30 days of receipt of DEQ comments on draft RI Work Plan.
Initiation of RI	To be specified in Project Management section of RI Work Plan.
Initiation of SCM	To be specified in Project Management section of RI Work Plan.
Initiation of FS	To be specified in Project Management section of RI Work Plan.

The schedule for additional deliverables specified in this SOW (e.g., Risk Assessment work plan, Remedial Investigation report, Risk Assessment report, and Source Control Measure work plan, Feasibility Study report) should be specified in the Project Management Plan section of the RI work plan.

All work plans may be amended by Respondent as necessary to reflect or incorporate newly discovered information and/or environmental conditions. Additional work plans and work plan amendments are subject to DEQ review and approval and shall be processed according to schedules negotiated between the parties at the time of each phase change or task addition. Respondent shall

initiate and complete work according to the schedule specified in the applicable approved work plan or amendment. Future schedules or deadlines for all submittals, work plans or other requirements shall be adjusted accordingly for the time necessary for preparation, approval and implementation of additional work plans, investigations and/or reports not contemplated in the original schedule and shall be approved by DEQ in writing.

II. OBJECTIVES

Work performed under this Agreement shall complement and incorporate existing site information with the following specific objectives. For purposes of this Scope of Work, the "site" shall exclude that portion of the site that is below the mean high-water mark of the Willamette River. The parties acknowledge that a separate Portland Harbor Sediment RI/FS is proceeding with respect to the portion of the Willamette River below the mean high-water mark, and it is not the purpose of this Scope of Work to duplicate any of that work:

A. Identify and characterize all hazardous substance and edible oils source areas at the PEO Site. Source areas shall be characterized through a review of historical information and the collection of environmental samples for chemical, geotechnical, and other analyses. The evaluation of source areas shall focus on upland operations that may have resulted in a release of hazardous substances or edible oils.

B. Evaluate all contaminant migration pathways at the PEO site. Key elements potentially relevant to contaminant migration include, but are not limited to, the rate and direction of groundwater flow, subsurface contaminant migration to the Willamette River, overland contaminant migration to the Willamette River, storm water discharge to the Willamette River, direct and indirect release to the Willamette River, preferential migration pathways, volatilization, dust entrainment, and riverbank seepage.

C. Determine the nature, extent, and distribution of hazardous substances and edible oils in affected media at the PEO site. This analysis should focus on the vertical and horizontal extent of source area contamination, groundwater contamination, and surface and subsurface soil contamination.

D. Identify all current and reasonably likely future human and ecological receptors at the PEO site. Receptors shall include human and ecological receptors that may be exposed to hazardous substances and edible oils at the site. This analysis should consider all relevant contaminant migration pathways and the nature, extent and distribution of hazardous substances in affected media.

E. Collect sufficient data and historical information to allow the identification of possible areas of sediment contamination adjacent to the PEO site. Areas of potential sediment contamination shall be characterized through the Portland Harbor

SCHN00259900

Sediment RI/FS. Data collection and evaluation shall consider the potential for contaminant migration to the Willamette River and over or in-water releases of hazardous substances and edible oil resulting from operations at the PEO site. Respondent may be required to perform limited sediment or benthic sampling adjacent to the site as necessary to address an objective of this Scope of Work but will not be required to conduct sediment or benthic sampling that is duplicative of sampling under the Portland Harbor sediment RI/FS.

F. Evaluate the risk to human health and the environment from releases of hazardous substances at or from the PEO site through the performance of human health and ecological risk assessments.

G. Identify hot spots of contamination, if any, at the PEO site.

H. Generate or use data of sufficient quality for site characterization, risk assessment, and remedy evaluation at the PEO site.

I. Develop the information necessary to evaluate and design necessary source control measures to address contaminant releases from the PEO site.

J. Implement necessary source control measures to address contaminant releases from the PEO site.

K. Develop the information necessary to evaluate remedial action alternatives to address identified site risks not addressed through source control measures.

III. REMEDIAL INVESTIGATION PROPOSAL

If DEQ determines that further RI work is required, Respondent shall prepare a RI proposal. The RI Proposal shall briefly discuss Respondent's proposed approach to the RI, addressing soil, groundwater, surface water, sediments, and air. The proposal will provide the framework for the RI Work Plan and will include at a minimum, a summary of data collected to date, a conceptual site model (including a conceptual site hydrogeologic model), a description of RI goals and objectives and an estimated schedule for completion of the RI. The RI proposal shall consider methodologies presented in the Portland Harbor Sediment Management Plan and the Portland Harbor Sediment Investigation Work Plan.

IV. REMEDIAL INVESTIGATION WORK PLAN

The work plan shall be developed in accordance with applicable Oregon Administrative Rules (OAR 340-122-010 through -115), DEQ guidance, and the Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, OSWER Directive 9355.3-01, 1988, as appropriate. Existing data may be used if it meets data quality objectives for the RI. The results of the RI shall be utilized to guide data collection efforts performed as part of the Portland Harbor RI/FS Work Plan. The submitted work plan shall include, but not be limited to the following items:

A. PROJECT MANAGEMENT PLAN

The RI Work Plan shall include a proposed schedule for submittals and implementation of all proposed activities and phases pertaining to this scope of work (this schedule will include target dates for the submittal of a Risk Assessment work plan, and submittal of draft and final Remedial Investigation, Risk Assessment, and Feasibility Study reports); a description of the personnel (including subcontractors, if known) involved in the project, and their respective roles in the project; and a discussion of how variations from the approved work plan will be managed.

B. SITE DESCRIPTION

RI work plan shall include a discussion of the current understanding of the physical setting of the PEO Site and surrounding area; the site history; hazardous substance and waste management history; site operations conducted on, in, over or adjacent to the Willamette River and current site conditions.

C. SITE CHARACTERIZATION PLAN

The Site Characterization plan shall be consistent with DEQ guidance and the requirements specified in OAR 340-122-080. The site characterization plan shall include, but not be limited to, characterization of the hazardous substances and edible oil, characterization of the site, identification of potential receptors and the collection and evaluation of information relevant to the identification of hot spots of contamination, and shall address the following:

1. Soils

Objective: To identify and characterize releases of hazardous substances and edible oil from the PEO Site to soils.

Scope: The plan shall supplement previous soil sampling at the PEO site. The plan shall address all areas of the site which could potentially have received spills, leaks from tanks or piping, been used for waste treatment or disposal, or have been affected by contaminated surface water or storm water runoff, and all other areas of the PEO Site where soil contamination is known or suspected.

Procedures: The plan shall be designed and conducted to determine the vertical and lateral extent of soil contamination, determine the extent to which soil contamination may contribute to Willamette River sediment contamination, characterize the site geology, determine the physical and chemical soil characteristics relevant to the RI, evaluate the potential for contaminant migration and gather the information necessary to identify hot

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spots of contamination. The plan shall include the proposed methodology for characterizing soil.

2. **Groundwater**

Objective: To identify and characterize releases of hazardous substances and edible oils from the PEO Site to groundwater.

Scope: The plan shall supplement previous investigations at the PEO site and shall identify and characterize all past, current and potential releases of hazardous substances and edible oils to groundwater from the PEO Site.

Procedures: The plan shall be designed and conducted to determine the vertical and lateral extent of groundwater contamination, both on and, if applicable, off-site; estimate the rate of contaminant flux to the Willamette River; determine the extent to which free phase product is migrating to the Willamette River; characterize the site hydrogeology, determine the physical and chemical water bearing zone characteristics relevant to the RI; evaluate the potential for contaminant migration through groundwater; and gather the information necessary to identify hot spots of contamination. The plan shall include the proposed methodology for characterizing groundwater. Alternative methods for characterizing groundwater should be considered to accelerate the RI. Monitoring wells and other holes must be drilled, constructed and decommissioned in accordance with OAR Chapter 690, Division 240 and DEQ "Ground Water Monitoring Well, Drilling, Construction and Decommissioning" guidelines (DEQ 1992).

3. **Surface Water**

Objective: To identify and characterize releases of hazardous substances and edible oils from the PEO site to surface water.

Scope: The plan shall supplement previous investigations at the site and shall identify and characterize all past, current, and potential impacts to surface waters from the PEO Site.

Procedures: The plan shall be designed to determine the extent to which surface water may have been impacted by releases through the storm water system and overland flow of hazardous substances and edible oils at the site; determine the nature and extent of surface water contamination; characterize the site hydrology; determine the physical and chemical surface water characteristics relevant to the RI including flow characteristics; evaluate the potential for contaminant migration and gather the information necessary to identify hot spots of contamination. The plan shall include the proposed methodology for characterizing surface water.

4. **Sediments**

Objective: To identify and characterize releases of hazardous substances and edible oils from the PEO Site to sediments.

Scope: The plan shall supplement previous investigations at the site, shall identify and characterize all past, current, and potential releases of hazardous substances and edible oils to sediments from the site in a manner consistent with the Portland Harbor Sediment RI/FS. Characterization of the nature and extent of sediment contamination shall not be subject to this Agreement, but is contemplated to be completed through the Portland Harbor Sediment RI/FS.

Procedures: The plan shall be designed to identify sources of sediment contamination from the site, and characterize release mechanisms from the site to Willamette River sediments. The plan shall include the proposed methodology for characterizing releases to sediments and as applicable shall utilize methodologies presented in the Portland Harbor Sediment Management Plan and the Portland Harbor Sediment Remedial Investigation and Feasibility Study Work Plan.

5. **Air**

Objective: To identify and characterize any unpermitted release of hazardous substances to the air, from soil, surface water, or groundwater contamination at the PEO Site.

Scope: The plan shall supplement previous investigations at the site and shall identify and characterize all past, current and potential releases (e.g. contaminated soil or groundwater) of hazardous substances to air.

Procedures: The plan shall include the proposed methodology for evaluating air emissions using appropriate emission calculations and/or a field sampling program. The plan shall be designed to delineate the nature and extent of contamination, characterize the site climatology, determine the physical and chemical air characteristics relevant to the RI, evaluate the potential for contaminant migration to the Willamette River and surrounding areas and gather the information necessary to identify hot spots of contamination.

6. **Identification of Current and Reasonably Likely Future Land and Water Use**

Objective: To identify current and reasonably likely future land and water uses in the locality of the facility not including those of the Willamette River.

Scope: The plan shall supplement previously identified current and reasonably likely future land and water uses for the purposes of identifying hot spots of contamination and conducting the baseline human health and ecological risk assessments based on OAR 340-122-080, DEQ Guidance, and the Portland Harbor Sediment Management Plan.

Procedures: The plan shall include the proposed methodology for identifying current and reasonably likely future land and water uses in the locality of the site.

D. SAMPLING AND ANALYSIS PLAN (SAP)

Objective: To adequately document all sampling and analysis procedures.

Scope: In preparation of the SAP, the following guidance documents shall be utilized: Data Quality Objectives for Remedial Response Activities, EPA/540/G-87/004 (OSWER Directive 9355.0-7B), March, 1987; Test Methods for Evaluating Solid Waste, SW-846; and A Compendium of Superfund Field Operations Methods, EPA/540/P-87/001 (OSWER Directive 9355.0-14), December, 1987. The SAP shall address all topics listed in Environmental Cleanup Division Policy #760.000, Quality Assurance Policy.

Procedures: The work plan shall include a sampling and analysis plan (SAP). The SAP shall include quality assurance and quality control (QA/QC) procedures for both field and lab procedures. The SAP shall be sufficiently detailed to function as a manual for field staff.

E. HEALTH AND SAFETY PLAN (HASP)

Objective: To establish policies and procedures to protect workers and the public from the potential hazards posed by a hazardous materials site.

Scope: The HASP portion of the work plan shall comply with 29 CFR 1910.120 and OAR Chapter 437, Division 2.

Procedures: The HASP shall include a description of risks related to RI activities, protective clothing and equipment, training, monitoring procedures, decontamination procedures and emergency response actions.

F. MAPS

The work plan shall include a map or maps of the PEO site, which clearly shows site topography, on-site structures, waste disposal areas and proposed sampling locations.

V. EVALUATION AND IMPLEMENTATION OF SOURCE CONTROL MEASURES

Objective: To implement necessary source control measures to address contaminant migration to the Willamette River that warrants removal action under OAR 340-122-070.

Scope: The plan shall gather sufficient information to evaluate, design and implement necessary source control measures.

Procedures: The plan shall be designed to and conducted to characterize all release mechanisms to the Willamette River. Characterization data shall be adequate to evaluate, design and implement necessary source control measures. Source control measures shall address contaminant migration to the river through overland transport, storm water runoff, free phase product migration, direct release, and/or dissolved groundwater contaminant migration that warrant removal action under OAR 340-122-070.

Termination: Respondent's obligations with respect to any source control measures implemented under this SOW shall terminate upon implementation of a remedy or entry of a consent decree, unilateral order, or other order that requires remedial action with respect to the site that effectively serves to control that source.

VI. RISK ASSESSMENT WORK PLAN

A. UPLAND HUMAN HEALTH RISK ASSESSMENT PLAN

Objective: To evaluate the collective demographic, geographic, physical, chemical, and biological factors at the site, for the purposes of characterizing current or reasonably likely future risks to human health as a result of a threatened or actual release(s) of a hazardous substance at or from the PEO site; documenting the magnitude of the potential risk at the PEO site; supporting risk management decisions; and establishing remedial action goals if necessary.

Scope: The human health risk assessment shall evaluate risk in the context of current and reasonably likely future land and water uses and in the absence of any actions to control or mitigate these risks (i.e., under an assumption of no action). The human health risk assessment portion of the work plan shall be developed based on the requirements specified in OAR 340-122-084, DEQ guidance, and the Risk Assessment Guidance for Superfund - Human Health Evaluation Manual Part A, United States Environmental Protection Agency (EPA) Interim Final, July 1989 (RAGS-HHEM). A suggested outline for the human health evaluation is given in Exhibit 9-1 of the RAGS-HHEM. The work plan should use this outline as a framework for discussing the methodologies and assumptions to be used in assessing the potential human health risks at the PEO site.

Procedure: The plan shall describe the different tasks involved in preparing the human health risk assessment. The human health risk assessment can be completed using either deterministic or probabilistic methodologies. If probabilistic methodologies are to be used, then Respondent shall discuss risk protocol with DEQ before the commencement of a probabilistic risk assessment.

The upland human health risk assessment shall be designed to achieve the following:

1. Develop appropriate exposure units considering the nature, extent, and distribution of contamination and the reasonably likely future land and water use in the locality of the facility;
2. Establish data quality objectives for each exposure unit identified;
3. Collect data appropriate to satisfy the data quality objectives for each exposure unit;
4. Identify contaminants of interest for each media of concern;
5. Develop exposure scenarios based on current and reasonably likely land use, site features and populations potentially exposed;
6. Identify appropriate exposure factors for all exposure pathways to be evaluated;
7. Identify the appropriate toxicity factors for all exposure pathways to be evaluated; and
8. Quantify the risks to human health at the PEO site.

B. UPLAND ECOLOGICAL RISK ASSESSMENT PLAN

Objective: To evaluate the collective demographic, geographic, physical, chemical, and biological factors at the PEO site, for the purposes of characterizing current or reasonably likely future risks to the environment as a result of a threatened or actual release(s) of a hazardous substance at or from the site; quantifying the potential risk at the PEO site; supporting risk management decisions; and establishing remedial action goals if necessary.

Scope: The ecological risk assessment shall evaluate risk in the context of current and reasonably likely future land and water uses and in the absence of any actions to control or mitigate these risks (i.e., under an assumption of no action). The ecological risk assessment will use a tiered approach (with four levels) to produce a focused and cost-effective assessment of risk. The ecological risk assessment work plan shall be developed based on the requirements specified in rule under OAR 340-122-084 and DEQ guidance.

Procedure: The plan shall describe the different tasks involved in preparing the ecological risk assessment. Ecological risk assessments may include a level I scoping plan; a level II screening plan; a level III baseline plan; and a level IV field baseline plan. The level III and level IV baseline plans shall include an exposure analysis, an ecological response analysis, a risk characterization and an uncertainty analysis as required by OAR 340-122-084(3). The ecological risk assessment can be completed using either deterministic or probabilistic methodologies. If probabilistic methodologies are to be used, then Respondent shall discuss risk protocol with DEQ before the commencement of a probabilistic risk assessment.

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Terrestrial habitats and receptors shall be evaluated through the following approach:

1. Complete a Level I Scoping assessment per ODEQ guidance for the terrestrial portion of the PEO site.
2. Make a preliminary determination of locality of the PEO site with respect to terrestrial receptors and current and potential future exposure to site-related contaminants.
3. Determine potential for presence/absence of terrestrial threatened or endangered species.

VII. FEASIBILITY STUDY WORK PLAN

Objective: To develop the information required to identify and evaluate remedial action alternatives and select or approve a remedial action to be performed at the PEO site.

Scope: The Feasibility Study (FS) shall be developed in accordance with the requirements specified in OAR 340-122-085 and 090, DEQ guidance and, as appropriate, Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, OSWER Directive 9355.3-01, 1988. The FS shall develop and evaluate an appropriate range of alternatives. The FS may be developed in parallel with Remedial Investigation (RI) activities or may be developed and submitted separately after commencement of RI activities.

Procedures: A work plan shall be submitted which will include, but not be limited to, the following:

A. PRELIMINARY EVALUATION OF REMEDIAL INVESTIGATION DATA

The FS work plan shall include a preliminary evaluation of data collected during the RI. The evaluation should be used to identify preliminary remedial alternatives and additional data needs.

B. DESCRIPTION OF FS EVALUATION PROCESS

The FS work plan shall include a description of how remedial alternatives will be developed, screened, and evaluated in detail, including identification of hot spots of contamination, evaluation of treatment of hot spots of contamination, and completion of a residual risk assessment.

VIII. REPORTS

A. QUARTERLY REPORTS

Two (2) copies of the Quarterly Reports shall be submitted to DEQ by the 15th day of the quarter following the reporting period. The quarterly reports shall summarize activities performed, data results collected or received and problems encountered or resolved

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during the previous quarter and activities planned for the upcoming quarter.

B. REMEDIAL INVESTIGATION REPORT

The Remedial Investigation report shall follow the outline in Table 3-13 (page 3-30 - 3-31) in the CERCLA RI/FS guidance, as applicable, and address the items listed below:

1. **Executive Summary.**

2. **Introduction.**

3. **Site Background.**

   A discussion and supporting maps of site operations, site description, site setting, and current and reasonably likely future land and water uses.

4. **Study Area Investigation.**

   A discussion of the investigative procedures and results for soil, groundwater, surface water, sediments and air.

5. **Summary and Conclusions.**

   A discussion of the nature, extent, distribution and environmental fate and transport of contaminants in soil, groundwater, surface water, sediments and air.

6. **Appendices.**

   Detailed information supporting the results of the Remedial Investigation shall be submitted in the Appendices of the report.

C. RISK ASSESSMENT REPORT

1. **Human Health Risk Assessment Report**

   The results of the human health risk assessment should follow DEQ risk assessment guidance for human health and RAGS-HHEM Part A.

2. **Ecological Risk Assessment Report**

   The main sections of the ecological risk assessment report should follow specific DEQ guidance for report formats at each level (I-III).

D. FEASIBILITY STUDY REPORT

The Feasibility Study report shall address the items listed below:

1. **Introduction and Site Background**

   Summarize the site description, site setting, remedial investigation and risk assessment findings, and current and reasonably likely future land and water uses.

2. **Development and Screening of Remedial Technologies**

   Discuss the remedial action objectives (RAOs), based on the risk assessment findings, appropriate general response actions to meet the RAOs, and screening of remedial technologies to identify appropriate technologies based on the site conditions, contaminants of concern, and RAOs.

3. **Development of Remedial Alternatives**

   Discuss the assembly of remedial alternatives, consistent with the required range of remedial alternatives, including a no action alternative that evaluates baseline conditions; an alternative utilizing engineering and institutional controls; a treatment-based alternative; an alternative utilizing excavation and offsite disposal; and one or more alternative(s) utilizing any combination of the preceding alternatives.

4. **Detailed Analysis of Remedial Alternatives**

   Discuss the detailed analysis of remedial alternatives, consistent with DEQ's "Final, Guidance for Conducting Feasibility Studies," dated July 1, 1998. For each remedial action, the FS must evaluate: (1) the protectiveness of the alternative based upon the standards set forth in OAR 340-122-040; (2) the feasibility of the alternative based upon balancing of the remedy selection factors which include effectiveness; long-term reliability, implementability, implementation risk, and cost effectiveness; and (3) the extent to which the remedial action alternative treats hot spots of contamination.

E. REPORT DISTRIBUTION.

1. Three (3) bound copies and one (1) unbound copy of all reports should be submitted to DEQ.

2. DEQ requests that all copies be duplex printed on recycled paper.

Gradient
CORPORATION

October 12, 2006

Mr. Mike Romero
Oregon Department of Environmental Quality
Northwest Region
2020 Southwest Fourth Avenue, Suite 400
Portland, OR 97201

Subject: Schnitzer/Premier Edible Oils (PEO) Site – Quarterly Report

Dear Mike:

On behalf of Schnitzer Investment Corp. (SIC), Gradient Corporation is submitting this Quarterly Report for the Premier Edible Oils (PEO) Site, as required by Section II, H of the Voluntary Agreement for Upland Remedial Investigation/Feasibility Study and Source Control Measures between SIC and the Oregon Department of Environmental Quality (DEQ). This Quarterly Report summarizes activities conducted during the time period quarter; describes activities planned for the next quarter; and discusses problems encountered during the quarter, if any, and actions taken to resolve those problems.

Summary of Project Activities

Between July 1 and September 30, 2006, SIC and its consultants, Gradient Corporation and URS, completed the following work at the PEO site:

- On August 2, 2006, submitted final *Work Plan for Additional Characterization of the Premier Edible Oils Property* for DEQ review and approval. The Work Plan is one component of ongoing communications with DEQ regarding next steps for evaluating the PEO property and inter-relationships between PEO site evaluations and investigations conducted by Time Oil on the adjacent Bell Terminal property
- Continued efforts to address new site issues identified by DEQ during May 3 site visit and listed in DEQ's May 10, 2006 letter to SIC regarding additional investigations at the PEO site (*i.e.*, evaluation of drums, slag, soil piles, and pipes observed at site). Documentation of the disposition of drums of investigation derived waste (IDW) is included with this quarterly report.
- Ongoing review of remedial investigation efforts at Time Oil's Northwest Terminal to determine implications for evaluations of the PEO property.
- Ongoing review of selected sediment data from the LWG Round 2 field sampling program and evaluation of implications of data for assessing conditions in the vicinity of the PEO site.

Suite 803, 600 Stewart Street, Seattle, WA 98101 • (206) 267-2920 • fax: (206) 267-2921 • www.gradientcorp.com

Activities to be Conducted Next Quarter

The following activities are planned for the PEO site between October 1 and December 31, 2006:

- Proceed with additional investigations of PEO site upon receiving DEQ approval of the Work Plan submitted on August 2, 2006.
- Continue efforts to address new site issues identified by DEQ during the May 3 site visit and prepare additional documentation of findings for submittal to DEQ.
- Continue communications with DEQ regarding proposed future efforts at the PEO site and ongoing Time Oil activities on the Bell Terminal site. As data become available, obtain additional information from DEQ regarding Time Oil's ongoing investigations and Bell Terminal site features.
- Continue evaluation of Time Oil's investigative data for the Bell Terminal site in light of proposed and ongoing data collection. This effort includes assessing implications of available data for potential impacts on the PEO site from the Time Oil site and assessing need for additional recommendations regarding further sampling on the Bell Terminal site.
- Continue reviewing statements made regarding the PEO site in documentation prepared by the LWG, Time Oil, and/or DEQ, and, as necessary, correcting errors presented in such documentation.
- Continue reviewing data from the LWG field sampling program as data become available.

Issues to be Resolved/Recommended Actions

In March 2006, SIC provided several submittals to DEQ, including comments to correct the numerous erroneous and/or misleading statements in the Lower Willamette Group's (LWG) draft conceptual site model (CSM) regarding contaminant sources and distribution for the PEO site (*Comments on the Lower Willamette Group's Draft Conceptual Site Model for the Premier Edible Oils Site*, dated March 1, 2006, prepared on behalf of SIC by Gradient Corporation in collaboration with URS Corporation) and a submittal from SIC's environmental counsel discussing sources for the residual contamination at the PEO site and requesting that Time Oil be named as a responsible party at the PEO site (*White Paper – Contaminant Sources at the Premier Edible Oils Site (ECSI #2013) Located Within The Portland Harbor Superfund Site*, dated March 6, 2006). SIC continues to await DEQ's response to SIC's March 2006 submittals, including DEQ's May 3, 2006 commitment to provide a written response within 60 days to SIC's request to name Time Oil as a responsible party at the PEO site.

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Please contact me if you have any questions regarding this report or any of the completed or proposed activities.

Sincerely,

Catherine Petito Boyce, S.M.
Principal Scientist

cc: J. Brown/James C. Brown & Associates
D. Coberley/URS
J. Jakubiak/SIC
T. Zelenka/SIC

SCHN00259925

Memorandum

URS

To: Project File

From: Donald M. Coberley, RPG

URS, Portland

Date: October 10, 2006

Subject: Investigation Derived Waste Disposition, Schnitzer Investment Corp. Premier Edible Oils site

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On behalf of Schnitzer Investment Corp. (SIC), URS and its subcontractor (Stratus Corporation) visited SIC's Premier Edible Oils (PEO) site on May 12, 2006 to arrange disposal of investigation derived waste (IDW) present at the site. An inventory indicated 14 drums of purge water from groundwater-monitoring wells located on site. This memo describes disposal of the purge water IDW.

Stratus personnel returned to the site on May 16, 2006. Stratus transported one drum of purge water containing hydrocarbon product to Oil Re-Refining Company (ORRCO) of Portland, Oregon for disposal. The disposal certificate for the material is provided as Attachment A. Stratus also collected a composite sample from the 13 remaining drums of purge water for chemical analysis for volatile organic compounds (VOCs) by US Environmental Protection Agency (EPA) method 8260, diesel-range hydrocarbons by method NWTPH-Dx, and flash point. Chemical analyses were completed by Test America of Beaverton, Oregon.

Analytical results are included as Attachment B. No VOCs or diesel-range or heavy oil-range hydrocarbons were detected above laboratory detection limits.

Pacific Power Vac, LLC (PPV) removed a total of 390 gallons of purge water from the 13 drums on May 30, 2006. The water was transported to PPV's Portland, Oregon facility via vacuum truck and treated as non-hazardous waste liquid, oily water on that day. Disposal documentation for the purge water is included as Attachment C. The drums were staged on site for eventual recycling.

SCHN00259926

Attachment A

Disposal Certificate for One Drum of Purge Water IDW

** RECEIVING RECORD ** No. [illegible]002449

RECEIVED BY: Oil Re Refining Company, EPA# WAD9B0986013 PLANT: PORTLAND
4150 N. Suttle Road Phone (503) 286-8352 EMPL PHEE:RL
Portland, OR 97217 Fax (503) 286-5022 PAGE: 1

RECEIVED FROM: Stratus Corporation Customer ID# [illegible]
19700 SW Tetsh Phone: [illegible]
DATE:05/17/2006 Tualatin,OR 97217 Driver: [illegible]

QTY.	UNIT	ITEM	MNF	%H2O	%SOLID	B/L#
30.	GAL.	USED OIL	N	0.%		
	SEN:	Stratus Corporation				
		PASSED SNIFFER. JOB# P06113.				
15.	GAL.	Diesel	N	0.%	0.%	0
	SEN:	Stratus Corporation				
		PASSED SNIFFER. JOB# P06113.				

TOTAL GAL 45.

Signed [illegible] DATE:05/17/2006

SCHN00259928

Attachment B

Analytical Results for Composite Sample of 13 Drums of Purge Water IDW

TestAmerica
ANALYTICAL TESTING CORPORATION

PORTLAND, OR 9405 S.W. NIMBUS AVENUE
BEAVERTON, OR 97008-7132
ph: (503) 906.9200 fax: (503) 906.9210

May 26, 2006

Scott Flaherty
Stratus Corporation
39515 S.W. Hartley Road
Gaston, OR 97119

RE: Premier Edible Oils

Enclosed are the results of analyses for samples received by the laboratory on 05/17/06 16:20. The following list is a summary of the Work Orders contained in this report, generated on 05/26/06 14:30.

If you have any questions concerning this report, please feel free to contact me.

Work Order	Project	ProjectNumber
PPE0756	Premier Edible Oils	P06113

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Roxanne L. Clifton, Project Manager

SCHN00259930

TestAmerica
ANALYTICAL TESTING CORPORATION

PORTLAND, OR 9405 S.W. NIMBUS AVENUE
BEAVERTON, OR 97008-7132
ph: (503) 906.9200 fax: (503) 906.9210

Stratus Corporation	Project Name:	**Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number:	P06113	Report Created:
Gaston, OR 97119	Project Manager:	Scott Flaherty	05/26/06 14:30

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
P06113-1	PPE0756-01	Other wet	05/17/06 12:00	05/17/06 16:20

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Roxanne L. Clifton, Project Manager

SCHN00259931

TestAmerica
ANALYTICAL TESTING CORPORATION

PORTLAND, OR 9405 S.W. NIMBUS AVENUE
BEAVERTON, OR 97008-7132
ph: (503) 906.9200 fax: (503) 906.9210

Stratus Corporation	Project Name: **Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number: P06113	Report Created:
Gaston, OR 97119	Project Manager: Scott Flaherty	05/26/06 14:30

Physical Parameters per APHA/ASTM/EPA Methods

TestAmerica - Portland, OR

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Notes
PPE0756-01 (P06113-1)	**Other wet**				**Sampled: 05/17/06 12:00**					
Flashpoint	EPA 1010	ND	----	150	°F	1x	6051110	05/23/06 12:35	05/23/06 19:57	

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Roxanne L. Clifton, Project Manager

SCHN00259932

TestAmerica
ANALYTICAL TESTING CORPORATION

PORTLAND, OR 9405 S.W. NIMBUS AVENUE
BEAVERTON, OR 97008-7132
ph: (503) 906.9200 fax: (503) 906.9210

Stratus Corporation	Project Name: **Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number: P06113	Report Created:
Gaston, OR 97119	Project Manager: Scott Flaherty	05/26/06 14:30

Physical Parameters per APHA/ASTM/EPA Methods - Laboratory Quality Control Results

TestAmerica - Portland, OR

QC Batch: 6051110 **Other wet Preparation Method: EPA 1010**

Analyte	Method	Result	MDL*	MRL	Units	Dil	Source Result	Spike Amt	% REC	(Limits)	% RPD	(Limits)	Analyzed	Notes
LCS (6051110-BS1)								Extracted: 05/23/06 12:35						
Flashpoint	EPA 1010	130	--		°F	1x	--	127	102%	(96.5-103)	--	--	05/23/06 19:57	
Duplicate (6051110-DUP1)				QC Source: PPE0614-19				Extracted: 05/23/06 12:35						
Flashpoint	EPA 1010	ND	--	150	°F	1x	ND	--	--	--		(50)	05/23/06 19:57	

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Roxanne L. Clifton, Project Manager

SCHN00259933

TestAmerica
ANALYTICAL TESTING CORPORATION

PORTLAND, OR 9405 S.W. NIMBUS AVENUE
BEAVERTON, OR 97008-7132
ph: (503) 906.9200 fax: (503) 906.9210

Stratus Corporation	Project Name:	**Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number:	P06113	Report Created:
Gaston, OR 97119	Project Manager:	Scott Flaherty	05/26/06 14:30

Notes and Definitions

Report Specific Notes:

None

Laboratory Reporting Conventions:

DET	-	Analyte DETECTED at or above the Reporting Limit. Qualitative Analyses only.
ND	-	Analyte NOT DETECTED at or above the reporting limit (MDL or MRL, as appropriate).
NR/NA	-	Not Reported / Not Available
dry	-	Sample results reported on a Dry Weight Basis. Results and Reporting Limits have been corrected for Percent Dry Weight.
wet	-	Sample results and reporting limits reported on a Wet Weight Basis (as received). Results with neither 'wet' nor 'dry' are reported on a Wet Weight Basis.
RPD	-	RELATIVE PERCENT DIFFERENCE (RPDs calculated using Results, not Percent Recoveries).
MRL	-	METHOD REPORTING LIMIT. Reporting Level at, or above, the lowest level standard of the Calibration Table.
MDL*	-	METHOD DETECTION LIMIT. Reporting Level at, or above, the statistically derived limit based on 40CFR, Part 136, Appendix B. *MDLs are listed on the report only if the data has been evaluated below the MRL. Results between the MDL and MRL are reported as Estimated Results.
Dil	-	Dilutions are calculated based on deviations from the standard dilution performed for an analysis, and may not represent the dilution found on the analytical raw data.
Reporting Limits	-	Reporting limits (MDLs and MRLs) are adjusted based on variations in sample preparation amounts, analytical dilutions and percent solids, where applicable.
Electronic Signature	-	Electronic Signature added in accordance with TestAmerica's *Electronic Reporting and Electronic Signatures Policy*. Application of electronic signature indicates that the report has been reviewed and approved for release by the laboratory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

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Roxanne L. Clifton, Project Manager

SCHN00259934

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PORTLAND, OR 9405 S.W. NIMBUS AVENUE
BEAVERTON, OR 97008-7132
ph: (503) 906.9200 fax: (503) 906.9210

May 26, 2006

Scott Flaherty
Stratus Corporation
39515 S.W. Hartley Road
Gaston, OR 97119

RE: Premier Edible Oils

Enclosed are the results of analyses for samples received by the laboratory on 05/18/06 12:20. The following list is a summary of the Work Orders contained in this report, generated on 05/26/06 14:02.

If you have any questions concerning this report, please feel free to contact me.

Work Order	Project	ProjectNumber
PPE0861	Premier Edible Oils	P06113

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Roxanne L. Clifton, Project Manager

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Stratus Corporation	Project Name:	**Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number:	P06113	Report Created:
Gaston, OR 97119	Project Manager:	Scott Flaherty	05/26/06 14:02

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
P06113-2	PPE0861-01	Water	05/17/06 17:40	05/18/06 12:20
P06113-3	PPE0861-02	Water	05/17/06 17:40	05/18/06 12:20

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Roxanne L. Clifton, Project Manager

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Stratus Corporation	Project Name: **Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number: P06113	Report Created:
Gaston, OR 97119	Project Manager: Scott Flaherty	05/26/06 14:02

Diesel and Heavy Range Hydrocarbons per NWTPH-Dx Method

TestAmerica - Portland, OR

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Notes
PPE0861-02 (P06113-3)		**Water**			**Sampled: 05/17/06 17:40**					
Diesel Range Organics	NWTPH-Dx	ND	—	0.243	mg/l	1x	6051020	05/22/06 13:30	05/22/06 20:27	
Heavy Oil Range Hydrocarbons	"	ND	—	0.485	"	"	"	"	"	
Surrogate(s): 1-Chlorooctadecane		*67.1%*			*50 - 150 %*	"			"	

TestAmerica - Portland, OR

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Roxanne L. Clifton, Project Manager

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Stratus Corporation	Project Name:	**Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number:	P06113	Report Created:
Gaston, OR 97119	Project Manager:	Scott Flaherty	05/26/06 14:02

Volatile Organic Compounds by EPA Method 8260B

TestAmerica - Spokane, WA

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Notes
PPE0861-01 (P06113-2)		**Water**			**Sampled: 05/17/06 17:40**					
Acetone	EPA 8260B	ND	----	25.0	ug/l	1x	6050186	05/25/06 16:09	05/25/06 23:10	
Benzene	"	ND	----	1.00	"	"	"	"	"	
Bromobenzene	"	ND	----	1.00	"	"	"	"	"	
Bromochloromethane	"	ND	----	1.00	"	"	"	"	"	
Bromodichloromethane	"	ND	----	1.00	"	"	"	"	"	
Bromoform	"	ND	----	1.00	"	"	"	"	"	
Bromomethane	"	ND	----	5.00	"	"	"	"	"	
2-Butanone	"	ND	----	10.0	"	"	"	"	"	
n-Butylbenzene	"	ND	----	1.00	"	"	"	"	"	
sec-Butylbenzene	"	ND	----	1.00	"	"	"	"	"	
tert-Butylbenzene	"	ND	----	1.00	"	"	"	"	"	
Carbon disulfide	"	ND	----	1.00	"	"	"	"	"	
Carbon tetrachloride	"	ND	----	1.00	"	"	"	"	"	
Chlorobenzene	"	ND	----	1.00	"	"	"	"	"	
Chloroethane	"	ND	----	1.00	"	"	"	"	"	
Chloroform	"	ND	----	1.00	"	"	"	"	"	
Chloromethane	"	ND	----	5.00	"	"	"	"	"	
2-Chlorotoluene	"	ND	----	1.00	"	"	"	"	"	
4-Chlorotoluene	"	ND	----	1.00	"	"	"	"	"	
Dibromochloromethane	"	ND	----	1.00	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	"	ND	----	5.00	"	"	"	"	"	
1,2-Dibromoethane	"	ND	----	1.00	"	"	"	"	"	
Dibromomethane	"	ND	----	1.00	"	"	"	"	"	
1,2-Dichlorobenzene	"	ND	----	1.00	"	"	"	"	"	
1,3-Dichlorobenzene	"	ND	----	1.00	"	"	"	"	"	
1,4-Dichlorobenzene	"	ND	----	1.00	"	"	"	"	"	
Dichlorodifluoromethane	"	ND	----	1.00	"	"	"	"	"	
1,1-Dichloroethane	"	ND	----	1.00	"	"	"	"	"	
1,2-Dichloroethane (EDC)	"	ND	----	1.00	"	"	"	"	"	
1,1-Dichloroethene	"	ND	----	1.00	"	"	"	"	"	
cis-1,2-Dichloroethene	"	ND	----	1.00	"	"	"	"	"	
trans-1,2-Dichloroethene	"	ND	----	1.00	"	"	"	"	"	
1,2-Dichloropropane	"	ND	----	1.00	"	"	"	"	"	
1,3-Dichloropropane	"	ND	----	1.00	"	"	"	"	"	
2,2-Dichloropropane	"	ND	----	1.00	"	"	"	"	"	
1,1-Dichloropropene	"	ND	----	1.00	"	"	"	"	"	
cis-1,3-Dichloropropene	"	ND	----	1.00	"	"	"	"	"	
trans-1,3-Dichloropropene	"	ND	----	1.00	"	"	"	"	"	

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Roxanne L. Clifton, Project Manager

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Stratus Corporation	Project Name: **Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number: P06113	Report Created:
Gaston, OR 97119	Project Manager: Scott Flaherty	05/26/06 14:02

Volatile Organic Compounds by EPA Method 8260B

TestAmerica - Spokane, WA

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Notes
PPE0861-01 (P06113-2)		**Water**			**Sampled: 05/17/06 17:40**					
Ethylbenzene	EPA 8260B	ND	----	1.00	ug/l	1x	6050186	05/25/06 16:09	05/25/06 23:10	
Hexachlorobutadiene	"	ND	----	1.00	"	"	"	"	"	
2-Hexanone	"	ND	----	10.0	"	"	"	"	"	
Isopropylbenzene	"	ND	----	1.00	"	"	"	"	"	
p-Isopropyltoluene	"	ND	----	1.00	"	"	"	"	"	
Methylene chloride	"	ND	----	5.00	"	"	"	"	"	
4-Methyl-2-pentanone	"	ND	----	10.0	"	"	"	"	"	
Methyl tert-butyl ether	"	ND	----	1.00	"	"	"	"	"	
Naphthalene	"	ND	----	2.00	"	"	"	"	"	
n-Propylbenzene	"	ND	----	1.00	"	"	"	"	"	
Styrene	"	ND	----	1.00	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	"	ND	----	1.00	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	"	ND	----	1.00	"	"	"	"	"	
Tetrachloroethene	"	ND	----	1.00	"	"	"	"	"	
Toluene	"	ND	----	1.00	"	"	"	"	"	
1,2,3-Trichlorobenzene	"	ND	----	1.00	"	"	"	"	"	
1,2,4-Trichlorobenzene	"	ND	----	1.00	"	"	"	"	"	
1,1,1-Trichloroethane	"	ND	----	1.00	"	"	"	"	"	
1,1,2-Trichloroethane	"	ND	----	1.00	"	"	"	"	"	
Trichloroethene	"	ND	----	1.00	"	"	"	"	"	
Trichlorofluoromethane	"	ND	----	1.00	"	"	"	"	"	
1,2,3-Trichloropropane	"	ND	----	1.00	"	"	"	"	"	
1,2,4-Trimethylbenzene	"	ND	----	1.00	"	"	"	"	"	
1,3,5-Trimethylbenzene	"	ND	----	1.00	"	"	"	"	"	
Vinyl chloride	"	ND	----	0.200	"	"	"	"	"	
o-Xylene	"	ND	----	1.00	"	"	"	"	"	
m,p-Xylene	"	ND	----	2.00	"	"	"	"	"	
Surrogate(s): Dibromofluoromethane		*92.9%*			*62.9 - 131 %*	"			"	
Toluene-d8		*90.8%*			*58.7 - 133 %*	"			"	
4-bromofluorobenzene		*100%*			*60.8 - 140 %*	"			"	

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Roxanne L. Clifton, Project Manager

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Stratus Corporation	Project Name: **Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number: P06113	Report Created:
Gaston, OR 97119	Project Manager: Scott Flaherty	05/26/06 14:02

Diesel and Heavy Range Hydrocarbons per NWTPH-Dx Method - Laboratory Quality Control Results

TestAmerica - Portland, OR

QC Batch: 6051020 **Water Preparation Method: EPA 3510 Fuels**

Analyte	Method	Result	MDL*	MRL	Units	Dil	Source Result	Spike Amt	% REC	(Limits)	% RPD	(Limits)	Analyzed	Notes
Blank (6051020-BLK1)								Extracted: 05/22/06 13:30						
Diesel Range Organics	NWTPH-Dx	ND	—	0.250	mg/l	1x	—	—	—	—	—	—	05/22/06 19:19	
Heavy Oil Range Hydrocarbons	"	ND	—	0.500	"	"	—	—	—	—	—	—	"	
Surrogate(s): 1-Chlorooctadecane		*Recovery: 84.6%*		*Limits: 50-150%*		"							*05/22/06 19:19*	
LCS (6051020-BS1)								Extracted: 05/22/06 13:30						
Diesel Range Organics	NWTPH-Dx	2.35	—	0.250	mg/l	1x	—	2.51	93.6%	(50-150)	—	—	05/22/06 18:45	
Heavy Oil Range Hydrocarbons	"	1.46	—	0.500	"	"	—	1.53	95.4%	"	—	—	"	
Surrogate(s): 1-Chlorooctadecane		*Recovery: 82.8%*		*Limits: 50-150%*		"							*05/22/06 18:45*	
LCS Dup (6051020-BSD1)								Extracted: 05/22/06 13:30						
Diesel Range Organics	NWTPH-Dx	2.46	—	0.250	mg/l	1x	—	2.51	98.0%	(50-150)	4.57%	(50)	05/22/06 18:11	
Heavy Oil Range Hydrocarbons	"	1.53	—	0.500	"	"	—	1.53	100%	"	4.68%	"	"	
Surrogate(s): 1-Chlorooctadecane		*Recovery: 87.4%*		*Limits: 50-150%*		"							*05/22/06 18:11*	

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Roxanne L. Clifton, Project Manager

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Stratus Corporation	Project Name: Premier Edible Oils	
39515 S.W. Hartley Road	Project Number: P06113	Report Created:
Gaston, OR 97119	Project Manager: Scott Flaherty	05/26/06 14:02

Volatile Organic Compounds by EPA Method 8260B - Laboratory Quality Control Results

TestAmerica - Spokane, WA

QC Batch: 6050186 Water Preparation Method: GC/MS Volatiles

Analyte	Method	Result	MDL*	MRL	Units	Dil	Source Result	Spike Amt	% REC	(Limits)	% RPD	(Limits)	Analyzed	Notes
Blank (6050186-BLK1)							Extracted: 05/25/06 16:09							
Acetone	EPA 8260B	ND	—	25.0	ug/l	1x	—	—	—	—	—	—	05/25/06 19:27	
Benzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Bromobenzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Bromochloromethane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Bromodichloromethane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Bromoform	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Bromomethane	"	ND	—	5.00	"	"	—	—	—	—	—	—	"	
2-Butanone	"	ND	—	10.0	"	"	—	—	—	—	—	—	"	
n-Butylbenzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
sec-Butylbenzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
tert-Butylbenzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Carbon disulfide	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Carbon tetrachloride	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Chlorobenzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Chloroethane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Chloroform	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Chloromethane	"	ND	—	5.00	"	"	—	—	—	—	—	—	"	
2-Chlorotoluene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
4-Chlorotoluene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Dibromochloromethane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,2-Dibromo-3-chloropropane	"	ND	—	5.00	"	"	—	—	—	—	—	—	"	
1,2-Dibromoethane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Dibromomethane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,2-Dichlorobenzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,3-Dichlorobenzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,4-Dichlorobenzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Dichlorodifluoromethane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,1-Dichloroethane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,2-Dichloroethane (EDC)	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,1-Dichloroethene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
cis-1,2-Dichloroethene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
trans-1,2-Dichloroethene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,2-Dichloropropane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,3-Dichloropropane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
2,2-Dichloropropane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,1-Dichloropropene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
cis-1,3-Dichloropropene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
trans-1,3-Dichloropropene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Ethylbenzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	

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Roxanne L. Clifton

Roxanne L. Clifton, Project Manager

SCHN00259941

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Stratus Corporation	Project Name: **Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number: P06113	Report Created:
Gaston, OR 97119	Project Manager: Scott Flaherty	05/26/06 14:02

Volatile Organic Compounds by EPA Method 8260B - Laboratory Quality Control Results

TestAmerica - Spokane, WA

QC Batch: 6050186 **Water Preparation Method: GC/MS Volatiles**

Analyte	Method	Result	MDL*	MRL	Units	Dil	Source Result	Spike Amt	% REC	(Limits)	% RPD	(Limits)	Analyzed	Notes
Blank (6050186-BLK1)							Extracted: 05/25/06 16:09							
Hexachlorobutadiene	EPA 8260B	ND	—	1.00	ug/l	1x	—	—	—	—	—	—	05/25/06 19:27	
2-Hexanone	"	ND	—	10.0	"	"	—	—	—	—	—	—	"	
Isopropylbenzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
p-Isopropyltoluene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Methylene chloride	"	ND	—	5.00	"	"	—	—	—	—	—	—	"	
4-Methyl-2-pentanone	"	ND	—	10.0	"	"	—	—	—	—	—	—	"	
Methyl tert-butyl ether	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Naphthalene	"	ND	—	2.00	"	"	—	—	—	—	—	—	"	
n-Propylbenzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Styrene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,1,1,2-Tetrachloroethane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,1,2,2-Tetrachloroethane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Tetrachloroethene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Toluene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,2,3-Trichlorobenzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,2,4-Trichlorobenzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,1,1-Trichloroethane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,1,2-Trichloroethane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Trichloroethene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Trichlorofluoromethane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,2,3-Trichloropropane	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,2,4-Trimethylbenzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
1,3,5-Trimethylbenzene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
Vinyl chloride	"	ND	—	0.200	"	"	—	—	—	—	—	—	"	
o-Xylene	"	ND	—	1.00	"	"	—	—	—	—	—	—	"	
m,p-Xylene	"	ND	—	2.00	"	"	—	—	—	—	—	—	"	
Surrogate(s): Dibromofluoromethane		*Recovery: 90.1%*			*Limits: 62.9-131%*	"							*05/25/06 19:27*	
Toluene-d8		*94.3%*			*58.7-133%*	"							"	
4-bromofluorobenzene		*98.5%*			*60.8-140%*	"							"	

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Roxanne L. Clifton, Project Manager

SCHN00259942

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PORTLAND, OR 9405 S.W. NIMBUS AVENUE
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Stratus Corporation	Project Name: **Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number: P06113	Report Created:
Gaston, OR 97119	Project Manager: Scott Flaherty	05/26/06 14:02

Volatile Organic Compounds by EPA Method 8260B - Laboratory Quality Control Results

TestAmerica - Spokane, WA

QC Batch: 6050186 **Water Preparation Method: GC/MS Volatiles**

Analyte	Method	Result	MDL*	MRL	Units	Dil	Source Result	Spike Amt	% REC (Limits)	% RPD (Limits)	Analyzed	Notes
LCS (6050186-BS1)								Extracted: 05/25/06 16:09				
Benzene	EPA 8260B	9.96	—	1.00	ug/l	1x	—	10.0	99.6% (70-130)	— —	05/25/06 19:55	
Chlorobenzene	"	10.0	—	1.00	"	"	—	"	100% (68.3-123)	— —	"	
1,1-Dichloroethene	"	10.8	—	1.00	"	"	—	"	108% (67-137)	— —	"	
Toluene	"	10.0	—	1.00	"	"	—	"	100% (68.8-139)	— —	"	
Trichloroethene	"	10.1	—	1.00	"	"	—	"	101% (68.1-128)	— —	"	
Surrogate(s): Dibromofluoromethane		*Recovery: 108%*			*Limits: 62.9-131%*	"					*05/25/06 19:55*	
Toluene-d8			*107%*		*58.7-133%*	"					"	
4-bromofluorobenzene			*102%*		*60.8-140%*	"					"	
Matrix Spike (6050186-MS1)					QC Source: SPE0099-02			Extracted: 05/25/06 16:09				
Benzene	EPA 8260B	10.7	—	1.00	ug/l	1x	0.955	10.0	97.4% (59.7-129)	— —	05/25/06 22:14	
Chlorobenzene	"	9.98	—	1.00	"	"	ND	"	99.8% (75.8-121)	— —	"	
1,1-Dichloroethene	"	10.4	—	1.00	"	"	ND	"	104% (63.8-137)	— —	"	
Toluene	"	10.1	—	1.00	"	"	0.600	"	95.0% (84.5-127)	— —	"	
Trichloroethene	"	9.93	—	1.00	"	"	ND	"	99.3% (75.5-129)	— —	"	
Surrogate(s): Dibromofluoromethane		*Recovery: 109%*			*Limits: 62.9-131%*	"					*05/25/06 22:14*	
Toluene-d8			*107%*		*58.7-133%*	"					"	
4-bromofluorobenzene			*108%*		*60.8-140%*	"					"	
Matrix Spike Dup (6050186-MSD1)					QC Source: SPE0099-02			Extracted: 05/25/06 16:09				
Benzene	EPA 8260B	11.3	—	1.00	ug/l	1x	0.955	10.0	103% (59.7-129)	5.45% (10)	05/25/06 22:42	
Chlorobenzene	"	10.5	—	1.00	"	"	ND	"	105% (75.8-121)	5.08% (11)	"	
1,1-Dichloroethene	"	10.8	—	1.00	"	"	ND	"	108% (63.8-137)	3.77% (14)	"	
Toluene	"	10.8	—	1.00	"	"	0.600	"	102% (84.5-127)	6.70% (12)	"	
Trichloroethene	"	10.3	—	1.00	"	"	ND	"	103% (75.5-129)	3.66% (10)	"	
Surrogate(s): Dibromofluoromethane		*Recovery: 103%*			*Limits: 62.9-131%*	"					*05/25/06 22:42*	
Toluene-d8			*103%*		*58.7-133%*	"					"	
4-bromofluorobenzene			*99.2%*		*60.8-140%*	"					"	

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Roxanne L. Clifton, Project Manager

SCHN00259943

TestAmerica
ANALYTICAL TESTING CORPORATION

PORTLAND, OR 9405 S.W. NIMBUS AVENUE
BEAVERTON, OR 97008-7132
ph: (503) 906.9200 fax: (503) 906.9210

Stratus Corporation	Project Name:	**Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number:	P06113	Report Created:
Gaston, OR 97119	Project Manager:	Scott Flaherty	05/26/06 14:02

Notes and Definitions

Report Specific Notes:

None

Laboratory Reporting Conventions:

DET - Analyte DETECTED at or above the Reporting Limit. Qualitative Analyses only.

ND - Analyte NOT DETECTED at or above the reporting limit (MDL or MRL, as appropriate).

NR/NA - Not Reported / Not Available

dry - Sample results reported on a Dry Weight Basis. Results and Reporting Limits have been corrected for Percent Dry Weight.

wet - Sample results and reporting limits reported on a Wet Weight Basis (as received). Results with neither 'wet' nor 'dry' are reported on a Wet Weight Basis.

RPD - RELATIVE PERCENT DIFFERENCE (RPDs calculated using Results, not Percent Recoveries).

MRL - METHOD REPORTING LIMIT. Reporting Level at, or above, the lowest level standard of the Calibration Table.

MDL* - METHOD DETECTION LIMIT. Reporting Level at, or above, the statistically derived limit based on 40CFR, Part 136, Appendix B. *MDLs are listed on the report only if the data has been evaluated below the MRL. Results between the MDL and MRL are reported as Estimated Results.

Dil - Dilutions are calculated based on deviations from the standard dilution performed for an analysis, and may not represent the dilution found on the analytical raw data.

Reporting Limits - Reporting limits (MDLs and MRLs) are adjusted based on variations in sample preparation amounts, analytical dilutions and percent solids, where applicable.

Electronic Signature - Electronic Signature added in accordance with TestAmerica's *Electronic Reporting and Electronic Signatures Policy.* Application of electronic signature indicates that the report has been reviewed and approved for release by the laboratory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

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Roxanne L. Clifton, Project Manager

SCHN00259944

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

18939 120th Avenue N.E., Suite 101, Bothell, WA 98011-9508 (425) 420-9200 FAX 420-9210
East 11115 Montgomery, Suite B, Spokane, WA 99206-4779 (509) 924-9200 FAX 924-9290
9405 S.W. Nimbus Avenue, Beaverton, OR 97008-7132 (503) 906-9200 FAX 906-9210

CHAIN OF CUSTODY REPORT

Work Order # PPE0861

REPORT TO: STRATUS CONSULTANTS
ATTENTION: SCOTT FLAHERTY
ADDRESS: 19611 33rd Ave W
Edmonds, WA
PHONE: 425-395-7192 FAX:
PROJECT NAME: PREMIER EAGLE OIL
PROJECT NUMBER: P06
SAMPLED BY: SCOTT FLAHERTY

INVOICE TO: SAME
ATTENTION:
ADDRESS:
P.O. NUMBER: NCA QUOTE #:

TURNAROUND REQUEST in Business Days *
Organic & Inorganic Analyses: [X] Standard 7 5 4 3 2 1 Same Day
Fuels & Hydrocarbon Analyses: 5 Standard 3-4 2 1 Same Day
OTHER Specify:
* Turnaround Requests less than standard may incur Rush Charges.

CLIENT SAMPLE IDENTIFICATION	SAMPLING DATE/TIME	NCA SAMPLE ID (Laboratory Use Only)	Analysis Request: 8260	TPH-Dx	MATRIX (W, S, A, O)	# OF CONTAINERS	COMMENTS
1. P06113-2	5-17-06 17:40		X		W	3	
2. P06113-3	5-17-06 17:40			X	W	1	
3.							
4.							
5.							
6.							
7.							
8.							
9.							
10.							

RELINQUISHED BY: [signature] DATE: 5-18-06
PRINT NAME: SCOTT FLAHERTY FIRM: STRATUS TIME: 10:45
RECEIVED BY: Virgil Hughes DATE: 5-18-06
PRINT NAME: Virgil Hughes FIRM: STRATUS TIME: 11:00AM

RELINQUISHED BY: Virgil Hughes DATE: 5-18-06
PRINT NAME: FIRM: TIME: 12:20
RECEIVED BY: [signature] DATE: 5-18-06
PRINT NAME: ALLYSON KERR FIRM: TMP TIME: 12:20

ADDITIONAL REMARKS: RUN THE SAMPLE THAT WAS BROUGHT IN ON 5-17-06 FOR FLASH POINT ONLY

511

PAGE 1 OF 1

SCHN00259945

TAT _____

Non-Conformances?
Circle Y or N
(If Y, see other side)

TEST AMERICA SAMPLE RECEIPT CHECKLIST

Received By: (applies to temp at receipt) **Logged-in By:** **Unpacked/Labeled By:** *Cooler ID:* ____ (___ of ___)

Date: 5-18-06 Date: 5-18-06 Date: 5-18-06 Work Order No: PPE0861

Time 2:20 Initials: JD Initials: JD Client: Stratus

Initials: JD Project: Premier edible oil

Container Type:
- ✓ Cooler
- ___ Box
- ___ None/Other ___

COC Seals:
- ___ Ship. Container
- ___ On Bottles
- X None
- ___ Sign By
- ___ Date

Packing Material
- X Bubble Bags
- ___ Styrofoam
- ___ Foam Packs
- ___ None/Other Other ___

Refrigerant:
- ___ Gel Ice Pack ___
- X Loose Ice IN Bag
- ___ None/Other ___
- ___ None

Received Via: Bill#
- ___ Fed Ex
- X Client
- ___ UPS
- ___ NCA Courier
- ___ DHL
- ___ Mid Valley
- ___ Senvoy
- ___ TDP
- ___ GS
- ___ Other ___

Cooler Temperature (IR): 5 °C Plastic Glass (circle one) (Frozen filters, Tedlars and aqueous Metals exempt)

Temperature Blank? ___ °C or NA Trip Blank? Y or N or NA

Sample Containers:		ID			ID
Intact?	Y or N		Metals Preserved?	Y or N or NA	
Provided by NCA?	Y or N		Client QAPP Preserved?	Y or N or NA	
Correct Type?	Y or N		Adequate Volume? (for tests requested)	Y or N	
#Containers match COC?	Y or N		Water VOAs: Headspace?	Y or N or NA	
IDs/time/date match COC?	Y or N		Comments:		
Hold Times in hold?	Y or N				

PROJECT MANAGEMENT

Is the Chain of Custody complete? Y or N If N, circle the items that were incomplete

Comments,Problems _____

Total access set up? Y or N
Has client been contacted regarding non-conformances? Y or N If Y, ___/___ Date Time

PM Initials: _____ Date: _____ Time: _____

(rev 3. 09/12/05)

SCHN00259946

TestAmerica
ANALYTICAL TESTING CORPORATION

PORTLAND, OR 9405 S.W. NIMBUS AVENUE
BEAVERTON, OR 97008-7132
ph: (503) 906.9200 fax: (503) 906.9210

May 26, 2006

Scott Flaherty
Stratus Corporation
39515 S.W. Hartley Road
Gaston, OR 97119

RE: Premier Edible Oils

Enclosed are the results of analyses for samples received by the laboratory on 05/17/06 16:20. The following list is a summary of the Work Orders contained in this report, generated on 05/26/06 14:30.

If you have any questions concerning this report, please feel free to contact me.

Work Order	Project	ProjectNumber
PPE0756	Premier Edible Oils	P06113

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Roxanne L. Clifton, Project Manager

SCHN00259947

TestAmerica
ANALYTICAL TESTING CORPORATION

PORTLAND, OR 9405 S.W. NIMBUS AVENUE
BEAVERTON, OR 97008-7132
ph: (503) 906.9200 fax: (503) 906.9210

Stratus Corporation	Project Name:	**Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number:	P06113	Report Created:
Gaston, OR 97119	Project Manager:	Scott Flaherty	05/26/06 14:30

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
P06113-1	PPE0756-01	Other wet	05/17/06 12:00	05/17/06 16:20

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Roxanne L. Clifton, Project Manager

SCHN00259948

TestAmerica
ANALYTICAL TESTING CORPORATION

PORTLAND, OR 9405 S.W. NIMBUS AVENUE
BEAVERTON, OR 97008-7132
ph: (503) 906.9200 fax: (503) 906.9210

Stratus Corporation	Project Name:	**Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number:	P06113	Report Created:
Gaston, OR 97119	Project Manager:	Scott Flaherty	05/26/06 14:30

Physical Parameters per APHA/ASTM/EPA Methods

TestAmerica - Portland, OR

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Notes
PPE0756-01 (P06113-1)	**Other wet**				**Sampled: 05/17/06 12:00**					
Flashpoint	EPA 1010	ND	----	150	°F	1x	6051110	05/23/06 12:35	05/23/06 19:57	

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Roxanne L. Clifton, Project Manager

SCHN00259949

TestAmerica
ANALYTICAL TESTING CORPORATION

PORTLAND, OR 9405 S.W. NIMBUS AVENUE
BEAVERTON, OR 97008-7132
ph: (503) 906.9200 fax: (503) 906.9210

Stratus Corporation	Project Name: **Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number: P06113	Report Created:
Gaston, OR 97119	Project Manager: Scott Flaherty	05/26/06 14:30

Physical Parameters per APHA/ASTM/EPA Methods - Laboratory Quality Control Results

TestAmerica - Portland, OR

QC Batch: 6051110 **Other wet Preparation Method: EPA 1010**

Analyte	Method	Result	MDL*	MRL	Units	Dil	Source Result	Spike Amt	% REC	(Limits)	% RPD	(Limits)	Analyzed	Notes
LCS (6051110-BS1)								Extracted: 05/23/06 12:35						
Flashpoint	EPA 1010	130	--		°F	1x	--	127	102%	(96.5-103)	--	--	05/23/06 19:57	
Duplicate (6051110-DUP1)				QC Source: PPE0614-19				Extracted: 05/23/06 12:35						
Flashpoint	EPA 1010	ND	--	150	°F	1x	ND	--	--	--		(50)	05/23/06 19:57	

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Roxanne L. Clifton, Project Manager

SCHN00259950

TestAmerica
ANALYTICAL TESTING CORPORATION

PORTLAND, OR 9405 S.W. NIMBUS AVENUE
BEAVERTON, OR 97008-7132
ph: (503) 906.9200 fax: (503) 906.9210

Stratus Corporation	Project Name:	**Premier Edible Oils**	
39515 S.W. Hartley Road	Project Number:	P06113	Report Created:
Gaston, OR 97119	Project Manager:	Scott Flaherty	05/26/06 14:30

Notes and Definitions

Report Specific Notes:

None

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MDL* - METHOD DETECTION LIMIT. Reporting Level at, or above, the statistically derived limit based on 40CFR, Part 136, Appendix B. *MDLs are listed on the report only if the data has been evaluated below the MRL. Results between the MDL and MRL are reported as Estimated Results.

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Roxanne L. Clifton, Project Manager

SCHN00259951

Attachment C

Disposal Documentation for 13 Drums of Purge Water IDW

Material Characterization Profile

Profile Number:
Effective Date:
Expiration Date:

For assistance, contact Customer Service at 1-503-261-9900

Section 1: Generator Information

Generator Name:	Schnitzer Investment Corp	Billing Name:	Schnitzer Investment Corp.
Generator EPA ID:	N/A	Billing Address:	3200 NW Yeon Ave
Pickup Address:	10400 N. Burgard Way		
County:	Multnomah	Billing Contact:	Mr. Jim Jakubiak
Technical Contact:	Mr. Jim Jakubiak	Billing Phone:	503.286.6976
Phone:	503.286.6976		

Section 2: Material Description & Characteristics

Name of Waste: IDW wastewater · Description of Waste: purge water from sampling activities

Process Generating Waste: purging groundwater wells prior to analytical sampling

Shipping Information: Quantity: 700 gal Units: bulk Per

Is the waste off-specification or discarded commercial product? ☐ Yes ☒ No If yes, is an MSDS available? ☐ Yes ☐ No ☐ MSDS Provided

Is the waste a hazardous waste as defined in RCRA (40 CFR §261)? ☐ Yes ☒ No If yes, list waste codes:

Is the waste a USDOT Hazardous Material? ☐ Yes ☒ No

Is the waste/wastewater subject to a CWA Categorical Pretreatment Standard (40 CFR §400-471)? ☒ Yes ☐ No List: Subcategory B

Method chemical/physical properties determined: ☐ Process Knowledge ☒ Lab Analysis ☒ Lab Analysis Provided ☐ MSDS ☐ MSDS Provided

Composition (key compounds, soil, water, PPE, debris, etc.):

Purge water % 100
%
%
%
%

Used Oil Management Parameters:

Halogens:
☐ ≤ 1000 ppm
☐ ≤ 4000 ppm
☐

BTU Value:
☐ < 2 (BTU/1000lb)
☐ 2-5 (BTU/1000lb)
☐ 5-9 (BTU/1000lb)
☐ 9-12 (BTU/1000lb)
☐ >12 (BTU/1000lb)
☐

Sulfur :
☐ ≤ 2%
☐

Ash (%):
☐ ≤ 1%
☐

Moisture (%):

Viscosity (SUS):

Description : Color : clear Odor : none

Physical State @ 70°F (check all that apply):
☒ Free Liquid % 100
☐ Sludge %
☐ Solid %
☐ Pumpable %
☐ Pourable %

pH:
☐ ≤ 2 ☐ < 12.5
☐ < 5 ☐ ≥ 12.5
☐ < 9 ☒ 7-8

Specific Gravity :
☐ < 0.8
☒ 0.8-1.2
☐ > 1.2
☐

Flash Point :
☐ < 130 °F
☐ < 140 °F
☐ 140 - 200 °F
☐ ≥ 200 °F
☒ N/A

TSS:
☐ < 200 ppm
☐ < 1000 ppm
☐ ≤ 5000 ppm
☐ > 5000 ppm
☒ N/A

TDS:
☐ < 0.5 ppm
☐ ≤ 1.0 ppm
☐ > 1.0 ppm
☒ N/A

Oil & Grease:
☒ > 100 ppm
☐ > 5%
☐

☐ BOD_5 ☐ COD :
☒ < 200 ppm
☐ < 2000 ppm
☐ ≤ 7500 ppm
☐ > 7500 ppm
☐

Ammonia
Sulfides
Phenols
N/A

Cyanides:
☐ < 0.02 ppm
☐ < 0.1 ppm
☐ < 5 ppm
☐ ≥ 5 ppm
☒ N/A

Contains Chelating Agents:
☐ Yes ☒ No

If Yes, list:

PCBs:
☐ Yes ☒ No
Conc.:

Radioactive:
☐ Yes ☒ No

Section 3: Chemical Constituents

Metals: Metal results below are: ☐ Total ☐ TCLP (Check all that are known present and indicate concentration) below TCLP

☐ Antimony	ppm	☐ Cobalt	ppm	☐ Molybdenum	ppm	☐ Tin	ppm
☐ Arsenic	ppm	☐ Copper	ppm	☐ Nickel	ppm	☐ Titanium	ppm
☐ Barium	ppm	☐ Lead	ppm	☐ Selenium	ppm	☐ Vanadium	ppm
☐ Cadmium	ppm	☐ Mercury	ppm	☐ Silver	ppm	☐ Zinc	ppm
☐ Chromium	ppm						

Organics: Organic results below are: ☐ Total ☐ TCLP (Check all that are known present and indicate concentration) below TCLP

☐ Bis(2-ethylhexyl)phthalate	ppm	☐ o-Cresol	ppm	☐ Fluoranthene	ppm
☐ Carbazole	ppm	☐ p-Cresol	ppm	☐ 2,4,6-Trichlorophenol	ppm
☐ n-Decane	ppm	☐ 2,3-Dichloroaniline	ppm	☐ n-Octadecane	ppm

Section 4: Certification

I certify under penalty of law that this document, all attachments and supporting materials were prepared and presented by me or under my direct supervision and that the information provided is a true accurate and complete representation of the waste materials to be presented for evaluation and management by Pacific Power Vac (PPV). Furthermore, I agree that any waste materials managed under any approval issued by PPV pursuant to this request will be transported, delivered, or tendered to be in conformance with the waste characterization profile. Where PPV determines a waste to be non-conforming, the generator shall be responsible for all costs associated with timely return of the waste to generator or for other alternate and lawful management of the non-conforming waste conducted on behalf of the generator.

Generator Signature : Jim Jakubiak Printed Name: Date: May 30, 2006

Title:

SCHN00259953

PACIFIC POWER VAC LLC

Daily Project Worksheet

FOR SERVICE CALL	Reference number
(503) 261-9800	11622

14041 NE Sandy Blvd
Portland OR 97230
503-261-9800

Bill to Customer	Generator
URS Corp. 111 SW Columbia R, Suite 1500 Portland, OR. 97201	Schnitzner Investment Corp Edible Oils 10400 N. Burgard, PDX OR

Rental Company Name	Equipment Rented	Hours	Cost	PPV Equipment	Hours	OT Hours
				1-80 BBL		

US DOT Waste Description (proper shipping name, hazard class, & ID)		CONTAINERS NO.	TYPE	Quantity	Sub Cat
NON-RCRA WASTEWATER	NA	1	Bulk	700	B
				390	5/30/06

Supplies Used	Quantity	Operator & Labor Name	Hours	OT Hours	Equipment Operated
		Jim Welch			

Customer Method of Payment (Circle One)

To be Billed COD VISA MasterCard AMEX Check No._____

Card No. Expiration Date: CVV2 #:

Remarks:

URS WORK ORDER 132669

URS MSA: 1151844

Customer warrants that the waste petroleum products being transferred by the above collector do not contain any contaminants including, without limitations, pesticides, chlorinated solvents at concentrations greater than 1000 PPM, PCB's at greater concentrations then 2 PPM (or PPM with Manifest), or any other material classified as hazardous waste by 40 CFR part 261, customer subparts C and D (implementing the Federal Resource Conservation and Recovery Act or by any equivalent state hazardous waste or hazardous substance classification program. Should laboratory tests find this waste product not in compliance with 40 CFR Part 261, customer (generator) agrees to pay for all disposal costs incurred.

[signature] May 30 2006

Generator Signature Date

Transporter Signature Date

SCHN00259954

PACIFIC POWER VAC LLC

Daily Project Worksheet

FOR SERVICE CALL	Reference number
(503) 261-9800	11522

14041 NE Sandy Blvd
Portland OR 97230
503-261-9800

Bill to Customer	Generator
URS Corp. 111 SW Columbia St, Suite 1500 Portland, OR. 97201	Schnitzer Investment Corp Edible Oils 10400 N. Burgard, PDX OR

Rental Company Name	Equipment Rented	Hours	Cost	PPV Equipment	Hours	OT Hours
				1-80 BBL		

US DOT Waste Description (proper shipping name, hazard class, & ID	CONTAINERS NO.	TYPE	Quantity	Sub-Cat
NON-RCRA WASTEWATER NA	1	BULK	3570	B

Supplies Used	Quantity	Operator & Labor Name	Hours	OT Hours	Equipment Operated
		Jim Welch			

Customer Method of Payment (Circle One)

(To be Billed) COD VISA MasterCard AMEX Check No._____

Card No. Expiration Date: CVV2 #:

Remarks:

URS WORK ORDER 132669

URS MSA: 1151844

Customer warrants that the waste petroleum products being transferred by the above collector do not contain any contaminants including, without limitations, pesticides, chlorinated solvents at concentrations greater than 1000 PPM, PCB's at greater concentrations then 2 PPM (or PPM with Manifest), or any other material classified as hazardous waste by 40 CFR part 261, customer subparts C and D (implementing the Federal Resource Conservation and Recovery Act or by any equivalent state hazardous waste or hazardous substance classification program. Should laboratory tests find this waste product not in compliance with 40 CFR Part 261, customer (generator) agrees to pay for all disposal costs incurred.

Generator Signature — 5-30-06 Date

Jim Welch
Transporter Signature — 5-30-06 Date

SCHN00259955

VLMK CONSULTING ENGINEERS
3933 SW Kelly Avenue • Portland • Oregon 97239-4393

P 503.222.4453
F 503.248.9263
E vlmk@vlmk.com
W www.vlmk.com

CONSULTING ENGINEERING SERVICES AGREEMENT
(Time and Materials)

PROJECT TITLE: ENVIROCON BLDG. DEMO. **DATE:** 7-28-04
CLIENT: ENVIROCON, INC. **PHONE:** (503) 285-6164
CLIENT CONTACT: STEVE HOLMBERG **FAX:** (503) 285-6205
ADDRESS: 10400 N. BURGARD WAY
PORTLAND, OR 97203 **VLMK JOB#:** 204332

A. GENERAL. This agreement is intended to clarify responsibilities on small consulting engineering projects where the scope of work may not include construction administration services and where standard agreement forms are inappropriate and/or cumbersome.

B. VLMK is VLMK Consulting Engineers. The client is the ~~person signing this agreement~~ company for whom the work is performed or "Consultant" and the one responsible for costs incurred under this agreement, "ENVIROCON, INC."

C. DESCRIPTION OF WORK:

- STRUCTURAL INVESTIGATION OF EXISTING BUILDING FOR DEMOLITION OF PORTION OF BUILDING
- PROVIDE LETTER VERIFYING WHETHER BUILDING CAN BE DEMOLISHED.
- ESTIMATED FEE (INCL. REIMBURSABLES AND INSURANCE): $400.00

D. CONSULTANTS FEES AND TIME SCHEDULE. The client agrees to pay the consultant on a time and material basis in accordance with the schedule as hereinafter provided. VLMK will make every effort to complete the work on time and at the estimated cost, but the estimated times and costs are not guaranteed. VLMK will keep the client informed of progress and costs and bring to the client's attention any event that is suspected to ~~significantly~~ affect time or cost.

E. BILLING. VLMK will bill client monthly and all amounts billed are due and payable by the 14th day of the month. Accounts outstanding past 30 days beyond the billing date are delinquent ~~and subject to interest charges of 1% per month~~ until paid. Attorneys fees and/or other cost of collection are to be paid by the client. Client will be billed for personnel time and reimbursable items in accordance with the Schedule of Charges in effect at the time the work is performed. Rates ~~are subject to~~ will not change without notice. Overtime rates when required by a project schedule are charged at a higher rate. ~~Services involving only a few hours work will be adjusted as appropriate for each project. Typical charges~~ RATES FOR THIS AGREEMENT are as follows:

1. **Personnel Charges:**

Senior Principal	$115.00 to $135.00 per hour
Principal	$92.50 to $120.00 per hour
Senior Engineer	$75.00 to $95.00 per hour
Project Manager and Project Coordinator	$75.00 to $82.50 per hour
Project Engineer	$65.00 to $84.00 per hour
Engineer/Technician	$55.00 to $70.00 per hour
CAD Technician	$55.00 to $72.50 per hour
Permit Coordinator	$35.00 to $55.00 per hour
Administrative	$25.00 to $50.00 per hour

2. **Reimbursable Charges:**

Copies, per page	$ 0.10
Color Copies, per page	$ 1.50
Color Plots, per plot	$25.00
Photo Prints, per page	$ 1.00
Drawing Prints, per print	$ 2.00
Drawing Plot (vellum, mylar), per plot	$10.00
Report w/cover and binding	$ 5.00
Travel (owned auto), per mile	$ 0.37
Fax, per page	$ 0.10
Delivery	Direct cost plus 10%
Travel (airline tickets and accommodations)	Direct cost plus 10%
Consultants and Sub-contracted Services	Direct cost plus 10%
Other (standard rates)	Direct cost plus 10%

F. RESPONSIBILITIES/WARRANTY. VLMK will accomplish the services required by this agreement as soon as permitted by our current schedule of work. VLMK warrants that the services provided are performed in the usual thoroughness and competence by members of our profession in this locale. No other warranty, either expressed or implied is included. but no later than 7/20/04

G. PROFESSIONAL LIABILITY. It is agreed that our responsibility is for our own (VLMK) activities and we specifically are not responsible for services or activities provided by others (e.g., contractors, subcontractors, other consultants, etc.). We may observe and communicate with others, but are not responsible for their performance and/or compliance with safety or other requirements and standards.

The ~~Owner~~/Client agrees that, to the fullest extent permitted by law, design professional's total liability to ~~Owner~~/Client for any and all injuries, claims, losses, expenses, damages or claims expenses arising out of this agreement from any cause, shall not exceed the total amount of our fee or $100,000 whichever is greater. Such causes include, but are not limited to, the design professional's negligence, errors, omissions, strict liability, breach of contract or breach of warranty.

H. VLMK does not consult on any aspects involving hazardous materials including asbestos, chemical substances, etc. If the client desires Consulting Services relative to these concerns, VLMK will suggest consultants but VLMK will have no responsibility relative to hazardous materials or site contamination. VLMK recommends to all clients that specialized consultants be retained whenever there is a question or concern about the presence of hazardous materials, site contamination or similar matters.

I. MISCELLANEOUS PROVISIONS.

1. This agreement can be terminated by either party with 24 hours written notice.
2. Oregon Law shall control in this agreement.
3. VLMK shall have lien rights upon the land and/or improvements in accordance with the law.
4. Client authorizes VLMK to enter onto land and into buildings as required to accomplish the work.
5. Others: None unless provided for as follows: _____

_____

J. AGREEMENT. This is the only agreement between VLMK and the Client. Any modifications shall be accomplished in writing.

Accepted: _____ 7/29/04
Client Date

Accepted: _____
VLMK Consulting Engineers Date

ASN 6

DEQ NOTIFICATION FORM

For Nonfriable Asbestos Removal

For DEQ use only
Date Received:
Amount Received:
Check Number:
Project Number:

ATTENTION!

CONTRACTORS: This notification is not complete unless it is accompanied by the required $35.00 fee and is submitted 5 days prior to the start date. All notifications where the 5-day period has been waived are subject to a fee increase of 50%. To inquire about a waiver of the 5-day notification period or for other information call 1-800-452-4011 for the phone number of your local regional DEQ office.

♦♦♦(PLEASE TYPE OR PRINT CLEARLY)♦♦♦

Is this a revision to a previous notification? Yes _____ No X

Start date of project: 09 NOV 04 End date of project: 09 NOV 04

Days of week and hours to be worked: TUESDAY 7:00AM to 5:00PM

Project site name: SCHNITZER DEMOLITION PROJECT Building Owner: SCHNITZER INVESTMENT CORP

Project address: 10400 N. BURGARD WAY
(Include Apt #, Floor #, Bldg #, school name or any other pertinent site location information)

City: PORTLAND County: MULTNOMAH State: OR Zip: 97203

Was a survey performed: Yes: X No: _____ By whom? CLIENT HAS PERFORMED SURVEY PREVIOUS TO DEMOLITION WORK

Type of non-friable material to be removed: TRANSITE PIPE

Amount of non-friable asbestos material to be removed. Square footage: APPROX. 20 LINEAR FEET

Contractor name: ENVIROCON, INC. Phone: 503-285-6164

Contractor address: 3330 NW YEON AVE

City: PORTLAND County: MULTNOMAH State: OR Zip: 97210

CCB registration number: 69948 Competent Person: STEVE HOLMBERG

Waste disposal site: WASTE MANAGEMENT HILLSBORO LANDFILL

Site address: 3205 SE MINTER BRIDGE ROAD

City: HILLSBORO County: MULTNOMAH State: OR Zip: _____

Waste hauler: ENVIROCON, INC. Phone: 503-285-6164

Sign below and send this form with the appropriate fee to The DEQ Business Office at 811 SW 6th, Portland, Oregon 97204. Make checks payable to "DEQ"

Name of owner, operator or contractor: ENVIROCON, INC.

Name: DAVID JACOBS (PLEASE PRINT) Phone: 503 285 6164

Signature: David B. Jacobs Date: 08 NOV 04

CAUTION! If the material being removed is handled in a manner that causes it to become friable (shattered, pulverized, or reduced to dust), then only a DEQ licensed asbestos abatement contractor may perform the removal work. Submit nonfriable

(Revised 12/01)

SCHN00259973

ASN 4 ASBESTOS WASTE SHIPMENT REPORT FORM

PLEASE PRINT OR TYPE! If you have questions, contact your local DEQ Regional Office in Portland at (503) 229-5364, Salem at (503) 378-8240 ext. 272, Medford at (541) 776-6010 ext. 235, or Bend at (541) 388-6146 ext. 226, **OR** call (800) 452-4011 for the location of your local regional DEQ office.

WASTE GENERATOR: (Contractor, Facility, or Operator)

1. Asbestos removal site name and address: SCHNITZER INVESTMENT CORP

   10400 N BURGARD WAY (Street) PORTLAND OR (City/State) MULTNOMAH (County) 97203 (Zip)

   Contact person: J. JAKUBIAK Phone: 503 286 6976

2. Operator's name and address: ENVIROCON, INC. Phone: 503 285 6164

   3330 NW YEON AVE SUITE 240 (Street) PORTLAND OR (City/State) MULTNOHAM (County) 97210 (Zip)

3. Waste disposal site: WASTE MANAGEMENT HILLSBORO LANDFILL Phone:

   3205 SE MINTER BRIDGE RD (Street) HILLSBORO OR (City/State) WASHINGTON (County) (Zip)

4. Describe asbestos materials: TRANSITE PIPE

5. Containers: Number: 4 Type: BAGS

6. Total quantity (cubic yards): LESS THAN ONE

7. **OPERATOR'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, and are in all respects in proper condition for transport according to all government regulations. All movement of this asbestos-containing material is recorded on this Waste Shipment Record Form.

   Name: STEVEN F. HOLMBERG Company: ENVIROCON, INC.

   Signature: Date: 09 NOV 04

TRANSPORTER(S):

8. Transporter #1: (Acknowledgment of receipt of materials)
   Agent: STEVEN F. HOLMBERG Company: ENVIROCON, INC.

   Address: 3330 NW YEON AVE. SUITE 240 PORTLAND OR 97210 Phone: 503 285 6164

   Signature: Date: 09 NOV 04

9. Transporter #2: (Acknowledgment of receipt of materials)
   Agent: Company:

   Address: Phone:

   Signature: Date:

DISPOSAL: (Certification of receipt of asbestos materials covered by this manifest, except as noted in item 11 below.)

10. Waste Disposal Site: Hillsboro Landfill

    Name and Title: Brad Blue OPS Date: 11-9-04

    Signature: Brad Blue Phone: 503 640 9427

11. DISCREPANCY SPACE: (Add attachments as needed)

(Revised 6/03)

SCHN00259974

ASN 4 ASBESTOS WASTE SHIPMENT REPORT FORM

PLEASE PRINT OR TYPE! If you have questions, contact your local DEQ Regional Office in Portland at (503) 229-5364, Salem at (503) 378-8240 ext. 272, Medford at (541) 776-6010 ext. 235, or Bend at (541) 388-6146 ext. 226, **OR** call (800) 452-4011 for the location of your local regional DEQ office.

WASTE GENERATOR: (Contractor, Facility, or Operator)

1. Asbestos removal site name and address: SCHNITZER INVESTMENT CORP

   10400 N BURGARD WAY (Street) | PORTLAND OR (City/State) | MULTNOMAH (County) | 97203 (Zip)

   Contact person: J. JAKUBIAK Phone: 503 286 6976

2. Operator's name and address: ENVIROCON, INC. Phone: 503 285 6164

   3330 NW YEON AVE SUITE 240 (Street) | PORTLAND OR (City/State) | MULTNOHAM (County) | 97210 (Zip)

3. Waste disposal site: WASTE MANAGEMENT HILLSBORO LANDFILL Phone:

   3205 SE MINTER BRIDGE RD (Street) | HILLSBORO OR (City/State) | WASHINGTON (County) | (Zip)

4. Describe asbestos materials: TRANSITE PIPE

5. Containers: Number: 4 Type: BAGS

6. Total quantity (cubic yards): LESS THAN ONE

7. **OPERATOR'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, and are in all respects in proper condition for transport according to all government regulations. All movement of this asbestos-containing material is recorded on this Waste Shipment Record Form.

   Name: STEVEN F. HOLMBERG Company: ENVIROCON, INC.

   Signature: Date: 09 NOV 04

TRANSPORTER(S):

8. Transporter #1: (Acknowledgment of receipt of materials)
   Agent: STEVEN F. HOLMBERG Company: ENVIROCON, INC.

   Address: 3330 NW YEON AVE. SUITE 240 PORTLAND OR 97210 Phone: 503 285 6164

   Signature: Date: 09 NOV 04

9. Transporter #2: (Acknowledgment of receipt of materials)
   Agent: Company:

   Address: Phone:

   Signature: Date:

DISPOSAL: (Certification of receipt of asbestos materials covered by this manifest, except as noted in item 11 below.)

10. Waste Disposal Site: Hillsboro Landfill

    Name and Title: Brad Blue DMS Date: 11-9-04

    Signature: Brad Blue Phone: 503 640 9427

11. **DISCREPANCY SPACE:** (Add attachments as needed)

(Revised 6/03)

SCHN00259975

1308292

Hillsboro Landfill, Inc. TICKET: 748089
3205 SE Minter Bridge, Hillsboro, 97123 DATE: 11/09/2004
Consumer Comments? We want to know! TIME: 11:36 - 11:46
PLEASE phone: 503-640-9427

CUSTOMER: 5152167 / ENVIROCON INC. P.O.:
GROSS: 5400 LBS
SOURCE: PDXM / Portland - Mult Co TARE: 5200 LBS
TRUCK: 123 BIN: LICENSE: NET: 200 LBS
HAULER: SELFHLD / HAULED IN BY CUST MANIFEST: STEVEN HOLMBERG
COMMENT: 10400 n brugard way/portland

COMMODITY	UNIT	QNTY	RATE	PRETAX	TAX	AMOUNT
ASBIN / FRIABLE ASBESTOS	T	0.10	Minimum	$ 47.95	$ 4.05	$ 52.00
EVF / Environmental Fee-S	U	1.00	$ 1.50	$ 1.50	$ 0.00	$ 1.50
				$ 49.45	$ 4.05	$ 53.50

IN OPERATOR: Jennifer O U T OPERATOR: Tracy

DRIVER:

SCHN00259976

546901

Attn: Business Office
811 SW Sixth Ave
Portland OR 97204

No. 641297

ENVIROCON
Missoula, MT 59807-8243

Stub 1 of 1
Check Date: 11/10/04

Invoice Number	Invoice Date	Comment	Gross	Deductions	Amount Paid
110904	100904	Nonfriable asbestos removal	52.50		52.50
			52.50		52.50

Please Detach Before Depositing

FOR SECURITY PURPOSES, THE FACE OF THIS DOCUMENT CONTAINS A COLORED BACKGROUND AND MICROPRINTING IN THE BORDER

ENVIROCON
P.O. Box 16655, Missoula, MT 59808

FIRST INTERSTATE BANK
OF MISSOULA
93-168/929

No. 641297

546901

Date	Amount
11/10/04	$********52.50

Pay
FIFTY TWO AND 50/100 **********

To The Order Of:

Department of Environmental Quality
Attn: Business Office
811 SW Sixth Ave
Portland OR 97204

Michael S Stevenson
Authorized Signature

THE REVERSE SIDE OF THIS DOCUMENT INCLUDES AN ARTIFICIAL WATERMARK - HOLD AT ANGLE TO VIEW

SCHN00259977

PROFESSIONAL SERVICES AGREEMENT

Agreement No. _____ made between:

CONTRACTOR:

Envirocon, Inc.
10400 N. Burgard Way
Portland, OR 97203
(503) 285-6164
(503) 285-6205 (FAX)

COMPANY:

Name: Schnizter Investment Corp.
Address: 3200 NW Yeon Avenue
Portland, OR 97210
Phone No.: 503/286-6976
Fax No.: 503/286-6960
POC.: Jim Jakublak, Project Manager

Schnitzer Investment Corp. (hereinafter referred to as "Company"), does hereby retain Envirocon, Inc. (hereinafter referred to as "Contractor") to furnish certain professional services upon the following terms and conditions:

I. DESCRIPTION AND LIMITATIONS OF SERVICES AGREEMENT

A. The Contractor shall furnish the services described below at the time and place designated by Company's Project Manager.

Item No.	Description of Work
1	Demolition project as described in April 21, 2004, proposal at former Premier Edible Oils site located at 10400 North Burgard Way, Portland, Oregon, 97203

B. Changes in the indicated scope of service beyond this Agreement shall be subject to renegotiation and implemented by a formal Change Order to the Agreement.

II. PERIOD OF SERVICE AND TERMINATION

A. The period of service hereunder is estimated to be October 7, 2004 through November 7, 2004.

B. In the event either party is in breach of its obligations under this Agreement, the non-breaching party may terminate the Agreement on three (3) days notice to the other party, provided the breaching party will be allowed the three day period to remedy its breach.

III. COMPENSATION

A. The Company will pay costs and fees to the Contractor for services performed hereunder on the following basis:

See April 21, 2004 Proposal attached hereto

B. Payment to the Contractor will be made within 30 days after the Contractor's submission of invoices which identify the Project and which set forth the agreed-upon charges. Weekly copies of supporting payroll reports or time cards, material invoices, and expense receipts may be required to be submitted the following Monday to a person named in Section V of this Agreement. (Certified payrolls and/or proof of payment may also be necessary subsequently.)

IV. TAXES

The compensation stated herein includes all applicable taxes, permits, and licenses and will not be changed hereafter as the result of any change in the Contractor's liabilities

V. REPORTING

In performing the services defined herein, the Contractor shall report to the person or persons appointed by the Company as follows:

NAME	TITLE	PHONE (day/night)
Jim Jakubiak	Project Manager	503/286-6976, 503/519-4795 cell

VI. CONFLICT OF INTEREST AND COORDINATION

A. The Contractor will not hire any employee of the Company to perform any service covered by this Agreement. The Contractor will understand that all contact with employees of the Company will be conducted on a consulting basis and the Contractor will not attempt to perform managerial duties.

B. The Contractor affirms that to the best of its knowledge no conflict of interest exists between the Contractor and the Company, and in the event of a change in either its private interests or its service under this Agreement, the Contractor will raise with the Company any question regarding possible conflicts of interest which may arise as a result of such change.

C. The Contractor will coordinate its work with that of the Company and other contractors and subcontractors working at the Company's site(s).

VII. THIS SERVICE AGREEMENT IS ALSO SUBJECT TO THE FOLLOWING PROVISIONS:

A. Levels of Competence - The Contractor is responsible to perform to the level of competence presently maintained by other practicing professionals engaged in the same type of professional services.

B. Discounts - The Company will not be responsible for any delay in receipt of the Contractor's invoices and supporting documents. Should any delay occur, the time allowed by the Contractor for payment of invoices, or for taking a cash discount, shall commence not earlier than the date that the invoices, complete with all supporting documents, are received by the Company.

C. Loss in Transit - Regardless of any other provision in this Service Agreement, the Contractor shall be responsible to the Company for any loss or damage suffered until the completed items have been received intact and in good order by the Company at the destination shown on Page 1 or as instructed per Section V.

D. Warranty - Notwithstanding inspection or acceptance by the Company, and regardless of any other provisions in this Service Agreement, the Contractor guarantees and warrants to the Company and to its Client all of the items covered by this Service Agreement to the full extent, if any, required by the Prime Contract between the Company and its Client. Said items are purchased from the Contractor in reliance of this warranty.

E. Tests, Samples, Drawings, Data - The testing of all materials shall be conducted by the Company unless specifically stated otherwise. All submittals, as well as all required contacts with the Company's Client or its representatives, shall be made through the Company. Approval of submittals shall not relieve the Contractor of responsibility for errors in, omissions of, or deviations from Prime Contract requirements.

F. Noninfringement of Patents - The Contractor warrants that no items or processes furnished under this Service Agreement, or used in the Contractor's performance, will infringe any patent, and the Contractor will indemnify the Company against any claim, liability, loss, damage, or expense arising from claims alleging that the sale or use of said items or processes constitutes patent infringement.

G. Confidentiality - Because of the sensitive nature of the work contemplated by this Agreement, the Contractor agrees to treat all information discussed between the Contractor and the Company as confidential information. The contractor will treat all information belonging to the Company, its affiliated companies, and any third party, which is disclosed to the Contractor in the course of the Contractor's services, as proprietary information.

H. Assignments - Neither this Service Agreement nor any interest therein may be transferred, voluntarily or involuntarily, without the written consent of the Company. Any attempted transfer, by assignment; attachment; filing

SCHN00259980

of voluntary petition in bankruptcy (including a petition for an arrangement); appointment of a receiver, trustee, or administrator; or otherwise, shall be void and may, at the option of the Company, be deemed to be a default under Section J.

I. No Liens or Claims - The Contractor will defend and hold the Company, the Company's Client, and the property owner(s) harmless from any lien or claim (including a stop notice or claim against the Company's bond) arising out of the Contractor's nonpayment or alleged nonpayment of obligations incurred in connection with the items covered by this Service Agreement or any of the components for said items. The Company may require interim or final lien releases or waivers before payment is made.

J. Default - If the Contractor fails to make any delivery within the time specified, or otherwise fails at any time to fully comply with its obligations hereunder, the Company may, at its option, terminate the right to proceed under this Service Agreement (or such part or parts with which there has been a default) without incurring any cancellation or other charges.

K. Nonwaiver - Failure of the Company to insist on strict and timely performance shall not be a waiver of any right or remedy that it may have and shall not be a waiver of any subsequent default. Neither payment for nor acceptance of any or all of the items shall relieve the Contractor of liability for failure to fully perform its obligations.

VIII. CONTRACTOR LIABILITY AND INSURANCE REQUIREMENTS

A. The Contractor is an independent contractor and all persons employed by the Contractor in connection with this Agreement shall be its employees and not employees of the Company in any respect whatsoever. To the extent of its negligence, the Contractor shall indemnify the Company against any claim, loss, damage, expense, or liability arising out of the Contractor's negligent acts or omissions which are connected with the performance of this Agreement, unless, and to the extent, due to the Company's negligence. The foregoing shall include indemnity for property damage and for injury or death of any person, including employees of the Company or the Contractor. The Contractor shall, at its own expense following the Company's request, defend any suit asserting a claim covered by its indemnity. To the extent of its liability, the Contractor shall pay all costs, including attorney's fees, incurred in enforcing this indemnity. "Acts or omissions of the Contractor" shall include acts or omissions of suppliers or others operating within the scope of authorization from the Contractor.

B. Prior to starting work, the Contractor shall procure, and maintain in force, statutory worker's compensation insurance, employers' liability insurance, commercial general liability insurance with contractual coverage, and automobile liability insurance; and, such other insurance, in accordance with the provisions of this Agreement.

C. The limits for the Contractor's worker's compensation insurance shall be as required statutorily and as otherwise discussed below. The Contractor's commercial general insurance and automobile liability insurance shall be written for not less than the limits of liability shown below:

Insurance Requirements:

- Statutory Worker's Compensation Insurance with Employer's Liability Insurance for all employees of Subcontractor with a limit of no less than $100,000. Such insurance shall cover claims filed under the Worker's Compensation Law of the State in which the work is to be performed, or any law of any State under which liability or any compensation claims shall arise.
- Commercial General Liability Insurance shall be written with minimum limits of $1,000,000 per occurrence / $1,000,000 aggregate, combined single limit, covering personal injury, bodily injury, and property damage. Insurance shall cover premises-operations, explosion and collapse hazard, underground hazard, products/completed operations hazard, contractual hazard, broad form property damage, independent contractors and personal injury. This insurance may be arranged under a single policy for the full limits required or by a combination of underlying policies with the balance provided by an excess or umbrella liability policy.
- Comprehensive Automobile Liability Insurance covering both bodily injury and property damage shall be written with minimum limits of $1,000,000 each occurrence. Insurance shall cover owned, hired and non-owned automobiles.
- Consultant's Professional Liability Insurance with minimum limits of $500,000 each claim and aggregate.

D. The foregoing policies shall each contain a provision that coverages afforded under the policies will not be cancelled or not renewed unless at least thirty (30) days prior written notice has been given to Company. With respect to the policies named above, Waivers of Subrogation are required; and, Company, Client and Owner shall also be named as "Additional Insureds" on the Commercial General Liability Insurance and the Comprehensive Automobile Liability Insurance. All aggregate limits shall apply separately for this Agreement. Each of the requirements listed in this paragraph shall be addressed in writing on the face of the Certificate(s) of Insurance.

SCHN00259981

Certificates of Insurance acceptable to Company shall be filed with Company prior to the commencement of work.

E. All insurance requirements herein shall flowdown in their entireties to any and all lower-tier subcontractors. Contractor shall require all lower-tier subcontractors to provide copies of insurance certificates reflecting the required coverages to Company as well as to the Contractor.

F. When the Company is entitled under this or other articles to be indemnified by the Contractor, the indemnity shall extend to the Company, its partners, and its affiliates and their directors, officers, agents, and employees.

IX. CONFLICT RESOLUTION

Any dispute arising out of this Agreement will be submitted to the courts in Multnomah County in which the demolition work is performed. The dispute will be heard by the court, sitting without a jury. EACH OF THE PARTIES WAIVES THE RIGHT TO A TRIAL BY JURY IN ANY SUCH PROCEEDING. The prevailing party shall be entitled to an award of its costs and expenses (including reasonable attorneys' fees incurred through trial, and on any appeal therefrom.

This Agreement contains the entire understanding between the parties, and there are no understandings or representations except those set forth or incorporated by reference herein. No subsequent modifications of this Agreement shall be of any force or effect unless in writing and signed by duly authorized officials of both parties.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the date fully signed below:

CONTRACTOR (ENVIROCON, INC.):

Michael S Stevenson
Signature

MICHAEL S STEVENSON PRESIDENT
Printed Name & Title

7/20/04
Date

COMPANY (Schnitzer Investment Corp.):

Tom Zelenka
Signature

Vice President
Printed Name & Title

10/13/04
Date

ENVIROCON

ENVIROCON, INC.
10400 NORTH BURGARD WAY
PORTLAND, OR 97203
(503) 285-6164
(503) 285-6205 FAX
www.envirocon.com

James Jakubiak
Environmental Administrator
Schnitzer Investment Corp.
3200 NW Yeon Avenue
Portland, Oregon 97210

April 21, 2004

Mr. Jakubiak:

Envirocon is pleased to present this revised proposal for demolition activities to Schnitzer Investment Corp. The proposal now reflects lump sum pricing for all items. Based on the information provided it is Envirocon's understanding that the scope of services to be provided are the following;

1) Building Demolition
Includes: Mobilization of men and equipment to site, preparation of health and safety plan, obtaining of demolition permit, demolition and sizing of metal structure, removal of associated concrete pads, and footings. **Subtotal: $21,800.00**

2) Disposal of Miscellaneous Debris
Includes: Offsite disposal of debris from within building including insulation, light ballast, 1- dishwasher, H2O heaters, air conditioners and poly tanks at Waste Management's Hillsboro Landfill Facility. Approximately 36 florescent light bulbs and 29 other bulbs are to be recycled by Ecolights in Seattle, WA.
Subtotal: $4,850.00

3) Recycling of Concrete
Includes: Transport of concrete to Porter Yett or East County Recycling for recycling.
Subtotal: $8,800.00

4) Backfill
Includes: Placement of import fill material to bring concrete removal areas to grade
Subtotal: $8,800.00

TOTAL: $44,250.00

Sincerely,

David B Jacobs

David Jacobs
Project Director

V. REPORTING

In performing the services defined herein, the Contractor shall report to the person or persons appointed by the Company as follows:

NAME	TITLE	PHONE (day/night)
Jim Jakubiak	Project Manager	503/286-6976, 503/519-4795 cell

VI. CONFLICT OF INTEREST AND COORDINATION

A. The Contractor will not hire any employee of the Company to perform any service covered by this Agreement. The Contractor will understand that all contact with employees of the Company will be conducted on a consulting basis and the Contractor will not attempt to perform managerial duties.

B. The Contractor affirms that to the best of its knowledge no conflict of interest exists between the Contractor and the Company, and in the event of a change in either its private interests or its service under this Agreement, the Contractor will raise with the Company any question regarding possible conflicts of interest which may arise as a result of such change.

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VII. THIS SERVICE AGREEMENT IS ALSO SUBJECT TO THE FOLLOWING PROVISIONS:

A. Levels of Competence - The Contractor is responsible to perform to the level of competence presently maintained by other practicing professionals engaged in the same type of professional services.

B. Discounts - The Company will not be responsible for any delay in receipt of the Contractor's invoices and supporting documents. Should any delay occur, the time allowed by the Contractor for payment of invoices, or for taking a cash discount, shall commence not earlier than the date that the invoices, complete with all supporting documents, are received by the Company.

C. Loss in Transit - Regardless of any other provision in this Service Agreement, the Contractor shall be responsible to the Company for any loss or damage suffered until the completed items have been received intact and in good order by the Company at the destination shown on Page 1 or as instructed per Section V.

D. Warranty - Notwithstanding inspection or acceptance by the Company, and regardless of any other provisions in this Service Agreement, the Contractor guarantees and warrants to the Company and to its Client all of the items covered by this Service Agreement to the full extent, if any, required by the Prime Contract between the Company and its Client. Said items are purchased from the Contractor in reliance of this warranty.

E. Tests, Samples, Drawings, Data - The testing of all materials shall be conducted by the Company unless specifically stated otherwise. All submittals, as well as all required contacts with the Company's Client or its representatives, shall be made through the Company. Approval of submittals shall not relieve the Contractor of responsibility for errors in, omissions of, or deviations from Prime Contract requirements.

F. Noninfringement of Patents - The Contractor warrants that no items or processes furnished under this Service Agreement, or used in the Contractor's performance, will infringe any patent, and the Contractor will indemnify the Company against any claim, liability, loss, damage, or expense arising from claims alleging that the sale or use of said items or processes constitutes patent infringement.

G. Confidentiality - Because of the sensitive nature of the work contemplated by this Agreement, the Contractor agrees to treat all information discussed between the Contractor and the Company as confidential information. The contractor will treat all information belonging to the Company, its affiliated companies, and any third party, which is disclosed to the Contractor in the course of the Contractor's services, as proprietary information.

H. Assignments - Neither this Service Agreement nor any interest therein may be transferred, voluntarily or involuntarily, without the written consent of the Company. Any attempted transfer, by assignment; attachment; filing

SCHN00259991

of voluntary petition in bankruptcy (including a petition for an arrangement); appointment of a receiver, trustee, or administrator; or otherwise, shall be void and may, at the option of the Company, be deemed to be a default under Section J.

I. No Liens or Claims - The Contractor will defend and hold the Company, the Company's Client, and the property owner(s) harmless from any lien or claim (including a stop notice or claim against the Company's bond) arising out of the Contractor's nonpayment or alleged nonpayment of obligations incurred in connection with the items covered by this Service Agreement or any of the components for said items. The Company may require interim or final lien releases or waivers before payment is made.

J. Default - If the Contractor fails to make any delivery within the time specified, or otherwise fails at any time to fully comply with its obligations hereunder, the Company may, at its option, terminate the right to proceed under this Service Agreement (or such part or parts with which there has been a default) without incurring any cancellation or other charges.

K. Nonwaiver - Failure of the Company to insist on strict and timely performance shall not be a waiver of any right or remedy that it may have and shall not be a waiver of any subsequent default. Neither payment for nor acceptance of any or all of the items shall relieve the Contractor of liability for failure to fully perform its obligations.

VIII. CONTRACTOR LIABILITY AND INSURANCE REQUIREMENTS

A. The Contractor is an independent contractor and all persons employed by the Contractor in connection with this Agreement shall be its employees and not employees of the Company in any respect whatsoever. To the extent of its negligence, the Contractor shall indemnify the Company against any claim, loss, damage, expense, or liability arising out of the Contractor's negligent acts or omissions which are connected with the performance of this Agreement, unless, and to the extent, due to the Company's negligence. The foregoing shall include indemnity for property damage and for injury or death of any person, including employees of the Company or the Contractor. The Contractor shall, at its own expense following the Company's request, defend any suit asserting a claim covered by its indemnity. To the extent of its liability, the Contractor shall pay all costs, including attorney's fees, incurred in enforcing this indemnity. "Acts or omissions of the Contractor" shall include acts or omissions of suppliers or others operating within the scope of authorization from the Contractor.

B. Prior to starting work, the Contractor shall procure, and maintain in force, statutory worker's compensation insurance, employers' liability insurance, commercial general liability insurance with contractual coverage, and automobile liability insurance; and, such other insurance, in accordance with the provisions of this Agreement.

C. The limits for the Contractor's worker's compensation insurance shall be as required statutorily and as otherwise discussed below. The Contractor's commercial general insurance and automobile liability insurance shall be written for not less than the limits of liability shown below:

Insurance Requirements:

- Statutory Worker's Compensation Insurance with Employer's Liability Insurance for all employees of Subcontractor with a limit of no less than $100,000. Such insurance shall cover claims filed under the Worker's Compensation Law of the State in which the work is to be performed, or any law of any State under which liability or any compensation claims shall arise.
- Commercial General Liability Insurance shall be written with minimum limits of $1,000,000 per occurrence / $1,000,000 aggregate, combined single limit, covering personal injury, bodily injury, and property damage. Insurance shall cover premises-operations, explosion and collapse hazard, underground hazard, products/completed operations hazard, contractual hazard, broad form property damage, independent contractors and personal injury. This insurance may be arranged under a single policy for the full limits required or by a combination of underlying policies with the balance provided by an excess or umbrella liability policy.
- Comprehensive Automobile Liability Insurance covering both bodily injury and property damage shall be written with minimum limits of $1,000,000 each occurrence. Insurance shall cover owned, hired and non-owned automobiles.
- Consultant's Professional Liability Insurance with minimum limits of $500,000 each claim and aggregate.

D. The foregoing policies shall each contain a provision that coverages afforded under the policies will not be cancelled or not renewed unless at least thirty (30) days prior written notice has been given to Company. With respect to the policies named above, Waivers of Subrogation are required; and, Company, Client and Owner shall also be named as "Additional Insureds" on the Commercial General Liability Insurance and the Comprehensive Automobile Liability Insurance. All aggregate limits shall apply separately for this Agreement. Each of the requirements listed in this paragraph shall be addressed in writing on the face of the Certificate(s) of Insurance.

SCHN00259992

Certificates of Insurance acceptable to Company shall be filed with Company prior to the commencement of work.

E. All insurance requirements herein shall flowdown in their entireties to any and all lower-tier subcontractors. Contractor shall require all lower-tier subcontractors to provide copies of insurance certificates reflecting the required coverages to Company as well as to the Contractor.

F. When the Company is entitled under this or other articles to be indemnified by the Contractor, the indemnity shall extend to the Company, its partners, and its affiliates and their directors, officers, agents, and employees.

IX. CONFLICT RESOLUTION

Any dispute arising out of this Agreement will be submitted to the courts in Multnomah County in which the demolition work is performed. The dispute will be heard by the court, sitting without a jury. EACH OF THE PARTIES WAIVES THE RIGHT TO A TRIAL BY JURY IN ANY SUCH PROCEEDING. The prevailing party shall be entitled to an award of its costs and expenses (including reasonable attorneys' fees incurred through trial, and on any appeal therefrom.

This Agreement contains the entire understanding between the parties, and there are no understandings or representations except those set forth or incorporated by reference herein. No subsequent modifications of this Agreement shall be of any force or effect unless in writing and signed by duly authorized officials of both parties.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the date fully signed below:

CONTRACTOR (ENVIROCON, INC.):

Michael S Stevenson
Signature

MICHAEL S STEVENSON PRESIDENT
Printed Name & Title

7/20/04
Date

COMPANY (Schnitzer Investment Corp.):

Signature

Printed Name & Title

Date

ENVIROCON

ENVIROCON, INC.
10400 NORTH BURGARD WAY
PORTLAND, OR 97203
(503) 285-6164
(503) 285-6205 FAX
www.envirocon.com

James Jakubiak
Environmental Administrator
Schnitzer Investment Corp.
3200 NW Yeon Avenue
Portland, Oregon 97210

April 21, 2004

Mr. Jakubiak:

Envirocon is pleased to present this revised proposal for demolition activities to Schnitzer Investment Corp. The proposal now reflects lump sum pricing for all items. Based on the information provided it is Envirocon's understanding that the scope of services to be provided are the following;

1) Building Demolition
Includes: Mobilization of men and equipment to site, preparation of health and safety plan, obtaining of demolition permit, demolition and sizing of metal structure, removal of associated concrete pads, and footings. **Subtotal: $21,800.00**

2) Disposal of Miscellaneous Debris
Includes: Offsite disposal of debris from within building including insulation, light ballast, 1- dishwasher, H2O heaters, air conditioners and poly tanks at Waste Management's Hillsboro Landfill Facility. Approximately 36 florescent light bulbs and 29 other bulbs are to be recycled by Ecolights in Seattle, WA.
Subtotal: $4,850.00

3) Recycling of Concrete
Includes: Transport of concrete to Porter Yett or East County Recycling for recycling.
Subtotal: $8,800.00

4) Backfill
Includes: Placement of import fill material to bring concrete removal areas to grade
Subtotal: $8,800.00

TOTAL: $44,250.00

Sincerely,

David Jacobs
Project Director

A Washington Company

VLMK CONSULTING ENGINEERS
3933 SW Kelly Avenue • Portland • Oregon 97239-4393

P 503.222.4453
F 503.248.9263
E vlmk@vlmk.com
W www.vlmk.com

July 19, 2004

MEMORANDUM

TO: Steve Holmberg
Envirocon, Inc.

FROM: Havlin G. Kemp, P.E.
VLMK Consulting Engineers

PROJECT: Building Demolition
10400 N. Burgard Way
Portland, Oregon

SUBJECT: Structural Investigation of Building

This afternoon, you and I met at the above noted building to review the building for the proposed demolition of the east portion of the building. You indicated that you plan on demolishing the building from the tall CMU wall eastward, leaving the existing lower western building intact.

The CMU wall appears to have been built adjacent to the western pre-engineered metal building. The metal siding of the western building runs past the CMU wall. It appears that when the CMU wall was constructed, the existing metal gutter of the western building was removed and an interior gutter was created adjacent to the new CMU wall.

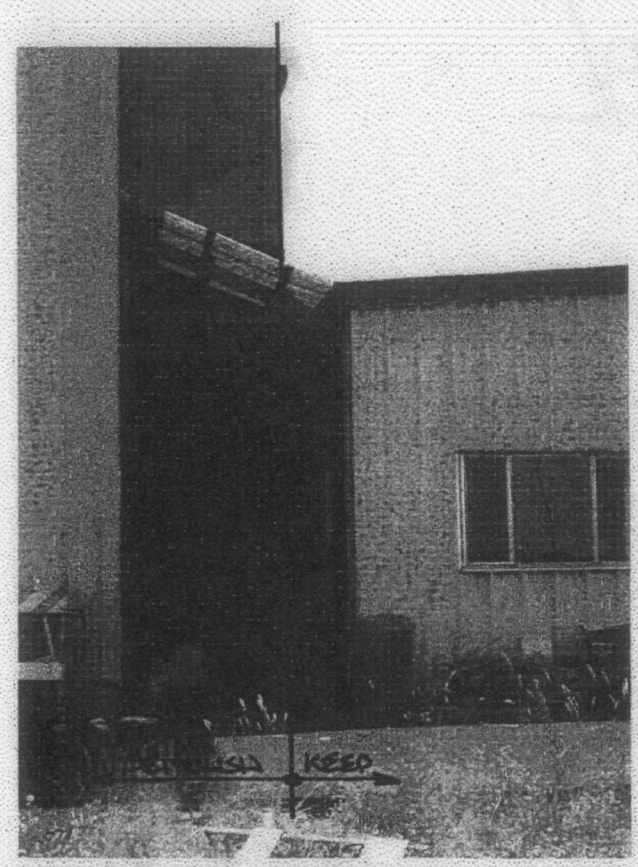
It appears that the existing western building is an independent structure and does not rely on the CMU wall or the building to the east for either gravity or lateral support. Consequently, the east portion of the building including the CMU wall can be demolished without impact to the western building.

Please give me a call if you have any questions at 503-222-4453.

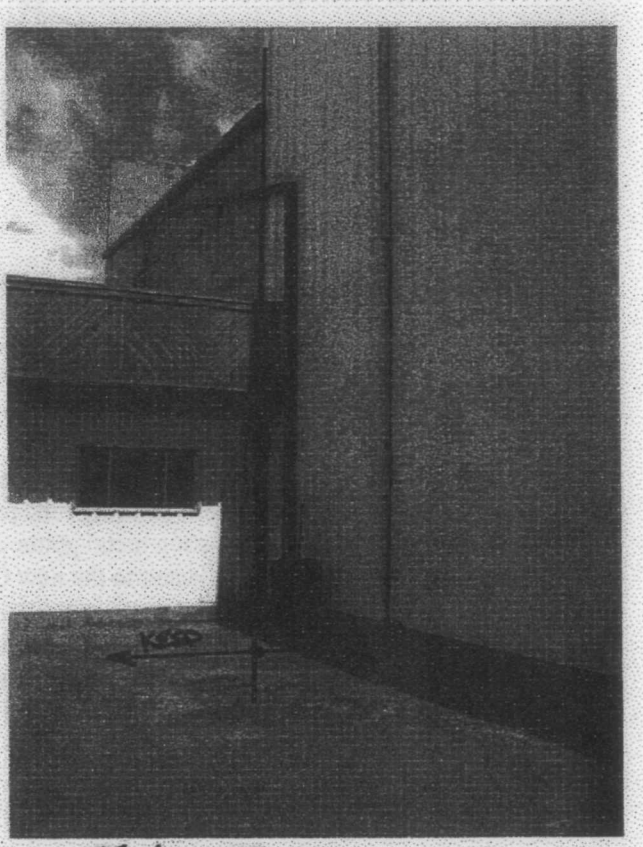
Enclosure: (7) photos of affected building area

REGISTERED PROFESSIONAL ENGINEER 17,362 OREGON JULY 19, 1994 HAVLIN G. KEMP

EXP. 6-30-05

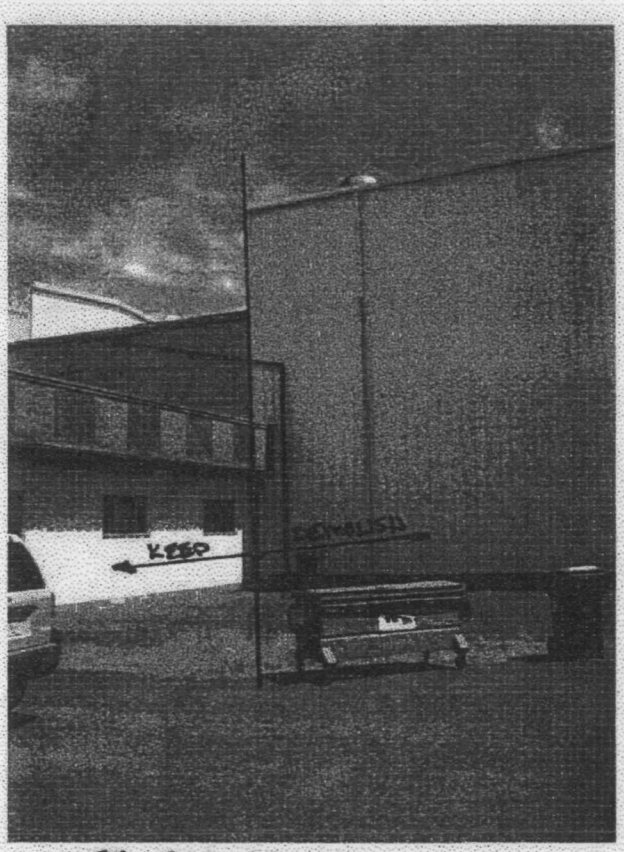


NE CORNER OF
WESTERN BLDG.



SE CORNER OF
WESTERN BLDG.

SCHN00260001



SE CORNER OF
WESTERN BUILDING

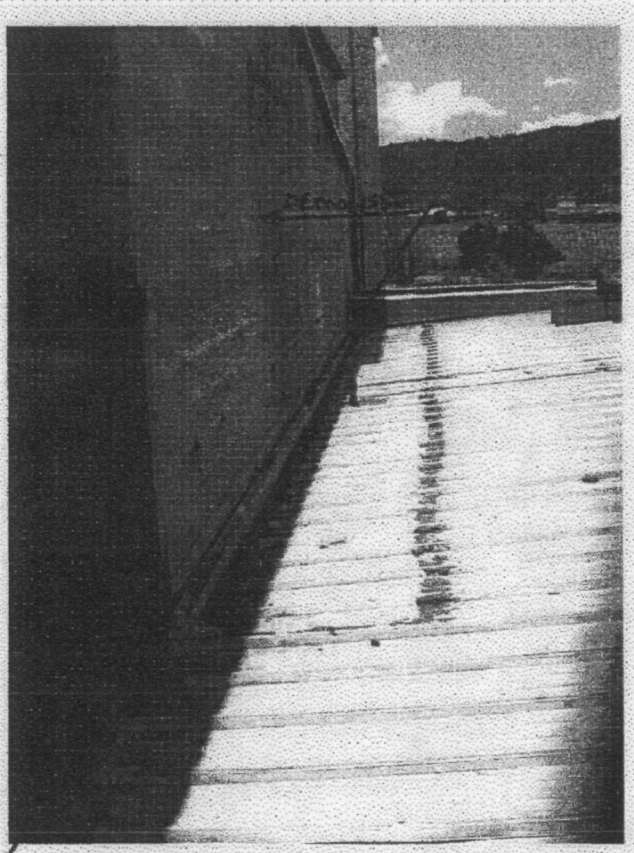


PHOTO LOOKING SOUTH
AT ROOF

SCHN00260002

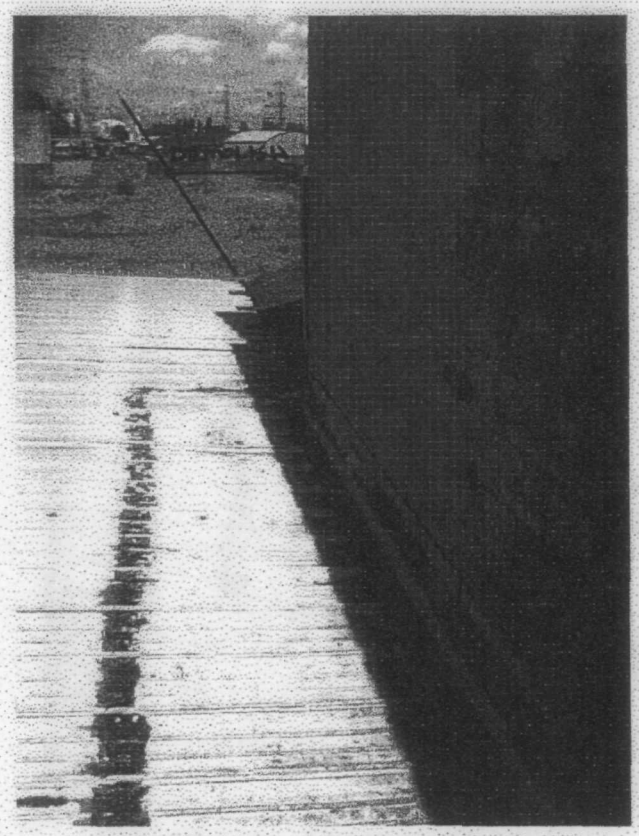


PHOTO LOOKING NORTH
AT ROOF

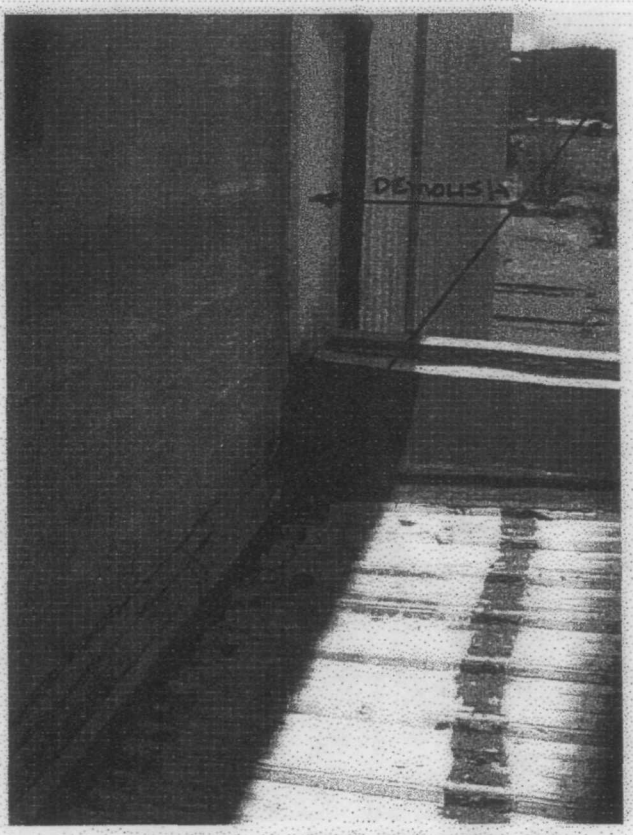
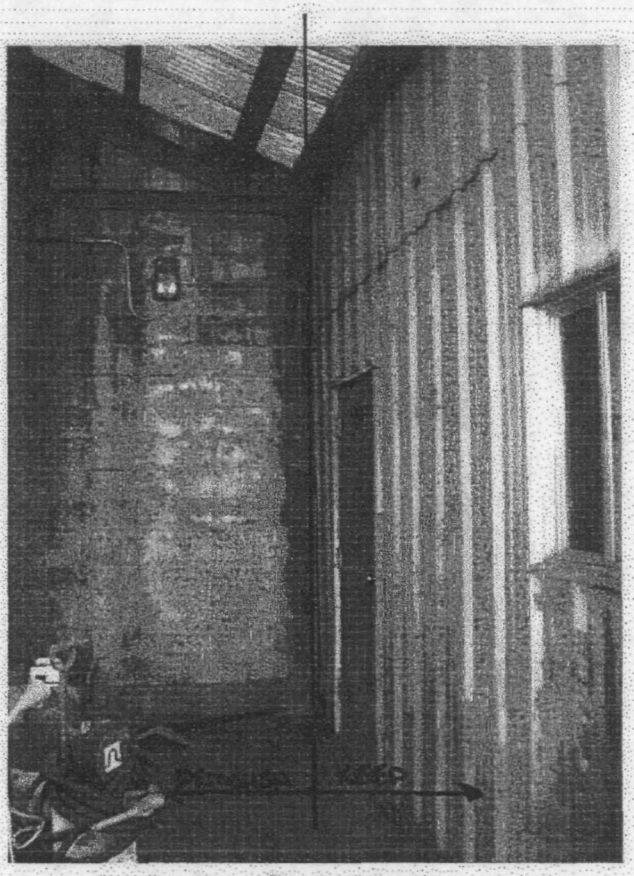


PHOTO LOOKING SOUTH
AT ROOF

SCHN00260003



INSIDE LEAN-TO AT
NE CORNER OF WESTERN BLDG.

SCHN00260004

Building Permit Application

City of Portland
1900 SW 4th, Suite 5000, PO Box 8120, Portland, OR 97201
Phone: (503) 823-7363, Fax: (503) 823-3018
TDD: (503) 823-6868, Website: www.bds.ci.portland.or.us

Office Use Only	
Date received:	Permit no.:
By: Tracy	

04-034685.CO

TYPE OF WORK	
☐ New construction	☒ Demolition
☐ Addition/alteration/replacement	☐ Other:
CATEGORY OF CONSTRUCTION	
☐ 1- and 2-family dwelling	☒ Commercial/industrial
☐ Accessory building	☐ Multi-family
☐ Master builder	☐ Other:
JOB SITE INFORMATION AND LOCATION	
Job site address: 10400 N BURGARD WAY	
City/State/ZIP: PORTLAND OR 97203	
Suite/bldg./apt. no.:	Project name:
Cross street/directions to job site:	
Subdivision:	Lot no.: TL300
Tax map/parcel no.: 325512	
DESCRIPTION OF WORK	
Demolition of building structure and concrete foundation	
☒ PROPERTY OWNER	☐ TENANT
Name: SCHNITZER INVESTMENT CORP	
Address: 3200 NW YEON	
City/State/ZIP: PORT. OR 97210	
Phone: (503) 286 6976	Fax: (503) 286 6960
☒ APPLICANT	☒ CONTACT PERSON
Business name: ENVIROCON INC	
Contact name: STEVE HOLMBERG	
Address: 10400 N Burgard Way	
City/State/ZIP: Portland OR 97203	
Phone: (406) 544 9831	Fax: (503) 285 6205
E-mail: sholmberg@envirocon.com	
CONTRACTOR	
Business name: same as above	
Address:	
City/State/ZIP:	
Phone: ( )	Fax: ( )
CCB lic.: 69948	City 673116 22JUN04

Authorized signature:

Print name: STEVE HOLMBERG Date: 14JUL04

REQUIRED DATA: 1- AND 2-FAMILY DWELLING	
Permit fees* are based on the value of the work performed. Indicate the value (rounded to the nearest dollar) of all equipment, materials, labor, overhead, and the profit for the work indicated on this application.	
Valuation	
Number. of bedrooms:	
Number of bathrooms:	
Total number of floors:	
New dwelling area:	square feet
Garage/carport area:	square feet
Covered porch area:	square feet
Deck area:	square feet
Other structure area:	square feet
REQUIRED DATA: COMMERCIAL-USE CHECKLIST	
Permit fees* are based on the value of the work performed. Indicate the value (rounded to the nearest dollar) of all equipment, materials, labor, overhead, and the profit for the work indicated on this application.	
Valuation	
Existing building area:	square feet
New building area:	square feet
Number of stories:	
Type of construction:	
Occupancy groups:	
Existing:	
New:	
NOTICE	
All contractors and subcontractors are required to be licensed with the Oregon Construction Contractors Board under ORS 701 and may be required to be licensed in the jurisdiction in which work is being performed. If the applicant is exempt from licensing, the following reasons apply:	
BUILDING PERMIT FEES*	
Please refer to fee schedule	
Fees due upon application	
Amount received	
Date received:	

This permit application expires if a permit is not obtained within 180 days after it has been accepted as complete

* Fee methodology set by Tri-County Building Industry Service Board

LT - forms\App Building 0703.doc

SCHN00260005

City of Portland Development Services Center

1900 SW 4th Avenue First Floor Portland, OR 97201 (503) 823-7310

URBAN FORESTRY (STREET TREE) REVIEW CHECKLIST

A street tree review may be required for any commercial or residential project that exceeds $25,000 in value. As a result of that review, fees may be assessed and the property owner may need to plant street trees.

Please complete this checklist **before** you put your customer routing slip in the box to see a plan reviewer. If (based on your answers to the survey) an Urban Forestry review is required, a street tree review fee ranging between $50.00 - $125.00 will be collected with your other plan check permit fees.

A Forestry inspector will visit the property soon after the building permit is issued. If Urban Forestry determines that street trees are required, the inspector will either mail or leave at the door, planting information on the species, size, spacing, etc. of required trees. Trees must be planted before a building inspector can sign off the final inspection for your building permit.

PART I

Site Address: 10400 N BURGARD WAY
PORTLAND OR 97203

Owner: SCHNITZER INVESTMENT

Applicant: STEVE HOLMBERG

Contact: 406 544 9831 (phone) 503 285 6205 (FAX) sholmberg@envirocon.com (e-mail)

What is the total market value (includes the cost of volunteer labor and donated materials) of this project ?

$25,000 or LESS ☐ MORE than $25,000 ☒

If the value of the work is $25,000 or less, NO Street Tree Review is required. Please go directly to PART IV.

If the value exceeds $25,000 please continue with PART II

PART II

1. Are there currently healthy trees in the public right-of-way spaced at 30' or less?

   Yes ☐ No ☐

2. Are there currently healthy trees in the public right-of-way 15' or less from your side property lines or driveway curb cut?

   Yes ☐ No ☐

If you answered "Yes" to both questions above, and the project will not affect existing trees in the public right-of-way (tree removal, pruning of limbs or roots, or any grade change), NO Street Tree Review is required before your permit is issued.
Please go to PART IV.

If you answered "No" to one or more questions, please continue with PART III.

PART III

3. Is there a curb **OR** sidewalk at the public right of way along this property?

   Yes ☐ No ☐

4. Will the project affect existing trees in the public right-of-way (tree removal, pruning of limbs or roots, or any grade change)?

   Yes ☐ No ☐

If you answered "yes" to question 3 OR 4 above, a Street Tree review IS required before your permit can be issued.
Please read and sign below in PART IV.

PART IV

If the project is under $25,000 and will affect existing trees in the public right-of-way (tree removal, pruning of limbs or roots, or any grade change), a free inspection and permit will be required. Please call the Urban Forestry Division at (503) 823-4489.

Disclaimer: The City of Portland reserves the right to inspect the property or otherwise to verify the information provided. If information provided by the applicant and/or property owner is found to be incorrect, and if the City determines that street trees are required, the applicant and/or property owner will be required to pay an inspection fee, as well as all costs incurred by the City, and will be required to plant street trees in accordance with the City Code.

Signature of Applicant: _____

Date: _____

Office Use Only

Permit #

SCHN00260007

City of
PORTLAND, OREGON
Bureau of Development Services

1900 SW 4th Avenue, Suite 5000
Portland, Oregon 97201
(503) 823-7300
FAX: (503) 823-6983
TDD: (503) 823-6868
http://www.bds.ci.portland.or.us

SIMPLE SITE EROSION CONTROL REQUIREMENTS FORM

Project or Permit Number 04 034685 Project Address 10400 N Burgard WAY

Name of Responsible Party (print) STEVE HOLMBERG Phone Number 406 544 9831

This form replaces the need for a drawn plan showing proposed installation of erosion control measures. All required erosion control inspections will still be conducted. This form may only be used for simple sites. A simple site is:

1. Flat (less than 10% slope before development)
2. More than 50' from a wetland or waterbody
3. Outside an environmental or greenway zone
4. Less than 10,000 sf of ground disturbance
5. Not a land division of 10,000 sf or more

This is an agreement that the applicant and/or responsible parties will use erosion control during this project as required. The applicant and/or responsible party must sign this form to comply with Section 10.40.020 of the Code. Details for the measures outlined below are located in the City of Portland Erosion Control Manual (Manual), available at either the Development Services Center or www.bds.ci.portland.or.us/inspect/sitedev.

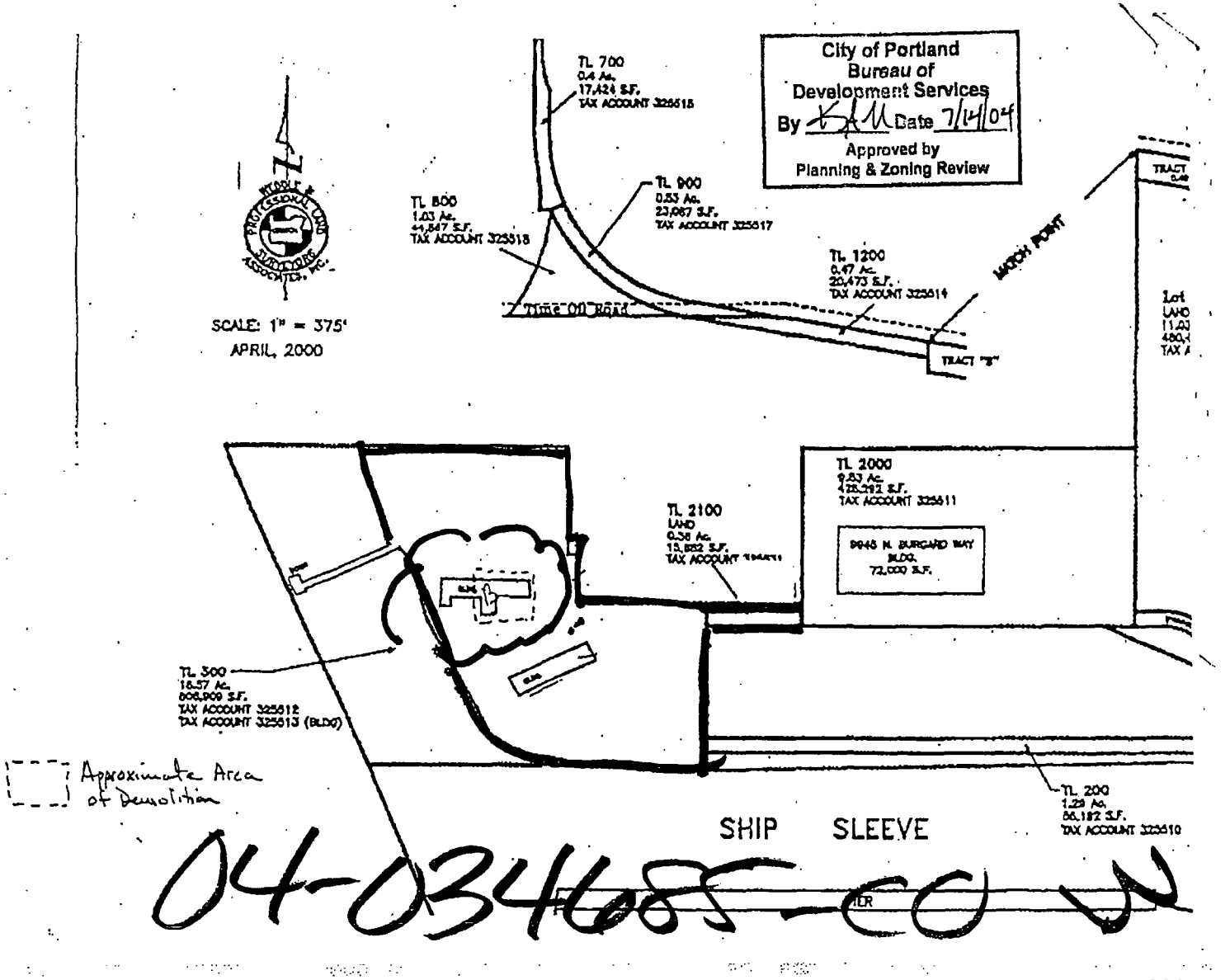
Requirements	Minimum Erosion Control
1. Soil Stabilization • From May 1 to September 30, no soils shall remain unstabilized for more than seven days. • From October 1 to April 30, no soils shall remain unstabilized for more than two days.	Stabilize all soils, including stockpiles that are temporarily exposed. Use one or more of the following temporary soil stabilization Best Management Practices (BMPs): surface roughing, temporary grasses, mulch applications, erosion blankets, plastic sheeting, or dust control measures. (Manual Section 4-4)
2. After construction but before project completion, permanently stabilize all exposed soils that have been disturbed during construction.	Use one or more of the following to permanently stabilize soils: Permanent vegetative cover, mulch applications (Manual Section 4-4) or application of sod.
3. Prevent the transport of sediment from the site.	Use each of the following to prevent the transport of sediment from the site: temporary sediment control (silt) fences, bio-filter bags or fiber rolls, storm drain inlet protection (Manual Section 4-2). These items must be provided even when leaving undisturbed vegetative buffers as allowed by the manual.
4. During construction, prevent the introduction of pollutants in addition to sediment into stormwater.	Comply with the necessary development activity controls, including controls for fuel spill control, waste removal, concrete waste management or painting preparation. (Manual Section 5)
5. Limit construction vehicle access, whenever possible, to one route. Stabilize access points.	Comply with the requirements for each of the following: gravel construction entrance, wooden curb ramp (Manual Section 4-1). Provide periodic street cleaning by sweeping or shoveling any sediment that may have been tracked out. Place sediment in a suitable disposal area where it will not erode again.
6. Inspect and maintain required erosion and sediment controls to ensure continued performance of their intended function.	Maintain erosion controls identified in requirements 1 through 3 above according to specifications prescribed in Manual chapters 4 and 5.
7. Prevent sediment from entering all storm drains, including ditches, which receive runoff from the disturbed area.	Provide storm drain inlet protection for any drain that receives runoff from the disturbed area. (Manual Section 4-2)

I agree to meet each requirement and use appropriate erosion control measures as outlined above to prevent erosion and sedimentation from leaving the site of project/permit number referenced. I understand that all inspections are still required. I understand that I may be required to use additional controls when the minimum controls established above are not sufficient to prevent erosion or transport of sediment or other pollutants from the site, and that failure to install or maintain adequate measures may result in a re-inspection fees or additional fines.

Signature of Responsible Party **Date** 4/5/04

LT – forms\commercial\site development\ec simple site form 0303.doc

SCHN00260008



04-034685-CO W

SCHN00260009

City of Portland
Bureau of Development Services

Building and Other Permits Fee Schedule

Effective Date: July 1, 2002

Building Permit Fee

Total Value of Construction Work to be Performed:

$1 - $500	$50 minimum fee
$501 - $2,000	$50 for the first $500, plus $2.25 for each additional $100 or fraction thereof, to and including $2,000
$2,001 - $25,000	$83.75 for the first $2,000, plus $8.82 for each additional $1,000 or fraction thereof, to and including $25,000
$25,001 - $50,000	$286.61 for the first $25,000, plus $6.56 for each additional $1,000 or fraction thereof, to and including $50,000
$50,001 - $100,000	$450.61 for the first $50,000, plus $4.37 for each additional $1,000 or fraction thereof, to and including $100,000
$100,001 and up	$669.11 for the first $100,000, plus $3.68 for each additional $1,000 or fraction thereof

Definition of Valuation: The valuation to be used in computing the permit fee and plan check/process fee shall be the total value of all construction work for which the permit is issued, as well as all finish work, painting, roofing, electrical, plumbing, heating, air conditioning, elevators, fire extinguishing systems and other permanent work or equipment, and the contractor's profit.

Plan Review / Process Fee For the original submittal and one revision, unless the revision increases the project valuation.	65% of the building permit fee
Fire and Life Safety Review Fee	40% of the building permit fee
Miscellaneous Fees	
Additional Plan Review Fee For changes, additions, or revisions to approved plans.	Plan review time 1/2 hour or less: $55 Plan review time greater than 1/2 hour: $105 per hour or fraction thereof
Address Assignment Fee	$45 for each address
Appeal Fees (per appeal)	
One and Two-Family Dwellings	$100
All other occupancies	$200
Plus, for each appeal item over 4	$50

SCHN00260010

City of Portland
Bureau of Development Services

Building and Other Permits Fee Schedule

Effective Date: July 1, 2002

Approved Fabricators Certification Fee	
Initial Certification	$1,000
Annual Renewal - without modifications	$250
Annual Renewal - with modifications	$500
Field audits and inspections	$120 per hour or fraction of an hour Minimum - 1 hour
Whenever an inspection is conducted by OPDR staff at a facility more than 50 miles from the City of Portland's OPDR office, the applicant shall reimburse the City for travel costs including auto travel, air travel, lodging and meals.	
Approved Testing Agency Certification Fee	
Initial Certification	$1,000
Annual Renewal - without modifications	$250
Annual Renewal - with modifications	$500
Field audits and inspections	$120 per hour or fraction of an hour Minimum - 1 hour
Whenever an inspection is conducted by OPDR staff at a facility more than 50 miles from the City of Portland's OPDR office, the applicant shall reimburse the City for travel costs including auto travel, air travel, lodging and meals.	
Circus Tent Fee	$160
Deferred Submittal Fee	
For processing and reviewing deferred plan submittals	10% of the building permit fee calculated using the value of the particular deferred portion or portions of the project.
The fee is in addition to the project plan review fee based on the total project value.	Minimum fee - $100 for 1 & 2 family dwelling projects, $250 for commercial and all other projects
Energy Plan Review	
Applies to all building permits with valuation over $2.5 million and to any subsequent tenant improvements.	Actual plan review costs, plus 10% administrative processing fee.
Express Start Program Fee	
Fee for accelerated plan review and the issuance of an authorization to proceed with construction prior to completion of the full plan review process.	$120 per hour or fraction of an hour
Fee for Examination of Filed Plans	If more than 2 plans, $1 per added plan.
Home Occupation Permit	
Initial Permit	$105
Annual Renewal	$105
Late charge for delinquent permits	$5 per month
Inspections Outside of Normal Business Hours	$150 per hour or fraction of an hour Minimum - $150

SCHN00260011

City of Portland
Bureau of Development Services

Building and Other Permits Fee Schedule

Effective Date: July 1, 2002

Investigation Fee	
For commencement of work before obtaining a permit	Equal to the permit fee or the actual investigation costs at $105 per hour, whichever is greater, plus $250
Limited Consultation Fee	$150
For an optional meeting held prior to application for building permits for projects with complex and fairly detailed issues in one or two areas of expertise (e.g., building and fire codes).	
The meeting will be limited to two City staff members.	
Manufactured Dwelling Installation on Individual Lot	
Installation and set up	$315
Earthquake-resistant bracing when not installed under a manufactured dwelling installation permit	$85
Additional fees are required for separate permits which may include but are not limited to the following: building, plumbing, electrical, water, sewage, public right of way approaches and improvements, and plan review.	
Manufactured Dwelling Installation in a Park	
Installation and set up	$315
Earthquake-resistant bracing when not installed under a manufactured dwelling installation permit	$85
Additional fees are required for separate permits which may include but are not limited to the following: *building, plumbing, electrical, water, sewage, public right of way approaches and improvements,* and plan review.	
Manufactured Dwelling Park	
(Development or enlargement of a manufactured dwelling park)	
Permit Fee:	
10 spaces or fewer	$45 each space
11 - 20 spaces	$450 plus $25 for each space over 10
more than 20 spaces	$700 plus $20 for each space over 20
Plan review	65% of the permit fee
Zoning inspection	15% of the permit fee
Cabana installation	$100
Additional fees are required for separate permits which may include but are not limited to the following: building, plumbing, electrical, water, sewage, public right of way approaches and improvements, and plan review.	

SCHN00260012

City of Portland
Bureau of Development Services

Building and Other Permits Fee Schedule

Effective Date: July 1, 2002

Master Permit/Facilities Permit Program	
Annual Registration Fee	$300 per site
For projects valued at $600,000 or less:	
Building orientations, inspection, plan review, and administrative activities	$135 per hour or fraction of an hour Minimum - 1 hour for each inspection
For projects exceeding $600,000 value:	
Building inspection and plan review	Fee based on project valuation and building permit fee schedule
Fees for services provided by bureaus other than the Office of Planning and Development Review and necessary for construction authorization will be billed to the Owner as assessed by those bureaus.	
Fees shall be billed monthly. Fees not paid within 30 days of billing shall be assessed a 5% penalty fee for each 30-day period until paid in full.	
Minor Structural Labels	$100 per set of 10 labels
Other Inspections Not Specifically Identified Elsewhere	$105 per hour or fraction of hour Minimum - 1 hour
Permit Reinstatement Processing Fee	
Fee for renewal of a permit that has been expired for six months or less provided no changes have been made in the original plans and specifications for such work. A permit may be renewed only once.	The renewal fee shall be one half the amount required for a new permit. Minimum Fee - $50
Phased Project Plan Review Fee	
For plan review on each phase of a phased project	10% of the total project building permit fee not to exceed $1,500 for each phase, plus $250.
Pre-Development Conference Fee	$950
For an optional meeting held prior to application for building permits for projects that contain complex or multiple issues in land use, zoning, engineering transportation, stormwater management, building, and fire codes.	

SCHN00260013

City of Portland
Bureau of Development Services

Building and Other Permits Fee Schedule

Effective Date: July 1, 2002

Recreational Park
(Development or enlargement of a recreational park)

Permit Fee:	
10 spaces or fewer	$26 each space
11 - 20 spaces	$260 plus $16 for each space over 10
21 - 50 spaces	$420 plus $12 for each space over 20
more than 50 spaces	$780 plus $9 for each space over 50
Plan review	65% of the permit fee
Zoning inspection	15% of the permit fee
Cabana installation	$100

Additional fees are required for separate permits which may include but are not limited to the following: building, plumbing, electrical, water, sewage, public right of way approaches and improvements, and plan review.

Reinspection Fee — $75 per inspection

Reproduction Fees — $2 per plan and $.50 per page of correspondence

Requested Inspection Fee

One and Two-Family Dwellings	$100
Apartment Houses	$160 + $10 for each dwelling unit in excess of three
Hotels/Motels	$160 + $5 for each sleeping room in excess of five
All other occupancies one and two stories in height	$160 + $10 for each additional 1,000 square feet over 10,000 square feet
All other occupancies 3 stories in height and above	$160 + $20 for each story in excess of three

Special Inspection Certification Fee

Initial Certification	$60
Annual Renewal	$25
Re-examination	$50

Street Use Fees — $.12 per square foot per week
Minimum - $20

Temporary Certificate of Occupancy — $175

Zoning Inspection Fee
Applies to all new construction and any other permit requiring Planning/Zoning approval.

For 1 & 2 family dwellings:	$68
For commercial and all other:	15% of the building permit or $68 whichever is greater.

Zoning Permit Fee
Fee for ensuring conformance of zoning code standards.

For 1 & 2 family dwellings:	$26
For commercial and all other:	Fee is based on project valuation and the commercial building permit fee table plus 65% plan review / process fee Minimum commercial zoning permit fee is $87

SCHN00260014

Oregon Water Resources Department

State of Oregon
Water Resources Department
158 12th Street NE, Salem, OR 97310
1(800)624-3199 • (503)378-8455
www.wrd.state.or.us

Fax Transmittal

TO: J Jakubiak

FAX: 503 986 0948 DATE: 7/5/00 PAGES: 15

FROM: Laurie Norton

COMMENTS: Water Wells 2N1W35 OWRD offers free access to well logs at: WWW.wrd.state.or.us At Home Page click on GRID web. At Query Page you'll need township, range, section. Use only this criteria. Hit search - this will bring up all logs in the section. Any of the columns ~~heading~~ can be sorted by clicking on heading.

Director's Office
- Water Resources Commission
- Legislation and Rules
- Public Information

Field & Technical Services
- Dam Safety
- Hydrographics
- Ground Water
- Information Services
- GIS/Mapping

FAX: **503-378-2496**

Administrative Services
- Accounting/Fiscal
- Personnel
- Water Development Loan Fund

Resource Management
- Regional Liaisons

Field & Technical Services
- Enforcement

FAX: **503-378-8130**

Water Rights & Adjudications
- Water Rights Information
- Adjudications
- Hydroelectric
- Certificates/Final Proofs
- Hearings/Contested Cases

Northwest Region
- District 16 Watermaster
- Transfers

FAX: **503-378-6203**

STATE ENGINEER
Salem, Oregon

MULT
001830

Well Record

STATE WELL NO. 2N/1W-35J(2)
COUNTY Multnomah
APPLICATION NO. G- 1390

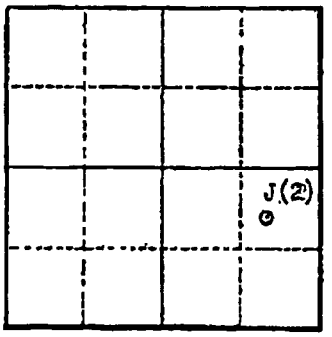
OWNER: Union Carbide
MAILING ADDRESS:
CITY AND STATE: Portland, Oregon

LOCATION OF WELL: Owner's No. 2

NE ¼ SE ¼ Sec. 35 T. 2 N. R. 1 E. W.M.

Bearing and distance from section or subdivision corner 1887' N. & 495' W. from SE cor. of sec. 35

Altitude at well



TYPE OF WELL: Drilled Date Constructed 1941

Depth drilled 154' Depth cased 154'

Section 35

CASING RECORD:
12 inch

FINISH:

AQUIFERS:
Gravel

WATER LEVEL:

PUMPING EQUIPMENT: Type Byron Jackson Subm. H.P. 30
Capacity 700 G.P.M.

WELL TESTS:
Drawdown ft. after hours G.P.M.
Drawdown ft. after hours G.P.M.

USE OF WATER Industrial Temp. °F. , 19
SOURCE OF INFORMATION G- 1294
DRILLER or DIGGER
ADDITIONAL DATA:
Log X Water Level Measurements Chemical Analysis Aquifer Test

REMARKS:

State Printing 45316

SCHN00260053

NOTICE TO WATER WELL CONTRACTOR
The original and first copy of this report are to be filed with the STATE ENGINEER, SALEM, OREGON 97310 within 30 days from the date of well completion.

MULT 001824

WATER WELL REPORT

STATE OF OREGON (Please type or do not write above this line)

RECEIVED JAN 29 1973 STATE ENGINEER SALEM, OREGON

State Well No. 2N/1W-35

State Permit No. _____

(1) OWNER:
Name: Beall Pipe & Tank Corp.
Address: 12005 N. Burgard Rd. Portland, Oregon

(2) TYPE OF WORK (check):
New Well ☐ Deepening ☒ Reconditioning ☐ Abandon ☐
If abandonment, describe material and procedure in Item 12.

(3) TYPE OF WELL:
Rotary ☐ Driven ☐
Cable ☒ Jetted ☐
Dug ☐ Bored ☐

(4) PROPOSED USE (check):
Domestic ☐ Industrial ☒ Municipal ☐
Irrigation ☐ Test Well ☐ Other ☐

(5) CASING INSTALLED:
Threaded ☐ Welded ☒
8" Diam. from 0 ft. to 216 ft. Gage .250
_____" Diam. from _____ ft. to _____ ft. Gage _____
_____" Diam. from _____ ft. to _____ ft. Gage _____

(6) PERFORATIONS:
Perforated? ☒ Yes ☐ No
Type of perforator used: Mills Knife
Size of perforations 1/8 in. by 3 in.
72 perforations from 195 ft. to 201 ft.
_____ perforations from _____ ft. to _____ ft.
_____ perforations from _____ ft. to _____ ft.

(7) SCREENS:
Well screen installed? ☒ Yes ☐ No
Manufacturer's Name: UOP Johnson
Type: 8" Telescoping Stainless Model No.: 304
Diam. 8" Slot size .020 Set from 215 ft. to 220 ft.
Diam. _____ Slot size _____ Set from _____ ft. to _____ ft.
5 ft. of 6" casing on top of screen with self sealing packer on top.

(8) WELL TESTS:
Drawdown is amount water level is lowered below static level
Was a pump test made? ☒ Yes ☐ No If yes, by whom?
Yield: 204 gal/min. with 19 ft. drawdown after 1 hr.
290 " 28 " 1 "
440 " 42 " 1 "
Bailer test _____ gal/min. with _____ ft. drawdown after _____ hrs.
Artesian flow _____ g.p.m.
Temperature of water _____ Depth artesian flow encountered _____ ft.

(9) CONSTRUCTION:
Well seal—Material used: Bentonite
Well sealed from land surface to 30 ft.
Diameter of well bore to bottom of seal 12" in.
Diameter of well bore below seal 8 in.
Number of sacks of cement used in well seal 0 sacks
Number of sacks of bentonite used in well seal 5 sacks
Brand name of bentonite: International Gel
Number of pounds of bentonite per 100 gallons of water 50 lbs./100 gals.
Was a drive shoe used? ☒ Yes ☐ No Plugs _____ Size: location _____ ft.
Did any strata contain unusable water? ☐ Yes ☒ No
Type of water? _____ depth of strata _____
Method of sealing strata off _____
Was well gravel packed? ☐ Yes ☒ No Size of gravel: _____
Gravel placed from _____ ft. to _____ ft.

(10) LOCATION OF WELL:
County: Multnomah Driller's well number _____
¼ ¼ Section 35 T. 2N R. 1 W. W.M.
Bearing and distance from section or subdivision corner _____

(11) WATER LEVEL: Completed well.
Depth at which water was first found 198 ft.
Static level 16 ft. below land surface. Date 1/22/73
Artesian pressure _____ lbs. per square inch. Date _____

(12) WELL LOG:
Diameter of well below casing 8"
Depth drilled 258 ft. Depth of completed well 220 ft.

Formation: Describe color, texture, grain size and structure of materials; and show thickness and nature of each stratum and aquifer penetrated, with at least one entry for each change of formation. *Report each change in position of Static Water Level and indicate principal water-bearing strata.*

MATERIAL	From	To	SWL
Previously drilled	0	25	
Silty gray clay-soft	25	46	
Fine gray sand	46	64	
Gray silty clay	64	98	
Fine gray sand	98	118	
Gray silty clay	118	129	
Fine gray sand	129	133	
Gray silty clay	133	161	
Fine gray sand	161	174	
Cemented gravel	174	198	
Coarse sand & gravel	198	203	
Fine brown sand	203	209	
Fine black sand	209	212	
Med. fine & coars sand w/some fine gravel	212	221	
Blue silty clay/gravel seams	221	229	
Gray clay (soft)	229	240	
Firm gray-brown clay	240	258	
Soft gray clay	258		

Work started 11/3/72 19 Completed 1/22/73 19
Date well drilling machine moved off of well 1/22/73 19

Drilling Machine Operator's Certification:
This well was constructed under my direct supervision. Materials used and information reported above are true to my best knowledge and belief.
[Signed] _____ (Drilling Machine Operator) Date 1/24/73 19
Drilling Machine Operator's License No. 751

Water Well Contractor's Certification:
This well was drilled under my jurisdiction and this report is true to the best of my knowledge and belief.
Name A. M. Jannsen Drilling Co. (Person, firm or corporation) (Type or print)
Address 21075 S. W. Tualatin Valley Hwy. - Aloha, Ore.
[Signed] _____ (Water Well Contractor)
Contractor's License No. 79 Date 1/24/73 19

(USE ADDITIONAL SHEETS IF NECESSARY)

SP-46658-119

SCHN00260054

MULT 53959

STATE OF OREGON
WATER SUPPLY WELL REPORT
(as required by ORS 537.765)

WELL I.D.# 12948 (START CARD) # 103181

Instructions for completing this report are on the last page of this form.

(1) OWNER: Well Number

Name PORT OF PORTLAND/LAND MANAGEMENT DIV.

Address 700 NE MULTNOMAH, PO BOX 3529

City PORTLAND State OR Zip 97208

(2) TYPE OF WORK

[X] New Well [ ] Deepening [ ] Alteration (repair/recondition) [ ] Abandonment

(3) DRILL METHOD:

[ ] Rotary Air [X] Rotary Mud [ ] Cable [ ] Auger

[ ] Other

(4) PROPOSED USE:

[ ] Domestic [ ] Community [ ] Industrial [X] Irrigation

[ ] Thermal [ ] Injection [ ] Livestock [ ] Other

(5) BORE HOLE CONSTRUCTION:

Special Construction approval [ ] Yes [X] No Depth of Completed Well 185 ft.

Explosives used [ ] Yes [X] No Type Amount

HOLE Diameter	From	To	SEAL Material	From	To	Sacks or pounds
10"	0	185	Hole Plug	0	20	12 SKS
			Cement	20	50	11 SKS
			Drill gel	50	110	14 SKS
			Cement	110	140	11 SKS

How was seal placed: Method [ ] A [ ] B [X] C [ ] D [ ] E

[X] Other Poured into annular

Backfill placed from ft. to ft. Material

Gravel placed from 140 ft. to 185 ft. Size of gravel pea gravel & 1-C Sand

(6) CASING/LINER:

	Diameter	From	To	Gauge	Steel	Plastic	Welded	Threaded
Casing:	6"	+1	171	250	[X]	[ ]	[X]	[ ]
	6"	181	185	250	[X]	[ ]	[X]	[ ]
					[ ]	[ ]	[ ]	[ ]
					[ ]	[ ]	[ ]	[ ]
Liner:					[ ]	[ ]	[ ]	[ ]
					[ ]	[ ]	[ ]	[ ]

Final location of shoe(s)

(7) PERFORATIONS/SCREENS:

[ ] Perforations Method

[X] Screens Type V-Wire Material Steel wire

From	To	Slot size	Number	Diameter	Tele/pipe size	Casing	Liner
171	181	.020		6"	pipe	[X]	[ ]
						[ ]	[ ]
						[ ]	[ ]
						[ ]	[ ]
						[ ]	[ ]

(8) WELL TESTS: Minimum testing time is 1 hour

[ ] Pump [ ] Bailer [X] Air [ ] Flowing Artesian

Yield gal/min	Drawdown	Drill stem at	Time
50		40	1 hr.
100		60	"

Temperature of water 57°F Depth Artesian Flow Found

Was a water analysis done? [ ] Yes By whom

Did any strata contain water not suitable for intended use? [ ] Too little

[ ] Salty [ ] Muddy [ ] Odor [ ] Colored [ ] Other

Depth of strata:

(9) LOCATION OF WELL by legal description:

County MULTNOMAH Latitude Longitude

Township 2N N or S Range 1W E or W. WM.

Section 35 NW 1/4 NE 1/4

Tax Lot 49 Lot Block Subdivision

Street Address of Well (or nearest address) INDUSTRIAL PARK @ RIVERGATE, PORTLAND, OR

(10) STATIC WATER LEVEL:

21 ft. below land surface. Date 07/14/97

Artesian pressure lb. per square inch. Date

(11) WATER BEARING ZONES:

Depth at which water was first found 171

From	To	Estimated Flow Rate	SWL
171	181	50 GPM	21

(12) WELL LOG:

Ground Elevation

Material	From	To	SWL
Fine brown sand	0	24	
Soft silty gray clay	24	27	
Soft brown silty clay	27	34	
Soft gray silty/sandy clay	34	47	
Fine gray-black sand	47	61	
Soft gray silty/sandy clay	61	82	
Fine to medium gray-black sand w/wood	82	147	
Black sand & fine [redacted] gravel	147	152	
Fine to medium black sand	152	164	
Medium black sand w/fine to medium fine gravel	164	185	21

RECEIVED
JUL 24 1997
WATER RESOURCES DEPT.
SALEM, OREGON

Date started 07/10/97 Completed 07/14/97

(unbonded) Water Well Constructor Certification:

I certify that the work I performed on the construction, alteration, or abandonment of this well is in compliance with Oregon water supply well construction standards. Materials used and information reported above are true to the best of my knowledge and belief.

WWC Number

Signed Date

(bonded) Water 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 water supply well construction standards. This report is true to the best of my knowledge and belief.

WWC Number 1266

Signed Date 07/18/97

ORIGINAL & FIRST COPY-WATER RESOURCES DEPARTMENT SECOND COPY-CONSTRUCTOR THIRD COPY-CUSTOMER

SCHN00260055

1

STATE OF OREGON
WATER WELL REPORT
(as required by ORS 537.765)

RECEIVED
APR 5 1993
WATER RESOURCES DEPT
SALEM, OREGON

MULT 3429

2N/1W/35b

(START CARD) # 52061

(1) OWNER: Well Number 107
Name Oregon Hydrocarbon, Inc.
Address 9333 N. Harbourgate
City Portland State OR. Zip 97283

(2) TYPE OF WORK:
☒ New Well ☐ Deepen ☐ Recondition ☐ Abandon

(3) DRILL METHOD:
☒ Rotary Air ☐ Rotary Mud ☐ Cable
☐ Other

(4) PROPOSED USE:
☐ Domestic ☐ Community ☐ Industrial ☒ Irrigation
☐ Thermal ☐ Injection ☐ Other

(5) BORE HOLE CONSTRUCTION:
Special Construction approval ☐ Yes ☒ No Depth of Completed Well 200 ft.
Explosives used ☐ Yes ☒ No Type Amount

HOLE Diameter	From	To	SEAL Material	From	To	Amount sacks or pounds
10	0	49	cement	0	49	15sack
6	49	200				

How was seal placed: Method ☐ A ☐ B ☒ C ☐ D ☐ E
☐ Other
Backfill placed from ft. to ft. Material
Gravel placed from ft. to ft. Size of gravel

(6) CASING/LINER:

	Diameter	From	To	Gauge	Steel	Plastic	Welded	Threaded
Casing:	6	+1	200	¼	☒	☐	☒	☐
					☐	☐	☐	☐
					☐	☐	☐	☐
					☐	☐	☐	☐
Liner:					☐	☐	☐	☐
					☐	☐	☐	☐

Final location of shoe(s) 200

(7) PERFORATIONS/SCREENS:
☐ Perforations Method
☐ Screens Type Material

From	To	Slot size	Number	Diameter	Tele/pipe size	Casing	Liner
						☐	☐
						☐	☐
						☐	☐
						☐	☐
						☐	☐

(8) WELL TESTS: Minimum testing time is 1 hour
☐ Pump ☐ Bailer ☒ Air ☐ Flowing Artesian

Yield gal/min	Drawdown	Drill stem at	Time
75	160	200	1 hr.

Temperature of Water 57 Depth Artesian Flow Found
Was a water analysis done? ☐ Yes By whom
Did any strata contain water not suitable for intended use? ☐ Too little
☐ Salty ☐ Muddy ☐ Odor ☐ Colored ☐ Other
Depth of strata:

(9) LOCATION OF WELL by legal description:
County Mult Latitude Longitude
Township 2 N or S. Range 1 E or W. WM.
Section 35 SE ¼ NW ¼
Tax Lot Lot Block Subdivision
Street Address of Well (or nearest address) same as above

(10) STATIC WATER LEVEL:
20 ft. below land surface. Date 3/17/93
Artesian pressure lb. per square inch. Date

(11) WATER BEARING ZONES:
Depth at which water was first found 195

From	To	Estimated Flow Rate	SWL
195	200	80x 75	20

(12) WELL LOG:
Ground elevation

Material	From	To	SWL
clay/sand brown	0	49	
sand/clay wood gray	49	170	
sand	170	195	
gravel/sand gray	195	200	20

Date started 3/15/93 Completed 3/17/93

(unbonded) Water 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 my best knowledge and belief.

WWC Number
Signed Date

(bonded) Water 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.

WWC Number 663
Signed Rodney C. Cole Date 4/1/93

ORIGINAL & FIRST COPY - WATER RESOURCES DEPARTMENT SECOND COPY - CONSTRUCTOR THIRD COPY - CUSTOMER 9209C 10/91

SCHN00260056

STATE ENGINEER
Salem, Oregon

MULT
001829

Well Record

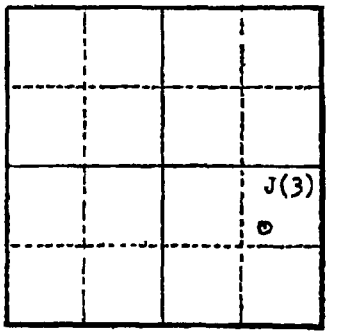
STATE WELL NO. 2N/1W-35J(3)
COUNTY Multnomah
APPLICATION NO. G- 1390

OWNER: Union Carbide
MAILING ADDRESS:
CITY AND STATE: Portland, Oregon

LOCATION OF WELL: Owner's No. 3

NW ¼ SE ¼ Sec. 35 T. 2 N. R. 1 E. W., W.M.

Bearing and distance from section or subdivision corner 1640' N. & 929' W. from SE cor. of sec. 35



Altitude at well

TYPE OF WELL: Drilled Date Constructed 1952

Depth drilled 150' Depth cased 150'

Section 35

CASING RECORD:
12 inch

FINISH:

AQUIFERS:

WATER LEVEL:

PUMPING EQUIPMENT: Type Byron Jackson Subm. H.P. 30
Capacity 700 G.P.M.

WELL TESTS:
Drawdown ft. after hours G.P.M.
Drawdown ft. after hours G.P.M.

USE OF WATER Industrial Temp. °F., 19
SOURCE OF INFORMATION G-1294
DRILLER or DIGGER
ADDITIONAL DATA:
Log X Water Level Measurements Chemical Analysis Aquifer Test

REMARKS:

State Printing 69318

SCHN00260057

STATE ENGINEER
Salem, Oregon

MULT
001831

Well Record

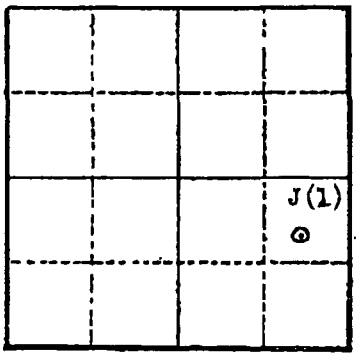
STATE WELL NO. 2N/1W-35J(1)
COUNTY Multnomah
APPLICATION NO. G- 1390

OWNER: Union Carbide
MAILING ADDRESS:
CITY AND STATE: Portland, Oregon

LOCATION OF WELL: Owner's No. 1

NE ¼ SE ¼ Sec. 35 T. 2 ~~XX~~ N., R. 1 ~~XX~~ W., W.M.

Bearing and distance from section or subdivision corner 1758' N. & 768' W. from SE cor. of sec. 35



Altitude at well

TYPE OF WELL: Drilled Date Constructed 1941

Depth drilled 152' Depth cased 152'

Section 35

CASING RECORD:
12 inch

FINISH:

AQUIFERS:
Gravel

WATER LEVEL:

PUMPING EQUIPMENT: Type Byron Jackson turbine (subm.?) H.P. 30
Capacity 700 G.P.M.

WELL TESTS:
Drawdown ft. after hours G.P.M.
Drawdown ft. after hours G.P.M.

USE OF WATER Industrial Temp. °F. 19
SOURCE OF INFORMATION G- 1294
DRILLER or DIGGER
ADDITIONAL DATA:
Log X Water Level Measurements Chemical Analysis Aquifer Test

REMARKS:

SCHN00260058

STATE ENGINEER
Salem, Oregon

State Well No. 2N/1W-35 J (1)
County Multnomah
Application No. G # 1390

Well Log

Owner: Union Carbide Owner's No. # 1

Driller: Date Drilled 1941

CHARACTER OF MATERIAL	(Feet below land surface) From	To	Thickness (feet)
Sand	0	75	75
Sand and gravel	75	87	12
Gravel	87	97	10
"River" gravel	97	100	3
"River" gravel and sand	100	103	3
Sand, coarse, and small gravel	103	107	4
Gravel, loose	107	117	10
Gravel, coarse	117	120	3
Gravel	120	127	7
Sand, "heaving"	127	132	5
Sand	132	145	13
Sand, coarse	145	150	5
Gravel	150	152	2

SCHN00260059

BRIDGEWATER GROUP, INC.
fax

To:	**Jim Jakubiak**	From:	Bill Cobb
Company:	SSI	Date:	June 16, 2000
Fax No.:	286-6948	Total Pages:	4
Voice No.:			

The information in this fax is a CONFIDENTIAL, Attorney-Client Communication, and is intended only for the individual named above. If you are not the intended recipient, disclosure, copying, distribution, or use of this information is prohibited. If you do not receive all of the pages or have received this fax in error, please notify me immediately at 503-973-6068.

Message:

Here is what we submitted to Time Oil on groundwater wells/beneficial use in the Burgard Industrial Park area.

BRIDGEWATER GROUP, INC. 4640 SW MACADAM; SUITE 222; PORTLAND, OR 97201 PHONE: (503)973-6068 FAX: (503)973-6069

Land Use and Groundwater Questionnaire

Respondent: Schnitzer Investment Corporation	Property: Lots 1 and 2 of Rivergate Industrial District

Check all the boxes below that apply to your property and return by mail to Kevin Murphy (see below)

Historic	Current	Planned	Land Activity/Use
			Residential
	✓	✓	Commercial
✓	✓	✓	Industrial
			Agricultural
			Recreational
			Other (describe)
			Water Uses
			Drinking Water
		✓	Irrigation/Landscape
✓	✓	✓	Industrial Process
			Recreational
		✓	Aesthetic (decorative)
			Wildlife
✓	✓	✓	Other (describe)
			Water Source(s)
✓	✓	✓	Municipal Supply
			Small Supplier (<5)
✓	✓	✓	On-site well
			Surface water

Additional comments?

See attached response.

For more information contact:
Kevin Murphy
Senior Environmental Specialist
Time Oil Co.
P.O. Box 2444
Seattle, WA 98124
(206) 285-2400

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

August 2, 1999

Mr. Kevin Murphy
Senior Environmental Specialist
Time Oil Co.
P.O. Box 24447
Seattle, WA 98124

Dear Mr. Murphy:

Attached is a completed land use and groundwater beneficial use questionnaire for Schnitzer Investment Corp.'s ("SIC") property in the general vicinity of Time Oil's property located in Portland, Oregon. This letter supplements SIC's response to the questionnaire as indicated on the bottom thereof.

Land Activity/Use

SIC owns property in the general vicinity of Time Oil's facility. This property has been and is currently leased for industrial manufacturing or warehouse distribution purposes, although SIC recently leased space at one of its properties for an industrial service-oriented use. SIC's lands provide flexibility regarding current and potential future land uses. We envision potential scenarios similar to those being considered at other large land blocks along the Willamette River (such as the conversion of the Port's Terminal 1 property). Such use would require rezoning, but nevertheless is a potential. The time frame for these types of uses and development will depend on market conditions and City of Portland redevelopment goals for large waterfront parcels.

Water Uses

There have been historic and are current uses of groundwater at SIC's property. There are at least five historic wells (two inactive, three active) installed in the vicinity. To the best of our knowledge, they were never used as a drinking water supply, but, rather to provide water for industrial purposes predating SIC's ownership. Operations at the Schnitzer Steel Products Co. site have occasionally used water from these wells as make-up water in its operation and for dust suppression. SIC is currently evaluating the potential development of shallow groundwater in the Lots 1 and 2 areas for irrigation, landscaping (including aesthetic/decorative purposes), and industrial (small-volume) uses that are associated with current and potential future site land uses. In that regard, SIC has obtained all the materials required by the Water Resources Department to initiate permitting of water rights in this area. SIC may or may not

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undertake initial evaluations of shallow groundwater yields and quality to support these potential uses.

Water Sources

SIC and its tenants have historically obtained water from the City of Portland and plan to continue obtaining water from this source in the future. As described above, site facilities have used well water for industrial purposes. SIC is also evaluating potential use of shallow groundwater in this area and may pursue obtaining water rights in this area.

Sincerely,

SCHNITZER INVESTMENT CORP.

Tom Zelenka

Tom Zelenka
Manager - Legislative/Environmental
and Public Affairs

TFZ/jdh
G:\TZ\TIME OIL.DOC
Attachment (1)

cc: Ms. Linda M. Wakefield
Mr. Anton U. Pardini

Premier
Edible Oils –
Floor Tile Removal

Assumed hot –
No Samples to
verify

Scheduled for 2-9-04

MINORITY ABATEMENT CONTRACTORS, INC
3200 NE 65th Street, Vancouver, WA 98663
Phone: 360. 750. 1900
Fax: 360.750. 1901

Fax Cover Sheet

Company: Schnitzer Investments	From: Emilio
Attention: Jim Jacobian	Date: 2/4/04
FAX Number: 503-286-6948	Company Phone Number:

__URGENT ✓Reply ASAP __Please Comment ✓Please Review __For Your Information

Number of Pages (including cover) : 2

RE: Asbestos Abatement Quote

If all pages are not received, please call
360. 750.1900

Minority Abatement Contractors, Inc.

3200 NE 65th St. Vancouver, WA 98663
(360) 750-1900 / Fax: (360) 750-1901

February 4, 2004

BY FAX TO
Mr. James Jakubiak
Schnitzer Investment Corp
503-286-6948

Re: Asbestos Removal, at 10400 N Burgard
Shop Building.

Dear James:

Thank you for the opportunity to offer a bid on this work. In accordance with our site visit and reviewing the work area with you on 2/2/2004, the scope of this proposal is as follows:

Remove and dispose non- friable asbestos floor tile and mastic from a concrete slab, approximately 130 square feet, building schedule for demolition, at the above reference job site. Work will be performed by Oregon certified asbestos workers and supervision in accordance for the safe handling and disposal of Class II asbestos flooring materials, using wet, manual methods, and low-odor chemical solvent to aid mastic removal.

BID PRICE: $ 500.00

Above bid price includes certified labor and supervision, materials, equipment, transportation, documentation and disposal costs, DEQ Notification fees, liability insurance at $3,000,000 limits, plus our fees for overhead and profit.

Above bid prices assume others will remove all obstructions to the work. Bid excludes hidden or inaccessible work.

Thank you for this opportunity. Please feel free to call with any questions or comments.

Very truly yours,

MINORITY ABATEMENT CONTRACTORS, INC.

Emilio P. Parra

- Monday -

Emilio P. Parra
President

OR CCB # 149390

WA # MINORAC999PR

❖CERTIFIED ENVIRONMENTAL CONSULTING, INC.❖

12806 N.E. 40TH CIRCLE, VANCOUVER, WASHINGTON 98682
(503) 221-7904 PHONE (360) 254-9385 & FAX-(360) 891-9633

BULK SAMPLES

LAB# _____

CLIENT: Schnitzer Investment Corp. PHONE: 503-286-6976

CONTACT: Jim Jakubick SAMPLED BY: Jim Jakubick DATE: January 12th

PROJECT NAME: Premier Edible Oils Site REG. [ ] RUSH [X]

SAMPLE #	DESCRIPTION OF MATERIAL	SAMPLE LOCATION
FT-1	Floor Tile	First floor - main room

SENT TO: CEC RELINQUISHED BY: J. Jakubick

RECEIVED BY: Annie Hart DATE RECEIVED: 1/12/07

SCHN00260091

❖CERTIFIED ENVIRONMENTAL CONSULTING, INC.❖

12806 N.E. 40TH CIRCLE, VANCOUVER, WASHINGTON 98682
(503) 221-7904 PHONE (360) 254-9385 & FAX-(360) 891-9633

BULK SAMPLES

LAB# P-60

ENT: Schnitzer Investment Corp. PHONE: 503-286-6976

NTACT: Jim Jakubick SAMPLED BY: Jim Jakubiak DATE: ~~12/~~ January 16, 2004

JECT NAME: Corp. Remodel Project REG. [ ] RUSH [X]

SA. LE	DESCRIPTION OF MATERIAL	SAMPLE LOCATION
C F	Floor Tile	Corporate Building - new tile

T TO: CEC RELINQUISHED BY: Jim Jakubiak

EIVED BY: [signature] DATE RECEIVED:

SCHN00260092

Minority Abatement Contractors, Inc.

3200 NE 65th St. Vancouver, WA 98663
(360) 750-1900 / Fax: (360) 750-1901

BY FAX TO
Mr. James Jakubiak
Schnitzer Investment Corp
503-286-6948

January 19, 2004

Re: Asbestos Removal
10400 Burgard, Envirocon office space, 1st floor

Dear James:

Thank you for the opportunity to offer a bid on this work. In accordance with our site visit and reviewing the work area with you on January17,2004 the scope of this proposal is as follows:

(I) Remove and dispose of asbestos containing floor tile and mastic from a concrete surface, approximately 1,150 square feet. Work will be performed by Oregon certified asbestos workers and supervision in accordance with regulatory requirements for the safe handling and disposal of class II friable asbestos products

BID PRICE: $ 2,523.00

Above bid price includes certified labor and supervision, materials, equipment, transportation, documentation, disposal costs, DEQ notification fees, OSHA required air sampling, air clearance performed by an independent third party consulting firm, and liability insurance at $3,000,000 limits, plus our fees for overhead and profit.

Above bid prices assume owner will provide water, power, and will remove all obstructions to fully exposed flooring materials, Bid excludes hidden or inaccessible work.

SCHEDULING:
Project schedule for completion in one 10 hrs shift, at the owner convenience.

Thank you for this opportunity. Please feel free to call with any questions or comments.

Very truly yours,

MINORITY ABATEMENT CONTRACTORS, INC.

Emilio P. Parra
President

– Jan 31, 2004
Removal Scheduled

OR CCB # 149390

WA # MINORAC999PR

❖ CERTIFIED ENVIRONMENTAL CONSULTING, INC. ❖

BULK SAMPLE ANALYSIS REPORT

SCHNITZER INVESTMENT CORP
ATTN: JAMES JAKUBIAK
PO BOX 10047
PORTLAND, OREGON 97296-0047

SOURCE: PREMIER EDIBLE OILS SITE
SAMPLED BY: CLIENT
LAB #: P-61
ANALYZED BY: TOM THOMPSON

DATE SAMPLED: 01-16-04
DATE RECEIVED: 01-16-04
DATE COMPLETED: 01-16-04

ANALYTICAL METHOD: EPA, 40 CFR Part 763, Section 1, Subpart F, Appendix A, PLM/Dispersion Staining

SAMPLE ID #	SAMPLE DESCRIPTION	SAMPLE LOCATION	ASBESTOS CONTENT	OTHER MATERIAL
FT-1	FLOOR TILE AND MASTIC	FIRST FLOOR MAIN ROOM	**FLOOR TILE: 4% CHRYSOTILE MASTIC: 6% CHRYSOTILE**	CALCIUM CARBONATE, VINYL, BINDER, TAR

ANALYST: Tom Thompson **REVIEWED BY:**

DEVIATION FROM METHOD: NONE.
PERCENTAGES ARE ESTIMATES.
TEST RESULTS PERTAIN ONLY TO ITEMS TESTED.
* DETECTION LIMIT IS LESS THAN 1% ASBESTOS.
NON ASBESTOS MATERIALS ARE NOT NECESSARILY LISTED.

❖ CERTIFIED ENVIRONMENTAL CONSULTING, INC. ❖

BULK SAMPLE ANALYSIS REPORT

SCHNITZER INVESTMENT CORP
ATTN: JAMES JAKUBIAK
PO BOX 10047
PORTLAND, OREGON 97296-0047

SOURCE: PREMIER EDIBLE OILS SITE
SAMPLED BY: CLIENT
LAB #: P-61
ANALYZED BY: TOM THOMPSON

DATE SAMPLED: 01-16-04
DATE RECEIVED: 01-16-04
DATE COMPLETED: 01-16-04

ANALYTICAL METHOD: EPA, 40 CFR Part 763, Section 1, Subpart F,
Appendix A, PLM/Dispersion Staining

SAMPLE ID #	SAMPLE DESCRIPTION	SAMPLE LOCATION	ASBESTOS CONTENT	OTHER MATERIAL
FT-1	FLOOR TILE AND MASTIC	FIRST FLOOR MAIN ROOM	**FLOOR TILE: 4% CHRYSOTILE MASTIC: 6% CHRYSOTILE**	CALCIUM CARBONATE, VINYL, BINDER, TAR

ANALYST: Tom Thompson **REVIEWED BY:**

DEVIATION FROM METHOD: NONE.
PERCENTAGES ARE ESTIMATES.
TEST RESULTS PERTAIN ONLY TO ITEMS TESTED.
* DETECTION LIMIT IS LESS THAN 1% ASBESTOS.
NON ASBESTOS MATERIALS ARE NOT NECESSARILY LISTED.

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

March 29, 2002

Linda Wakefield
Schnitzer Investment Corp.
3200 NW Yeon Avenue
PO Box 10047
Portland, Oregon 97210

CERTIFIED MAIL NO. 7000 1670 0009 9005 8585
RETURN RECEIPT REQUESTED

RE: NOTICE TO CURRENT AND/OR PAST OWNERS AND OPERATORS OF DECISION TO LIST CONTAMINATED PROPERTY ON THE CONFIRMED RELEASE LIST (CRL)
Premier Edible Oils
10400 N. Burgard Road, Portland
ECSI ID NO. # 2013

Dear Ms. Wakefield:

By letter dated January 8, 2002 the Department of Environmental Quality (Department) notified you as an owner or operator of the Premier Edible Oils site of the Department's proposal to add this facility to the Confirmed Release List (CRL). The notice invited comments on the proposed listing. None were received.

Premier Edible Oils meets the criteria for listing, and with this notice the Department is adding it to the CRL. Enclosed is the Site Summary Report, which includes the information about the Premier Edible Oils site that will appear on the CRL. If after a site assessment the Department determines that a comprehensive site investigation or cleanup is necessary, Premier Edible Oils will be proposed for the Inventory; a second list of sites with confirmed releases of hazardous substances.

The Department will update the CRL and Inventory quarterly and provide copies to area newspapers and to the public upon request. A facility can be removed from the Confirmed Release List and Inventory after all necessary cleanup is completed.

We are pleased that you have elected to participate in our Voluntary Cleanup Program to investigate and assess necessary remedial actions for this site. We hope that this cooperative relationship will continue until potential threats from hazardous materials at this site have been eliminated.

DEQ-1

As noted in the earlier letter to you, listing your property does not necessarily mean that you are responsible for the contamination, investigation or cleanup. Responsibility for these costs is prescribed by various provisions in state and federal laws. If you have specific questions about the CRL or Inventory, or want copies of the statute or regulations governing the Department's site assessment, listing, or cleanup processes, please contact Listing Coordinator Kimberlee Van Patten at (503) 229-5256 or at the address shown on the letterhead.

Sincerely,

Charles W. Donaldson
Manager
Emergency Response and Site Assessment

Enclosures: Site Summary Report
cc: Alicia Voss; NWR, DEQ
ECSI File # 2013

ENVIRONMENTAL CLEANUP SITE INFORMATION
SITE SUMMARY REPORT

April 04, 2002 03:04 pm

SITE ID: 2013 | SITE NAME: Premier Edible Oils | CERCLIS NO:

ALIASES: C & T Quincy Foods (SEE ECSI 2355)
Portland Harbor Sediment Study
Schnitzer Investment Corp.

ADDRESS: 10400 N Burgard Way Portland 97203

COUNTY: MULTNOMAH | REGION: NWR

INVG STATUS: LIS | NPL SITE: N | ORPHAN SITE: N | STUDY AREA: N

PROPERTY: | TWNSHP/RANGE/SECT: 2N,1W,35 | TAX LOTS:

LATITUDE: 45 deg.36'51" | LONGITUDE: -122 deg.46'58" | SITE SIZE:

STUDY AREAS:

STUDY ID	STUDY NAME	INVG STATUS
2339	V.A.- Designated National Estuaries	XCN
2340	V.A.- Surface Waters, WQ-Limited for Toxics	XCN
1544	Lower Willamette River Basin Study Area (LWRBSA)	XCN
2068	Portland Harbor Sediments	XCN

FACILITIES: NAME: Premier Edible Oils Corporation

YEARS OF OPERATION: August 1994 - February 1997

SIC CODES: 2079 | OPERATING STATUS: Inactive

----- C & T Quincy Foods of Portland

YEARS OF OPERATION: November 1996 - Current

SIC CODES: 2079 2079

OPERATING STATUS: Active

HAZARDOUS SUBSTANCES/WASTE TYPES:

Petroleum hydrocarbons, BTEX, and VOCs, including chlorinated solvents, on-site. In adjacent river sediments: mercury, cobalt, antimony, barium, PAHs, copper, zinc, manganese, arsenic, carbazole, dibenzofuran, methylnaphthalene, and bis(2-ethylhexyl)phthalate.

CONTAMINATION INFORMATION:

Property owner submitted an 11/96 Phase II ESA to DEQ in February 1997, which documented groundwater contamination at this site. Primary contaminants included BTEX and other petroleum-based VOCs. Several well points also contained low levels of chlorinated solvents. The property owner and operator concluded that the contamination originated from the adjacent Time Oil site (ECSI #170). (6/17/99 JMW/SAP) Weston sampling results from the Portland Harbor Sediment Study revealed mercury, cobalt, antimony, barium, PAHs, zinc, copper, manganese, arsenic, carbazole, dibenzofuran, methylnaphthalene, and bis(2-ethylhexyl)phthalate in river sediments adjacent to the site. DEQ has not determined the source(s) of these contaminants. (1/4/02 ACV/VCP) Results of investigation activities conducted through 2001 indicate groundwater impacts in several different locations on the site. Free-phase petroleum is present on groundwater at the southwest corner of the site and appears to be from historic site operations. Low-level chlorinated solvents, PAHs, and VOCs usually associated with gasoline were detected with the free-phase petroleum. This contaminated groundwater plume appears to be distinct from impacted groundwater toward the northeast part of the property. Further groundwater investigation is planned in 2002 to more fully characterize groundwater conditions.

SUBSTANCE CONTAMINATION

SUBSTANCE	MEDIA CONTAMINATED	CONCENTRATION LEVEL	EVIDENCE	OBSERV. DATE
BENZENE	Groundwater Date released: unk Quantity Released: unk	6.8 ppb	Laboratory Data	23NOV1996
BUTYLBENZENE,n-	Groundwater	220 ppb	Laboratory Data	23NOV1996

	Date released: unk Quantity Released: unk		
BUTYLBENZENE,sec-	Groundwater 81 ppb Date released: unk Quantity Released: unk	Laboratory Data	23NOV1996
CHLOROETHANE	Groundwater 11.6 ppb Date released: unk Quantity Released: unk	Laboratory Data	23NOV1996
CUMENE	Groundwater 350 ppb Date released: unk Quantity Released: unk	Laboratory Data	23NOV1996
DICHLOROETHANE,1,1-	Groundwater 3.5 ppb Date released: unk Quantity Released: unk	Laboratory Data	23NOV1996
DIESEL - FUEL OIL	Groundwater 19 ppm Soil 3,900 ppm Date released: unk Quantity Released: unk Sample Depth: 20 feet	Laboratory Data Laboratory Data	23NOV1996 23NOV1996
ETHYLBENZENE	Groundwater 2,600 ppb Date released: unk Quantity Released: unk	Laboratory Data	23NOV1996
GASOLINE	Groundwater 7.1 ppm Soil 1,500 ppm Date released: unk Quantity Released: unk Sample Depth: 20 feet	Laboratory Data Laboratory Data	23NOV1996 23NOV1996
ISOPROPYLTOLUENE,p-	Groundwater 58 ppb Date released: unk Quantity Released: unk	Laboratory Data	23NOV1996
NAPHTHALENE	Groundwater 1,900 ppb Date released: unk Quantity Released: unk	Laboratory Data	23NOV1996
PROPYLBENZENE,n-	Groundwater 1,000 ppb Date released: unk Quantity Released: unk	Laboratory Data	23NOV1996
STYRENE	Groundwater 400 ppb Date released: unk Quantity Released: unk	Laboratory Data	23NOV1996
TRICHLOROETHANE,1,1,1-	Groundwater 2.5 ppb Date released: unk	Laboratory Data	23NOV1996

	Quantity Released: unk			
TRIMETHYLBENZENE,1,2,4-	Groundwater Date released: unk Quantity Released: unk	5,200 ppb	Laboratory Data	23NOV1996
TRIMETHYLBENZENE,1,3,5-	Groundwater Date released: unk Quantity Released: unk	1,200 ppb	Laboratory Data	23NOV1996
XYLENEs	Groundwater Date released: unk Quantity Released: unk	3,953 ppb	Laboratory Data	23NOV1996

STATUS OF INVESTIGATIVE OR REMEDIAL ACTION:

(6/17/99 JMW/SAP) Based on initial sampling results from a river sediment quality study, the C & T Quincy Foods/Premier Edible Oils (PEO) site has been identified as a potential source of contamination to the Portland Harbor. DEQ sent a Site Assessment review notice 3/2/99, but has received no response. A site screening is scheduled (level II priority). (2/1/00 JMW/SAP) PEO information combined with the Schnitzer Investment Corporation (SIC) Strategy Recommendation - SEE ECSI #2355. (9/1/00 ACV/VCP) DEQ is reviewing site investigation information conducted by Schnitzer. (12/21/00 ACV/VCP) DEQ issued a file review memo summarizing additional information submitted by PEO, SIC, and Time Oil on December 21, 2000. DEQ proposed that SIC, as the property owner, take over the remedial investigation for PEO. (7/17/01 ACV/VCP) Negotiations for formal agreement started in March 2001. Soil and groundwater investigation running concurrent with negotiations. Free-phase petroleum discovered at two locations on-site. (1/4/02 ACV/VCP) New groundwater data confirms contamination from historic operations in the southwestern portion of the site. Premier Edible Oils should be added to the Confirmed Release List.

REMEDIAL ACTION FUNDING:

Owner, operator or other party under agreement, order or consent decree under ORS 465.200 or 465

INVESTIGATIVE, REMEDIAL, AND ADMINISTRATIVE ACTIONS

ACTION	START DATE	COMPL. DATE	RESP. STAFF	AGENCY CODE	REGION	LEAD PROGRAM
Site added to database	11MAR1997	11MAR1997	Gil Wistar	DEQ	NW	SAS
SITE EVALUATION	11MAR1997	11MAR1997	Gil Wistar	DEQ	NW	SAS

Site Screening recommended (EV)	17JUN1999	17JUN1999	Steve Fortuna	DEQ	NW	VCS
COMMENTS: Combined with Schnitzer Steel Strategy Recommendation - SEE ECSI 2355.						
Letter Agreement	01DEC1999	01JUL2000	Alicia Voss	DEQ	NW	VCS
REMEDIAL INVESTIGATION	06MAR2001		Alicia Voss	DEQ	NW	VCS
NEGOTIATIONS	06MAR2001		Alicia Voss	DEQ	NW	VCS
Proposal for Confirmed Release List recommended	04JAN2002	04JAN2002	Alicia Voss	DEQ	NW	VCS
Facility proposed for Confirmed Release List	08JAN2002	08JAN2002	Kim Van Patten	DEQ	NW	VCS
Facility placed on Confirmed Release List	29MAR2002	29MAR2002	Kim Van Patten	DEQ	NW	VCS

ACTIVE PROJECTS

PROJECT ID	PROJECT NAME
15457	Premier Edible Oils II

COMMENT:

PARTY INFORMATION

SITE CONTACT:

Tom Zelenka
Mgr Env Affairs - Form/Site/Fee Contact
Schnitzer Investment Corporation
3200 NW Yeon Avenue
Portland , OR 97296-0047
PHONE: (503) 224-9900

ASSOCIATED PARTIES NAME AND ADDRESS	AFFILIATION	AFFILIATION STATUS	INFORMATION AS OF DATE
BOB MASTERSON C & T QUINCY FOODS OF PORTLAND, L.L.C.	Facility Operator		17JUN1999

10400 N Burgard Road
Portland , OR 97203
(503) 978-3540
COMMENTS:

Richard Glick — Interested Party — 23JUL2001
Davis Wright Tremaine
2300 1st Interstate Tower
1300 SW 5th Avenue
Portland , OR 97201-5682
(503) 241-2300
COMMENTS:

Linda Wakefield — Owner — 14APR1997
Vice President
Schnitzer Investment Corp
3200 NW Yeon Avenue
PO Box 10047
Portland , OR 97210
(503) 224-9900
COMMENTS:

OWNERSHIP COMMENTS:

DATA SOURCES: 1997 Level II ESA documenting the presence of chlorinated solvents in groundwater and petroleum in soils; EPA, 1998, Portland Harbor Sediment Investigation Report; quarterly groundwater monitoring data from on-site wells, with results through October 2001.

LAST UPDATED BY: kvp DATE: 04-APR-02

(site_report.rpt)

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

March 29, 2002

Tom Zelenka
Schnitzer Investment Corp.
3200 NW Yeon Avenue
Portland, Oregon 97296-0047

CERTIFIED MAIL NO. 7000 1670 0009 9005 8622
RETURN RECEIPT REQUESTED

RE: NOTICE TO CURRENT AND/OR PAST OWNERS AND OPERATORS OF DECISION TO LIST CONTAMINATED PROPERTY ON THE CONFIRMED RELEASE LIST (CRL)
Premier Edible Oils
10400 N. Burgard Way, Portland
ECSI ID NO. # 2013

Dear Mr. Zelenka:

By letter dated January 8, 2002 the Department of Environmental Quality (Department) notified you as an owner or operator of the Premier Edible Oils site of the Department's proposal to add this facility to the Confirmed Release List (CRL). The notice invited comments on the proposed listing. None were received.

Premier Edible Oils meets the criteria for listing, and with this notice the Department is adding it to the CRL. Enclosed is the Site Summary Report, which includes the information about the Premier Edible Oils site that will appear on the CRL. If after a site assessment the Department determines that a comprehensive site investigation or cleanup is necessary, Premier Edible Oils will be proposed for the Inventory; a second list of sites with confirmed releases of hazardous substances.

The Department will update the CRL and Inventory quarterly and provide copies to area newspapers and to the public upon request. A facility can be removed from the Confirmed Release List and Inventory after all necessary cleanup is completed.

We are pleased that you have elected to participate in our Voluntary Cleanup Program to investigate and assess necessary remedial actions for this site. We hope that this cooperative relationship will continue until potential threats from hazardous materials at this site have been eliminated.

As noted in the earlier letter to you, listing your property does not necessarily mean that you are responsible for the contamination, investigation or cleanup. Responsibility for these costs is prescribed

by various provisions in state and federal laws. If you have specific questions about the CRL or Inventory, or want copies of the statute or regulations governing the Department's site assessment, listing, or cleanup processes, please contact Listing Coordinator Kimberlee Van Patten at (503) 229-5256 or at the address shown on the letterhead.

Sincerely,

Charles W. Donaldson
Manager
Emergency Response and Site Assessment

Enclosures: Site Summary Report
cc: Alicia Voss; NWR, DEQ
ECSI File # 2013

ENVIRONMENTAL CLEANUP SITE INFORMATION
SITE SUMMARY REPORT

April 08, 2002 08:04 am

SITE ID: 2013 | SITE NAME: Premier Edible Oils | CERCLIS NO:

ALIASES: C & T Quincy Foods (SEE ECSI 2355)
Portland Harbor Sediment Study
Schnitzer Investment Corp.

ADDRESS: 10400 N Burgard Way Portland 97203

COUNTY: MULTNOMAH REGION: NWR

INVG STATUS: LIS | NPL SITE: N | ORPHAN SITE: N | STUDY AREA: N

PROPERTY: | TWNSHP/RANGE/SECT: 2N,1W,35 | TAX LOTS:

LATITUDE: 45 deg.36'51" | LONGITUDE: -122 deg.46'58" | SITE SIZE:

STUDY AREAS:

STUDY ID	STUDY NAME	INVG STATUS
2339	V.A.- Designated National Estuaries	XCN
2340	V.A.- Surface Waters, WQ-Limited for Toxics	XCN
1544	Lower Willamette River Basin Study Area (LWRBSA)	XCN
2068	Portland Harbor Sediments	XCN

FACILITIES:

NAME: Premier Edible Oils Corporation

YEARS OF OPERATION: August 1994 - February 1997

SIC CODES: 2079 | OPERATING STATUS: Inactive

SCHN00260108

----- C & T Quincy Foods of Portland

YEARS OF OPERATION: November 1996 - Current

SIC CODES: 2079 2079

OPERATING STATUS: Active

HAZARDOUS SUBSTANCES/WASTE TYPES:

Petroleum hydrocarbons, BTEX, and VOCs, including chlorinated solvents, on-site. In adjacent river sediments: mercury, cobalt, antimony, barium, PAHs, copper, zinc, manganese, arsenic, carbazole, dibenzofuran, methylnaphthalene, and bis(2-ethylhexyl)phthalate.

CONTAMINATION INFORMATION:

Property owner submitted an 11/96 Phase II ESA to DEQ in February 1997, which documented groundwater contamination at this site. Primary contaminants included BTEX and other petroleum-based VOCs. Several well points also contained low levels of chlorinated solvents. The property owner and operator concluded that the contamination originated from the adjacent Time Oil site (ECSI #170). (6/17/99 JMW/SAP) Weston sampling results from the Portland Harbor Sediment Study revealed mercury, cobalt, antimony, barium, PAHs, zinc, copper, manganese, arsenic, carbazole, dibenzofuran, methylnaphthalene, and bis(2-ethylhexyl)phthalate in river sediments adjacent to the site. DEQ has not determined the source(s) of these contaminants. (1/4/02 ACV/VCP) Results of investigation activities conducted through 2001 indicate groundwater impacts in several different locations on the site. Free-phase petroleum is present on groundwater at the southwest corner of the site and appears to be from historic site operations. Low-level chlorinated solvents, PAHs, and VOCs usually associated with gasoline were detected with the free-phase petroleum. This contaminated groundwater plume appears to be distinct from impacted groundwater toward the northeast part of the property. Further groundwater investigation is planned in 2002 to more fully characterize groundwater conditions.

SUBSTANCE CONTAMINATION

SUBSTANCE	MEDIA CONTAMINATED	CONCENTRATION LEVEL	EVIDENCE	OBSERV. DATE
BENZENE	Groundwater Date released: unk Quantity Released: unk	6.8 ppb	Laboratory Data	23NOV1996
BUTYLBENZENE,n-	Groundwater	220 ppb	Laboratory Data	23NOV1996

	Date released: unk Quantity Released: unk			
BUTYLBENZENE,sec-	Groundwater Date released: unk Quantity Released: unk	81 ppb	Laboratory Data	23NOV1996
CHLOROETHANE	Groundwater Date released: unk Quantity Released: unk	11.6 ppb	Laboratory Data	23NOV1996
CUMENE	Groundwater Date released: unk Quantity Released: unk	350 ppb	Laboratory Data	23NOV1996
DICHLOROETHANE,1,1-	Groundwater Date released: unk Quantity Released: unk	3.5 ppb	Laboratory Data	23NOV1996
DIESEL - FUEL OIL	Groundwater Soil Date released: unk Quantity Released: unk Sample Depth: 20 feet	19 ppm 3,900 ppm	Laboratory Data Laboratory Data	23NOV1996 23NOV1996
ETHYLBENZENE	Groundwater Date released: unk Quantity Released: unk	2,600 ppb	Laboratory Data	23NOV1996
GASOLINE	Groundwater Soil Date released: unk Quantity Released: unk Sample Depth: 20 feet	7.1 ppm 1,500 ppm	Laboratory Data Laboratory Data	23NOV1996 23NOV1996
ISOPROPYLTOLUENE,p-	Groundwater Date released: unk Quantity Released: unk	58 ppb	Laboratory Data	23NOV1996
NAPHTHALENE	Groundwater Date released: unk Quantity Released: unk	1,900 ppb	Laboratory Data	23NOV1996
PROPYLBENZENE,n-	Groundwater Date released: unk Quantity Released: unk	1,000 ppb	Laboratory Data	23NOV1996
STYRENE	Groundwater Date released: unk Quantity Released: unk	400 ppb	Laboratory Data	23NOV1996
TRICHLOROETHANE,1,1,1-	Groundwater Date released: unk	2.5 ppb	Laboratory Data	23NOV1996

	Quantity Released: unk		
TRIMETHYLBENZENE,1,2,4-	Groundwater 5,200 ppb Date released: unk Quantity Released: unk	Laboratory Data	23NOV1996
TRIMETHYLBENZENE,1,3,5-	Groundwater 1,200 ppb Date released: unk Quantity Released: unk	Laboratory Data	23NOV1996
XYLENEs	Groundwater 3,953 ppb Date released: unk Quantity Released: unk	Laboratory Data	23NOV1996

STATUS OF INVESTIGATIVE OR REMEDIAL ACTION:

(6/17/99 JMW/SAP) Based on initial sampling results from a river sediment quality study, the C & T Quincy Foods/Premier Edible Oils (PEO) site has been identified as a potential source of contamination to the Portland Harbor. DEQ sent a Site Assessment review notice 3/2/99, but has received no response. A site screening is scheduled (level II priority). (2/1/00 JMW/SAP) PEO information combined with the Schnitzer Investment Corporation (SIC) Strategy Recommendation - SEE ECSI #2355. (9/1/00 ACV/VCP) DEQ is reviewing site investigation information conducted by Schnitzer. (12/21/00 ACV/VCP) DEQ issued a file review memo summarizing additional information submitted by PEO, SIC, and Time Oil on December 21, 2000. DEQ proposed that SIC, as the property owner, take over the remedial investigation for PEO. (7/17/01 ACV/VCP) Negotiations for formal agreement started in March 2001. Soil and groundwater investigation running concurrent with negotiations. Free-phase petroleum discovered at two locations on-site. (1/4/02 ACV/VCP) New groundwater data confirms contamination from historic operations in the southwestern portion of the site. Premier Edible Oils should be added to the Confirmed Release List.

REMEDIAL ACTION FUNDING:

Owner, operator or other party under agreement, order or consent decree under ORS 465.200 or 465

INVESTIGATIVE, REMEDIAL, AND ADMINISTRATIVE ACTIONS

ACTION	START DATE	COMPL. DATE	RESP. STAFF	AGENCY CODE	REGION	LEAD PROGRAM
Site added to database	11MAR1997	11MAR1997	Gil Wistar	DEQ	NW	SAS
SITE EVALUATION	11MAR1997	11MAR1997	Gil Wistar	DEQ	NW	SAS

Site Screening recommended (EV)	17JUN1999	17JUN1999	Steve Fortuna	DEQ	NW	VCS
COMMENTS: Combined with Schnitzer Steel Strategy Recommendation - SEE ECSI 2355.						
Letter Agreement	01DEC1999	01JUL2000	Alicia Voss	DEQ	NW	VCS
REMEDIAL INVESTIGATION	06MAR2001		Alicia Voss	DEQ	NW	VCS
NEGOTIATIONS	06MAR2001		Alicia Voss	DEQ	NW	VCS
Proposal for Confirmed Release List recommended	04JAN2002	04JAN2002	Alicia Voss	DEQ	NW	VCS
Facility proposed for Confirmed Release List	08JAN2002	08JAN2002	Kim Van Patten	DEQ	NW	VCS
Facility placed on Confirmed Release List	29MAR2002	29MAR2002	Kim Van Patten	DEQ	NW	VCS

ACTIVE PROJECTS

PROJECT ID	PROJECT NAME
15457	Premier Edible Oils II

COMMENT:

PARTY INFORMATION

SITE CONTACT:

Tom Zelenka
Mgr Env Affairs - Form/Site/Fee Contact
Schnitzer Investment Corporation
3200 NW Yeon Avenue
Portland , OR 97296-0047
PHONE: (503) 224-9900

ASSOCIATED PARTIES NAME AND ADDRESS	AFFILIATION	AFFILIATION STATUS	INFORMATION AS OF DATE
BOB MASTERSON C & T QUINCY FOODS OF PORTLAND, L.L.C.	Facility Operator		17JUN1999

10400 N Burgard Road
Portland , OR 97203
(503) 978-3540
COMMENTS:

Richard Glick — Interested Party — 23JUL2001
Davis Wright Tremaine
2300 1st Interstate Tower
1300 SW 5th Avenue
Portland , OR 97201-5682
(503) 241-2300
COMMENTS:

Linda Wakefield — Owner — 14APR1997
Vice President
Schnitzer Investment Corp
3200 NW Yeon Avenue
PO Box 10047
Portland , OR 97210
(503) 224-9900
COMMENTS:

OWNERSHIP COMMENTS:

DATA SOURCES: 1997 Level II ESA documenting the presence of chlorinated solvents in groundwater and petroleum in soils; EPA, 1998, Portland Harbor Sediment Investigation Report; quarterly groundwater monitoring data from on-site wells, with results through October 2001.

LAST UPDATED BY: kvp DATE: 04-APR-02

(site_report.rpt)

LETTER OF TRANSMITTAL

SLR International Corp.

Building H, Suite 150 22122 20th Ave SE | Bothell, WA 98021 | Phone 425.402.8800 | Fax 425.402.8488

To: Mr. James Brown
James C. Brown & Associates, P.C.
P.O. Box 31
Marylhurst, Oregon 97036

Date: September 1, 2004
Project #: 001.0174.00001

Re: Preliminary Evaluation of Remedial Alternatives, Premier Edible Oils Site, Portland, Oregon

ENCLOSED, PLEASE FIND THE FOLLOWING:

Quantity	*Description*
1	Draft Letter

FOR YOUR:
- ☐ *USE*
- ☐ *APPROVAL*
- X *REVIEW/COMMENTS*
- ☐ *INFORMATION*
- ☐ *OTHER:*_____

SENT VIA:
- X *REGULAR MAIL*
- ☐ *FEDEX / AIRBORNE*
- ☐ *UPS*
- ☐ *COURIER*
- ☐ *OTHER:*_____

COMMENTS:

Attached is a draft version of a letter that presents the results of our preliminary evaluation of remedial alternatives for the gasoline-diesel product beneath the southwestern part of the above-referenced site. The letter outlines the site and contaminant conditions that were considered in the evaluation, and describes several data gaps that should be resolved in order to complete the evaluation. The letter also presents the results of the screening of several remediation technologies, describes the three selected remedial alternatives, and details the results of our preliminary evaluation of the alternatives. Please review the letter and call me with your comments. Based on your edits and Schnitzer's edits, we will finalize the document. If you have any questions, please call me at (425) 402-8800.

cc: Jim Jakubiak, Schnitzer Investment Corporation	By: Mike Staton

11-10-77

FORM No. 731—QUITCLAIM DEED (Individual or Corporate)
1-1-74

STEVENS-NESS LAW PUBLISHING CO. PORTLAND, OR 97204

QUITCLAIM DEED

BOOK 1220 PAGE 2359

KNOW ALL MEN BY THESE PRESENTS, That SCHNITZER INVESTMENT CORP., an Oregon corporation, *hereinafter called grantor, for the consideration hereinafter stated, does hereby remise, release and quitclaim unto* BELL OIL TERMINAL CO., an Oregon corporation *hereinafter called grantee, and unto grantee's heirs, successors and assigns all of the grantor's right, title and interest in that certain real property with the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining, situated in the County of* Multnomah, *State of Oregon, described as follows, to-wit:*

Beginning at a point in Section 35, Township 2 North of Range 1 West of the Willamette Meridian, at the Southwest corner of the William Gatton Donation Land Claim; thence North 59°29'35" East 570.52 feet; thence North 0°3'3" East 1826.10 feet; thence North 89°56'57" West 1403.15 feet to a boat spike in pavement; thence North 0°4'48" East, 313.53 feet to a galvanized spike in pavement, being the Northwest corner of the tract of land conveyed to the California Container Corporation, a Delaware corporation; by deed recorded June 1, 1950 in PsDeed Book 1408 at page 125; thence North 67°33'18" East 213.99 feet to a nail in the center of spur track; thence due South 21.5 feet to a spike in pavement; thence due North 417.75 feet to a point which is the true point of beginning; thence North 89°52'15" West, 579.18 feet to a point; thence South 229.81 feet to a spike in the North line of the tract leased to American Chemical Corporation, a Delaware corporation, by instrument recorded March 11, 1952 in PsDeed Book 1525 at page 482; thence South 89°21' East 26.10 feet along said North line to an iron bar which is the Northeast corner of said leased tract; thence South 0°39' West 188.56 feet to an iron pipe; thence South 89°58' East 614.58 feet; thence due North 417.75 feet; thence North 89°52'15" West 61.5 feet to the true point of beginning.

83

75

76

(IF SPACE INSUFFICIENT, CONTINUE DESCRIPTION ON REVERSE SIDE)

To Have and to Hold the same unto the said grantee and grantee's heirs, successors and assigns forever.

The true and actual consideration paid for this transfer, stated in terms of dollars, is None - title clearance

~~*However, the actual consideration consists of or includes other property or value given or promised which is the whole part of the consideration (indicate which).*~~ *(The sentence between the symbols ①, if not applicable, should be deleted. See ORS 93.030.)*

In construing this deed and where the context so requires, the singular includes the plural and all grammatical changes shall be implied to make the provisions hereof apply equally to corporations and to individuals.

In Witness Whereof, the grantor has executed this instrument this day of , 19 ; if a corporate grantor, it has caused its name to be signed and seal affixed by its officers, duly authorized thereto by order of its board of directors.

SCHNITZER INVESTMENT CORP.

By [signature]
Title: Vice President

By Title: [signature]

(If executed by a corporation, affix corporate seal)

STATE OF OREGON,) ss.
County of)

, 19

Personally appeared the above named

and acknowledged the foregoing instrument to be voluntary act and deed.

Before me:

(OFFICIAL SEAL)

Notary Public for Oregon

My commission expires:

STATE OF OREGON, County of [illegible]) ss.

Nov 7, 19 77

Personally appeared [illegible] *and* [illegible] *who, being duly sworn, each for himself and not one for the other, did say that the former is the* [illegible] *president and that the latter is the* [illegible] *secretary of* [illegible] *, a corporation, and that the seal affixed to the foregoing instrument is the corporate seal of said corporation and that said instrument was signed and sealed in behalf of said corporation by authority of its board of directors; and each of them acknowledged said instrument to be its voluntary act and deed.*

Before me:

[signature] *(SEAL)*

Notary Public for Oregon

My commission expires: [illegible]

SCHNITZER INVESTMENT CORP.
3200 N. W. Yeon
Portland, Oregon 97210
GRANTOR'S NAME AND ADDRESS

BELL OIL TERMINAL CO.
12005 N. Burgard Road
Portland, Oregon 97203

81569

...artment of Admin... Conveyances, in ... certify that the ... received for record

2359 ... affixed.

... of Administration

Deputy.

POF

SCHN00260399

EXHIBIT "A" BOOK 1220 PAGE 2360

TO QUITCLAIM DEED FROM
SCHNITZER INVESTMENT CORP., Grantor
TO NORTHWEST TERMINAL CO., Grantee

The following described property in Section 35, Township 2 North, Range 1 West of the Willamette Meridian, Multnomah County, Oregon:

Beginning at the Southwesterly corner of a tract of land conveyed to Northwest Terminal Co. by deed recorded December 11, 1943 in Book 800 at page 240 of Deed Records; thence South 89°52'15" East a distance of 2505.35 feet to the Southwest corner of a tract of land conveyed to Consolidated Freightway Corporation by deed recorded July 9, 1968 in Book 628 at page 1427 of Deed Records; thence North 0°07'45" East along the westerly line of the Consolidated Freightways Tract 770.71 feet to the Southerly line of a thirty-five foot easement described in deed recorded December 11, 1943 in Book 800 at page 240 of Deed Records; thence North 80°35'45" West along said Southerly boundary 384.04 feet to the point of beginning of a curve left; thence along said curve left, the radius of which is 182.50 feet, an arc distance of 30.54 feet, to the end of said curve; thence South 89°49' West along said Southerly line 1112.53 feet to the point of intersection with the Easterly line of said tract of land described in Deed recorded December 11, 1943 in Book 800 at page 240; thence North 0°07'45" East 35 feet to the intersection with the Southerly line of the parcel of land conveyed by the William Gatton Estate Company and George G. Gatton to Portland General Electric Company by deed dated February 7, 1941, recorded February 11, 1941 in Book 588, page 515 of the Deed Records; thence South 89°49' West along the Southerly line of said tract so conveyed to Portland General Electric Company 261.78 feet; thence South 58°59'45" West 228.04 feet along the Southeasterly boundary of said tract so conveyed to Portland General Electric Company; thence North 26°17'40" West 50.17 feet along the Southwesterly boundary of said tract so conveyed to Portland General Electric Company; thence South 58°59'45" West 804.77 feet along the Southeasterly boundary of the strip of land 150 feet wide occupied by Bonneville Power Administration to the Harbor Line of the Willamette River; thence South 26°17'40" East along said Harbor Line a distance of 416.30 feet to the point of beginning.

Reserving Grantor's easement rights to the use of Time Road as described in deeds recorded October 4, 1967 in Deed Book 585, at pages 341-343 and October 4, 1967 in Deed Book 585, at pages 344-347, and June 22, 1973 in Deed Book 933, at page 1902, and Grantor further reserves from the foregoing quitclaim its easement as granted by easement deed from Northwest Terminal Co. recorded October 10, 1974 at Book 1011, page 73 of the Deed Records.

EXHIBIT "A" TO QUITCLAIM DEED

NORTHWEST TERMINAL CO.
[illegible] Burgard Road
[illegible] Oregon

SCHN00260400

FORM No. 721—QUITCLAIM DEED (Individual or Corporate).

1 1 74

QUITCLAIM DEED

BOOK 1220 PAGE 2361

KNOW ALL MEN BY THESE PRESENTS, That SCHNITZER INVESTMENT CORP., an Oregon corporation *, hereinafter called grantor, for the consideration hereinafter stated, does hereby remise, release and quitclaim unto* NORTHWEST TERMINAL CO. *hereinafter called grantee, and unto grantee's heirs, successors and assigns all of the grantor's right, title and interest in that certain real property with the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining, situated in the County of* Multnomah *, State of Oregon, described as follows, to-wit:*

THE PROPERTY DESCRIBED IN EXHIBIT "A" ATTACHED HERETO.

44 102 37

(IF SPACE INSUFFICIENT, CONTINUE DESCRIPTION ON REVERSE SIDE)

To Have and to Hold the same unto the said grantee and grantee's heirs, successors and assigns forever.

The true and actual consideration paid for this transfer, stated in terms of dollars, is $None - Title clearance *(Here comply with the requirements of ORS 93.030)*

However, the actual consideration consists of or includes other property or value given or promised which is the whole part of the consideration (indicate which). ① *(The sentence between the symbols ①, if not applicable, should be deleted. See ORS 93.030.)*

In construing this deed and where the context so requires, the singular includes the plural and all grammatical changes shall be implied to make the provisions hereof apply equally to corporations and to individuals.

In Witness Whereof, the grantor has executed this instrument this day of , 19 ; if a corporate grantor, it has caused its name to be signed and seal affixed by its officers, duly authorized thereto by order of its board of directors.

SCHNITZER INVESTMENT CORP.

By Title: Vice President

By Title: Assistant Secretary

(If executed by a corporation, affix corporate seal)

STATE OF OREGON,)
) ss.
County of)

, 19

Personally appeared the above named

and acknowledged the foregoing instrument to be voluntary act and deed.

Before me:

(OFFICIAL SEAL)

Notary Public for Oregon

My commission expires:

STATE OF OREGON, County of Multnomah) ss.

November, 1977

Personally appeared [illegible] *and* [illegible] *who, being duly sworn, each for himself and not one for the other, did say that the former is the* vice president *and that the latter is the* secretary of *, a corporation, and that the seal affixed to the foregoing instrument is the corporate seal of said corporation and that said instrument was signed and sealed in behalf of said corporation by authority of its board of directors, and each of them acknowledged said instrument to be its voluntary act and deed.*

Before me: [illegible] *(SEAL)*

Notary Public for Oregon

My commission expires: 7/21/78

SCHNITZER INVESTMENT CORP.
3200 N. W. Yeon
Portland, Oregon

GRANTOR'S NAME AND ADDRESS

NORTH WEST TERMINAL CO.
[illegible] Road
[illegible]

GRANTEE'S NAME AND ADDRESS

STATE OF OREGON

SCHN00260401

412738

PARTIAL RELEASE OF MORTGAGE

KNOW ALL MEN BY THESE PRESENTS, That

WHEREAS, FIRST NATIONAL BANK OF OREGON, a national banking association, hereinafter called the "Bank", is the holder of that certain mortgage dated March 28, 1973 executed by SCHNITZER INVESTMENT CORP, an Oregon corporation as Mortgagors, in favor of the Bank, as Mortgagee, recorded on March 28, 1973 in Book 917 at Page 1082 of the Record of Mortgages for the County of Multnomah State of Oregon; and

WHEREAS, payments have been made to apply thereon by which the indebtedness secured by said mortgage has been reduced to the sum of $_____ and interest thereon from _____ 19____

NOW THEREFORE, at the request of said Mortgagors and in consideration of said payments, the Bank has released and does hereby release from the lien of said mortgage the following described real property:

Per attached legal marked as Exhibit "A".

and 114

Except with respect to the real property hereinabove described the said mortgage and the lien thereof shall remain in full force and effect.

and 115

IN WITNESS WHEREOF, the Bank has caused these presents to be executed by its duly authorized representative this 25TH day of February 19 76.

FIRST NATIONAL BANK OF OREGON

By [signature]
Assistant Vice President

STATE OF OREGON)
) ss.
County of Multnomah)

February 25 A. D. 19 76.

Personally appeared Robert J. Sutcliff who, being duly sworn did say that he is the Assistant Vice President of First National Bank of Oregon, and that the said instrument was signed in behalf of said corporation by authority of its Board of Directors; and he acknowledged said instrument to be its voluntary act and deed. Before me:

Joanne Jean Cushman
Notary Public for Oregon

My Commission Expires My Commission Expires July 22, 1979

BOOK 1030 PAGE 489

Title Insurance Company

10389
PARTIAL RELEASE OF MORTGAGE

FIRST NATIONAL BANK OF OREGON

TO

SCHNITZER INVESTMENT Corp.

STATE OF OREGON | PAR. REC. MTG.
Multnomah County

Director, Department of Administration Services and Recorder of Conveyances, in and for said County, do hereby certify that the within instrument of writing was received for record and recorded in the record of said County at

MAR 1 3 26 PM '76

RECEIVED SECTION ADMIN. SERVICES MULTNOMAH CO. OREGON

Director
Department of Administration Services

Fee $ 6.00

Deputy

When recorded, return to:
First National Bank of Oregon
Teon Branch
Avenue
Fee 97210

10389

Att: Robert Sutcliff
Assistant Vice President

MAR 1 1976

PORTLAND

SCHN00260402

412738

BOOK 1090 PAGE 488

Exhibit "A"

The following parcels of land being part of the William Gatton Donation Land Claim in the Southwest one-quarter of Section 35, Township 2 North, Range 1 West of the Willamette Meridian, Multnomah County, Oregon; said parcels of land being more particularly described as follows:

"Parcel B-1"

Beginning at the Southwest corner of said William Gatton Donation Land Claim, said point also being the Northwest corner of the J. Loomis Donation Land Claim; thence North 59° 29' 35" East along the South line of said William Gatton Donation Land Claim a distance of 1045.69 feet (the deed calls this 1054.31 feet); thence North 26° 15' 33" West a distance of 46.56 feet (the deed calls this 44.31 feet) to the most Easterly corner of that certain tract conveyed to Beall Pipe and Tank Corporation by deed recorded February 14, 1956 in Deed Book 1769 page 257, Multnomah County Records of Deeds; thence South 63° 44' 27" West a distance of 104.25 feet; thence North 26° 16' 36" West a distance of 1013.14 feet to the true point of beginning of "Parcel B-1"; thence North 86° 50' 48" East a distance of 90.55 feet; thence South 63° 34' 17" West a distance of 83.28 feet; thence North 26° 16' 36" West a distance of 35.78 feet to the true point of beginning of "Parcel B-1."

"Parcel B-2"

Beginning at the true point of beginning of "Parcel B-1," thence North 86° 50' 48" East a distance of 443.37 feet to the true point of beginning of "Parcel B-2," thence continuing North 86° 50' 48" East a distance of 328.48 feet; thence South 63° 44' 27" West a distance of 146.67 feet; thence North 76° 35' 40" West a distance of 201.96 feet to the true point of beginning of "Parcel B-2."

Recorded by Pioneer National Title Insurance Company

PARTIAL RELEASE

FIRST NATIONAL BANK

TO

SCHNITZER INVES

STATE OF OREGON | PAR RE

Multnomah County

MAR 1

"1090"

Rec-17

6

When recorded, return to:
First National Bank of
N. Jeon Bra
327 Avenue
Por 97210

Att: Assistant Vice Pre

MAR 1 1976

PORTLAND

SCHN00260403

11-14-77

FORM No. 721—QUITCLAIM DEED (Individual or Corporate)
1-74

QUITCLAIM DEED

BOOK 1221 PAGE 455

KNOW ALL MEN BY THESE PRESENTS, That BELL OIL TERMINAL CO., an Oregon corporation, *hereinafter called grantor, for the consideration hereinafter stated, does hereby remise, release and quitclaim unto* SCHNITZER INVESTMENT CORP., an Oregon corporation, *hereinafter called grantee, and unto grantee's heirs, successors and assigns all of the grantor's right, title and interest in that certain real property with the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining, situated in the County of* Multnomah *, State of Oregon, described as follows, to-wit:*

THE PROPERTY DESCRIBED IN EXHIBIT "A" ATTACHED HERETO.

Excepting Lots 65, 66, 67, 68, 64, 111, 118

100, 104, 109

117, 110, 114

To Have and to Hold the same unto the said grantee and grantee's heirs, successors and assigns forever.

The true and actual consideration paid for this transfer, stated in terms of dollars, is None - Title Clearance ~~[illegible]~~ *(The sentence between the symbols ¹, if not applicable, should be deleted. See ORS 93.030.)*

In construing this deed and where the context so requires, the singular includes the plural and all grammatical changes shall be implied to make the provisions hereof apply equally to corporations and to individuals.

In Witness Whereof, the grantor has executed this instrument this day of , 19 ; if a corporate grantor, it has caused its name to be signed and seal affixed by its officers, duly authorized thereto by order of its board of directors.

BELL OIL TERMINAL CO.

By R. D. Ahrendroth Pres.
Title

By Title [illegible]

STATE OF OREGON, County of [illegible] ss.

Personally appeared the above named

and acknowledged the foregoing instrument to be voluntary act and deed.

Before me

(OFFICIAL SEAL)

Notary Public for Oregon
My commission expires

STATE OF OREGON, County of Multnomah ss.

Personally appeared [illegible] and [illegible] who, being duly sworn, each for himself and not one for the other, did say that the former is the president and that the latter is the secretary of Bell Oil Terminal Co., a corporation, and that the seal affixed to the foregoing instrument is the corporate seal of said corporation and that said instrument was signed and sealed in behalf of said corporation by authority of its board of directors; and each of them acknowledged said instrument to be its voluntary act and deed.

Before me

[illegible] (SEAL)

Notary Public for Oregon
My commission expires August 25, 1980

BELL OIL TERMINAL CO.
12005 N. Burgard Road
Portland, Oregon

SCHNITZER INVESTMENT CORP.
3200 N. W. Yeon
Portland, Oregon

After recording return to:

Bruce Hall, Attorney at Law
300 Jackson Tower
Portland, Oregon 97205

Until a change is requested all tax statements shall be sent to the following address:

SCHNITZER INVESTMENT CORP.
3200 N. W. Yeon
Portland, Oregon

SPACE RESERVED FOR RECORDER'S USE

STATE OF OREGON, County of ss.

I certify that the within instrument was received for record on the day of , 19 , at o'clock M., and recorded in book on page or as file reel number , Record of Deeds of said county.

Witness my hand and seal of County affixed.

Recordin,

By

PORTLAND

SCHN00260404

11 - 14 - 77

EXHIBIT A BOOK 1221 PAGE 456

PROPERTY OF SCHNITZER INVESTMENT CORP.

PARCEL I

A tract of land in Section 35, Township 2 North, Range 1 West of the Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

Beginning on the old harbor line along the right or easterly side of the Willamette River at a point which bears North 26°17'40" West 24.01 feet along said harbor line from its intersection with the projection of the south line of said Section 35; thence South 89°53' East, parallel with and 21.5 feet North from the south line of said Section 35 and its projection, a distance of 684.60 feet to a point on a line drawn parallel with and 11.0 feet Southerly, when measured at right angles, from the projected southeasterly line of the William Sutton Donation Land Claim; thence North 59°29'35" East, parallel with and 11.0 feet Southeasterly from said claim line and its projection, 124.71 feet; thence North 56°33'43" East 15.52 feet to a point 10.5 feet Southeasterly, measured at right angles from said claim line; thence North 59°29'35" East, parallel with and 10.5 feet Southeasterly from said claim line, a distance of 124.26 feet; thence South 89°53' East, parallel with the south line of aforesaid Section 35, 288.73 feet to a point marked by an iron rod monument; thence North 59°29'35" East, parallel with said claim line, 57.95 feet to a point marked by an iron rod monument; thence South 89°53' East, parallel with the south line of said Section 35, 1904.74 feet to a point marked by an iron rod monument; thence North 61°42'20" East 394.57 feet to a point in the westerly right-of-way line of N. Burgard, County Road No. 1397, said point being 30 feet Westerly, measured at right angles, from the center line of said road; thence North 22°46'10" West, along said westerly right-of-way line, 205.69 feet to a point that is North 70°27' East 50.55 feet from the southeast corner of that certain tract conveyed to Dulien Steel Products, Inc., of Washington, by deed recorded July 18, 1956 in Deed Book 1795, page 247; thence continuing along said westerly right-of-way line, North 22°46'10" West 156.30 feet to a point; thence continuing along said westerly right-of-way line along the arc of a 543 foot radius curve to the left through a central angle of 6°24' an arc distance of 60.65 feet (the long chord of which bears North 25°58'10" West 60.62 feet); thence continuing along said westerly right-of-way line North 29°10'10" West 117.88 feet to a point on the southerly road line of North Sever Road, County Road No. 1379A; thence along said southerly road line South 60°49'50" West 42.96 feet to a point on the easterly line of that certain tract conveyed to Dulien Steel Products, Inc., of Washington, by deed recorded July 18, 1956 in Deed Book 1795, page 247; thence South 00°49'50" West, along said southerly road line, 12.04 feet; thence continuing along said southerly road line, North 29°10'10" West, 514.54 feet; thence continuing along said

PORTLAND

SCHN00260405

11-14-77

southerly road line along the arc of a 273.10 foot radius curve to the left through a central angle of 9°40'25" an arc distance of 46.11 feet (the long chord of which bears North 54°00'22" West, 46.05 feet); thence continuing along said southerly road line, North 51°09'25" East 25.00 feet; thence continuing along said southerly road line along the arc of a 298.10 foot radius curve to the left through a central angle of 5°35'58" an arc distance of 28.96 feet (the long chord of which bears North 41°57'34" West 28.95 feet) to the southeasterly corner of that tract of land conveyed to McIntyre Electrical Inc., by deed recorded June 6, 1968, in Deed Book 623, page 28; thence North 89°50' West along the South line of said McIntyre tract 227.99 feet to the Southeast corner of that certain tract conveyed to Owen McIntyre Electrical Co. by deed recorded June 8, 1959, in Deed Book 1958, page 672; thence North 89°50' West along the south line of said second McIntyre tract 100.00 feet to the Southeast corner of that certain tract conveyed to Beall Pipe & Tank Corp. by deed recorded June 25, 1962, in Deed Book 2122, page 235; thence North 89°50' West along the south line of said Beall tract 235.54 feet to the Northwest corner of the tract conveyed to Dulien Steel Products, Inc. by deed recorded July 18, 1956, in Book 1795, page 247; thence North 89°50' West 11.52 feet; thence South 62°09' West 10.26 feet to the southwest corner of that certain tract conveyed to Beall Pipe and Tank Corporation, by deed recorded June 25, 1962 in Book 2122, page 235; thence North 0°10'30" West (North 1°10'30" West deed) along the west line of said Beall Tract, 118.01 feet to the northwest corner thereof; thence South 89°53' East, along the north line of said Beall Tract, 256.82 feet to the northeast corner thereof; thence South 0°54'30" East, along the east line of said Beall Tract, 4.05 feet to the northwest corner of that certain tract conveyed to Owen McIntyre Electrical Company, by deed recorded June 8, 1959, in Book 1958, page 672; thence South 89°47' East, along the north line of said McIntyre Tract, 100 feet to the northeast corner thereof and the northwest corner of that certain tract conveyed to McIntyre Electrical Inc. by deed recorded June 6, 1968 in Book 623, page 28; thence South 89°47' East, along the north line of the last McIntyre Tract, 17.55 feet to the west end of the south line of N. Sever Road; thence North 0°13' East, along the west line of said road, 70 feet; thence following the north line of N. Sever Road on the arc of a curve to the right and normal to the last described course, with a radius of 388.1 feet and central angle of 15°20', a distance of [illegible] feet; thence on a radial line to the left, North 13°39' East 10 feet; thence on the arc of a curve to the right and normal to the last described course, with a radius of 398.1 feet and central angle of 35°51'30" a distance of 249.15 feet to an intersection with the westerly right-of-way line of N. Burgard Road; thence tracing said road line North 22°46'10" West 104.16 feet to a point normal to highway monument BC 15+24.25; thence continuing along said westerly right-of-way line along the arc of a 807.50 foot radius curve to the right through a central angle of 69°28'50" an arc distance of 815.38 feet (the long chord of which bears North 11°58'05" East 578.36 feet) to the southwest

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corner of that certain tract conveyed to P.G.E. Co. by deed recorded October 4, 1967 in Book 585, page 347; thence North 15°17'15" West, along the west line of said P.G.E. Co. tract, 402.49 feet; thence continuing along said west line North 28°47'20" West 125.15 feet to the northwest corner of Parcel II, said P.G.E. Co. tract; thence South 88°00'25" East 26.50 feet to the southwesterly corner of Parcel I, said P.G.E. Co. tract; thence North 17°24'15" West, along the westerly line of said P.G.E. Co. tract, 361.95 feet; thence continuing along said westerly line along the arc of a 861.50 foot radius curve to the right through a central angle of 22°51'50", an arc distance of 551.70 feet (the long chord of which bears North 5°58'20" West 349.43 feet); thence continuing along said westerly line North 5°27'55" East 45.17 feet; thence continuing along said westerly line North 15°20'45" East 118.36 feet; thence continuing along said westerly line along the arc of a 197.60 foot radius curve to the left through a central angle of 95°54', an arc distance of 330.74 feet (the long chord of which bears North 32°36'15" West 293.46 feet); thence continuing along said westerly line, North 80°53'15" West, 68.90 feet to the most westerly corner of said P.G.E. Co. tract; thence South 9°24'15" West 11.34 feet to a point in the south line of that certain road easement described in Book 800, page 258, recorded December 11, 1943; thence North 80°35'45" West, along said easement line, 1159.06 feet to an intersection with the easterly line, projected North 0°07'45" East, of a 25 foot temporary road easement described in said deed to Northwest Terminal Co.; thence South 0°07'45" West 673.88 feet, along said projection and the easterly line of said temporary easement, to an intersection with a line drawn South 89°52'15" East from the most southerly corner of the tract conveyed to Northwest Terminal Co. by deed recorded in Book 800, page 240; thence North 89°52'15" West 1484.32 feet to the northeast corner of that certain tract conveyed to Bell Oil Terminal Co. by deed recorded February 1, 1955 in Deed Book 1705, page 450; thence South 0°02'45" West, along the east line of said Bell Tract, 417.75 feet to the southeast corner thereof; thence North 89°57'15" West, along the south line of said Bell Tract, 61.50 feet to the southwest corner thereof and the southeast corner of that certain tract conveyed to Bell Oil Terminal Co. by deed recorded October 9, 1953 in Book 1625, page 494; thence along the south and west lines of the second Bell Tract, with the following courses; North 89°55'15" West, 555.08 feet; North 0°02'45" East 188.50 feet; North 89°18'45" West 26.10 feet and North 0°02'45" East 229.39 feet to the northwest corner thereof, said point being on a line drawn South 89°52'15" East from the most southerly corner of the tract conveyed to Northwest Terminal Co. by deed recorded in Book 800, page 240; thence North 89°52'15" West 918.15 feet to a point on the harbor line on the easterly side of the Willamette River as established by the U. S. Army Corps of Engineers, February 9, 1968; thence South 25°38'12" East, along said harbor line, 1502.30 feet to an angle point on said harbor line; thence continuing along said harbor line, South 25°51'50" East 1937.52 feet to its intersection with and 21.5 feet Northerly of the projected south line of said Section 35; thence South 89°53' East, along said line

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which is 21.5 feet Northerly of and parallel to the south line of said Section 35, 34.48 feet to the point of beginning.

EXCEPTING from the foregoing described Parcel 1 the following parcels:

(a) A tract of land in Section 35, Township 2 North, Range 1 West of Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

Beginning at the monument marking the southwest corner of the William Gatton Donation Land Claim; thence North 59°29'35" East, along the south line of said Gatton Donation Land Claim 570.52 feet; thence North 0°15'35" West 1825.92 feet (deed North 0°03'05" East, 1826.10 feet) to a point marked by a boat spike and being the true point of beginning of the tract herein described; thence North 89°54'12" West, 1403.15 feet (deed North 89°56'57" West, 1403.15 feet) to a point marked by a boat spike; thence North 0°07'35" East 313.55 feet (deed North 0°04'48" East 313.53 feet) to point marked by a boat spike; thence South 89°54'12" East, 1075.20 feet (deed South 89°56'57" East, 1075.20 feet) to a point marked by a boat spike; thence South 65°05'05" East, 301.15 feet (deed South 65°07'48" East, 301.13 feet) to a point marked by a boat spike; thence South 0°05'48" West, 161.70 feet (deed South 0°03'05" West, 161.70 feet) to the point of beginning.

(b) A tract of land in Section 35, Township 2 North, Range 1 West of the Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

From a monument marking the Southwest corner of the William Gatton Donation Land Claim and the Northwest corner of the J. Loomis Donation Land Claim; thence North 59°29'35" East, along the South line of the said Gatton Donation Land Claim, 1045.69 feet (deed 1054.31 feet); thence North 26°15'33" West 46.56 feet (deed 44.31 feet) to the most Easterly corner of that certain tract conveyed to Beall Pipe and Tank Co. by deed recorded February 14, 1956, in Deed Book 1769, page 257; thence South 63°44'27" West, 104.25 feet to a 3/4 inch iron pipe and the true point of beginning of the tract herein described; thence South 26°16'36" East, 226.89 feet (deed South 26°15'36" East, 226.89 feet) to an iron pipe; thence along the arc of a 286.00 foot radius curve to the left (the long chord of which bears South 55°54'09" East 90.58 feet) through a central angle of 18°13'25" an arc distance of 90.96 feet (deed 91.55 feet) to an iron pipe; thence along the arc of a 332.5 foot radius curve to the left (the long chord of which bears South 57°37'05" East 149.54 feet) through a central angle of 25°59'27" an arc distance of 150.83 feet (deed 151.00 feet) to a post; thence North 65°56'11" East 777.9 feet (deed North 65°58'07" East, 777.0 feet) to a post; thence North 26°15'35" West, 900.15 feet; thence North 30°42'35" West, 35.58 feet; thence along the arc of a 250.0 foot radius curve to the left (the long chord of which bears North 44°27'33" West, 118.35 feet) through a central angle of 27°30", an arc distance of 119.99 feet; thence North 58°12'35" West, 38.59 feet; thence along

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the arc of a 357.5 foot radius curve to the left (the long chord of which bears North 60°27'53" West, 96.86 feet) through a central angle of 16°30', an arc distance of 97.19 feet; thence North 31°04'27" East 34.53 feet; thence North 58°55'33" West, 28.50 feet; thence South 31°04'27" West, 29.40 feet; thence South 63°44'27" West, 179.30 feet; thence North 76°55'40" West, 419.00 feet (deed North 76°12'33" West, 419.6 feet) to a one-inch iron pipe; thence South 63°34'17" West 240.25 feet (deed South 63°41'27" West, 241.25 feet); thence South 26°16'36" East, 977.56 feet (deed South 26°15'33" East, 977.50 feet) to the point of beginning.

(c) A parcel of land located in Section 35, Township 2 North, Range 1 West, Willamette Meridian, Multnomah County, Oregon, more particularly described as follows:

Beginning at a point on the easterly harbor line of the Willamette River as said harbor line was established by the U. S. Army Corps of Engineers, February 9, 1968, said beginning point bears North 25°51'50" West, 25.92 feet along said harbor line from its intersection with the westerly extension of the south line of said Section 35; thence from said point of beginning South 89°55'00" East, parallel with and 21.50 feet north from, when measured at right angles, the said line of Section 35, 719.08 feet to a point on a line drawn parallel with and 11.00 feet southeasterly from, when measured at right angles, the southwesterly extension of the southeasterly line of the William Gatton D.L.C.; thence North 59°29'35" East, parallel with said claim line and its said extended line, 124.71 feet; thence North 56°53'43" East, 15.52 feet to a point on a line drawn parallel with and 10.50 feet southeasterly from, when measured at right angles, the aforementioned claim line; thence North 59°29'35" East, parallel with said claim line, 124.26 feet; thence South 89°55'00" East, parallel with the said south line of Section 35, 288.73 feet; thence North 59°29'35" East, parallel with said claim line, 57.95 feet; thence North 88°09'14" West, 1586.25 feet to the said easterly harbor line, thence South 25°51'50" East, 230.00 feet to the said true point of beginning.

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EXHIBIT A BOOK 1221 PAGE 461

PROPERTY OF SCHNITZER INVESTMENT CORP.

PARCEL II

A tract of land situated in Section 35, Township 2 North, Range 1 West of the Willamette Meridian in Multnomah County, Oregon, described as follows, to-wit:

Beginning at the intersection of the easterly extension of the southerly line of that parcel of land described in Deed Book 800, page 234, recorded December 11, 1943, with the easterly edge of Tract No. 2, as described in Deed Book 1405, page 577, recorded May 23, 1950, which place of beginning is further described as being North 2905.09 feet and East 825.84 feet from the southwest corner of the W. Catton Donation Land Claim; thence North 0°07'45" East along the easterly edge of said Tract No. 2, 674.21 feet (674.11 feet Deed) to the intersection of the easterly extension of the northerly boundary of a parcel of land described in deed recorded December 11, 1943, in Deed Book 800, page 234; thence North 80°32'45" West (North 80°35'45" Deed) along the easterly extension of said northerly boundary of said parcel 595.57 feet; thence leaving said easterly extension of said northerly boundary South 0°07'45" West parallel with the easterly edge of said Tract No. 2 described in said Deed Book 1405, page 577, 770.71 feet to the southerly boundary of said parcel described in said Deed Book 800, page 234; thence South 89°52'15" East along said southerly boundary and the easterly extension thereof 587.70 feet to the place of beginning.

Reserving the easement to Bell for railroad purposes as described in Section 2.3 of the Agreement between Schnitzer Investment Corp., Palmco, Inc., Bell Oil Terminal Co., Northwest Terminal Co. and Time Oil Company dated November 9, 1977 and Exhibit E thereto, and further reserving the easement to Bell for pipeline purposes and rights of user of the Palmco dock as set forth in Sections 3.1 et seq. of said Agreement and Exhibit G thereto, and further reserving the road rights of Bell set forth in Sections 4.1 et seq. of said Agreement.

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FORM No. 751—QUITCLAIM DEED (Individual or Corporate).
1-1-74

QUITCLAIM DEED

BOOK 1221 PAGE 447

KNOW ALL MEN BY THESE PRESENTS, That NORTHWEST TERMINAL CO., an Oregon corporation, *hereinafter called grantor, for the consideration hereinafter stated, does hereby remise, release and quitclaim unto* SCHNITZER INVESTMENT CORP., an Oregon corporation, *hereinafter called grantee, and unto grantee's heirs, successors and assigns all of the grantor's right, title and interest in that certain real property with the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining, situated in the County of* Multnomah *, State of Oregon, described as follows, to-wit:*

THE PROPERTY DESCRIBED IN EXHIBIT "A" ATTACHED HERETO.

Same as 1221-1155

(If space insufficient, continue description on reverse side)

To Have and to Hold the same unto the said grantee and grantee's heirs, successors and assigns forever.

The true and actual consideration paid for this transfer, stated in terms of dollars, is $ None - Title Clearance

~~(Here comply with the requirements of ORS 93.030 and 93.040)~~ *(The sentence between the symbols ✓, if not applicable, should be deleted. See ORS 93.030.)*

In construing this deed and where the context so requires, the singular includes the plural and all grammatical changes shall be implied to make the provisions hereof apply equally to corporations and to individuals.

In Witness Whereof, the grantor has executed this instrument this day of , 19 ; if a corporate grantor, it has caused its name to be signed and seal affixed by its officers, duly authorized thereto by order of its board of directors.

NORTHWEST TERMINAL CO.

By Title: R. D. Abendroth Pres.

By Title: Nurton P. Leah - Sec

(If executed by a corporation, affix corporate seal)

STATE OF OREGON, County of) ss.

, 19

Personally appeared the above named

and acknowledged the foregoing instrument to be voluntary act and deed.

Before me:

(OFFICIAL SEAL)

Notary Public for Oregon

My commission expires

STATE OF OREGON, County of Multnomah) ss.

September 16, 1977

Personally appeared R. D. Abendroth and Nurton P. Leah who, being duly sworn, each for himself and not one for the other, did say that the former is the president and that the latter is the secretary of Northwest Terminal Co., a corporation, and that the seal affixed to the foregoing instrument is the corporate seal of said corporation and that said instrument was signed and sealed in behalf of said corporation by authority of its board of directors; and each of them acknowledged said instrument to be its voluntary act and deed.

Before me:

(SEAL)

Notary Public for Oregon

My commission expires: August 25, 1980

NORTHWEST TERMINAL CO.
12005 N. Burgard Road
Portland, Oregon
GRANTOR'S NAME AND ADDRESS

SCHNITZER INVESTMENT CORP.
3200 N. W. Yeon
Portland, Oregon
GRANTEE'S NAME AND ADDRESS

After recording return to
Bruce Hall, Attorney at Law
300 Jackson Tower
Portland, Oregon 97205
NAME, ADDRESS, ZIP

SPACE RESERVED FOR RECORDER'S USE

STATE OF OREGON, County of) ss.

I certify that the within instrument was received for record on the day of , 19 , at o'clock M., and recorded in book on page as file/reel number , Record of Deeds of said county.

Witness my hand and County affixed.

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BOOK 1221 PAGE 448

EXHIBIT A

PROPERTY OF SCHNITZER INVESTMENT CORP.

PARCEL 1

A tract of land in Section 35, Township 2 North, Range 1 West of the Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

Beginning on the old harbor line along the right or easterly side of the Willamette River at a point which bears North 26°17'40" West 24.01 feet along said harbor line from its intersection with the projection of the south line of said Section 35; thence South 89°53' East, parallel with and 21.5 feet North from the south line of said Section 35 and its projection, a distance of 684.60 feet to a point on a line drawn parallel with and 11.0 feet Southerly, when measured at right angles, from the projected southeasterly line of the William Gatton Donation Land Claim; thence North 59°29'35" East, parallel with and 11.0 feet Southeasterly from said claim line and its projection, 124.71 feet; thence North 56°33'43" East 15.52 feet to a point 10.5 feet Southeasterly, measured at right angles from said claim line; thence North 59°29'35" East, parallel with and 10.5 feet Southeasterly from said claim line, a distance of 124.26 feet; thence South 89°53' East, parallel with the south line of aforesaid Section 35, 288.73 feet to a point marked by an iron rod monument; thence North 59°29'35" East, parallel with said claim line, 57.95 feet to a point marked by an iron rod monument; thence South 89°53' East, parallel with the south line of said Section 35, 1004.74 feet to a point marked by an iron rod monument; thence North 61°47'20" East 394.57 feet to a point in the westerly right-of-way line of N. Burgard, County Road No. 1397, said point being 30 feet westerly, measured at right angles, from the center line of said road; thence North 22°46'10" West, along said westerly right-of-way line, 205.69 feet to a point that is North 70°27' East 30.55 feet from the southeast corner of that certain tract conveyed to Dullen Steel Products, Inc., of Washington, by deed recorded July 18, 1956 in Deed Book 1795, page 247; thence continuing along said westerly right-of-way line, North 22°46'10" West 156.36 feet to a point; thence continuing along said westerly right-of-way line along the arc of a 543 foot radius curve to the left through a central angle of 6°24' an arc distance of 60.65 feet (the long chord of which bears North 25°58'10" West 60.62 feet); thence continuing along said westerly right-of-way line North 29°10'10" West 117.88 feet to a point on the southerly road line of North Sever Road, County Road No. 1379A; thence along said southerly road line South 60°49'50" West 42.96 feet to a point on the easterly line of that certain tract conveyed to Dullen Steel Products, Inc., of Washington, by deed recorded July 18, 1956 in Deed Book 1795, page 247; thence South 60°49'50" West, along said southerly road line, 12.04 feet; thence continuing along said southerly road line, North 29°10'10" West, 314.54 feet; thence continuing along said

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southerly road line along the arc of a 273.10 foot radius curve to the left through a central angle of 9°40'25" an arc distance of 46.11 feet (the long chord of which bears North 34°00'22" West, 46.05 feet); thence continuing along said southerly road line, North 51°09'25" East 25.00 feet; thence continuing along said southerly road line along the arc of a 298.10 foot radius curve to the left through a central angle of 5°33'58" an arc distance of 28.96 feet (the long chord of which bears North 41°37'34" West 28.95 feet) to the southeasterly corner of that tract of land conveyed to McIntyre Electrical Inc., by deed recorded June 6, 1968, in Deed Book 623, page 28; thence North 89°50' West along the South line of said McIntyre tract 227.99 feet to the Southeast corner of that certain tract conveyed to Owen McIntyre Electrical Co. by deed recorded June 8, 1959, in Deed Book 1958, page 672; thence North 89°50' West along the south line of said second McIntyre tract 100.00 feet to the Southeast corner of that certain tract conveyed to Beall Pipe & Tank Corp. by deed recorded June 25, 1962, in Deed Book 2122, page 235; thence North 89°50' West along the south line of said Beall tract 235.54 feet to the Northwest corner of the tract conveyed to Dulien Steel Products, Inc. by deed recorded July 18, 1956, in Book 1705, page 247; thence North 89°50' West 11.52 feet; thence South 62°09' West 10.26 feet to the southwest corner of that certain tract conveyed to Beall Pipe and Tank Corporation, by deed recorded June 25, 1962 in Book 2122, page 235; thence North 0°10'30" West (North 1°10'30" West Deed) along the west line of said Beall Tract, 118.01 feet to the northwest corner thereof; thence South 89°53' East, along the north line of said Beall Tract, 256.82 feet to the northeast corner thereof; thence South 0°54'30" East, along the east line of said Beall Tract, 4.03 feet to the northwest corner of that certain tract conveyed to Owen McIntyre Electrical Company, by deed recorded June 8, 1959, in Book 1958, page 672; thence South 89°47' East, along the north line of said McIntyre Tract, 100 feet to the northeast corner thereof and the northwest corner of that certain tract conveyed to McIntyre Electrical Inc. by deed recorded June 6, 1968 in Book 623, page 28; thence South 89°47' East, along the north line of the last McIntyre Tract, 17.53 feet to the west end of the south line of N. Sever Road; thence North 0°13' East, along the west line of said road, 70 feet; thence following the north line of N. Sever Road on the arc of a curve to the right and normal to the last described course, with a radius of 398.1 feet and central angle of 13°26', a distance of 91.1 feet; thence on a radial line to the left, North 13°39' East 10 feet; thence on the arc of a curve to the right and normal to the last described course, with a radius of 398.1 feet and central angle of 35°51'30" a distance of 249.15 feet to an intersection with the westerly right-of-way line of N. Burgard Road; thence tracing said road line North 22°46'19" West 104.16 feet to a point normal to highway monument BC 15+24.28; thence continuing along said westerly right-of-way line along the arc of a 507.50 foot radius curve to the right through a central angle of 69°28'30" an arc distance of 615.38 feet (the long chord of which bears North 11°58'05" East 578.36 feet) to the southwest

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corner of that certain tract conveyed to P.G.E. Co. by deed recorded October 4, 1967 in Book 585, page 347; thence North 15°17'15" West, along the west line of said P.G.E. Co. tract, 402.49 feet; thence continuing along said west line North 28°47'20" West 125.15 feet to the northwest corner of Parcel II, said P.G.E. Co. tract; thence South 88°00'25" East 26.50 feet to the southwesterly corner of Parcel I, said P.G.E. Co. tract; thence North 17°24'15" West, along the westerly line of said P.G.E. Co. tract, 361.95 feet; thence continuing along said westerly line along the arc of a 881.50 foot radius curve to the right through a central angle of 22°51'50", an arc distance of 351.76 feet (the long chord of which bears North 5°58'20" West 349.43 feet); thence continuing along said westerly line North 5°27'35" East 43.17 feet; thence continuing along said westerly line North 15°20'45" East 118.36 feet; thence continuing along said westerly line along the arc of a 197.60 foot radius curve to the left through a central angle of 95°54', an arc distance of 330.74 feet (the long chord of which bears North 32°36'15" West 293.46 feet); thence continuing along said westerly line, North 80°33'15" West, 68.90 feet to the most westerly corner of said P.G.E. Co. tract; thence South 9°24'15" West 11.34 feet to a point in the south line of that certain road easement described in Book 800, page 258, recorded December 11, 1943; thence North 80°35'45" West, along said easement line, 1139.00 feet to an intersection with the easterly line, projected North 0°07'45" East, of a 25 foot temporary road easement described in said deed to Northwest Terminal Co.; thence South 0°07'45" West 673.38 feet, along said projection and the easterly line of said temporary easement, to an intersection with a line drawn South 89°52'15" East from the most southerly corner of the tract conveyed to Northwest Terminal Co. by deed recorded in Book 800, page 240; thence North 89°52'15" West 1484.32 feet to the northeast corner of that certain tract conveyed to Bell Oil Terminal Co. by deed recorded February 1, 1955 in Deed Book 1703, page 450; thence South 0°02'45" West, along the east line of said Bell Tract, 417.75 feet to the southeast corner thereof; thence North 89°57'15" West, along the south line of said Bell Tract, 61.50 feet to the southwest corner thereof and the southeast corner of that certain tract conveyed to Bell Oil Terminal Co. by deed recorded October 9, 1953 in Book 1625, page 494; thence along the south and west lines of the second Bell Tract, with the following courses; North 89°55'15" West, 553.08 feet; North 0°02'45" East 188.56 feet; North 89°18'15" West 26.10 feet and North 0°02'45" East 229.39 feet to the northwest corner thereof, said point being on a line drawn South 89°52'15" East from the most southerly corner of the tract conveyed to Northwest Terminal Co. by deed recorded in Book 800, page 240; thence North 89°52'15" West 918.13 feet to a point on the harbor line on the easterly side of the Willamette River as established by the U. S. Army Corps of Engineers, February 9, 1968; thence South 23°38'12" East, along said harbor line, 1309.36 feet to an angle point on said harbor line; thence continuing along said harbor line, South 25°51'50" East 1987.52 feet to its intersection with and 21.5 feet Northerly of the projected south line of said Section 35; thence South 89°53' East, along said line

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which is 21.5 feet Northerly of and parallel to the south line of said Section 35, 34.48 feet to the point of beginning.

EXCEPTING from the foregoing described Parcel 1 the following parcels:

(a) A tract of land in Section 35, Township 2 North, Range 1 West of Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

Beginning at the monument marking the southwest corner of the William Gatton Donation Land Claim; thence North 59°29'35" East, along the south line of said Gatton Donation Land Claim 570.52 feet; thence North 0°13'35" West 1825.92 feet (deed North 0°03'03" East, 1826.10 feet) to a point marked by a boat spike and being the true point of beginning of the tract herein described; thence North 89°54'12" West. 1403.15 feet (deed North 89°56'57" West, 1403.15 feet) to a point marked by a boat spike; thence North 0°07'33" East 313.53 feet (deed North 0°04'48" East 313.53 feet) to point marked by a boat spike; thence South 89°54'12" East, 1075.20 feet (deed South 89°56'57" East, 1075.20 feet) to a point marked by a boat spike; thence South 65°05'03" East, 361.13 feet (deed South 65°07'48" East, 361.13 feet) to a point marked by a boat spike; thence South 0°05'48" West, 161.70 feet (deed South 0°03'03" West, 161.70 feet) to the point of beginning.

(b) A tract of land in Section 35, Township 2 North, Range 1 West of the Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

From a monument marking the Southwest corner of the William Gatton Donation Land Claim and the Northwest corner of the J. Loomis Donation Land Claim; thence North 59°29'35" East, along the South line of the said Gatton Donation Land Claim, 1045.69 feet (deed 1054.31 feet); thence North 26°15'33" West 46.56 feet (deed 44.31 feet) to the most Easterly corner of that certain tract conveyed to Beall Pipe and Tank Co. by deed recorded February 14, 1956, in Deed Book 1769, page 257; thence South 63°44'27" West, 104.25 feet to a 3/4 inch iron pipe and the true point of beginning of the tract herein described; thence South 26°16'36" East, 226.89 feet (deed South 26°15'36" East, 226.89 feet) to an iron pipe; thence along the arc of a 286.00 foot radius curve to the left (the long chord of which bears South 35°34'09" East 90.58 feet) through a central angle of 18°13'23" an arc distance of 90.96 feet (deed 91.35 feet) to an iron pipe; thence along the arc of a 332.5 foot radius curve to the left (the long chord of which bears South 57°37'05" East 149.54 feet) through a central angle of 25°59'27" an arc distance of 150.83 feet (deed 151.00 feet) to a post; thence North 65°56'11" East 777.9 feet (deed North 65°58'07" East, 777.0 feet) to a post; thence North 26°[illegible]'33" West, 900.13 feet; thence North 30°42'33" West, 35.58 feet; thence along the arc of a 250.0 foot radius curve to the left (the long chord of which bears North 44°27'33" West, 118.33 feet) through a central angle of 27°30", an arc distance of 119.99 feet; thence North 58°12'33" West, 38.59 feet; thence along

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the arc of a 337.5 foot radius curve to the left (the long chord of which bears North 66°27'33" West, 96.86 feet) through a central angle of 16°30', an arc distance of 97.19 feet; thence North 31°04'27" East 34.33 feet; thence North 58°55'33" West, 28.50 feet; thence South 31°04'27" West, 25.40 feet; thence South 63°44'27" West, 176.30 feet; thence North 76°35'40" West, 419.60 feet (deed North 76°12'33" West, 419.6 feet) to a one-inch iron pipe; thence South 63°34'17" West 240.25 feet (deed South 63°44'27" West, 241.25 feet); thence South 26°16'36" East, 977.36 feet (deed South 26°15'33" East, 977.50 feet) to the point of beginning.

(c) A parcel of land located in Section 35, Township 2 North, Range 1 West, Willamette Meridian, Multnomah County, Oregon, more particularly described as follows:

Beginning at a point on the easterly harbor line of the Willamette River as said harbor line was established by the U. S. Army Corps of Engineers, February 9, 1968, said beginning point bears North 25°51'50" West, 23.92 feet along said harbor line from its intersection with the westerly extension of the south line of said Section 35; thence from said point of beginning South 89°53'00" East, parallel with and 21.50 feet north from, when measured at right angles, the said line of Section 35, 719.08 feet to a point on a line drawn parallel with and 11.00 feet southeasterly from, when measured at right angles, the southwesterly extension of the southeasterly line of the William Gatton D.L.C.; thence North 59°29'35" East, parallel with said claim line and its said extended line, 124.71 feet; thence North 56°33'43" East, 15.52 feet to a point on a line drawn parallel with and 10.50 feet southeasterly from, when measured at right angles, the aforementioned claim line; thence North 59°29'35" East, parallel with said claim line, 124.26 feet; thence South 89°53'00" East, parallel with the said south line of Section 35, 288.73 feet; thence North 59°29'35" East, parallel with said claim line, 57.95 feet; thence North 88°09'14" West, 1386.25 feet to the said easterly harbor line, thence South 25°51'50" East, 230.00 feet to the said true point of beginning.

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which is 21.5 feet Northerly of and parallel to the south line of said Section 35, 34.48 feet to the point of beginning.

EXCEPTING from the foregoing described Parcel I the following parcels:

(a) A tract of land in Section 35, Township 2 North, Range 1 West of Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

Beginning at the monument marking the southwest corner of the William Gatton Donation Land Claim; thence North 59°29'35" East, along the south line of said Gatton Donation Land Claim 570.52 feet; thence North 0°13'35" West 1825.92 feet (deed North 0°03'03" East, 1826.10 feet) to a point marked by a boat spike and being the true point of beginning of the tract herein described; thence North 89°54'12" West. 1403.15 feet (deed North 89°56'57" West, 1403.15 feet) to a point marked by a boat spike; thence North 0°07'33" East 313.53 feet (deed North 0°04'48" East 313.53 feet) to point marked by a boat spike; thence South 89°54'12" East, 1075.20 feet (deed South 89°56'57" East, 1075.20 feet) to a point marked by a boat spike; thence South 65°05'03" East, 361.13 feet (deed South 65°07'48" East, 361.13 feet) to a point marked by a boat spike; thence South 0°05'48" West, 161.70 feet (deed South 0°03'03" West, 161.70 feet) to the point of beginning.

(b) A tract of land in Section 35, Township 2 North, Range 1 West of the Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

From a monument marking the Southwest corner of the William Gatton Donation Land Claim and the Northwest corner of the J. Loomis Donation Land Claim; thence North 59°29'35" East, along the South line of the said Gatton Donation Land Claim, 1045.69 feet (deed 1054.31 feet); thence North 26°15'33" West 46.56 feet (deed 44.31 feet) to the most Easterly corner of that certain tract conveyed to Beall Pipe and Tank Co. by deed recorded February 14, 1956, in Deed Book 1769, page 257; thence South 63°44'27" West, 104.25 feet to a 3/4 inch iron pipe and the true point of beginning of the tract herein described; thence South 26°16'36" East, 226.89 feet (deed South 26°15'36" East, 226.89 feet) to an iron pipe; thence along the arc of a 286.00 foot radius curve to the left (the long chord of which bears South 35°34'09" East 90.58 feet) through a central angle of 18°13'23" an arc distance of 90.96 feet (deed 91.35 feet) to an iron pipe; thence along the arc of a 332.5 foot radius curve to the left (the long chord of which bears South 57°37'05" East 149.54 feet) through a central angle of 25°59'27" an arc distance [illegible]50.83 feet (deed 151.00 feet) to a post; thence North 65°56'11" [illegible]7.9 feet (deed North 65°58'07" East, 777.0 feet) to a post; [illegible] 26°15'33" West, 900.13 feet; thence North 30°42'33" [illegible]t; thence along the arc of a 250.0 foot radius curve [illegible]ong chord of which bears North 44°27'33" West, [illegible] central angle of 27°30", an arc distance of [illegible] 58°12'33" West, 38.59 feet; thence along

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the arc of a 337.5 foot radius curve to the left (the long chord of which bears North 66°27'53" West, 96.86 feet) through a central angle of 16°30', an arc distance of 97.19 feet; thence North 31°04'27" East 34.33 feet; thence North 58°55'33" West, 28.50 feet; thence South 31°04'27" West, 25.40 feet; thence South 63°44'27" West, 176.30 feet; thence North 76°35'40" West, 419.60 feet (deed North 76°12'33" West, 419.6 feet) to a one-inch iron pipe; thence South 63°34'17" West 240.25 feet (deed South 63°44'27" West, 241.25 feet); thence South 26°16'36" East, 977.36 feet (deed South 26°15'33" East, 977.50 feet) to the point of beginning.

(c) A parcel of land located in Section 35, Township 2 North, Range 1 West, Willamette Meridian, Multnomah County, Oregon, more particularly described as follows:

Beginning at a point on the easterly harbor line of the Willamette River as said harbor line was established by the U. S. Army Corps of Engineers, February 9, 1968, said beginning point bears North 25°51'50" West, 23.92 feet along said harbor line from its intersection with the westerly extension of the south line of said Section 35; thence from said point of beginning South 89°53'00" East, parallel with and 21.50 feet north from, when measured at right angles, the said line of Section 35, 719.08 feet to a point on a line drawn parallel with and 11.00 feet southeasterly from, when mensured at right angles, the southwesterly extension of the southeasterly line of the William Gatton D.L.C.; thence North 59°29'35" East, parallel with said claim line and its said extended line, 124.71 feet; thence North 56°33'43" East, 15.52 feet to a point on a line drawn parallel with and 10.50 feet southeasterly from, when measured at right angles, the aforementioned claim line; thence North 59°29'35" East, parallel with said claim line, 124.26 feet; thence South 89°53'00" East, parallel with the said south line of Section 35, 118.73 feet; thence North 59°29'35" East, parallel with said claim line, 57.95 feet; thence North 88°09'14" West, 1386.25 feet to the said easterly harbor line, thence South 25°51'50" East, 230.00 feet to the said true point of beginning.

County of) ss.

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BOOK 1221 PAGE 453

EXHIBIT A

PROPERTY OF SCHNITZER INVESTMENT CORP.

PARCEL II

A tract of land situated in Section 35, Township 2 North, Range 1 West of the Willamette Meridian in Multnomah County, Oregon, described as follows, to-wit:

Beginning at the intersection of the easterly extension of the southerly line of that parcel of land described in Deed Book 800, page 254, recorded December 11, 1943, with the easterly edge of Tract No. 2, as described in Deed Book 1405, page 577, recorded May 23, 1950, which place of beginning is further described as being North 2905.09 feet and East 825.84 feet from the southwest corner of the W. Gatton Donation Land Claim; thence North 0°07'45" East along the easterly edge of said Tract No. 2, 674.21 feet (674.14 feet Deed) to the intersection of the easterly extension of the northerly boundary of a parcel of land described in deed recorded December 11, 1943, in Deed Book 800, page 254; thence North 80°52'45" West (North 80°55'45" Deed) along the easterly extension of said northerly boundary of said parcel 595.57 feet; thence leaving said easterly extension of said northerly boundary South 0°07'45" West parallel with the easterly edge of said Tract No. 2 described in said Deed Book 1405, page 577, 770.71 feet to the southerly boundary of said parcel described in said Deed Book 800, page 254; thence South 89°52'15" East along said southerly boundary and the easterly extension thereof 587.70 feet to the place of beginning.

Reserving the rights of Northwest set forth in the Agreement between Schnitzer Investment Corp., Palmco, Inc., Dell Oil Terminal Co., Northwest Terminal Co. and Time Oil Company dated November 9, 1977, including but not limited to the permanent easement for use of Time Road described in Section 4.1 of said Agreement.

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BOOK 1220 PAGE 2129

AGREEMENT

I

Introductory Provisions

1.1 Date of Agreement. This Agreement is made this 9th day of November, 1977.

1.2 Parties. The parties to this Agreement are:

Schnitzer Investment Corp., an Oregon corporation (hereinafter "Schnitzer")

Palmco Inc., an Oregon corporation (hereinafter "Palmco")

Bell Oil Terminal Co., an Oregon corporation (hereinafter "Bell")

Northwest Terminal Co., an Oregon corporation (hereinafter "Northwest")

Time Oil Co., a Washington corporation (hereinafter "Time")

The latter three corporations are sometimes collectively referred to herein as the "Time Group."

1.3 Status of Parties.

(a) Schnitzer is the fee owner of the real property described in Exhibit A attached hereto.

(b) Palmco is currently the lessee from Schnitzer, under terms of a lease dated April 23, 1973, of that portion of Schnitzer's real property described in Exhibit B attached hereto. All rights and obligations of Palmco herein shall be applicable to Palmco, regardless of its status as lessee, owner, or part-owner of such real property. also 117

(c) Bell is the owner of the real property described in Exhibit C attached hereto. also 75, 76, 83

(d) Northwest is the owner of the real property also 102, 44? 37

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BOOK 1220 PAGE 2129

AGREEMENT

I

Introductory Provisions

1.1 Date of Agreement. This Agreement is made this 9th day of November, 1977.

1.2 Parties. The parties to this Agreement are:

Schnitzer Investment Corp., an Oregon corporation (hereinafter "Schnitzer")

Palmco Inc., an Oregon corporation (hereinafter "Palmco")

Bell Oil Terminal Co., an Oregon corporation (hereinafter "Bell")

Northwest Terminal Co., an Oregon corporation (hereinafter "Northwest")

Time Oil Co., a Washington corporation (hereinafter "Time")

The latter three corporations are sometimes collectively referred to herein as the "Time Group."

1.3 Status of Parties.

(a) Schnitzer is the fee owner of the real property described in Exhibit A attached hereto.

(b) Palmco is currently the lessee from Schnitzer, under terms of a lease dated April 23, 1973, of that portion of Schnitzer's real property described in Exhibit B attached hereto. All rights and obligations of Palmco herein shall be applicable to Palmco, regardless of its status as lessee, owner, or part-owner of such real property.

(c) Bell is the owner of the real property described in Exhibit C attached hereto.

(d) Northwest is the owner of the real property described in Exhibit D attached hereto.

(e) Time is the parent corporation of both Bell and Northwest and the lessee from Bell and Northwest of all of

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the real property described in Exhibits C and D.

1.4 Purpose of Agreement. Each of the parties has or claims various easements, rights-of-way and other rights of use in or over portions of the property of one or more of the other parties. Some of these claims are the subject of litigation in the Circuit Court of Multnomah County, Case Nos. 414-659, 414-660 and 417-498. The claims made in said litigation include claims of the Time Group for damages for alleged destruction of and interference with certain alleged pipeline and dock rights.

Each of the parties to this Agreement wishes to clear the title of its property from easements, rights and claims of the other parties except as provided in this Agreement or other agreements to which reference is expressly made in this Agreement, and to resolve the claims made in the aforesaid litigation.

The purpose of this Agreement is to accomplish these wishes of the parties by resolution of the claims and issues in said litigation and by clearing the title of the parties to this Agreement to the property described in Exhibits to this Agreement from easements, rights and claims of other parties to this Agreement except as expressly stated in this Agreement or reserved by reference in this Agreement to other agreements.

II

Railroad Rights

2.1 Agreement of October 7, 1974. Schnitzer, Bell, Northwest and Time are parties to that certain Agreement dated October 7, 1974, defining certain rights of the parties to construct and use rail trackage over portions of the real property described in Exhibits to this Agreement and over other real property. The provisions of that Agreement are expressly reaffirmed, and this Agreement shall not be deemed to amend or modify any of the rights or obligations stated in the Agreement of October 7, 1974 unless such intent to amend or modify is expressly stated in this Agreement.

2.2 Schnitzer-Palmco Lease of April 23, 1973. The above-mentioned lease dated April 23, 1973 between Schnitzer, as lessor, and Palmco, as lessee, has certain provisions concerning construction and use of railroad track over portions of the real property described in Exhibits to this Agreement. This Agreement shall not be deemed to amend or modify any of the rights or obligations stated in the Agreement of April

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23, 1973 unless such intent to amend or modify is expressly stated in this Agreement.

2.3 Easement to Bell. Schnitzer, with Palmco's consent, hereby grants to Bell, on the terms set forth in Sections 2.4, 2.5 and 2.6 of this Agreement, a non-exclusive easement over and upon the property described as Easement No. 1 and No. 2 in Exhibit E attached hereto for the purpose of constructing, maintaining and using a railroad spur track to connect Bell's property described in Exhibit C to the so-called Palmco spur railroad track and for the purpose of using Schnitzer's railroad tracks located on the property described in Exhibit E attached hereto, to move rail cars to and from the Bell property. The property described in Exhibit E includes, but is not limited to, the property described as Parcels III and V in the aforesaid Agreement of October 7, 1974, and is shown on the drawing as Exhibit F, attached hereto.

The easement granted herein shall run with the land of Bell described in Exhibit C and shall inure to the benefit of the present and future owners of said property. All costs of constructing the spur track connecting Bell's property with the Palmco spur shall be paid solely by Bell.

2.4 Reimbursement of Schnitzer's Track Costs. If Bell constructs the spur track connecting its property with the Palmco spur and elects to begin moving rail cars over Schnitzer's railroad track situated on the property described in Exhibit E Bell shall pay Schnitzer, before moving any railroad car over any of Schnitzer's said railroad track, the sum of $60,000.00, representing one-fourth of Schnitzer's expense in acquiring land for and constructing its existing railroad tracks on the property described in Exhibit E. Bell shall also pay all of the expense of any additional signals or permits which its use of Schnitzer's railroad track situated on the property described in Exhibit E may cause to be required.

2.5 Relation of Payments to 10/7/74 Agreement.

(a) Payment of the sum of $60,000.00 to Schnitzer under Section 2.4 of this Agreement shall be deemed payment in full for all sums due to Schnitzer from Time for reimbursement of land and track construction costs specified in sub-paragraphs 9a and 9b of the aforesaid Agreement dated October 7, 1974, in the event of exercise of the right under paragraph 9 of that Agreement to connect a spur railroad track to Schnitzer's railroad track located on Parcel III or V described in that Agreement.

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(b) If the right under paragraph 9 of the said Agreement dated October 7, 1974 to construct a spur track connecting with Schnitzer's railroad track on Parcel III or V described in that Agreement is exercised before payment to Schnitzer of the sum of $60,000.00 under Section 2.4 of this Agreement, all sums paid to Schnitzer pursuant to subparagraphs 9a and 9b of the said Agreement dated October 7, 1974 for partial reimbursement of land acquisition and track construction costs shall be credited against the $60,000.00 otherwise due under Section 2.4 of this Agreement.

2.6 Maintenance. When Bell begins using the Schnitzer railroad tracks located on the real property described in Exhibit E to this Agreement, Bell shall reimburse Schnitzer for a pro rata portion of Schnitzer's costs in maintaining said track incurred after the date of Bell's first use thereof, in accordance with the formula and other terms set forth in subparagraph 10a of the Agreement of October 7, 1974. Bell's use of the railroad track situated on Parcel 1 described in said Agreement dated October 7, 1974 shall be deemed use by Time for purposes of said subparagraph.

III

Dock and Pipeline Rights

3.1 Pipeline Easement to Bell. Schnitzer and Palmco grant to Bell, on the terms set forth in this Agreement, a permanent non-exclusive underground easement and right-of-way, 10' in width, over and upon the property described in Exhibit G attached hereto, for the purpose of piping gasoline, oil and allied petroleum products, molasses and vegetable oils between Bell's property described in Exhibit C attached hereto and the Palmco dock, together with the right to install and maintain such underground equipment and facilities on the pipeline as Bell may deem necessary or desirable for the safe and efficient use of the pipeline, including installation and maintenance of surface pits for access to valves and other fittings and a right of reasonable access to the right-of-way for the purpose of repairing, maintaining and adding to the pipelines constructed thereon. Said right-of-way is located on the perimeter of the Palmco property, is shown on the drawing attached hereto as Exhibit F, and is hereinafter referred to as the "Bell pipeline right-of-way." Such underground equipment and facilities shall not impair Palmco's and Schnitzer's right to utilize fully the surface of the right-of-way for all purposes including use of the surface as a roadway.

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3.2 Reservation of Rights. Schnitzer and Palmco reserve the right to utilize fully the surface of the Bell pipeline right-of-way for all purposes, and to install, operate and maintain additional pipelines or other facilities within, along or across said right-of-way, provided, however, that such reserved rights shall be exercised so as not unduly to interfere with pipelines of Bell or Bell's access thereto for inspection, maintenance, repair, replacement or additions thereto.

3.3 Right to Substitute Different Easement. In the event that Bell's pipelines in the Bell pipeline right-of-way interfere with Palmco's or Schnitzer's use or development of its real property, Bell shall, upon 90 days written demand, relocate such pipelines at Palmco's or Schnitzer's expense, and without expense to Bell, to a substitute easement and right-of-way on said real property which Schnitzer will grant to Bell. Upon such relocation, the pipeline easement rights granted hereunder shall cease as to the original pipeline easement and shall attach to the new pipeline easement.

3.4 Bell Pipelines on Palmco Dock. Schnitzer and Palmco also grant to Bell and its successor owners of the property described in Exhibit C the right to extend the Bell pipelines from the southerly and westerly terminus of the pipeline easement referred to in Sections 3.1 and 3.3 of this Agreement under and across the real property described in Exhibit B and on the pipe supports located on the northerly side of the Palmco dock or any replacements thereof to a terminus on the dock to which vessels will connect loading or discharge lines, together with a right of reasonable access for construction, maintenance, repair and replacement of the pipelines as thus extended, the location and extent of which right to extend is described in Exhibit H attached hereto.

3.5 Construction of Pipeline. Schnitzer and Palmco, or their designees, shall install a 10-inch, schedule 40 pipeline in the Bell pipeline right-of-way from the existing Bell pipeline on the westerly property line of Bell's property described in Exhibit C to the terminus on the Palmco dock. The pipeline shall be constructed in accordance with the specifications set forth in Exhibit H and shall be equipped with a 10-inch flange at the dock terminus.

The parties have been advised that a building permit will not be required for construction of this pipeline, and the parties are presently unaware of any other licenses or

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permits required for the construction and operation of the pipeline. If, however, any license or permit is required for construction or operation of the pipeline, it shall be obtained and paid for by Bell, except that any permit for underground construction of the pipeline shall be obtained and paid for by Palmco and Schnitzer.

Before commencement of construction, Bell shall designate a consulting engineer of its choice, who shall have final approval and power to determine that installation and construction of the pipeline is in accordance with the specifications set forth in Exhibit H. The engineer's approval shall not be unreasonably withheld.

Construction of the pipeline shall begin within 90 days after the date of this Agreement, provided that if construction is delayed by any cause beyond control of the parties, construction shall commence within 90 days after such cause ceases to exist. If commencement of construction of the pipeline is delayed beyond 90 days after the date of this Agreement by causes solely within the control of Bell, then Bell shall pay to Palmco and Schnitzer the additional costs, if any, of constructing the pipeline by reason of said delay in commencement of construction beyond the 90-day period. Any dispute as to liability for or the amount of any such additional cost shall be subject to arbitration under Section 3.22 of this Agreement.

3.6 Title to Pipeline. Upon completion of installation and construction of the pipeline as provided in Section 3.5, title to the pipeline is in Bell and its successor owners of the property described in Exhibit C, and Bell thereafter shall be responsible for all costs and liabilities arising from such ownership, including without limitation, maintenance costs, capital improvements, licensing fees and applicable taxes. Upon completion of installation and construction of the pipeline in accordance with the provisions of this Agreement, Bell's consulting engineer shall furnish to Schnitzer and Palmco a certificate that the pipeline has been installed and constructed in accordance with the specifications set forth in Exhibit H, such certificate to be furnished upon completion of construction and installation in accordance with said specifications.

ALL WARRANTIES OR GUARANTEES, INCLUDING WITHOUT LIMITATION, WARRANTIES OF MERCHANTABILITY AND FITNESS ARE EXPRESSLY DISCLAIMED except Palmco and Schnitzer shall assign to Bell any rights they or either of them may have against any contractor or supplier, based on breach of warranty, guarantee

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or contract, for failure to construct the pipeline in accordance with the provisions of this Agreement. In no event shall Palmco or Schnitzer be liable for damages of any nature, whether arising through contract, tort, or otherwise arising from their installation of the pipeline.

3.7 Definition of a Triangular Shoreland. For the purposes of this Agreement, the term "triangular shoreland" is defined as that triangular-shaped area on the Willamette River bounded by the following lines: (a) A line which is an extension of the boundary line between the Palmco property and the Northwest property into the Willamette River, (b) a line drawn into the Willamette River perpendicular to the Harbor line to the point of intersection of that line with the boundary line between the Palmco property and the Northwest property at the mean highwater mark, and (c) the Harbor line of the Willamette River, all as more particularly described on Exhibit F.

3.8 Use of Triangular Shoreland. Notwithstanding any other rights of usage of the triangular shoreland of any other person, Palmco, Schnitzer and the Time Group, and the permittees of each of them, shall have the right to use the triangular shoreland on a first-come, first-served basis, for overhanging vessels calling at the Palmco or Northwest docks, provided, however, that Palmco, Schnitzer, and the Time Group and their permittees shall use all reasonable efforts to avoid use of the triangular shoreland. For purposes of this Agreement, "permittees" shall mean any non-party to this Agreement loading or unloading products for the benefit of a party to this Agreement.

3.9 Use of Palmco Dock. Palmco, Schnitzer and Bell, and the permittees of each of them, shall have the right to use the Palmco dock on a first-come, first-served basis, provided, however, that the use of the Palmco dock by Bell or its permittees shall be limited to loading into or discharge from tanks located on the property of Bell described in Exhibit C of gasoline, oil and allied petroleum products, molasses and vegetable oils to or from vessels which can safely arrive at and be berthed and unberthed alongside the Palmco dock. Upon completion of any loading or discharging of cargo to or from tanks on the Bell property, the vessels and Bell and/or its permittees shall promptly vacate the Palmco dock.

3.10 Joint Use and Priority. The parties recognize that it may be possible for vessels to load or discharge at the Palmco dock and the Northwest dock at the same time. If that is not possible, the following provisions on priority shall apply.

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Notwithstanding Sections 3.8 and 3.9, if Palmco provides any of the Time Group with each of the notices hereinafter set forth in Section 3.11, a vessel loading or discharging Palmco cargo shall have a right of first priority to use the triangular shoreland and Palmco dock for the purpose of such loading or discharging and to remain in the triangular shoreland and at the Palmco dock as long as all reasonable efforts are used to complete loading or discharging its cargo. For the purpose of this Agreement, "Palmco cargo" shall mean cargo loaded or unloaded to or from tanks, warehouses or other facilities owned or leased by Palmco, and located on the property described in Exhibits A and B, whether or not such cargo is owned by Palmco.

Notwithstanding any language to the contrary in this Agreement, the priority in use of the Palmco dock provided in this paragraph shall not pass to any successor in interest of Palmco except for an affiliate and such priority shall terminate when Palmco and its affiliates cease to be the party in possession of and operating tanks, warehouses and other facilities owned or leased by Palmco and its affiliates and located on the property described in Exhibits A and B. "Possession" as used herein shall include the leasing of tanks, warehouses and other facilities where Palmco or its affiliates retain the obligation to operate and maintain such tanks, warehouses and facilities. An affiliate is defined as an entity in which Palmco has at least 51% ownership.

3.11 Notice of Palmco Vessel Arrival. Palmco shall advise Bell by telephone or telex of the estimated time of arrival of a vessel at the Palmco dock for the purpose of loading or discharging Palmco cargo:

(a) When Palmco is first advised of the estimated time of arrival of the vessel at the Palmco dock;

(b) When the vessel is estimated by its Captain to be five days from arrival at the Palmco dock, and such information is known to Palmco; and

(c) When the vessel crosses the Columbia River bar on its way to the Palmco dock.

3.12 Variation in Actual Vessel Arrival. It is recognized that the estimated times of arrival supplied by Palmco to Bell under Section 3.11 may differ from the actual time of a vessel's arrival due to unforeseen circumstances. If the estimated times of arrival provided by Palmco under Section 3.11 are provided in good faith, Palmco or its permittee shall have the right of first priority for use of the Palmco

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dock and triangular shoreland even if there is a difference between the estimated time of arrival and the actual time of arrival.

Upon notice from Palmco in accordance with this Agreement of arrival of a vessel to load or discharge Palmco cargo, the Time Group will cause vessels using the triangular shoreland and/or Palmco dock with the permission of any member of the Time Group to vacate sufficiently to permit Palmco or its permittee its right of first priority in use of said dock and triangular shoreland. If a vessel using said dock and/or triangular shoreland fails to move and denies Palmco or its permittee its right of first priority in use of said dock or triangular shoreland, in violation of this Agreement, the member of the Time Group originally giving permission to the vessel to use the Palmco dock and/or occupy the triangular shoreland shall pay to Palmco all demurrage and other expenses incurred by Palmco as a result of such interference with Palmco's right of first priority in use of the Palmco dock and triangular shoreland. Such payment shall be in addition to any injunctive or other remedies at law or in equity.

3.13 In the event that there is a vessel at the Northwest dock upon arrival in Portland of a Palmco vessel, Palmco's priority right of usage of the triangular shoreland shall require such vessel at the Northwest dock to vacate the triangular shoreland, or a portion of it sufficient to allow the incoming vessel to safely berth or unberth and load or discharge Palmco cargo, within six hours following arrival of the Palmco vessel.

3.14 Priority of Bell at Palmco Dock. In the event that there is a vessel under the control of Schnitzer or Palmco lying at the Palmco dock, but said vessel is not loading or discharging cargo or engaged in any work incident thereto, and another party to this Agreement or its permittee desires to use the Palmco dock for loading or discharging cargo, the party which has the vessel lying at the dock under its control shall cause said vessel to vacate the dock upon six hours' notice by telephone or telex from the party desiring to use the dock for loading or discharging of cargo. If a vessel using said dock and/or triangular shoreland fails to move after the above notice has been given and thereby denies the notifying party or its permittees access to the Palmco dock and/or triangular shoreland, the party having control over the offending vessel shall pay to the notifying party all demurrage and other expenses incurred by the notifying party as a result of such failure to remove said vessel.

3.15 Commencement of Notification Procedure at Palmco Dock. Bell shall notify Palmco in writing one month in advance of the date upon which Bell desires Palmco to commence the

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notification procedure described or referred to in Sections 3.10, 3.11 and 3.12 to obtain priority usage of the Palmco dock. Until such written notice is provided, Palmco shall have priority usage of the Palmco dock without such notification. In the event that Bell does not use the Palmco dock for a period of four consecutive months, Palmco may discontinue such notification procedure and maintain its priority use of the Palmco dock until Palmco again receives written notice from Bell one month in advance of Bell's intention to use the Palmco dock.

3.16 Maintenance and Improvement of Palmco Dock. Unless otherwise stated herein, Palmco or its successor as owner or operator of the Palmco dock shall pay all costs reasonably required, in its sole opinion, to maintain, repair and improve the Palmco dock, including without limitation, capital expenditures incurred after the date of this Agreement, taxes, insurance, State Land Board rents, if any, or any other costs required by federal, state or city agencies. Such costs shall not include ground rent paid by Palmco pursuant to its lease from Schnitzer dated April 23, 1975, or any renewal or replacement thereof. Bell will reimburse Palmco for Bell's proportionate share of all such costs, based on the number of hours during which vessels under the control of Bell are loading or discharging at the Palmco dock in comparison to the total hours of all vessels loading or discharging at the Palmco dock. At the end of each quarter of the calendar year, beginning with the end of the first full quarter after the date of this Agreement, Palmco shall calculate the total expenses incurred for maintenance, repair and improvement of the Palmco dock in the preceding period, including the expenses already listed, taxes, governmental assessments and depreciation expense of capital costs for improvement of the dock incurred after the date of this Agreement, calculated on a straight-line basis over the useful life of the improvement. Palmco shall bill Bell for its proportionate share of such total expenses. Bell shall pay Palmco's bill within 30 days after receipt by Bell of such bill or demand arbitration as hereinafter provided in this Agreement within that period.

3.17 Expenses of One Party. In the event that any of the expenses described in Section 3.16 of this Agreement, including but not limited to capital expenditures, are incurred solely because of use of or activities upon the Palmco dock by one party to this Agreement or its permittees, such costs in their entirety will be billed to and paid by that party.

In the event that the dock is damaged while being used by one party or its permittee, all such damage shall be the responsibility of and paid for by that party to this Agreement or its permittee. Nothing contained herein shall limit

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Palmco's right to repair such damage and bill and be paid for such repair by the party responsible.

Any disagreement between the parties in application of this Section 3.17 shall be arbitrated as hereinafter provided.

3.18 Improvements of Bell Pipeline. Bell may install on the Palmco dock and maintain at its expense any equipment or facilities required to be located on the Palmco dock by its use of the pipelines and which do not unreasonably interfere with Palmco's usage of the Palmco Dock, provided, however, that any such equipment or facilities which may be installed in a fashion which allows attachment at the commencement of each operation and removal at the end thereof, shall be so installed. Bell may install and maintain at its expense any other equipment or facilities on the Palmco dock with the prior written approval of Palmco and Schnitzer. Any disagreement between the parties in application of this Section 3.18 shall be arbitrated as hereinafter provided.

3.19 Right of Bell to Repair Dock. If Schnitzer or Palmco fails to perform, within a reasonable time after written request by Bell, maintenance, repairs or any other act necessary for Bell or its permittees to exercise Bell's right to use the Palmco dock as provided in this Agreement, and if performance of such maintenance, repairs or act is the responsibility of Schnitzer or Palmco under the terms of this Agreement, then Bell may perform such maintenance, repairs or act and Palmco or Schnitzer shall reimburse Bell for its reasonable expense incurred in doing so, or for such pro rata portion thereof as is their responsibility under the terms of this Agreement. However, if Schnitzer or Palmco provides Bell with written notice that it does not intend to use the Palmco dock in the future, Palmco or Schnitzer shall not have the obligation to so reimburse Bell. If Palmco or Schnitzer thereafter use the Palmco dock it shall reimburse Bell for the repair and maintenance expenses on a pro rata basis in accordance with Section 3.16, based on usage after the date Palmco or Schnitzer recommences usage of the dock. Any dispute under this paragraph shall be subject to arbitration as hereinafter provided.

3.20 Replacement of Palmco Dock. The rights and obligations of the parties stated in this Agreement concerning the Palmco dock and triangular shoreland shall exist so long as the present Palmco dock exists, and shall attach to any replacement of the present Palmco dock intended to serve a

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generally similar function to the present Palmco dock. Palmco or Schnitzer shall have the right to replace the Palmco dock for any reason, provided that a replacement dock shall not deprive Bell of the ability to use the dock pursuant to the same terms and conditions of this Agreement. In the event that the replacement dock is generally similar in function to the present Palmco dock, Bell shall share proportionately in the cost of the replacement dock through payment of the depreciation expense as described in Section 3.16 of this Agreement. Otherwise, such replacement dock costs shall be borne by Schnitzer or Palmco. Notwithstanding anything otherwise stated in this Section, if any capital expenditure is made in construction of any replacement dock solely because of the needs of one party, such party shall be solely responsible for payment of that capital expense, and it shall not be prorated among other parties.

Nothing herein shall impose on Schnitzer or Palmco any obligation to maintain the Palmco dock. In the event that Palmco or Schnitzer desire to destroy the dock without providing a replacement such party shall give Bell 90 days written notice of such decision. In the event that Bell notifies Palmco or Schnitzer in writing 60 days after the date of the first notice of its desire to maintain the dock, thereafter Bell shall so maintain the dock so as to prevent injury to third persons or damage to third party property and shall indemnify and hold Palmco and Schnitzer harmless therefrom. If Bell elects to maintain the dock, Palmco or Schnitzer shall upon 30 days written notice have the right to again use the dock pursuant to the conditions of this Agreement. Upon the recommencement of usage Bell's obligations of maintenance and indemnification described herein shall terminate and maintenance expense shall be prorated in accordance with Section 3.17.

Whether and to what extent any party must reimburse another pursuant to the terms of this paragraph for expenses to replace the Palmco dock shall be arbitrated in accordance with Section 3.22 of this Agreement.

3.21 Right of Bell to Replace Palmco Dock. In the event that the Palmco dock is destroyed or damaged to an extent that prevents its use while this Agreement remains in effect, and in the event that neither Schnitzer nor Palmco or their successors elects to repair said damage or construct a replacement dock, Bell, upon reasonable advance notice in writing to other parties, shall have the right to perform

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such repairs or construct such replacement dock. Upon completion of such repairs or replacement dock, all rights and obligations of the parties under this Agreement shall apply to it, including rights of Bell to be reimbursed for repair or replacement costs on a pro rata basis as provided in Section 3.16, 3.19 or 3.20 of this Agreement. Any proceeds from insurance, or claims against third parties shall be assigned by Palmco or Schnitzer to Bell to be applied against the cost of repairing or replacing the damaged or destroyed dock.

Whether and to what extent any party must reimburse another, pursuant to the terms of this paragraph, for expenses to replace the Palmco dock shall be arbitrated in accordance with Section 3.22 of this Agreement.

3.22 Arbitration of Certain Issues. Any dispute between the parties concerning any of the following matters shall be subject to arbitration:

(a) Any additional pipeline construction cost under Section 3.5 of this Agreement;

(b) The proper proration between the parties under Section 3.16 of this Agreement of expenses described in that Section;

(c) Whether an expense falls within and is governed by the terms of Section 3.17 of this Agreement;

(d) Whether particular improvements of the Bell pipe lines and facilities of the Palmco dock will or do interfere with the use of the dock by Palmco or its permittees and are therefore not permitted by Section 3.18;

(e) Whether and to what extent any other party must reimburse Bell for repairs to the Palmco dock pursuant to Section 3.19 of this Agreement;

(f) Whether and to what extent any party must reimburse another for expenses to replace the Palmco dock in accordance with Sections 3.20 and 3.21 of this Agreement.

Unless otherwise agreed by the parties, any arbitration under this Section shall be before a single arbitrator chosen by the parties or by the American Arbitration Association and conducted in accordance with the rules of the American Arbitration Association.

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Nonperformance of this Agreement in any respect which is in dispute and subject to arbitration under this Section shall not entitle any other party to this Agreement to rescind or fail to perform its other obligations under this Agreement unless and until an award has been entered in the arbitration and the party against whom the award was rendered has failed to pay or perform the terms of the award within 30 days after the date of the award.

3.23 Access to Palmco Dock by Employees of Bell and its Permittees. Employees of Bell and its permittees shall have the right of reasonable access, by a means and route determined by Palmco, to the Palmco dock while a vessel is loading or discharging cargo to or from the Bell pipeline and property. Such employees shall be supervised by Bell, and neither Palmco nor Schnitzer shall have any responsibility for nor any right to direct or control such employees or their work. The employees of each party shall not load or discharge any vessel at the Palmco dock for the other party. Neither party shall employ any employee who interferes with the work of the other party. Employees of Bell and its permittees shall remain on the Palmco property only for such time as is reasonably necessary to complete loading or discharging of a vessel or to complete work on the Bell pipeline right-of-way as permitted by this Agreement, and such employee shall in no way interfere with any employees or operations of Palmco or Schnitzer. It is not intended by this Agreement that any joint venture shall be created between any of the parties, and nothing in this Agreement shall impose any duty upon Palmco or Schnitzer with respect to employees of Bell or its permittees.

Reasonable access for employees of Bell and its permittees means access through a gate to be constructed and designated by Palmco, except as may be otherwise necessary for construction or maintenance purposes.

3.24 Compensation Act Coverage for Employees on Palmco Property. All employees of any party engaged in any work on Palmco property shall be protected by the employer of those employees under the terms of any applicable state or federal Workmen's Compensation Act and any other applicable laws present or future, requiring payment of benefits in the event of injury to employees.

3.25 Jurisdictional Disputes. If any jurisdictional dispute arises within or between labor organizations concerning work by employees of Bell or its permittees on Palmco's property permitted by the terms of this Agreement, Palmco, Schnitzer

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and Bell shall attempt to resolve that dispute promptly. If the dispute is submitted to arbitration under the provisions of a collective bargaining agreement, Bell, Schnitzer and Palmco agree to be bound by the final arbitration award, provided that each is allowed an opportunity to become a party to the arbitration proceeding whether or not it is a party to the collective bargaining agreement providing for such arbitration.

If work of employees of Bell or its permittees on Palmco's property under the terms of this Agreement is assigned by an arbitration award or a decision of any other body having jurisdiction to Palmco's employees, Palmco shall thereafter perform that work and Bell shall reimburse Palmco for its reasonable expenses in performing that work.

3.26 Compliance by Bell with Applicable Laws and Regulations. Bell, its employees, agents and permittees, shall comply with all applicable laws, rules and regulations of any governmental body while on Palmco property and while operating its pipelines installed in the Bell pipeline right-of-way pursuant to the terms of this Agreement. Bell shall keep the Palmco property free from any accumulation of waste materials, tools or equipment, and upon completion of any work on the Palmco dock, the Bell pipeline right-of-way, or other Palmco property, shall leave the area in the same clean and safe condition as existed before any such work commenced.

3.27 Rights and Obligations Run with Property. All rights granted to and obligations imposed upon Bell by this Agreement arising from and incidental to the Bell pipeline right-of-way and Bell's rights to use the Palmco dock and the triangular shoreland are appurtenant to and run with the Bell property described in Exhibit C.

All rights granted to and obligations imposed upon Northwest by this Agreement arising from and incidental to its right to use the triangular shoreland as provided in this Agreement, are appurtenant to and run with the property of Northwest described in Exhibit D.

All rights granted to and obligations imposed upon Schnitzer and Palmco by this Agreement with respect to the Bell pipeline right-of-way, the Palmco dock and the triangular shoreland are appurtenant to and run with the properties owned or leased by those respective parties as described in Exhibits A and B.

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3.28 Schnitzer-Palmco Lease. Nothing herein shall be deemed to amend or modify the obligations and rights of Palmco and Schnitzer under the lease between these two parties dated April 23, 1973. In the event there are any terms herein which conflict with the lease, the lease shall control, as between the parties thereto.

3.29 Termination of Prior Dock and Pipeline Rights. The rights and obligations set forth in this Agreement supersede all rights granted to Bell by William Shenker et ux., as predecessors in title to Schnitzer and Palmco, in that certain Easement dated September 9, 1953 and recorded at Book 1625, page 494-496 of the deed records of Multnomah County, Oregon, and also supersede the non-exclusive underground easement of right-of-way, 10' in width, for the purpose of piping gasoline and other products, granted to Bell by William Shenker et ux., as predecessors in title of Schnitzer and Palmco, in subparagraph 1 of that certain instrument dated September 9, 1953 and recorded at Book 1626, pages 497-502 (the non-exclusive easement referred to herein being described at pages 497-498 of said instrument) of the deed records of Multnomah County, Oregon. The superseded easements and rights hereinabove referred to shall be of no further force or effect after the date of this Agreement.

3.30 Indemnification. Bell agrees to protect, indemnify and hold harmless Palmco and Schnitzer, their directors, officers and employees, against and from any and all loss, claims, actions or suits, including without limitation, judgments, settlements, attorneys' fees at the trial court level or on appeal, and all other costs of defense for or on account of injury, bodily or otherwise, to or death of persons, including Bell's employees, damage to or destruction of property, other than the Palmco dock, belonging to Schnitzer, Palmco or others, resulting from or arising out of, or in any way connected with Bell's operations pursuant to this Agreement on the Palmco dock or on other Palmco property, including, without limitation, any maritime action for oil spillage in the course of such operations, except for any loss, claims or suits arising from the sole negligence of Palmco or Schnitzer.

Palmco and Schnitzer agree to protect, indemnify and hold harmless Bell, its directors, officers and employees, against and from any and all loss, claims, actions or suits, including without limitation, judgments, settlements, attorneys' fees at the trial court level or on appeal, and all other costs of defense for or on account of injury, bodily or otherwise, to or death of persons, including their employees, damage to

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or destruction of property belonging to Bell or to others, resulting from or arising out of, or in any way connected with the respective operations of Palmco or Schnitzer pursuant to this Agreement on the Palmco dock or on other Palmco property, including without limitation any maritime action for oil spillage resulting from such operations, except for any loss, claims or suits arising from the sole negligence of Bell.

IV

Road Rights

4.1 Time Road. Schnitzer recognizes and confirms that Northwest has a permanent easement to use Time Road for ordinary road purposes, which easement is granted by a deed from the Port of Portland to Northwest dated December 2, 1943 and recorded at Book 800, page 225 of the deed records of Multnomah County, Oregon and a deed from Oregon Shipbuilding Corporation to Northwest dated December 2, 1943 and recorded at Book 800, page 240 of the deed records of Multnomah County, Oregon.

The Time Group recognize and confirm that Schnitzer has a right of ingress and egress over Time Road and the right to install facilities for utility services along that roadway as set forth in the deed from Consolidated Freightways Corporation of Delaware to Schnitzer Investment Corp. recorded June 22, 1973 at Book 933, page 1902 of the deed records of Multnomah County, Oregon.

4.2 Road from Bell Property to N. Sever Road. Schnitzer and Palmco recognize and confirm that Bell has a non-exclusive easement for access and egress between Bell's property described in Exhibit C and N. Sever Road over an existing roadway, which easement was granted in the deed from William Shenker et ux. to Bell Oil Terminal Co. dated September 9, 1953 and recorded at Book 1625, page 497 of the deed records of Multnomah County, Oregon and which easement and existing roadway are more particularly described in the deed from Louis Dulien et ux. to California Container Corp. dated June 1, 1950 and recorded at Book 1408, page 125 of the deed records of Multnomah County, Oregon as follows:

> A 60-foot roadway, running east and west, north of and adjoining the north boundary line of the tract conveyed in fee by the said deed recorded at Book 1408, page 125, which 60-foot roadway runs the full length of the north boundary line of said tract; thence becoming a

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40-foot roadway extending east for a distance of 155 feet from the most northerly northeast corner of the said tract conveyed in fee by deed recorded at Book 1408, page 125; thence on a curve to the right having an inside radius of 160 feet, a distance of 159.0 feet to a point; thence south 39 degrees 27' east a distance of 460 feet to a point; thence continuing on a curve to the right, with an inside radius of 160 feet, a distance of 67.5 feet to a point; thence south 18 degrees east a distance of 275 feet; thence on a curve to the left, with an inside radius of 100 feet, a distance of 150.8 feet; thence east 57 feet to a point; thence becoming a 50-foot roadway, being 25 feet on each side of the centerline described as follows:
Beginning at the center line of the easterly terminus of the above-described 40-foot roadway; thence south 10.77 feet to a point which is the true point of beginning of the center line of the said 50-foot roadway; thence south 59 degrees east a distance of 687 feet to a point; thence on a curve to the left, having a radius of 175 feet, a distance of 97.5 feet to a point; thence south 89 degrees east a distance of 348 feet to a point 15 feet southerly of the center line of N. Sever Road.

4.3 Substitute Road and Easement. Schnitzer or its successors may, at any time in the future, construct a substitute road connecting Bell's property described in Exhibit C with Time Road at a point where Time Road abuts property now owned by Schnitzer. If such substitute road is built, has a minumum width of 30 feet, and has no sharp corners or other characteristics which would preclude safe use of the road by the largest vehicles presently allowable on Class A Oregon State highways (Zarosinski-Tatone Engineers, Inc., or, if that firm is no longer in existence, an engineer agreed upon by Schnitzer and Bell, to be the the final arbiter of whether road meets aforesaid requirements), and if Schnitzer or its successors grants to Bell or its successors a permanent easement for use of said substitute road for access to and egress from the Bell property, without limitation upon what may be carried by vehicles using the road for such access and egress, then Bell or its successor will abandon the roadway easement described in Section 4.2 of this Agreement by quitclaim deed to Schnitzer or its successors.

4.4 Easements to Run with Land. The existing and future roadway easements described in Sections 4.1, 4.2 and 4.3 of this Agreement are intended to benefit the properties to and

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from which they permit access and egress, and shall, therefore, run with the land and inure to the benefit of the present owners of said properties and their successors in interest. The property benefited by the easement described in Section 4.1 of this Agreement is the property presently owned by Northwest described in Exhibit D and the property of Schnitzer described in Exhibit A. The property benefited by the easement described in Section 4.2 of this Agreement and by the future easement described in Section 4.3 of this Agreement is the property presently owned by Bell described in Exhibit C.

V

Title Clearance

5.1 Schnitzer Property. In order to free the property of Schnitzer from outmoded and unneeded easements, rights-of-way and other encumbrances, Northwest and Bell are executing contemporaneously herewith a quitclaim deed to Schnitzer which releases all claims to any right, title or interest whatsoever in, upon or over Schnitzer's property described in Exhibit A or any part thereof, except rights reserved or created in this Agreement and rights reserved or created in the heretofore mentioned Agreement dated October 7, 1974 between Northwest, Time and Schnitzer, or in instruments executed pursuant to the provisions of said Agreement dated October 7, 1974.

5.2 Northwest and Bell Properties. In order to free the properties of Bell and Northwest from outmoded and unneeded easements, rights-of-way and other encumbrances, Schnitzer is executing contemporaneously herewith quitclaim deeds to Bell and Northwest which release all claims to any right, title or interest whatsoever in, upon or over their respective properties described in Exhibits C and D or any part thereof, except rights reserved or created in this Agreement and rights reserved or created in the aforesaid Agreement dated October 7, 1974, or in instruments executed pursuant to the provisions of said Agreement dated October 7, 1974.

5.3 Conflict. If there is any conflict or inconsistency in the terms of effect of any quitclaim deed executed contemporaneously herewith and referred to in Section 5.1 or 5.2 of this Agreement with the terms or effect of any rights reserved or created in this Agreement or in the aforesaid Agreement dated October 7, 1974, or in instruments executed pursuant to the provisions of said Agreement dated October

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7, 1974, then this Agreement or the said Agreement dated October 7, 1974, or instruments executed pursuant to said Agreement, shall prevail over the conflicting or inconsistent provision in any such quitclaim deed.

VI

Disposition of Claims and Litigation

6.1 Mutual Release. Each of the parties to this Agreement hereby releases and forever discharges each of the other parties to this Agreement from any and all liability, or claims of liability, of whatsoever nature now existing, whether known or unknown, arising out of or pertaining to any act or omission alleged to have caused damage to, or to have interfered with, the property of any such other party described or referred to in this Agreement or to or with easements or other property rights claimed in or upon the property of any other party to this Agreement, said released and discharged liability or claims of liability including, but not limited to, the claims which are the subject of that certain litigation now pending in the Circuit Court of Multnomah County as Case Nos. 414-659, 414-660 and 417-498. This release does not affect any right or claim arising under this Agreement or under the aforesaid Agreement dated October 7, 1974, or under any instrument executed pursuant to said Agreement dated October 7, 1974.

6.2 Dismissal of Litigation. As part of the consideration for this Agreement, the parties have previously caused to be dismissed the said Case Nos. 414-659, 414-660 and 417-498, with prejudice and without costs to any party.

VII

General Conditions

7.1 Liens. No party shall allow any indebtedness to accrue for labor, materials, equipment, supplies or services which may become a lien on the property of any other party, and in any such case the property owner may discharge any such indebtedness and charge the other party therefor, provided that the other party has not instituted legal proceedings contesting the validity of such lien.

7.2 Modification and Waiver. This Agreement shall not be modified without the written consent of each party affected by such modification.

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Waiver of any breach or failure to exercise any right hereunder, or failure to enforce any of the terms and conditions of this Agreement, shall not in any way affect, limit or waive the right thereafter to require strict compliance with every term and condition hereof.

7.3 Notices. Any and all notices provided for herein shall be deemed to have been properly given if the same shall have been communicated to each party as follows:

a. If directed to Bell Oil by telephone:

Bell Oil Terminal Company
Office of Vice President
503 - 286-1611

If directed to Bell Oil by letter or telex:

Bell Oil Terminal Company
P. O. Box 24447
Terminal Annex
Seattle, Washington 98124
Telex No: _____

b. If directed to Northwest Terminal Company by telephone:

Northwest Terminal Company
Office of Vice President
503 - 286-1611

If directed to Northwest Terminal Company by letter or telex:

Northwest Terminal Company
P. O. Box 24447
Terminal Annex
Seattle, Washington
Telex No: _____

c. If directed to Palmco by telephone:

Palmco Inc.
Office of Vice President
503 - 286-8827

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If directed to Palmco by letter or telex:

Palmco Inc.
Office of Vice President
12005 N. Burgard Road
P. O. Box 03380
Portland, Oregon 97203
Telex No: 360679

d. If directed to Schnitzer by telephone:

Schnitzer Investment Corp.
Kenneth M. Novack
503 - 224-9900

If directed to Schnitzer by letter or telex:

Schnitzer Investment Corp.
3300 N.W. Yeon
Portland, Oregon 97210
Telex No: 36-0144

Any party may change its own place of notification by notifying all other parties in writing one month in advance of the effective date of such change.

7.4 Attorneys' Fees. The prevailing party in any arbitration proceeding, trial or appellate court proceeding shall be entitled to reasonable attorney's fees as determined by the decision maker in that proceeding.

7.5 Successors and Assigns. The rights and obligations of each party to this Agreement shall inure to the benefit of and bind their respective successors and assigns, subject to such limitations on transfer or assignment as are elsewhere stated in this Agreement.

IN WITNESS WHEREOF, each of the parties has executed this Agreement on the date first above mentioned.

SCHNITZER INVESTMENT CORP.,
an Oregon corporation

By _____
Title Vice President

BELL OIL TERMINAL CO.,
an Oregon corporation

By _____
Title President

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PALMCO INC., an Oregon corporation

By _____
Title PRESIDENT

NORTHWEST TERMINAL CO., an Oregon corporation

By _____
Title PRESIDENT

TIME OIL CO., a Washington corporation

By _____
Title PRESIDENT

FORM NO. 23 — ACKNOWLEDGMENT
STEVENS NESS LAW PUB CO PORTLAND ORE

STATE OF OREGON,
County of Multnomah } ss.

BE IT REMEMBERED, That on this 30th day of September, 1977, before me, the undersigned, a Notary Public in and for said County and State, personally appeared the within named R. D. Abendroth, President of Bell Oil Terminal Co., Northwest Termi-al Co., and Time Oil Co.

known to me to be the identical individual described in and who executed the within instrument and acknowledged to me that he executed the same freely and voluntarily on behalf and with the authority of each of said corporations.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal the day and year last above written.

John L. Cates
Notary Public for Oregon.
My Commission expires August 25, 1978

FORM NO. 23 — ACKNOWLEDGMENT
STEVENS NESS LAW PUB CO PORTLAND ORE

STATE OF OREGON,
County of Multnomah } ss.

BE IT REMEMBERED, That on this 7th day of November, 1977, before me, the undersigned, a Notary Public in and for said County and State, personally appeared the within named Kenneth M. Novack, Vice President of Schnitzer Investment Corp.

known to me to be the identical individual described in and who executed the within instrument and acknowledged to me that he executed the same freely and voluntarily. on behalf of and with the authority of the said corporation.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal the day and year last above written.

Grace C. Egan
Notary Public for Oregon.
My Commission expires 2/5/81

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FORM NO. 23 — ACKNOWLEDGMENT
STEVENS-NESS LAW PUB. CO., PORTLAND, ORE.

STATE OF OREGON,
County of Multnomah } ss.

BE IT REMEMBERED, That on this 9th day of November, 1977, before me, the undersigned, a Notary Public in and for said County and State, personally appeared the within named G.E. Bryant, President of Palmco Inc.

known to me to be the identical individual described in and who executed the within instrument and acknowledged to me that he executed the same freely and voluntarily on behalf of and with the authority of the said corporation.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal the day and year last above written.

Notary Public for Oregon.
My Commission expires 5/1/78

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EXHIBIT A

PROPERTY OF SCHNITZER INVESTMENT CORP.

PARCEL I

A tract of land in Section 35, Township 2 North, Range 1 West of the Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

Beginning on the old harbor line along the right or easterly side of the Willamette River at a point which bears North 26°17'40" West 24.01 feet along said harbor line from its intersection with the projection of the south line of said Section 35; thence South 89°53' East, parallel with and 21.5 feet North from the south line of said Section 35 and its projection, a distance of 684.60 feet to a point on a line drawn parallel with and 11.0 feet Southerly, when measured at right angles, from the projected southeasterly line of the William Gatton Donation Land Claim; thence North 59°29'35" East, parallel with and 11.0 feet Southeasterly from said claim line and its projection, 124.71 feet; thence North 56°33'43" East 15.52 feet to a point 10.5 feet Southeasterly, measured at right angles from said claim line; thence North 59°29'35" East, parallel with and 10.5 feet Southeasterly from said claim line, a distance of 124.26 feet; thence South 89°53' East, parallel with the south line of aforesaid Section 35, 288.73 feet to a point marked by an iron rod monument; thence North 59°29'35" East, parallel with said claim line, 57.95 feet to a point marked by an iron rod monument; thence South 89°53' East, parallel with the south line of said Section 35, 1904.74 feet to a point marked by an iron rod monument; thence North 61°47'20" East 394.57 feet to a point in the westerly right-of-way line of N. Burgard, County Road No. 1397, said point being 30 feet Westerly, measured at right angles, from the center line of said road; thence North 22°46'10" West, along said westerly right-of-way line, 205.69 feet to a point that is North 70°27' East 30.55 feet from the southeast corner of that certain tract conveyed to Dulien Steel Products, Inc., of Washington, by deed recorded July 18, 1956 in Deed Book 1795, page 247; thence continuing along said westerly right-of-way line, North 22°46'10" West 156.36 feet to a point; thence continuing along said westerly right-of-way line along the arc of a 543 foot radius curve to the left through a central angle of 6°24' an arc distance of 60.65 feet (the long chord of which bears North 25°58'10" West 60.62 feet); thence continuing along said westerly right-of-way line North 29°10'10" West 117.88 feet to a point on the southerly road line of North Sever Road, County Road No. 1379A; thence along said southerly road line South 60°49'50" West 42.96 feet to a point on the easterly line of that certain tract conveyed to Dulien Steel Products, Inc., of Washington, by deed recorded Jul. 18, 1956 in Deed Book 1795, page 247; thence South 60°49'50" West, along

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said southerly road line, 12.04 feet; thence continuing along said southerly road line, North 29°10'10" West, 314.54 feet; thence continuing along said southerly road line along the arc of a 273.10 foot radius curve to the left through a central angle of 9°40'25" an arc distance of 46.11 feet (the long chord of which bears North 34°00'22" West, 46.05 feet); thence continuing along said southerly road line, North 51°09'25" East 25.00 feet; thence continuing along said southerly road line along the arc of a 298.10 foot radius curve to the left through a central angle of 5°33'58" an arc distance of 28.96 feet (the long chord of which bears North 41°37'34" West 28.95 feet) to the southeasterly corner of that tract of land conveyed to McIntyre Electrical Inc., by deed recorded June 6, 1968, in Deed Book 623, page 28; thence North 89°50' West along the South line of said McIntyre tract 227.99 feet to the Southeast corner of that certain tract conveyed to Owen McIntyre Electrical Co. by deed recorded June 8, 1959, in Deed Book 1958, page 672; thence North 89°50' West along the south line of said second McIntyre tract 100.00 feet to the Southeast corner of that certain tract conveyed to Beall Pipe & Tank Corp. by deed recorded June 25, 1962, in Deed Book 2122, page 235; thence North 89°50' West along the south line of said Beall tract 235.54 feet to the Northwest corner of the tract conveyed to Dulien Steel Products, Inc. by deed recorded July 18, 1956, in Book 1795, page 247; thence North 89°50' West 11.52 feet; thence South 62°09' West 10.26 feet to the southwest corner of that certain tract conveyed to Beall Pipe and Tank Corporation, by deed recorded June 25, 1962 in Book 2122, page 235; thence North 0°10'30" West (North 1°10'30" West deed) along the west line of said Beall Tract, 118.01 feet to the northwest corner thereof; thence South 89°53' East, along the north line of said Beall Tract, 256.82 feet to the northeast corner thereof; thence South 0°54'30" East, along the east line of said Beall Tract, 4.03 feet to the northwest corner of that certain tract conveyed to Owen McIntyre Electrical Company, by deed recorded June 8, 1959, in Book 1958, page 672; thence South 89°47' East, along the north line of said McIntyre Tract, 100 feet to the northeast corner thereof and the northwest corner of that certain tract conveyed to McIntyre Electrical Inc. by deed recorded June 6, 1968 in Book 623, page 28; thence South 89°47' East, along the north line of the last McIntyre Tract, 17.53 feet to the west end of the south line of N. Sever Road; thence North 0°13' East, along the west line of said road, 70 feet; thence following the north line of N. Sever Road on the arc of a curve to the right and normal to the last described course, with a radius of 388.1 feet and central angle of 13°30' a distance of 91.1 feet; thence on a radial line to the left, North 13°39' East 10 feet; thence on the arc of a curve to the right and normal to the last described course, with a radius of 398.1 feet and central angle of 35°51'30" a distance of 249.15 feet to an intersection with the westerly right-of-way line of N. Dunyard Road; thence tracing said road line North 22°46'10" West 104.16 feet to a point normal to highway monument BC 15+24.28; thence continuing along said westerly right-

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of-way line along the arc of a 507.50 foot radius curve to the right through a central angle of 69°28'30" an arc distance of 615.38 feet (the long chord of which bears North 11°58'05" East 578.36 feet) to the southwest corner of that certain tract conveyed to P.G.E. Co. by deed recorded October 4, 1967 in Book 585, page 347; thence North 15°17'15" West, along the west line of said P.G.E. Co. tract, 402.49 feet; thence continuing along said west line North 28°47'20" West 125.15 feet to the northwest corner of Parcel II, said P.G.E. Co. tract; thence South 88°00'25" East 26.50 feet to the southwesterly corner of Parcel I, said P.G.E. Co. tract; thence North 17°24'15" West, along the westerly line of said P.G.E. Co. tract, 261.95 feet; thence continuing along said westerly line along the arc of a 881.50 foot radius curve to the right through a central angle of 22°51'50", an arc distance of 351.76 feet (the long chord of which bears North 5°58'20" West 349.43 feet); thence continuing along said westerly line North 5°27'35" East 43.17 feet; thence continuing along said westerly line North 15°20'45" East 118.36 feet; thence continuing along said westerly line along the arc of a 197.60 foot radius curve to the left through a central angle of 95°54', an arc distance of 330.74 feet (the long chord of which bears North 32°36'15" West 293.46 feet); thence continuing along said westerly line, North 80°33'15" West, 68.90 feet to the most westerly corner of said P.G.E. Co. tract; thence South 9°24'15" West 11.34 feet to a point in the south line of that certain road easement described in Book 800, page 258, recorded December 11, 1943; thence North 80°35'45" West, along said easement line, 1139.06 feet to an intersection with the easterly line, projected North 0°07'45" East, of a 25 foot temporary road easement described in said deed to Northwest Terminal Co.; thence South 0°07'45" West 673.88 feet, along said projection and the easterly line of said temporary easement, to an intersection with a line drawn South 89°52'15" East from the most southerly corner of the tract conveyed to Northwest Terminal Co. by deed recorded in Book 800, page 240; thence North 89°52'15" West 1484.32 feet to the northeast corner of that certain tract conveyed to Bell Oil Terminal Co. by deed recorded February 1, 1955 in Deed Book 1703, page 450; thence South 0°02'45" West, along the east line of said Bell Tract, 417.75 feet to the southeast corner thereof; thence North 89°57'15" West, along the south line of said Bell Tract, 61.50 feet to the southwest corner thereof and the southeast corner of that certain tract conveyed to Bell Oil Terminal Co. by deed recorded October 9, 1953 in Book 1625, page 494; thence along the south and west lines of the second Bell Tract, with the following courses; North 89°55'15" West, 553.08 feet; North 0°02'45" East 180.56 feet; North 89°18'15" West 26.10 feet and North 0°02'45" East 229.39 feet to the northwest corner thereof, said point being on a line drawn South 89°52'15" East from the most southerly corner of the tract conveyed to Northwest Terminal Co. by deed recorded in Book 800, page 240; thence North 89°52'15" West 918.13 feet to a point on the harbor line on the easterly

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side of the Willamette River as established by the U.S. Army Corps of Engineers, Feburary 9, 1968; thence South 23°38'12" East, along said harbor line, 1309.36 feet to an angle point on said harbor line; thence continuing along said harbor line, South 25°51'50" East 1987.52 feet to its intersection with and 21.5 feet Northerly of the projected south line of said Section 35; thence South 89°53' East, along said line which is 21.5 feet Northerly of and parallel to the south line of said Section 35, 34.48 feet to the point of beginning, TOGETHER WITH the easements for road purposes reserved in deed from Elizabeth Shenker, a widow, individually, and Elizabeth Shenker, Trustee under the Will of William Shenker, Deceased to Dulien Steel Products, Inc. of Washington, a Washington corporation, recorded October 4, 1967 in Deed Book 585 at page 341 to 343, and in the Deed from Dulien Steel Products, Inc. of Washington, a Washington corporation, to Portland General Electric, an Oregon corporation, recorded October 4, 1967 in Deed Book 585, pages 344 to 347.

TOGETHER WITH an easement for railroad purposes reserved in the two deeds from William Shenker and Elizabeth Shenker, husband and wife, and co-partners doing business as William Shenker Company, to Bell Oil Terminal Co., recorded October 9, 1953, in Deed Book 1625, page 497, and deed recorded February 1, 1955 in Book 1703, page 450.

TOGETHER WITH an easement for railroad purposes reserved in deed from William Gatton Estate Company, an Oregon corporation and George G. Gatton, a bachelor, to Oregon Ship Building Corporation recorded February 11, 1941 in Book 588, page 508.

TOGETHER WITH an easement for railroad purposes in easement agreement with Beall Pipe & Tank Corporation, recorded November 6, 1968 in Book 648, page 1222.

EXCEPTING from the foregoing described Parcel I the following parcels:

(a) A tract of land in Section 35, Township 2 North, Range 1 West of Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

Beginning at the monument marking the southwest corner of the William Gatton Donation Land Claim; thence North 59°29'35" East, along the south line of said Gatton Donation Land Claim 570.52 feet; thence North 0°13'35" West 1825.92 feet (deed North 0°03'03" East, 1826.10 feet) to a point marked by a boat spike and being the true point of beginning of the tract herein described; thence North 89°54'12" West; 1403.15 feet (deed North 89°56'57" West, 1403.15 feet) to a point marked by a boat spike; thence North 0°07'33" East 313.53 feet (deed North 0°04'48" East 313.53 feet) to a point marked by a boat spike; thence South 89°54'12" East, 1075.20 feet (deed South 89°56'57" East, 1075.20 feet) to a point marked by a boat

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spike; thence South 65°05'03" East, 361.13 feet (deed South 65°07'48" East 361.13 feet) to a point marked by a boat spike; thence South 0°05'48" West, 161.70 feet (deed South 0°03'03" West, 161.70 feet) to the point of beginning.

(b) A tract of land in Section 35, Township 2 North, Range 1 West of the Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

From a monument marking the Southwest corner of the William Gatton Donation Land Claim and the Northwest corner of the J. Loomis Donation Land Claim; thence North 59°29'35" East, along the South line of the said Gatton Donation Land Claim, 1045.69 feet (deed 1054.31 feet); thence North 26°15'33" West 46.56 feet (deed 44.31 feet) to the most Easterly corner of that certain tract conveyed to Beall Pipe and Tank Co. by deed recorded February 14, 1956, in Deed Book 1769, page 257; thence South 63°44'27" West, 104.25 feet to a 3/4 inch iron pipe and the true point of beginning of the tract herein described; thence South 26°16'36" East, 226.89 feet (deed South 26°15'36" East, 226.89 feet) to an iron pipe; thence along the arc of a 286.00 foot radius curve to the left (the long chord of which bears South 35°34'09" East 90.58 feet) through a central angle of 18°13'23" an arc distance of 90.96 feet (deed 91.35 feet) to an iron pipe; thence along the arc of a 332.5 foot radius curve to the left (the long chord of which bears South 57°37'05" East 149.54 feet) through a central angle of 25°59'27" an arc distance of 150.83 feet (deed 151.00 feet) to a post; thence North 65°56'11" East 777.9 feet (deed North 65°58'07" East, 777.0 feet) to a post; thence North 26°15'33" West, 900.13 feet; thence North 30°42'33" West, 35.58 feet; thence along the arc of a 250.0 foot radius curve to the left (the long chord of which bears North 44°27'33" West, 118.33 feet) through a central angle of 27°30", an arc distance of 119.99 feet; thence North 58°12'33" West, 38.59 feet; thence along the arc of a 337.5 foot radius curve to the left (the long chord of which bears North 66°27'33" West, 96.86 feet) through a central angle of 16°30', an arc distance of 97.19 feet; thence North 31°04'27" East 34.33 feet; thence North 58°55'33" West, 28.50 feet; thence South 31°04'27" West, 23.40 feet; thence South 63°44'27" West, 176.30 feet; thence North 76°35'40" West, 419.60 feet (deed North 76°12'33" West, 419.6 feet) to a one-inch iron pipe; thence South 63°34'17" West 240.25 feet (deed South 63°44'27" West, 241.25 feet); thence South 26°16'36" East, 977.36 feet (deed South 26°15'33" East, 977.50 feet) to the point of beginning.

(c) A parcel of land located in Section 35, Township 2 North, Range 1 West, Willamette Meridian, Multnomah County, Oregon, more particularly described as follows:

Beginning at a point on the easterly harbor line of the Willamette River as said harbor line was established by the U.S. Army Corps of Engineers, February 9, 1968, said beginning point

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bears North 25°51'50" West, 23.92 feet along said harbor line from its intersection with the westerly extension of the south line of said Section 35; thence from said point of beginning South 89°53'00" East, parallel with and 21.50 feet north from, when measured at right angles, the said line of Section 35, 719.08 feet to a point on a line drawn parallel with and 11.00 feet southeasterly from, when measured at right angles, the southwesterly extension of the southeasterly line of the William Gatton D.L.C.; thence North 59°29'35" East, parallel with said claim line and its said extended line, 124.71 feet; thence North 56°33'43" East, 15.52 feet to a point on a line drawn parallel with and 10.50 feet southeasterly from, when measured at right angles, the aforementioned claim line; thence North 59°29'35" East, parallel with said claim line, 124.26 feet; thence South 89°53'00" East, parallel with the said south line of Section 35, 288.73 feet; thence North 59°29'35" East, parallel with said claim line, 57.95 feet; thence North 88°09'14" West, 1386.25 feet to the said easterly harbor line, thence South 25°51'50" East, 230.00 feet to the said true point of beginning.

PARCEL II

A tract of land situated in Section 35, Township 2 North, Range 1 West of the Willamette Meridian in Multnomah County, Oregon, described as follows, to wit:

Beginning at the intersection of the easterly extension of the southerly line of that parcel of land described in Deed Book 800, page 234, recorded December 11, 1943, with the easterly edge of Tract No. 2, as described in Deed Book 1405, page 577, recorded May 23, 1950, which place of beginning is further described as being North 2905.09 feet and East 825.84 feet from the southwest corner of the W. Gatton Donation Land Claim; thence North 0°07'45" East along the easterly edge of said Tract No. 2, 674.21 feet (674.14 feet Deed) to the intersection of the easterly extension of the northerly boundary of a parcel of land described in deed recorded December 11, 1943, in Deed Book 800, page 234; thence North 80°32'45" West (North 80°35'45" Deed) along the easterly extension of said northerly boundary of said parcel 595.57 feet; thence leaving said easterly extension of said northerly boundary South 0°07'45" West parallel with the easterly edge of said Tract No. 2 described in said Deed Book 1405, page 577, 770.71 feet to the southerly boundary of said parcel described in said Deed Book 800, page 234; thence South 89°52'15" East along said southerly boundary and the easterly extension thereof 587.70 feet to the place of beginning.

TOGETHER WITH the right of ingress and egress over the permanent common user roadway easement and the right to install facilities for utility services along said roadway as granted in deeds, including the terms and provisions thereof, to Northwest Terminal Company, an Oregon corporation, recorded December 11 1943 in Deed Book 800, at pages 225 and 240.

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BOOK 1220 PAGE 2159

EXHIBIT B

PROPERTY OF PALMCO, INC.
LEASED FROM SCHNITZER INVESTMENT CORP.

A tract of land located in Section 35, Township 2 North, Range 1 West of the Willamette Meridian, in the City of Portland, County of Multnomah and State of Oregon, said tract of land being more particularly described as follows:

Beginning at the point of intersection of the Easterly harbor line of the Willamette River as established by the U.S. Army Corps of Engineers, February 9, 1968, with the Westerly extension of the South line of said Section 35; thence from said point of beginning North 25°51'50" West along said Easterly harbor line a distance of 2011.44 feet; thence North 23°38'12" West along said Easterly harbor line a distance of 358.90 feet to the true point of beginning of the tract of land herein described.

Thence South 89°52'15" East a distance of 917.45 feet to a point further described as North a distance of 2115.16 feet and East a distance of 93.47 feet from said point of beginning where said Easterly harbor line intersects the Westerly extension of the South line of said Section 35; thence North 00°04'48" East along the West line of that certain tract conveyed to Container Corporation by deed recorded in Book 1408, Page 125, a distance of 452.17 feet to a point on the South line of that certain tract conveyed to Bell Oil Terminal Co. by deed recorded October 9, 1953, in Book 1625, Page 494; thence North 89°57'15" West along the South line of said Bell Oil Terminal tract a distance of 355.36 feet. Thence along the West line of said Bell Oil Terminal tract the following courses: North 00°02'45" East a distance of 188.56 feet; thence North 89°18'15" West a distance of 26.10 feet; thence North 00°02'45" East a distance of 229.39 feet to the Northwest corner of said Bell Oil Terminal tract. Said point being on a line drawn South 89°52'15" East from the most Southerly corner of the tract conveyed to Northwest Terminal Co. by deed recorded in Book 800, Page 240; thence North 89°52'15" West a distance of 918.13 feet to a point on the harbor line on the Easterly side of the Willamette River established by the U.S. Army Corps of Engineers February 9, 1968; thence South 23°38'12" East along said harbor line a distance of 950.46 feet to the true point of beginning.

Said tract of land contains an area of 18.57 acres.

EXHIBIT B

and 117.

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EXHIBIT C

PROPERTY OF BELL OIL TERMINAL CO.

Beginning at a point in Section 35, Township 2 North of Range 1 West of the Willamette Meridian, at the Southwest corner of the William Gatton Donation Land Claim; thence North 59°2?'35" East 570.52 feet; thence North 0°3'3" East 1826.10 feet; thence North 89°56'57" West 1403.15 feet to a boat spike in pavement; thence North 0°4'48" East, 313.53 feet to a galvanized spike in pavement, being the Northwest corner of the tract of land conveyed to the California Container Corporation, a Delaware corporation; by deed recorded June 1, 1950 in PsDeed Book 1408 at Page 125; thence North 67°33'18" East 213.99 feet to a nail in the center of spur track; thence due South 21.5 feet to a spike in pavement; thence due North 417.75 feet to a point which is the true point of beginning; thence North 89°52'15" West, 579.18 feet to a point; thence South 229.81 feet to a spike in the North line of the tract leased to American Chemical Corporation, a Delaware corporation, by instrument recorded March 11, 1952 in PsDeed Book 1525 at Page 482; thence South 89°21' East 26.10 feet along said North line to an iron bar which is the Northeast corner of said leased tract; thence South 0°39' West 188.56 feet to an iron pipe; thence South 89°58' East 614.58 feet; thence due North 417.75 feet; thence North 89°52'15" West 61.5 feet to the true point of beginning.

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EXHIBIT C

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EXHIBIT D

BOOK 1220 PAGE 2161

PROPERTY OF NORTHWEST TERMINAL CO.

The following described property in Section 35, Township 2 North, Range 1 West of the Willamette Meridian, Multnomah County, Oregon:

Beginning at the Southwesterly corner of a tract of land conveyed to Northwest Terminal Co. by deed recorded December 11, 1943 in Book 800 at Page 240 of Deed Records; thence South 89° 52' 15" East a distance of 2505.35 feet to the Southwest corner of a tract of land conveyed to Consolidated Freightways Corporation by deed recorded July 9, 1968 in Book 628 Page 1427 of Deed Records; thence North 0° 07' 45" East along the Westerly line of the Consolidated Freightways Tract 770.71 feet to the Southerly line of a thirty-five foot easement described in deed recorded December 11, 1943 in Book 800 at Page 240 of Deed Records; thence North 80° 35' 45" West along said Southerly boundary 384.04 feet to the point of beginning of a curve left; thence along said curve left, the radius of which is 182.50 feet, an arc distance of 30.54 feet, to the end of said curve; thence South 89° 49' West along said Southerly line 1112.53 feet to the point of intersection with the Easterly line of said tract of land described in Deed recorded December 11, 1943 in Book 800 at Page 240; thence North 0° 07' 45" East 35 feet to the intersection with the Southerly line of the parcel of land conveyed by the William Gatton Estate Company and George C. Gatton to Portland General Electric Company by deed dated February 7, 1941, recorded February 11, 1941 in Book 588, Page 515 of Deed Records; thence South 89° 49' West along the Southerly line of said tract so conveyed to Portland General Electric Company 261.78 feet; thence South 58° 59' 45" West 228.04 feet along the Southeasterly boundary of said tract so conveyed to Portland General Electric Company; thence North 26° 17' 40" West 50.17 feet along the Southwesterly boundary of said tract so conveyed to Portland General Electric Company; thence South 58° 59' 45" West 804.77 feet along the Southeasterly boundary of the strip of land 150 feet wide occupied by Bonneville Power Administration to the Harbor Line of the Willamette River; thence South 26° 17' 40" East along said Harbor Line a distance of 416.30 feet to the point of beginning.

TOGETHER WITH a permanent easement for road purposes over the property known as Time Road to the intersection of said road with N. Burgard Road, as described in the deed of Oregon Shipbuilding Corporation to Northwest Terminal Co. dated December 2, 1943 and recorded December 11, 1943 at Book 800 Page 225 of the Deed Records; and as described in the deed from Morgan Shipbuilding Corporation to Northwest Terminal Co. dated December 2, 1943 and recorded December 11, 1943 at Book 800 Page 240 of the Deed Records.

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EXHIBIT D

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EXHIBIT E

BELL OIL COMPANY RAILROAD EASEMENT

Two (2) Easements reserved for Ingress and Egress for installing and perpetually maintaining and operating a railroad located in the William Gatton D.L.C. in the Northwest one quarter (N.W. 1/4) of Section 35, Township 2 North, Range 1, West of the Willamette Meridian, Multnomah County, Oregon. Said Easements being more particularly described as follows:

EASEMENT NO. 1

Beginning at the Southeast corner of that parcel of land conveyed to Schnitzer Investment Corporation and recorded in Book 933, Page 1902, Record of Deeds, Multnomah County, Oregon. Said point being East a distance of 825.84 feet and North a distance of 2905.09 feet from the Southwest corner of said William Gatton D.L.C.; thence North 89°52'15" West along the Southerly line of said Schnitzer property a distance of 192.15 feet to the true point of beginning of Easement No. 1.

Thence South 00°10'45" West a distance of 3.72 feet to a point of curve; thence along a 479.28 foot radius curve to the right, through a central angle of 35°51'49" an Arc distance of 300.00 feet; (the long chord of said curve bears South 18°06'40" West a distance of 295.13 feet); thence North 53°57'26" West a distance of 10.00 feet; thence in a Southwesterly direction along a 469.28 foot radius curve to the right through a central angle of 54°14'11" an Arc distance of 444.22 feet (the long chord of said curve bears South 63°09'40" West a distance of 427.82 feet) to a point that is 6.00 feet Northerly of, when measured at right angles to the Northerly line of that parcel of land conveyed to Container Corporation of America and recorded June 1, 1950 in Book 1408, Page 125, Record of Deeds, Multnomah County, Oregon; thence North 89°43'15" West, parallel with and 6.00 feet Northerly of said Northerly line a distance of 560.48 feet; thence North 00°16'45" East a distance of 20.00 feet to a point that is 26.00 feet Northerly of the Northerly line of said Container Corporation property; thence South 89°43'15" East, parallel with and 26.00 feet Northerly of said Northerly line a distance of 560.48 feet to a point of curve; thence along a 449.28 foot radius curve to the left, through a central angle of 90°06'00" an Arc distance of 706.51 feet, (the long chord of said curve bears North 45°13'45" East a distance of

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635.93 feet); thence North 00°10'45" East a distance of 296.14 feet to a point of curve; thence along a 444.28 foot radius curve to the left through a central angle of 79°52'37" an Arc distance of 619.38 feet (the long chord of said curve bears North 39°45'33" West a distance of 570.43 feet); thence North 80°32'45" West a distance of 642.86 feet to a point of curve; thence along a 488.37 foot radius curve to the right through a central angle of 56°07'28" an Arc distance of 478.39 feet (the long chord of said curve bears North 52°29'00" West a distance of 459.49 feet); thence North 65°34'43" East a distance of 40.00 feet; thence Southeasterly along a 448.37 foot radius curve to the left through a central angle of 56°07'28" an Arc distance of 439.20 feet (the long chord of said curve bears South 52°29'00" East a distance of 421.85 feet); thence South 80°32'45" East a distance of 636.30 feet to the Northwesterly corner of said Schnitzer Investment Corporation property, said point being a point of curve; thence along a 484.28 foot radius curve to the right through a central angle of 80°43'30" an Arc distance of 682.31 feet (the long chord of said curve bears South 40°11'00" East a distance of 627.26 feet); thence South 00°10'45" West a distance of 292.42 feet to a point on the Southerly line of said Schnitzer Investment Corporation property; thence North 89°52'15" West along said Southerly line a distance of 10.00 feet to the true point of beginning of the herein described Easement No. 1.

Said Easement contains an area of 2.465 acres.

EASEMENT NO. 2

Beginning at the true point of beginning of Easement No. 1, said point being on the Southerly line of said Schnitzer Investment Corporation property; thence North 89°52'15" West along said Southerly line a distance of 30.00 feet; thence South 00°10'45" West a distance of 3.72 feet to a point of curve; thence Southwesterly along a 449.28 foot radius curve to the right through a central angle of 90°06'00" an Arc distance of 706.51 feet, (the long chord of said curve bears South 45°13'45" West a distance of 635.93 feet) to a point that is 26.00 feet Northerly of when measured at right angles to the Northerly line of said Container Corporation property; thence North 89°43'15" West, parallel with and 26.00 feet Northerly of said Northerly line a distance of 495.38 feet to the true beginning of Easement No. 2.

Thence continuing North 89°43'15" west, parallel with and 26.00 feet Northerly of said Northerly line a distance of 65.10 feet; thence South 00°16'45" West a distance of 16.38

EXHIBIT E

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PORTLAND

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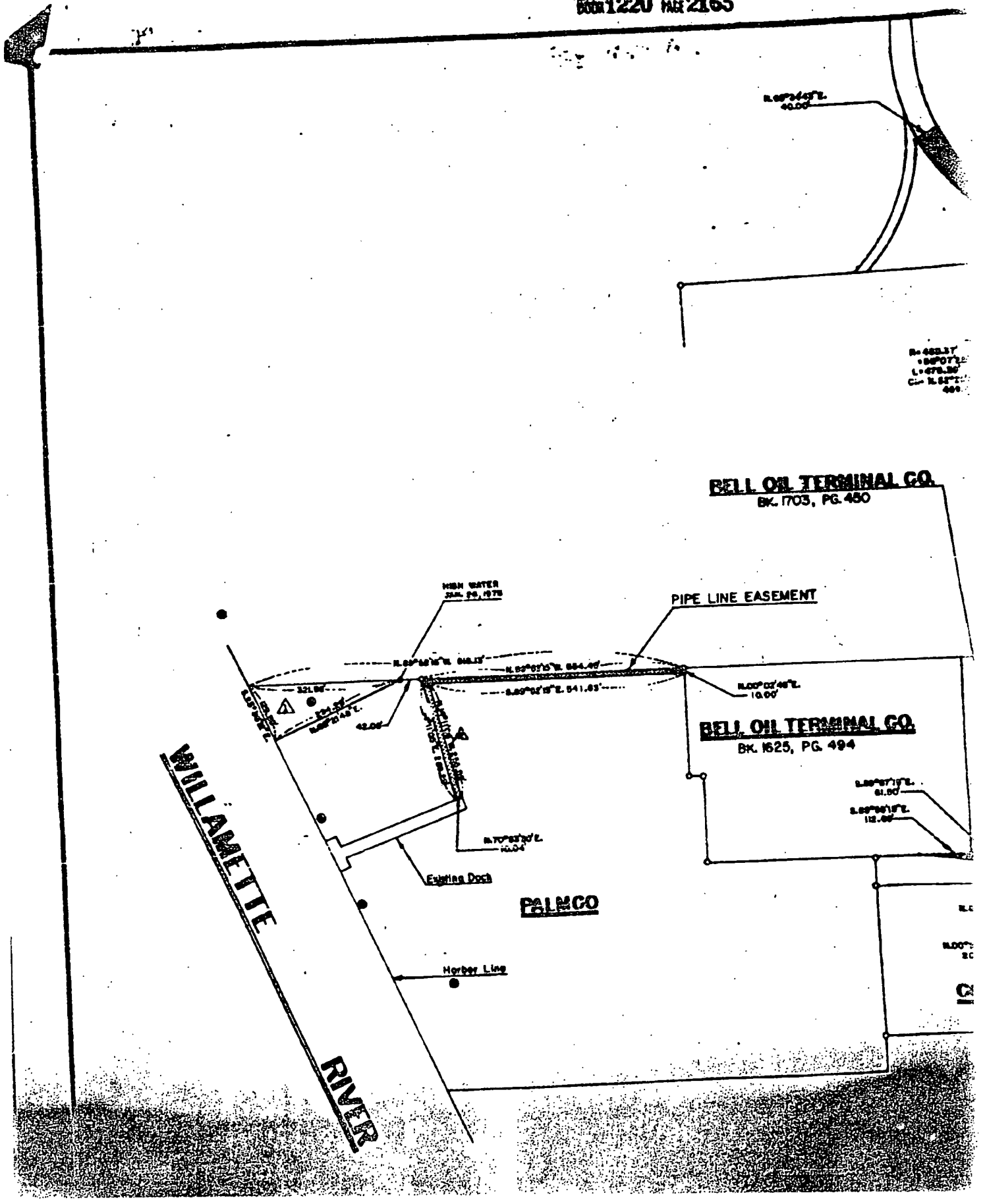
feet; thence North 83°21'35" West a distance of 435.31 feet to a point on the Southerly line of that parcel of land conveyed to Bell Oil Terminal Company and recorded October 9, 1953 in Book 1625, Page 494, Record of Deeds, Multnomah County, Oregon. Said point being North 89°55'15" West a distance of 112.69 feet from the Southeast corner of said Bell Oil property; thence South 89°55'15" East along said Southerly line a distance of 112.69 feet to said Southeast corner, said point being the Southwest corner of that parcel of land conveyed to Bell Oil Terminal Company and recorded in Book 1703, Page 450, Record of Deeds, Multnomah County, Oregon; thence South 89°57'15" East along the Southerly line of the last mentioned Bell Oil property a distance of 61.50 feet to the Southeast corner of said Bell Oil Company property; thence South 83°21'35" East a distance of 261.07 feet to a point of curve; thence along a 587.71 foot radius curve to the left through a central angle of 06°21'35" an Arc distance of 65.23 feet (the long chord of said curve bears South 86°32'27" East a distance of 65.20 feet) to the true point of beginning of the herein described Easement No. 2.

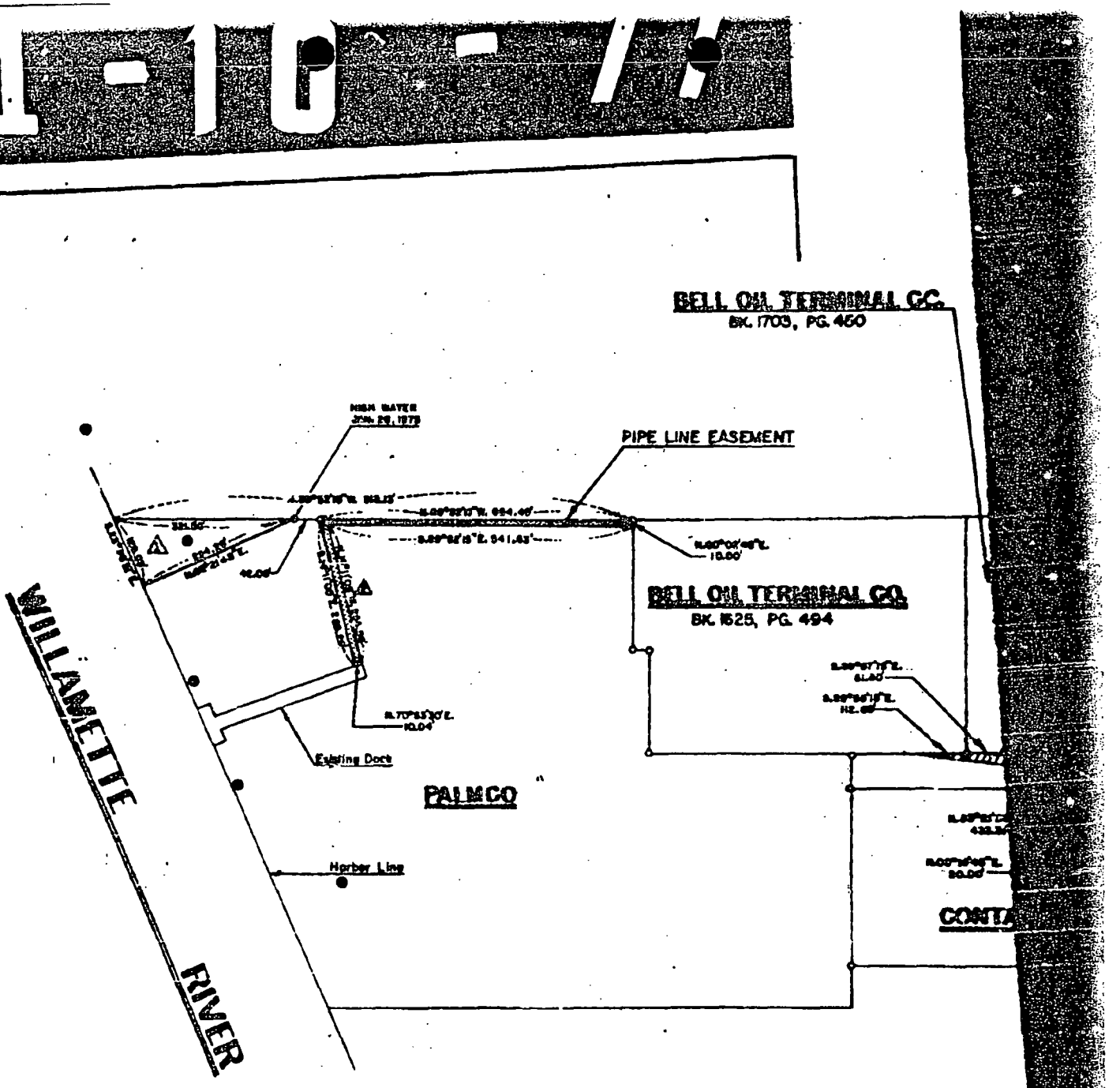
Said Easement contains an area of 7,016.36 square feet.

EXHIBIT E

PORTLAND

SCHN00260456


BELL OIL TERMINAL CO.
BK. 1703, PG. 450
HIGH WATER
PIPE LINE EASEMENT
BELL OIL TERMINAL CO.
BK. 1625, PG. 494
Existing Dock
PALMCO
Harbor Line
WILLAMETTE RIVER



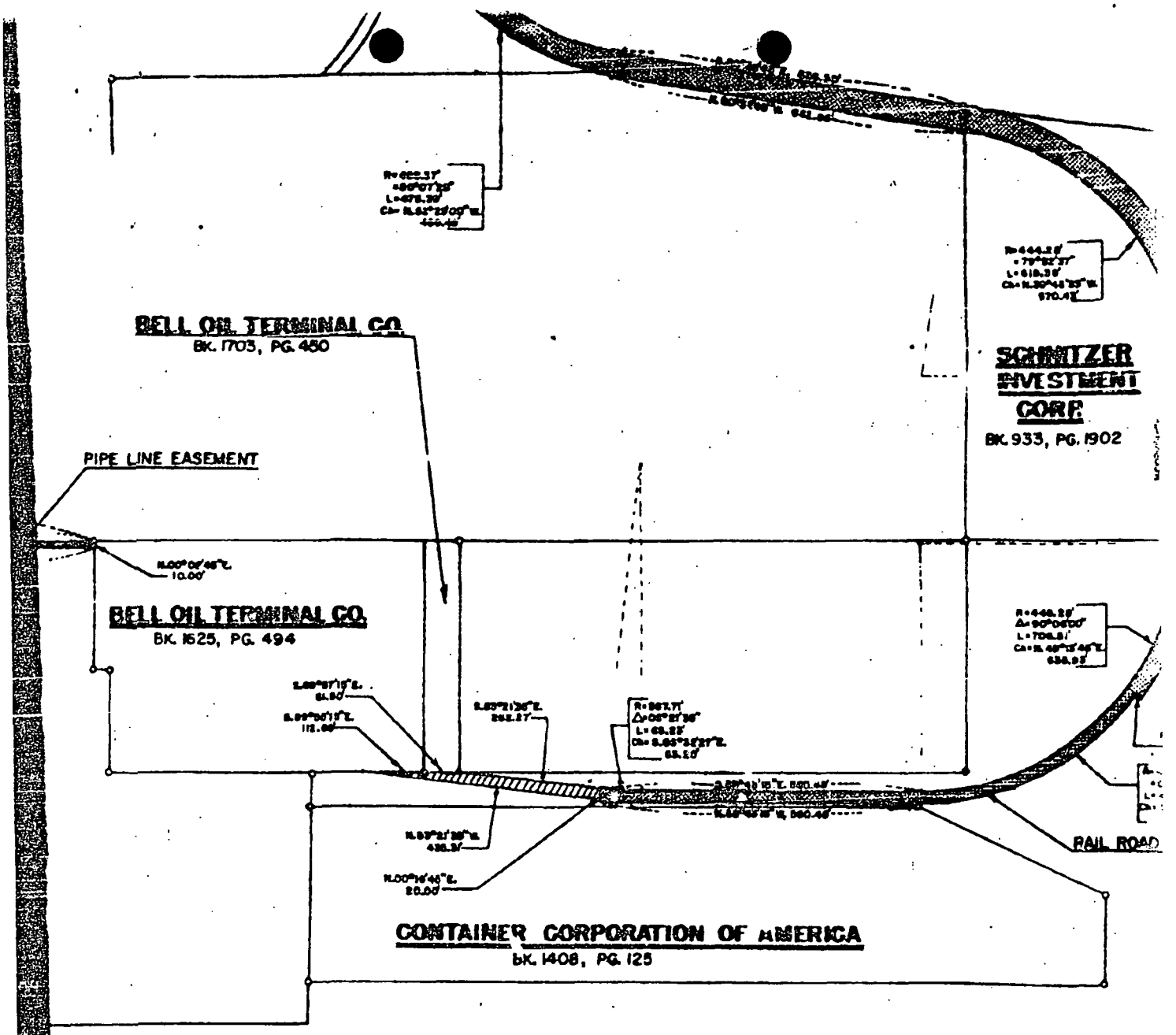
BOOK 1220 PAGE 2166

REVISIONS

1	Dolphins & Property To N.W.	8-14-77 R.R.
2	Changed Pipe Line Easement	8-31-77 R.R.

ZAR
E
3737 S.E.
LOCATED I

SCHN00260458



LEGEND

RAILROAD EASE

RAILROAD

DOLPHIN

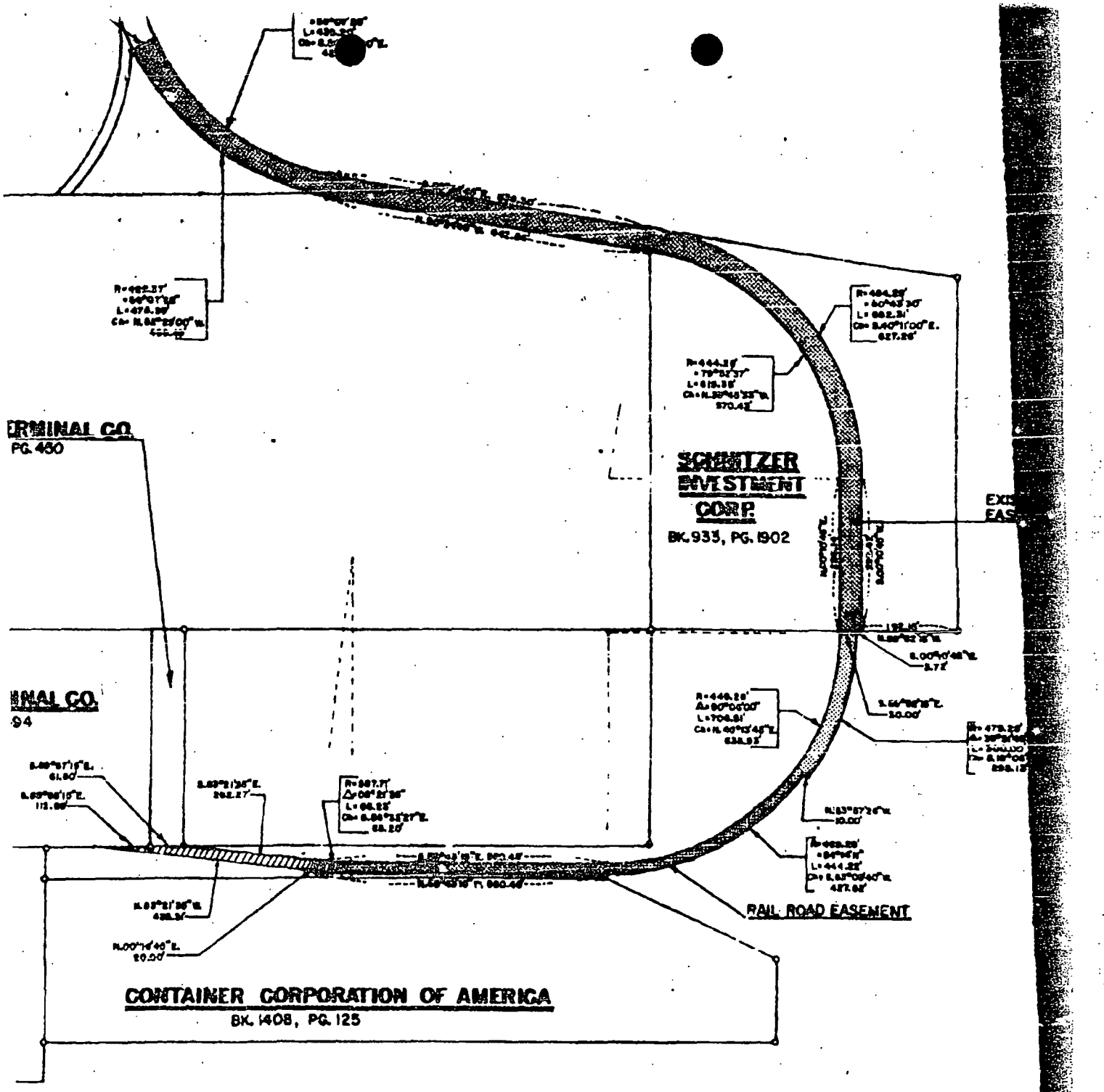
BOOK 1220 PAGE 2166

NOV 1 0 1977

BOOK 1220 PAGE 2166

REVISIONS	ZAROSINSKI-TATONE ENGINEERS, INC.	
s & Property To N.W. 2-14-77 R.R.	3737 S.E. EIGHTH AVE. PORTLAND, ORE.	
2-21-77 R.R.		

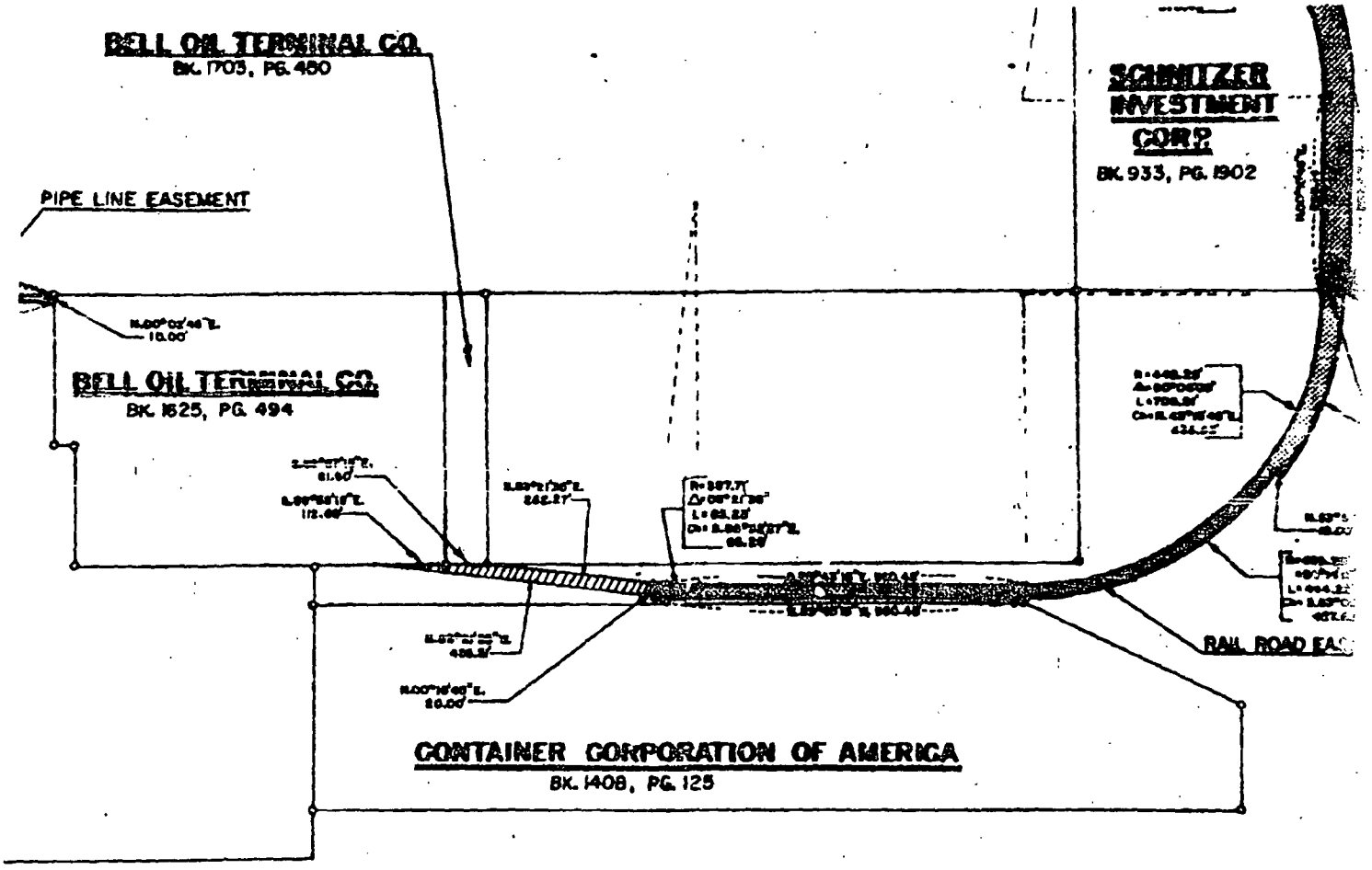
SCHN00260459



51181

BOOK 1220 PAGE 216

SCHN00260460



LEGEND

RAILROAD EASEMENT NO. 1

RAILROAD EASEMENT NO. 2

DOLPHIN

BOOK 1220 PAGE 2166

BOOK 1220 PAGE 2168

REVISIONS

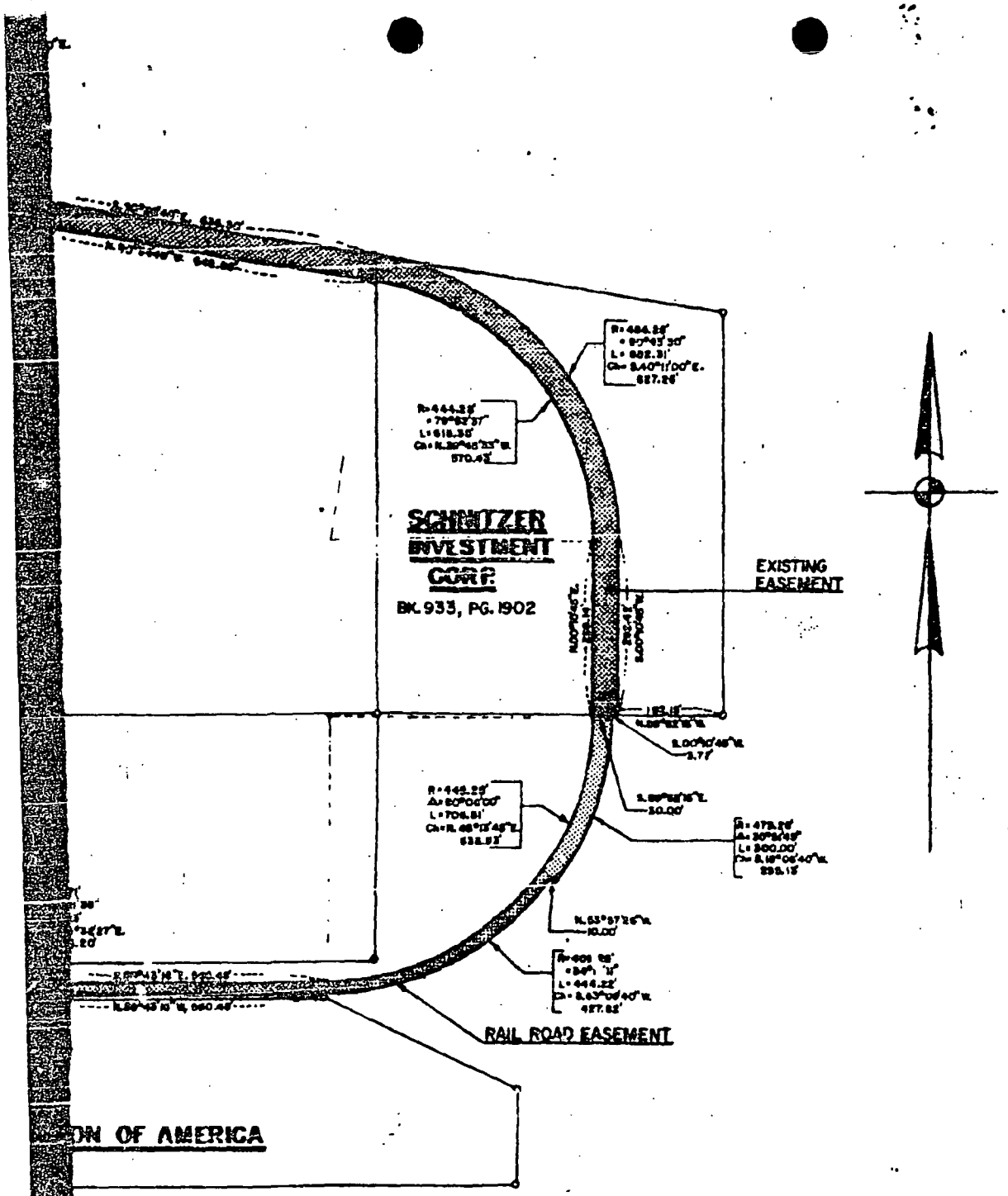
Dolphins & Property To N.W. 2-14-77 R.R.

Pipe Line Easement 2-21-77 R.R.

ZAROSINSKI-TATONE ENGINEERS, INC.

3787 S.E. EIGHTH AVE. PORTLAND, ORE.

SCHN00260461



LEGEND

RAILROAD EASEMENT NO. 1

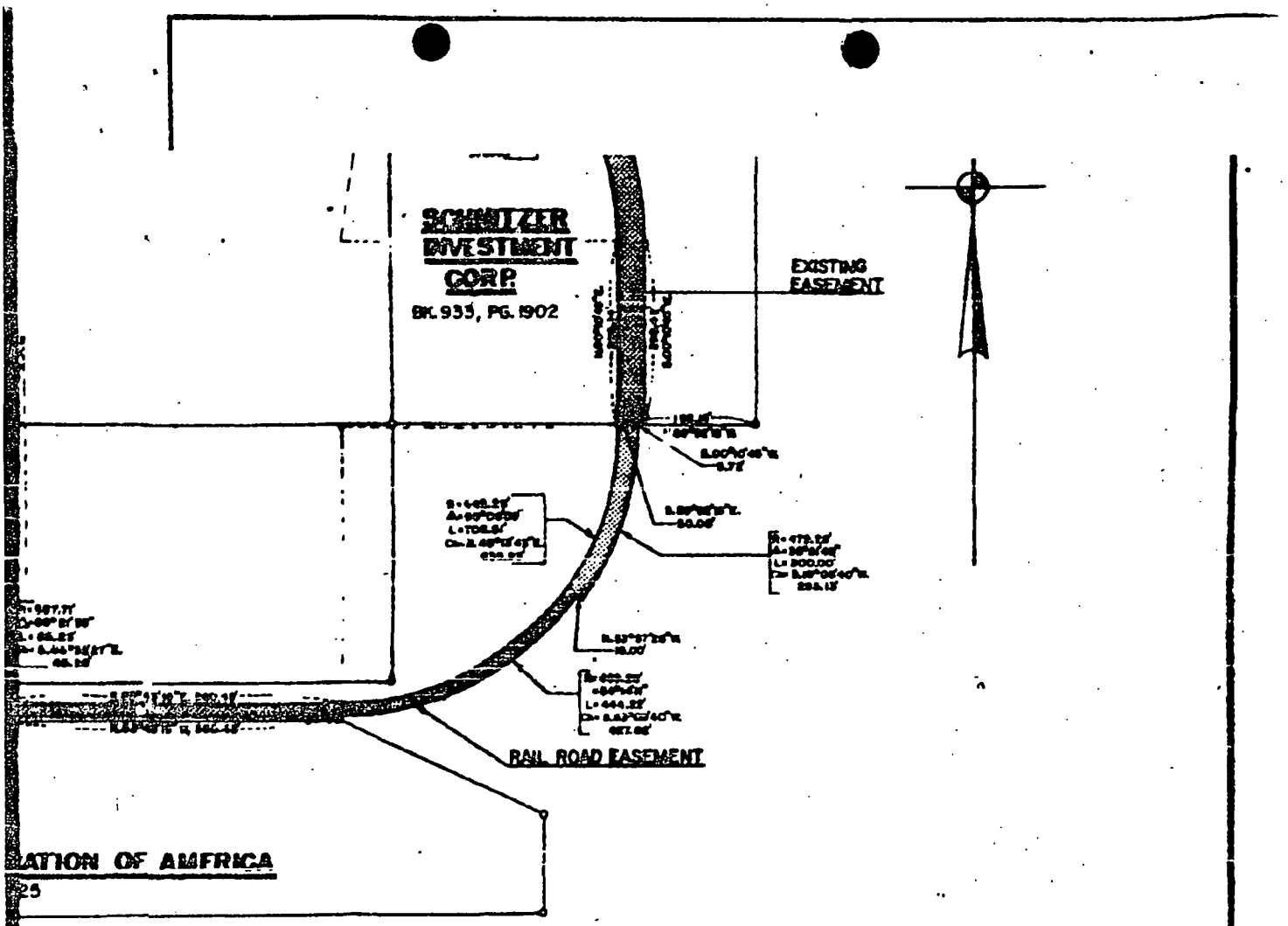
RAILROAD EASEMENT NO. 2

DOLPHIN

NOV 10 1977 Vol 2168

12

SCHN00260462



LEGEND

RAILROAD EASEMENT NO. 1

RAILROAD EASEMENT NO. 2

DOLPHIN

BOOK 1220 PAGE 2168

-TATONE
S, INC.
PORTLAND, ORE.

M GATTON D.L.C.
F SEC. 35
W. M.
TY, OREGON

BELL OIL TERMINAL CO.

R.R.& PIPE LINE EASEMENTS BY PALMCO AND SCHNITZER

5-97

EXHIBIT "F"

BOOK 1220 PAGE 2170

SCHN00260463

EXHIBIT G

DESCRIPTION OF PIPE LINE EASEMENT
GRANTED TO

BELL OIL TERMINAL CO.
BY
SCHNITZER INVESTMENT CORPORATION
AND
PALMCO, INC.

An Easement reserved for the purpose of installing and perpetually maintaining pipe lines located in the William Gatton D.L.C., in the Northwest one quarter (N.W. 1/4) of Section 35, Township 2 North, Range 1 West of the Willamette Meridian, Multnomah County, Oregon. Said Easement being more particularly described as follows:

Beginning at the Northwest corner of that Parcel of Land conveyed to Bell Oil Terminal Company and recorded October 9, 1953 in Book 1625, Page 494, Record of Deeds, Multnomah County, Oregon. Said point being North a distance of 2,912.83 feet and West a distance of 1,286.37 feet from the Southwesterly corner of said William Gatton D.L.C.; thence North 89°52'15" West along the Westerly extension of the Northerly line of said Bell Oil Terminal Company property a distance of 554.49 feet; thence South 14°11'05" East a distance of 269.29 feet; thence North 70°53'30" East a distance of 10.04 feet; thence North 14°11'05" West a distance of 255.56 feet to a point that is 10.00 feet Southerly of when measured at right angles to the Westerly extension of the Northerly line of said Bell Oil Terminal Company property; thence South 89°52'15" East parallel with and 10.00 feet Southerly of said Westerly extension a distance of 541.63 feet to a point on the Westerly line of said Bell Oil Terminal Company property; thence North 00°02'45" East along said Westerly line a distance of 10.00 feet to the true point of beginning.

Said Easement contains an area of 8,103.27 square feet.

EXHIBIT G

PORTLAN

EXHIBIT H

BOOK 1220 PAGE 2172

Pipeline from Palmco Dock
to Bell Oil Terminal

Specifications

1. Pipe

Size:	10"
Weight:	Standard weight (Sch 40)
Material:	A-53, Grade B, Seamless Steel
Coating:	Any coating or wrapping to be as designated by Bell and for its account.

2. Fittings

All fittings to be 300 pound rating; to be made of A-53, Grade B, Seamless Steel. All elbows to be "Long Radius".

3. Welding

Electrodes:
Fleetweld 5P or equal (AWS Spec E6010). Use 1/8" rod for root pass; use 5/32" rod for fill and cover passes.

Qualification:
The welding procedure and the individual welders working on the pipeline shall be qualified in accordance with API Std. 1104, 13th Ed., July 1973. Qualification may be performed at Pittsburgh Testing, Commercial Welding or other qualified testing laboratory.

4. Pressure Testing

The completed pipeline shall be hydrostatically tested @ 450 psi before burial. Test procedures and records shall be in accordance with API RP-1110; 1st Ed., January 1972. Bell's Engineer shall be present when the test is performed.

5. Burial

Since most of the pipeline can be driven over, a minimum cover of 4' shall be maintained for the buried portion of the pipeline except as otherwise noted on attached plans. Trench cut, backfill and compaction shall be as indicated in Dwg. 1434, and in accordance with API RP 1102, 4th Ed., September 1963, Section 5.6.

6. Painting

All exposed pipe, fittings and support brackets to be given one coat of metal primer and one coat of aluminum colored paint.

PUBLIC

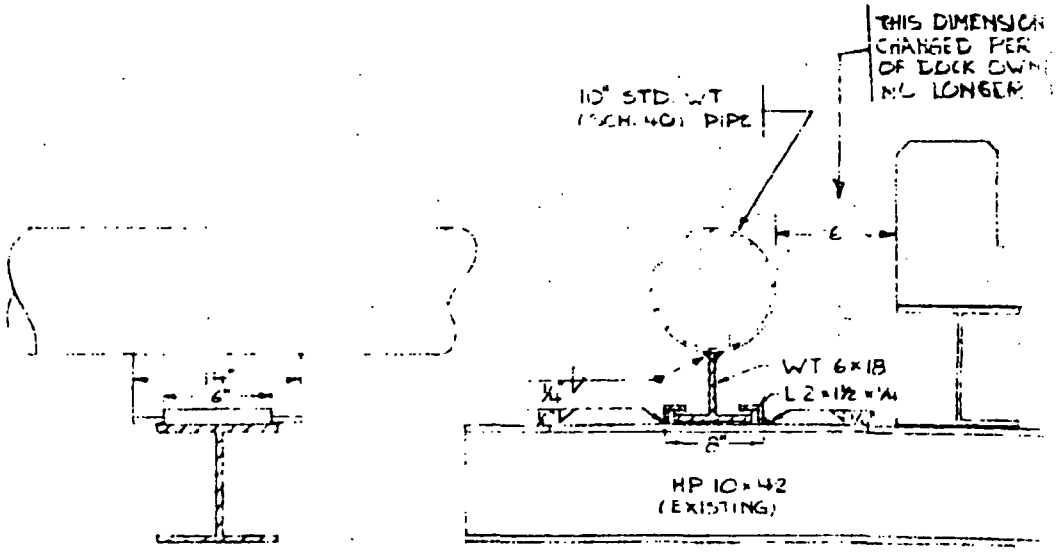
SCHN00260465

7. Bell Oil Terminal Co. Dwgs. #1433 and 1434 are to be considered a part of this specification.

8. All phases of the pipeline construction shall be subject to review, inspection and approval of a consulting engineer. The consulting engineer is to be designated by Bell Oil Terminal Co. The review and approval are to be pursuant to this specification and Bell Oil Dwgs. #1433 and 1434; review and approval to be given reasonably.

POR

BOOK 1220 PAGE 2174

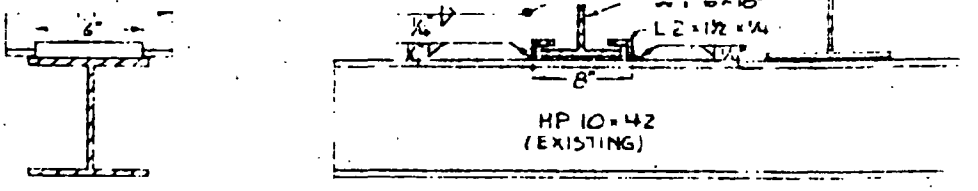


DETAIL A-2
PIPELINE SUPPORT ON PIER
SCALE: 1" = 1'-0"

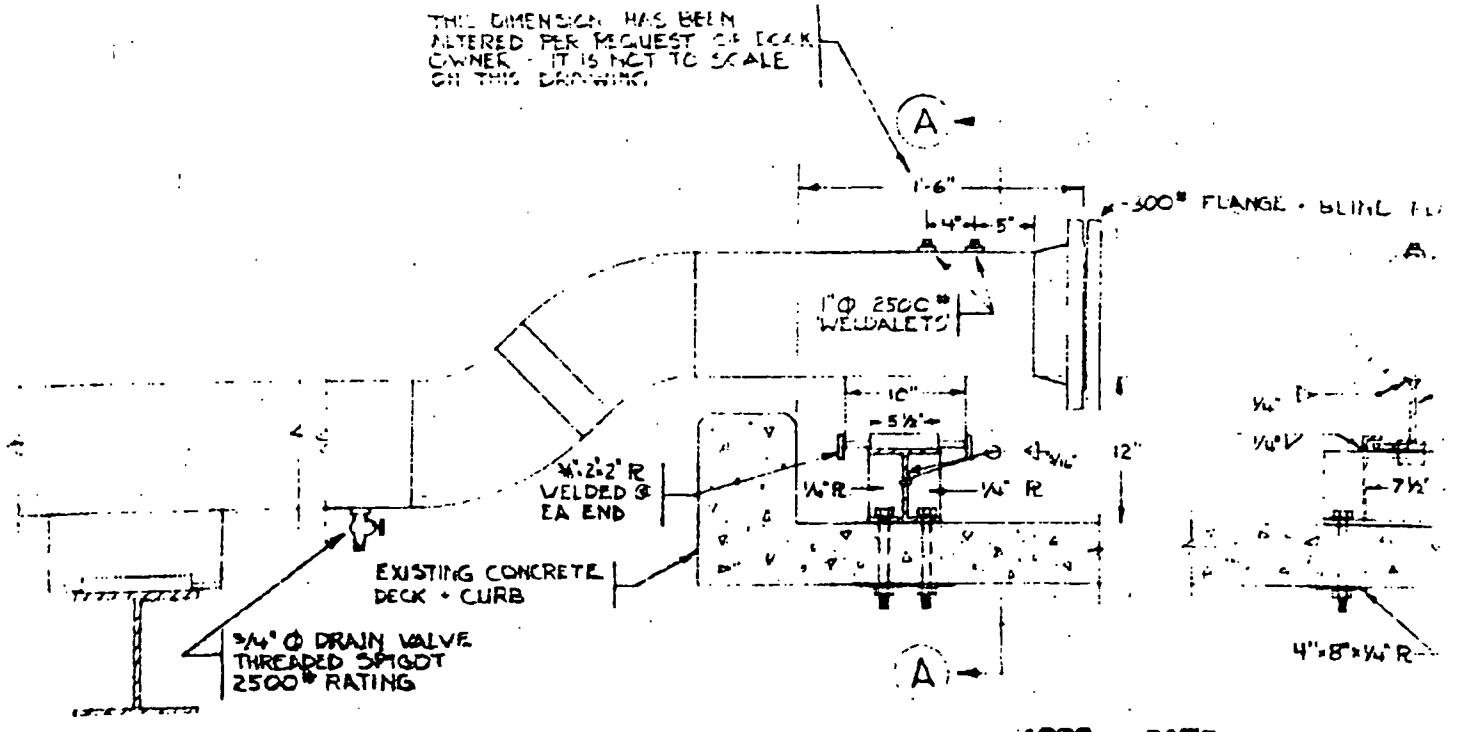
THIS DIMENSION HAS BEEN ALTERED PER REQUEST OF DOCK OWNER. IT IS NOT TO SCALE ON THIS DRAWING

A

SCHN00260467



DETAIL A-2
PIPELINE SUPPORT ON PIER
SCALE: 1" = 1'-0"

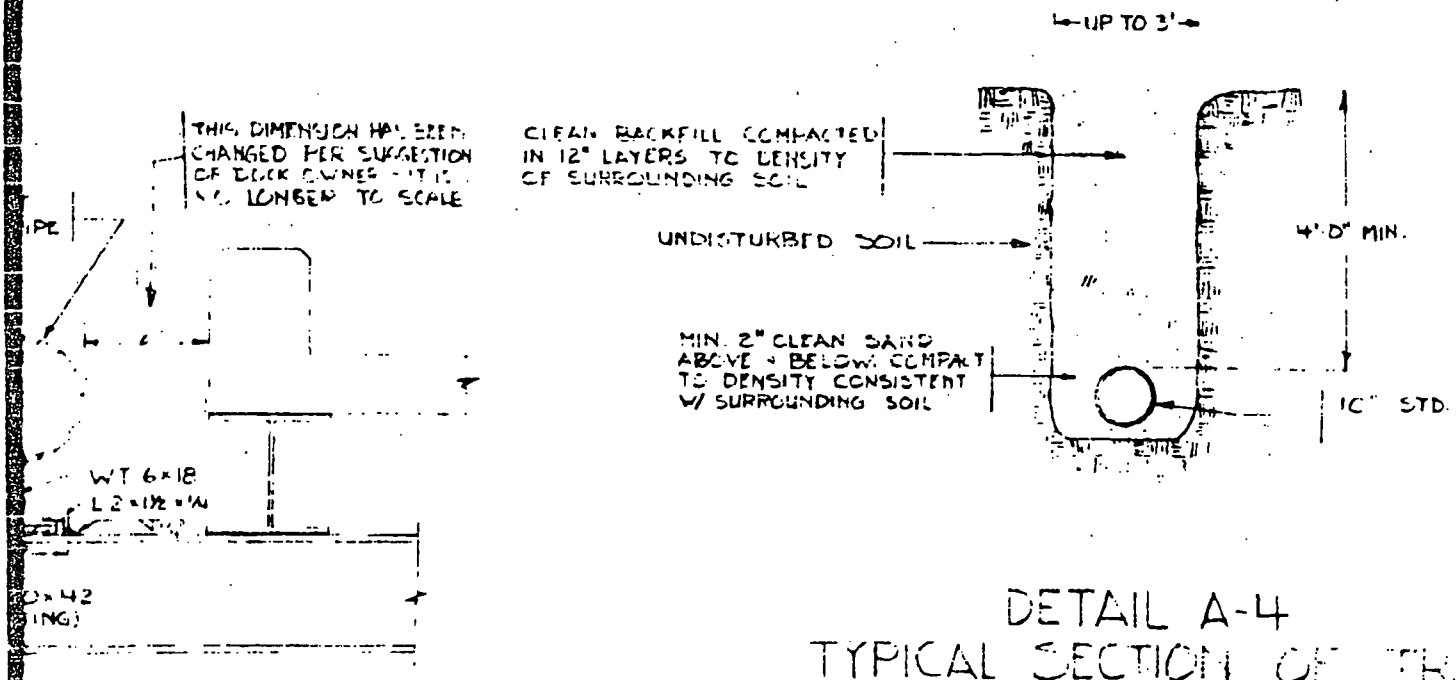


BOOK 1220 PAGE 2075

DETAIL A-1
PIPELINE SUPPORT ON DOCK
SCALE: 1" = 1'-0"

SECTION
SCAL

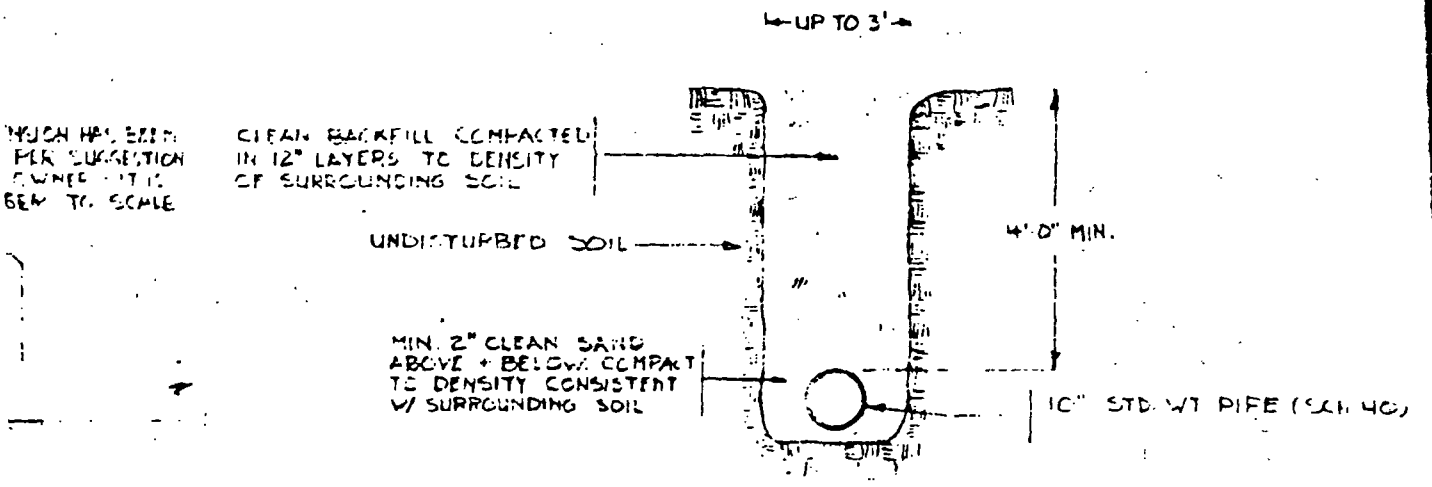
SCHN00260468



DETAIL A-4
TYPICAL SECTION OF TR
SCALE: ½" = 1'-0"

INSIDE DIM: 4'-4" x 4'-8" DEEP
OUTSIDE DIM.: 5'x5' x 6'-6" DEEP

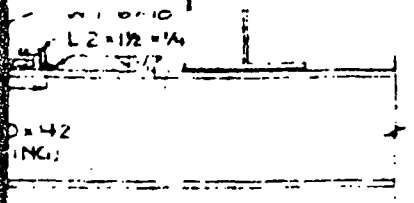
BOOK 1220 PAGE 2176



DETAIL A-4
TYPICAL SECTION OF TRENCH
SCALE: ½" = 1'-0"

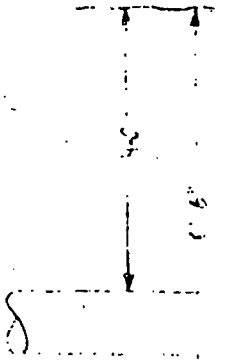
INSIDE DIM.: 4'-4" x 6'-0" DEEP
OUTSIDE DIM.: 5'-5" x 6'-6" DEEP

SCHN00260470

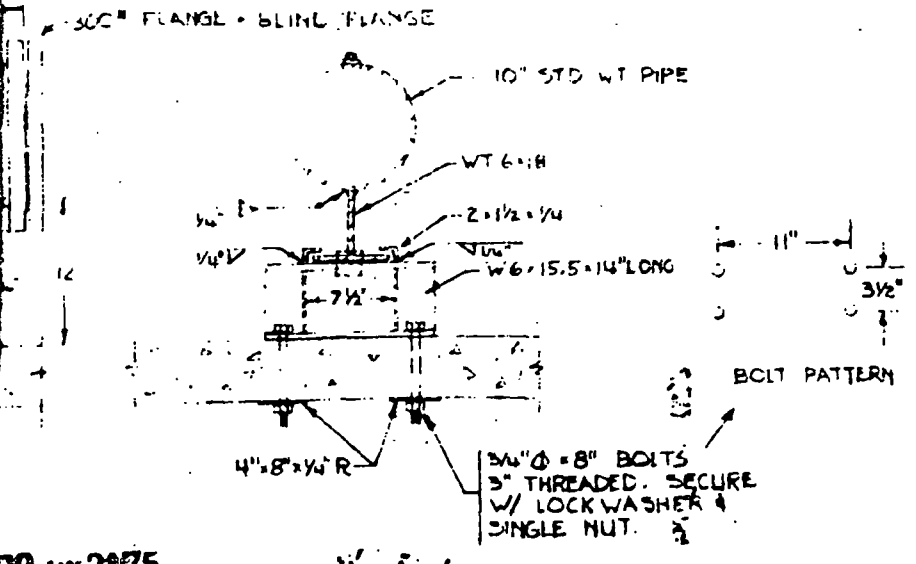


DETAIL A-4
TYPICAL SECTION OF TH
SCALE · ½" = 1'-0"

INSIDE DIM.: 4'-4' × 6'-0" DEEP
OUTSIDE DIM.: 5' × 5' - 6'-6" DEEP



¾" DRAIN VALVES
THREADED SPIGOTS
2500# RATING



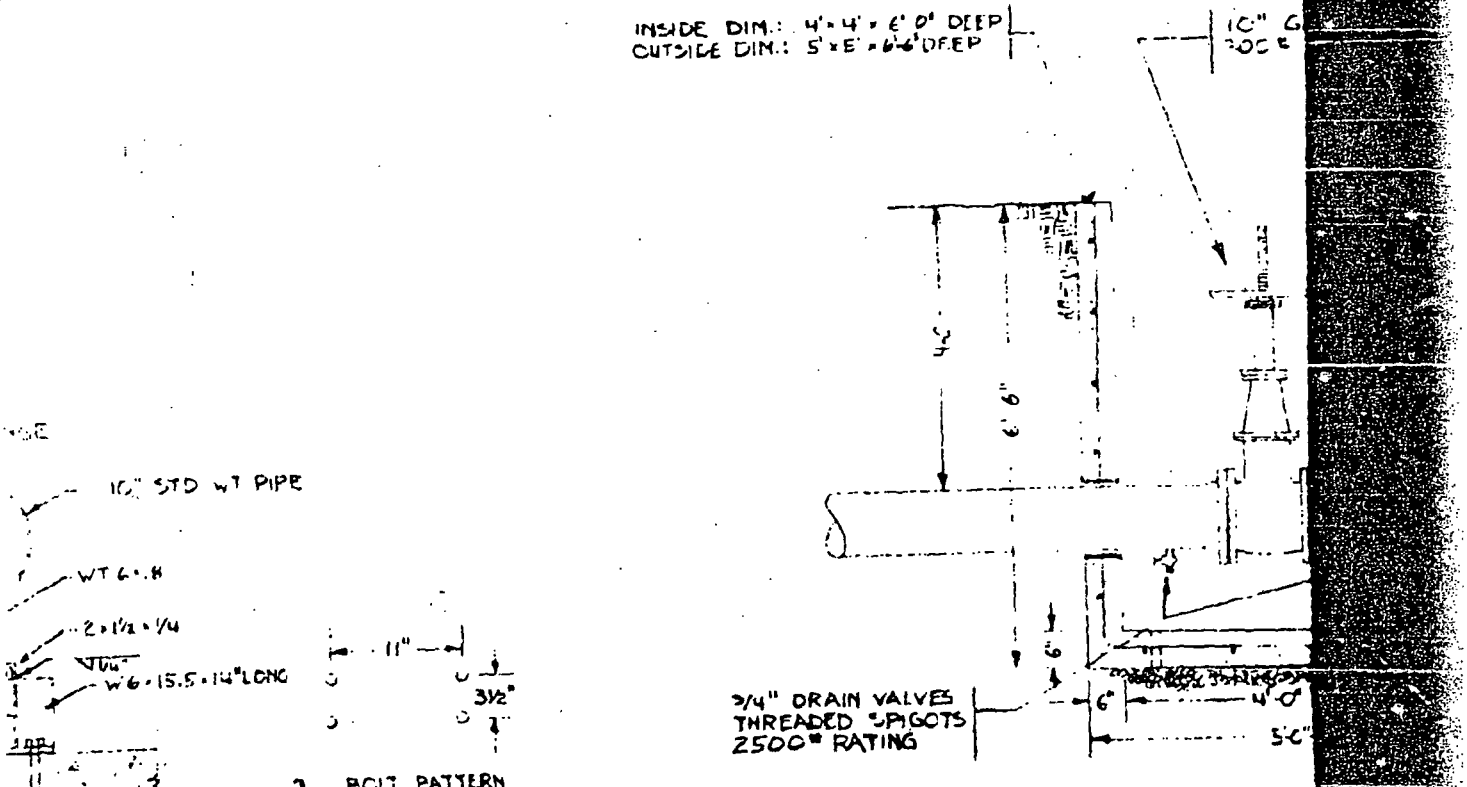
BOOK 1220 PAGE 2177

BOOK 1220 PAGE 2175

SECTION (A)
SCALE · 1" = 1'-0"

SCHN00260471

DETAIL A-4
TYPICAL SECTION OF TRENCH
SCALE: ½" = 1'-0"



BOOK 1220 PAGE 2177

DETAIL
CONCRETE VA
SCALE:

BE
1200

1" = 1'-0"

SCHN00260472

BOOK 1220 PAGE 2178

BOOK 1220 PAGE 2176

UP TO 3'

4'-0" MIN.

IC" STD. WT PIPE (SCH 40)

DETAIL A-4

CAL SECTION OF TRENCH

SCALE: ½" = 1'-0"

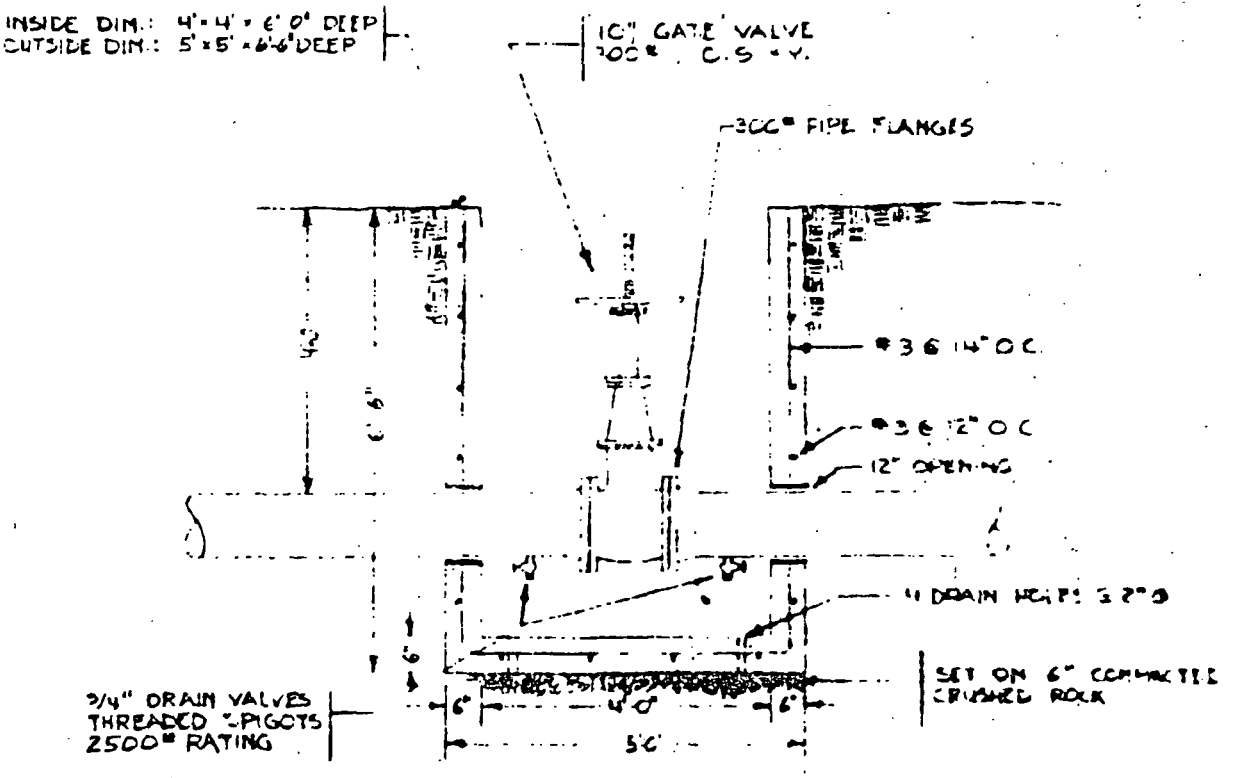
INSIDE DIM.: 4'x4'x6'-0" DEEP
OUTSIDE DIM.: 5'x5'x6'-6" DEEP

IC" GATE VALVE
300# C.S. x Y.

300# PIPE FLANGES

SCHN00260473

DETAIL A-4
CAL SECTION OF TRENCH
SCALE ½" = 1'-0"



BOOK 1220 PAGE 2177

DETAIL A-3
CONCRETE VALVE ENCLOSURE
SCALE: ½" = 1'-0"

BELL OIL TERMINAL CO
12005 N. BURGARD ST. PORTLAND, ORE.

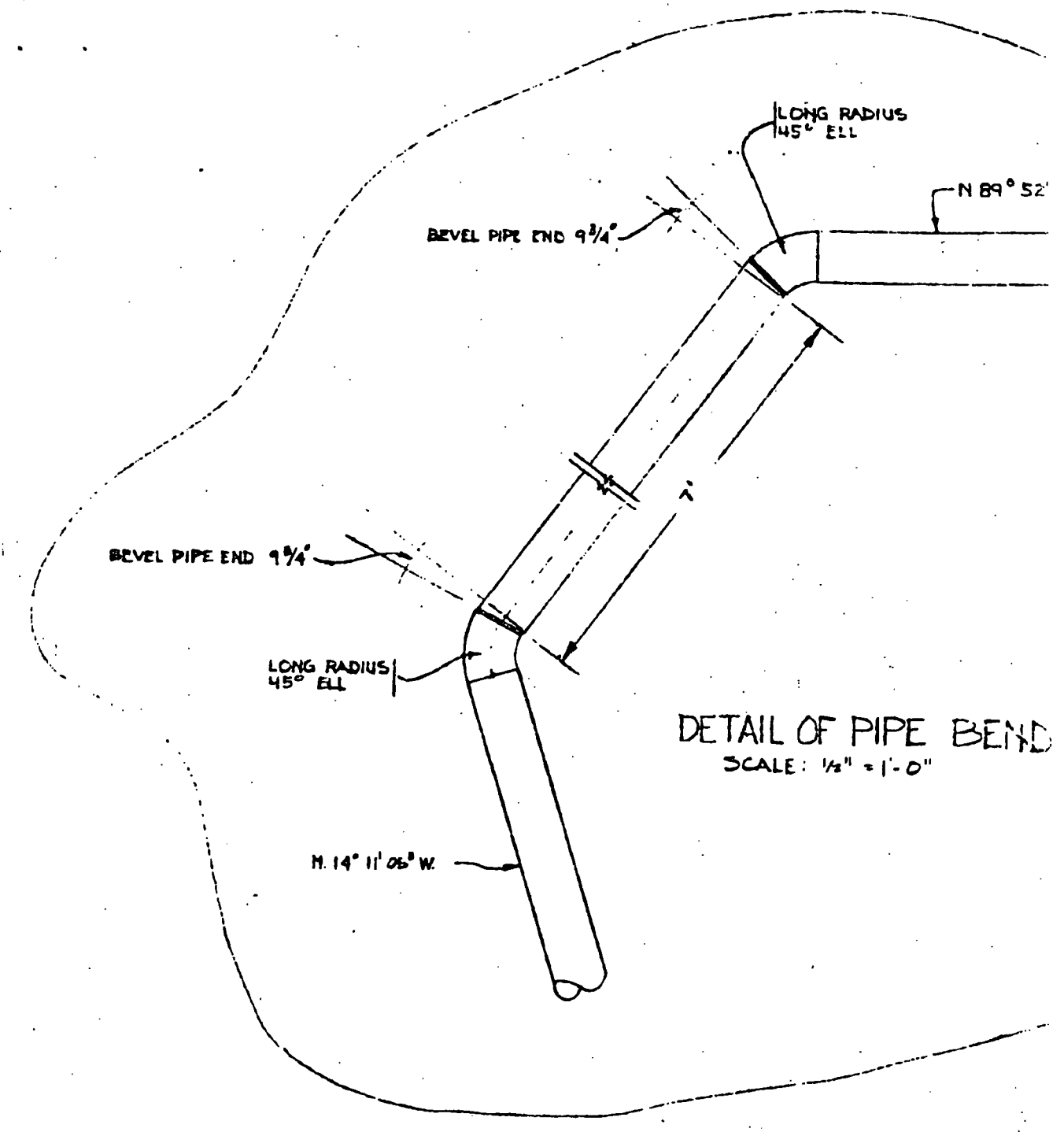
NOTED	DELETE PIPE [illegible] DETAIL A-4	[illegible]	[illegible]
12-1-76	DIMENSION CHANGES DETAILS A-4 & A-3	JDS	[illegible]
JDS	CONC. PLUGS W/GRADE DETAIL A-3	[illegible]	[illegible]

DETAILS OF PIPE LINE FROM PAVING ROCK TO BELL OIL TERMINAL

1434

SCHN00260474

BOOK 1220 PAGE 2180



DETAIL OF PIPE BEND
SCALE: ½" = 1'-0"

SCHN00260475

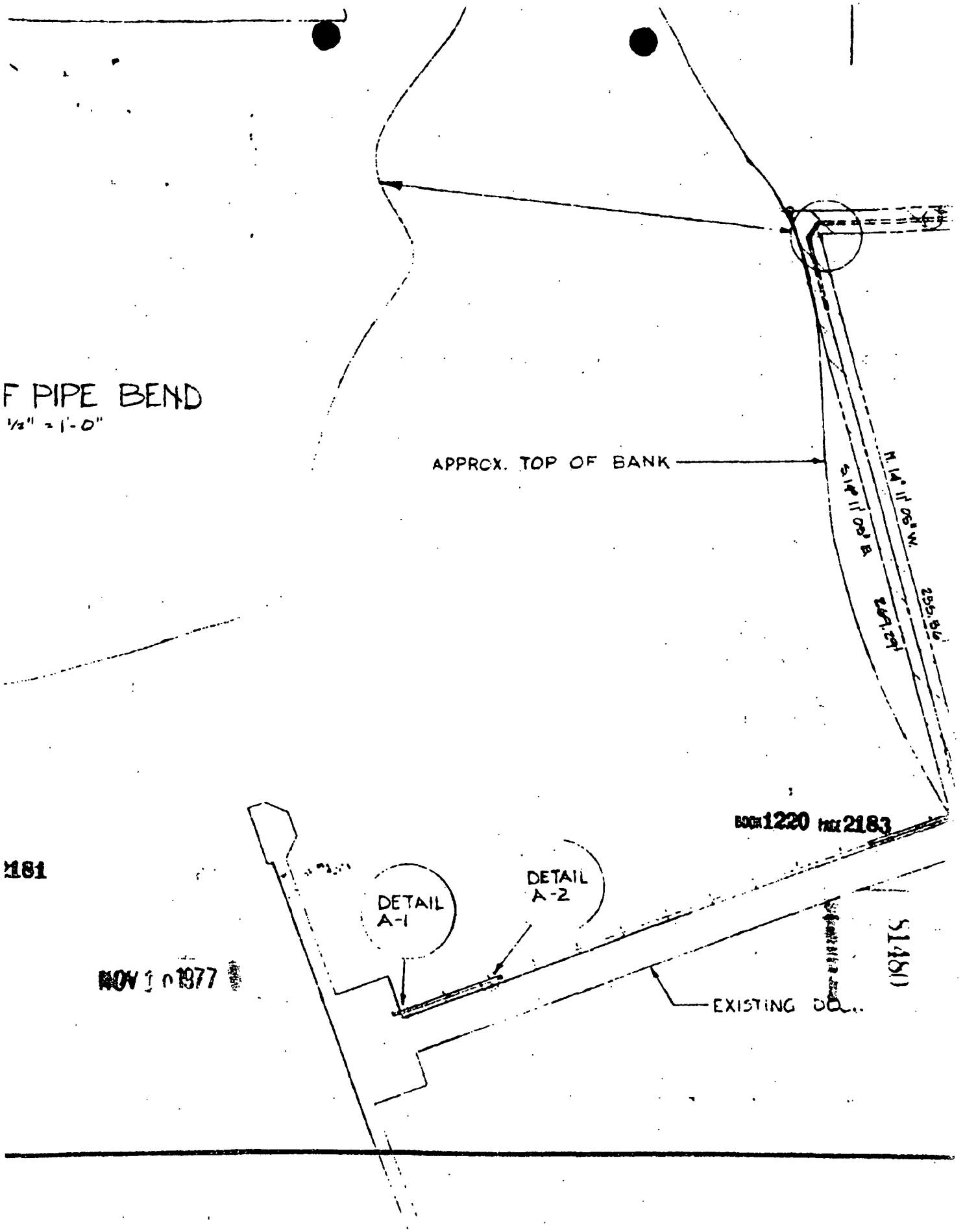
11-10-77

N 14° 11' 08" W

bk 1220 pg 2161

WILLAMETTE RIVER

SCHN00260476



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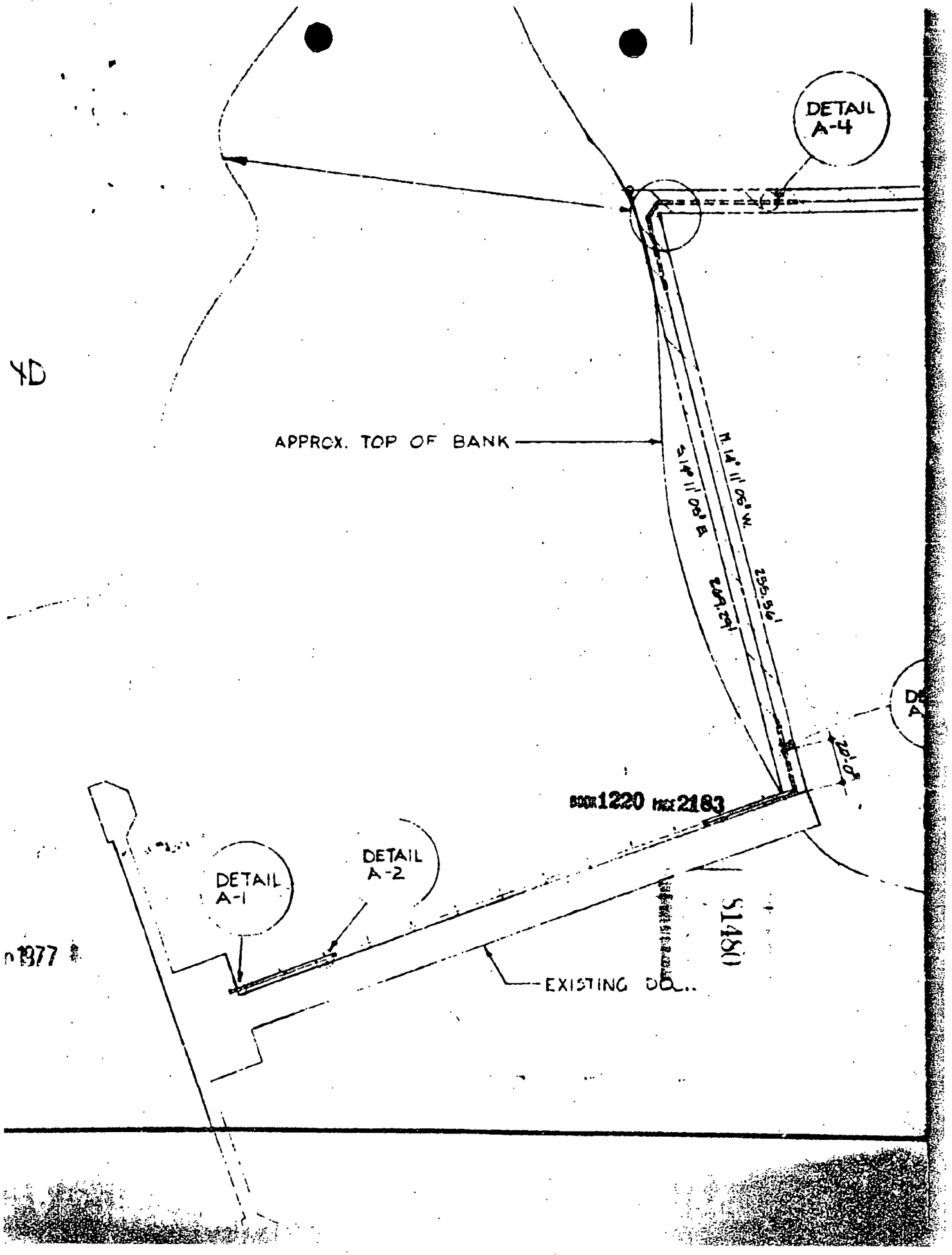

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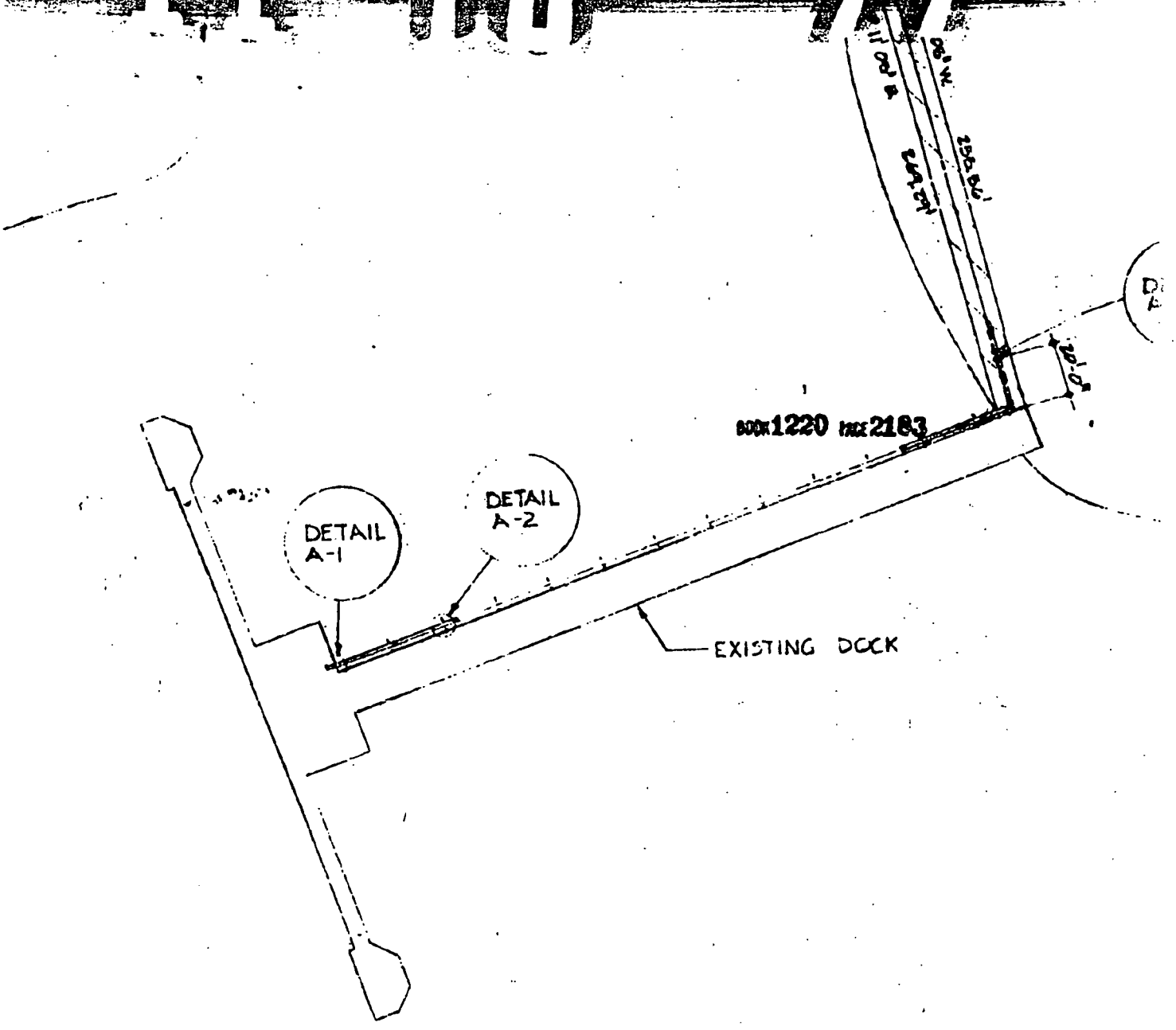

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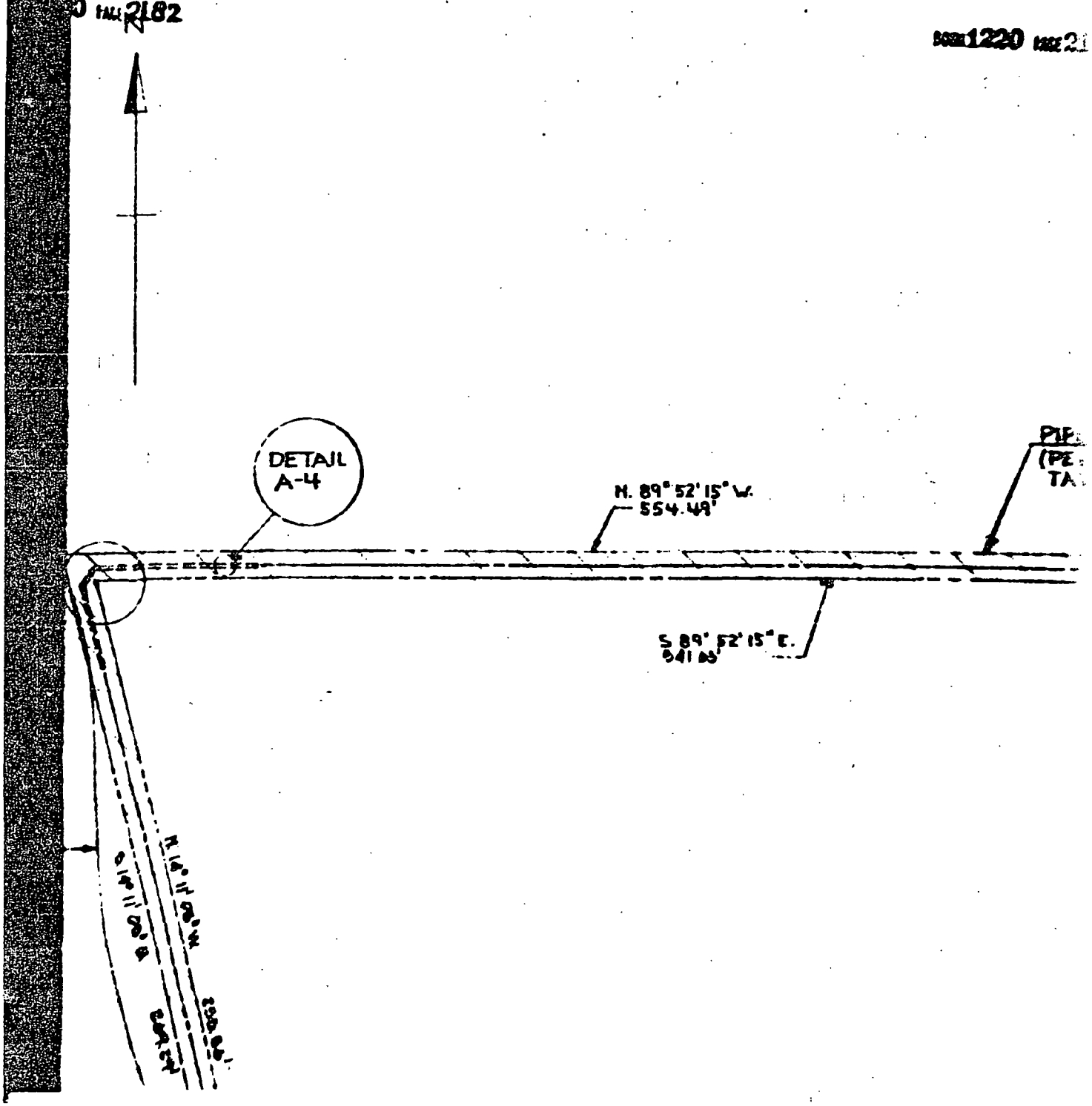
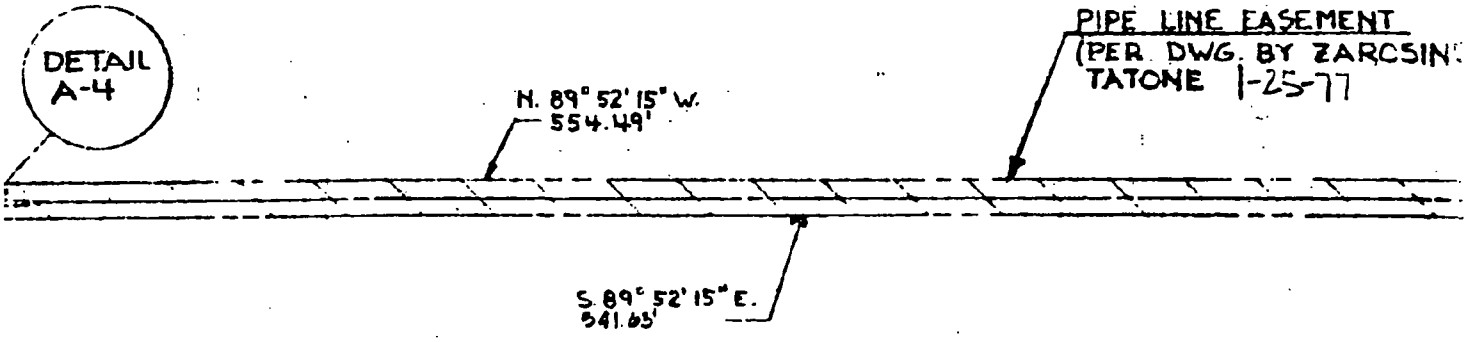


SCHN00260480

11-10-77

BOOK 1220 PAGE 2184



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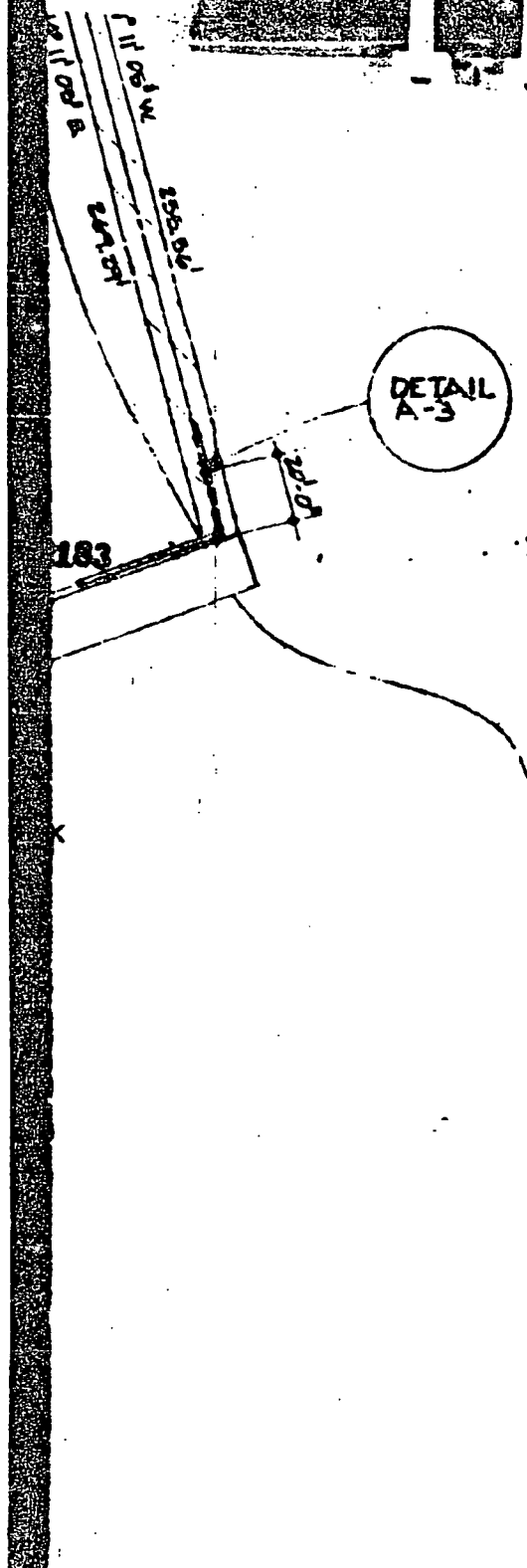
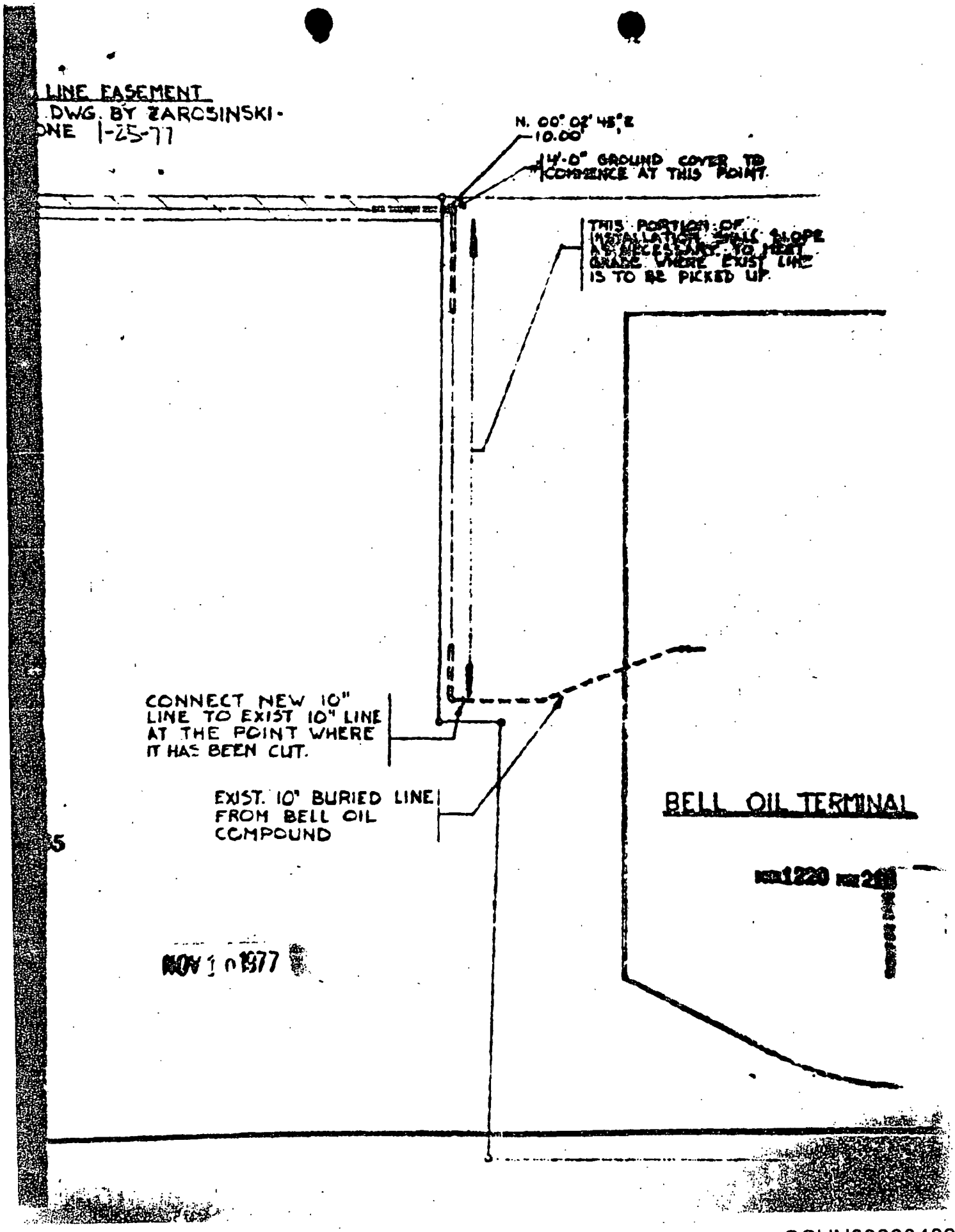


1220 2185

PALMCO

SCHN00260482



SCHN00260483

Gradient
CORPORATION

April 15, 2005

Ms. Alicia Voss
Oregon Department of Environmental Quality
Northwest Region
2020 Southwest Fourth Avenue, 4th Floor
Portland, OR 97201

Subject: Schnitzer/Premier Edible Oils (PEO) Site – Quarterly Report

Dear Alicia:

On behalf of Schnitzer Investment Corp. (SIC), Gradient Corporation is submitting this Quarterly Report for the Premier Edible Oils (PEO) Site, as required by Section II, H of the Voluntary Agreement for Upland Remedial Investigation/Feasibility Study and Source Control Measures between SIC and the Oregon Department of Environmental Quality (DEQ). This Quarterly Report summarizes activities conducted during the time period quarter; describes activities planned for the next quarter; and discusses problems encountered during the quarter, if any, and actions taken to resolve those problems.

Summary of Project Activities

Between January 1 and March 31, 2005, SIC and its consultants, Gradient Corporation and URS, completed the following work at the PEO site:

- Ongoing communications with DEQ regarding next steps for evaluating PEO property and inter-relationships between PEO site evaluations and investigations conducted by Time Oil on the adjacent Bell Terminal property. Meeting with DEQ to discuss next steps on January 21, 2005.
- Submitted draft *Work Plan for Additional Characterization of the Premier Edible Oils Property* to DEQ on March 29, 2005. Scope of work included recommendations for coordinated sampling between the PEO and Time Oil Bell Terminal properties.
- Ongoing review of remedial investigation efforts at Time Oil's Northwest Terminal to determine implications for evaluations of PEO property.
- Initiated review of draft Conceptual Site Model (CSM) for the PEO site that was prepared by the Lower Willamette Group (LWG). Initial discussion of draft CSM with DEQ at January 21 meeting. Began preparing SIC comments to correct the numerous erroneous and/or misleading statements in the draft CSM regarding contaminant sources and distribution for the PEO site.

Suite 803, 600 Stewart Street, Seattle, WA 98101 • (206) 267-2920 • fax: (206) 267-2921 • www.gradientcorp.com

SCHN00260494

Activities to be Conducted Next Quarter

The following activities are planned for the PEO site between April 1 and June 30, 2005:

- Continue evaluation of Time Oil's investigative data for the Bell Terminal site in light of proposed and ongoing data collection, including assessing implications of available data for potential impacts on PEO site from Time Oil site and assessing need for additional recommendations regarding further sampling on the Bell Terminal site.
- Continue communications with DEQ regarding proposed future efforts at PEO site and ongoing Time Oil activities on Bell Terminal site. As data become available, obtain additional information from DEQ regarding Time Oil's ongoing investigations and Bell Terminal site features.
- Following receipt of DEQ comments, finalize *Work Plan for Additional Characterization of the Premier Edible Oils Property* and initiate additional efforts.
- Continue preparing SIC comments to correct errors in the LWG's draft CSM for the PEO site.

Issues to be Resolved/Recommended Actions

None.

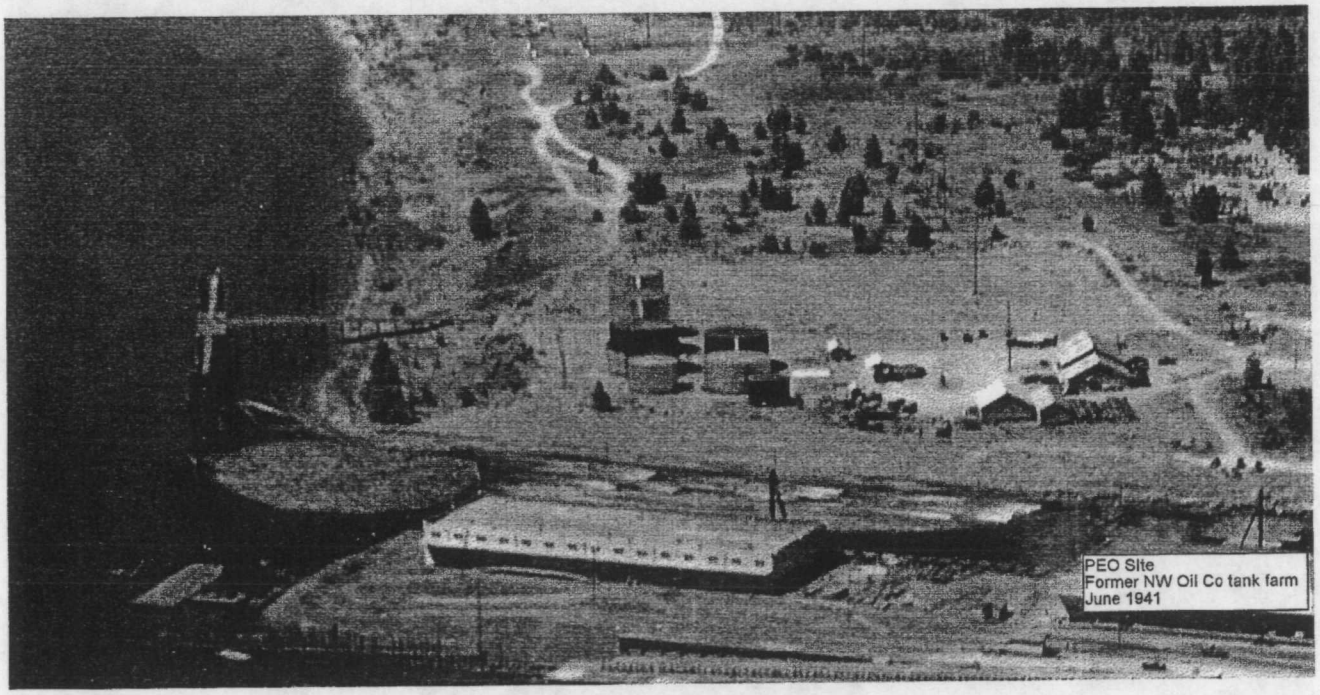
Please contact me if you have any questions regarding this report or any of the completed or proposed activities.

Sincerely,

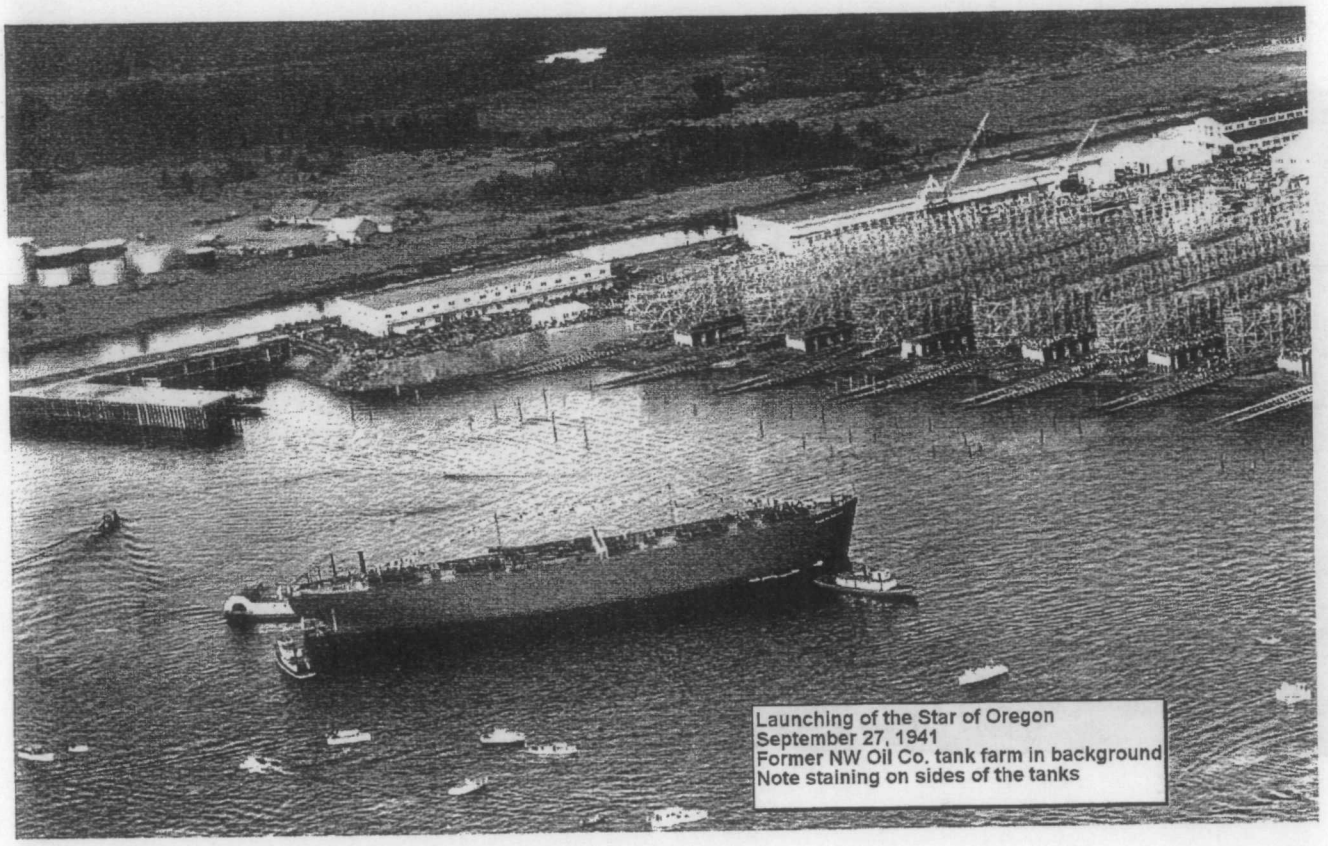
Cathy Petito Boyce

Catherine Petito Boyce, S.M.
Principal Scientist

cc: J. Brown/James C. Brown & Associates
D. Coberley/URS
J. Jakubiak/SIC
T. Zelenka/SIC



SCHN00260508



Launching of the Star of Oregon
September 27, 1941
Former NW Oil Co. tank farm in background
Note staining on sides of the tanks

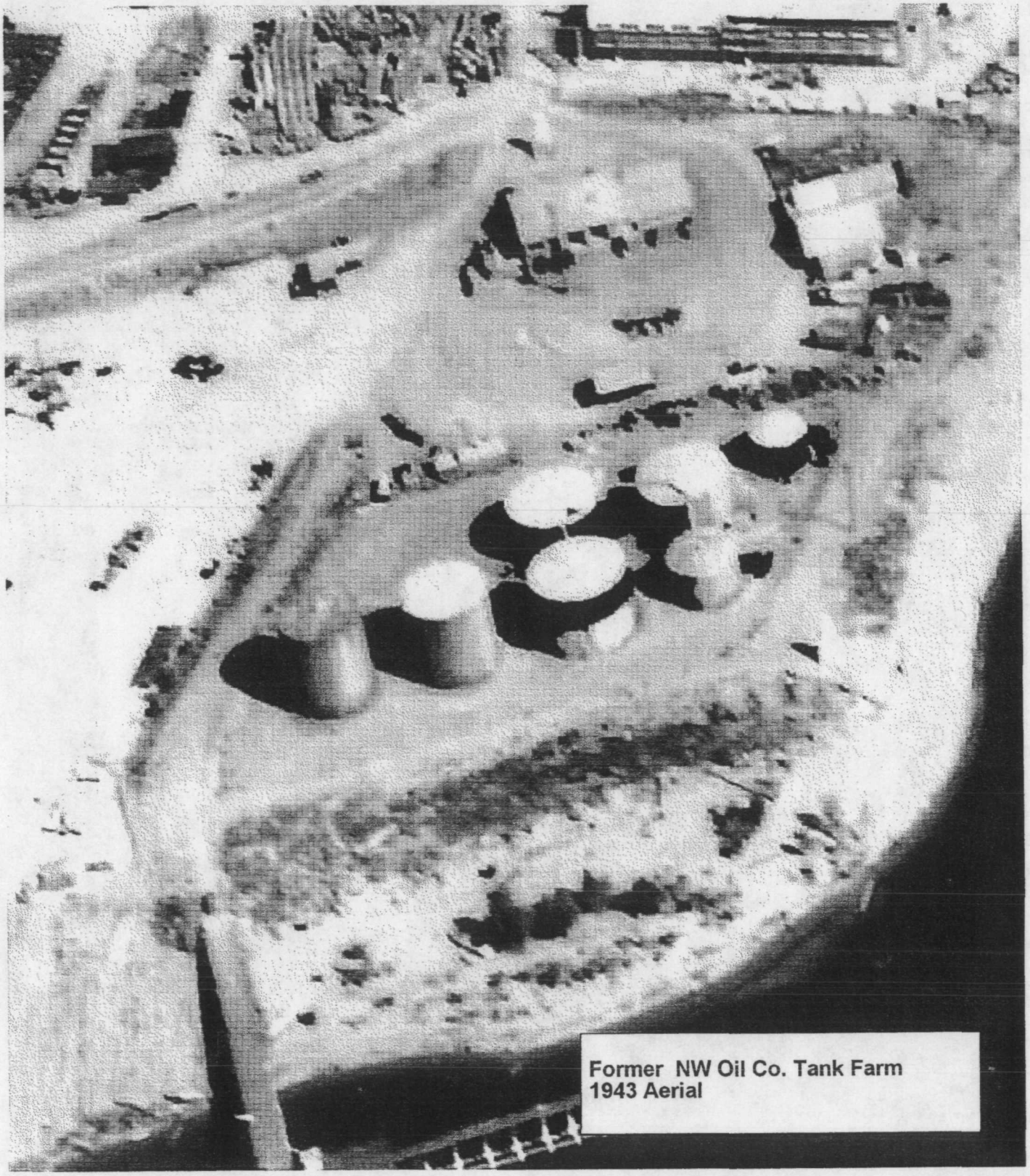
SCHN00260509

Launch of the Star of Oregon - Sept 27, 1941
Former NW Oil Co. tank farm in background
Note: Staining on the sides of the ASTs and horizontal ASTs to the left of the vertical ASTs

SCHN00260510

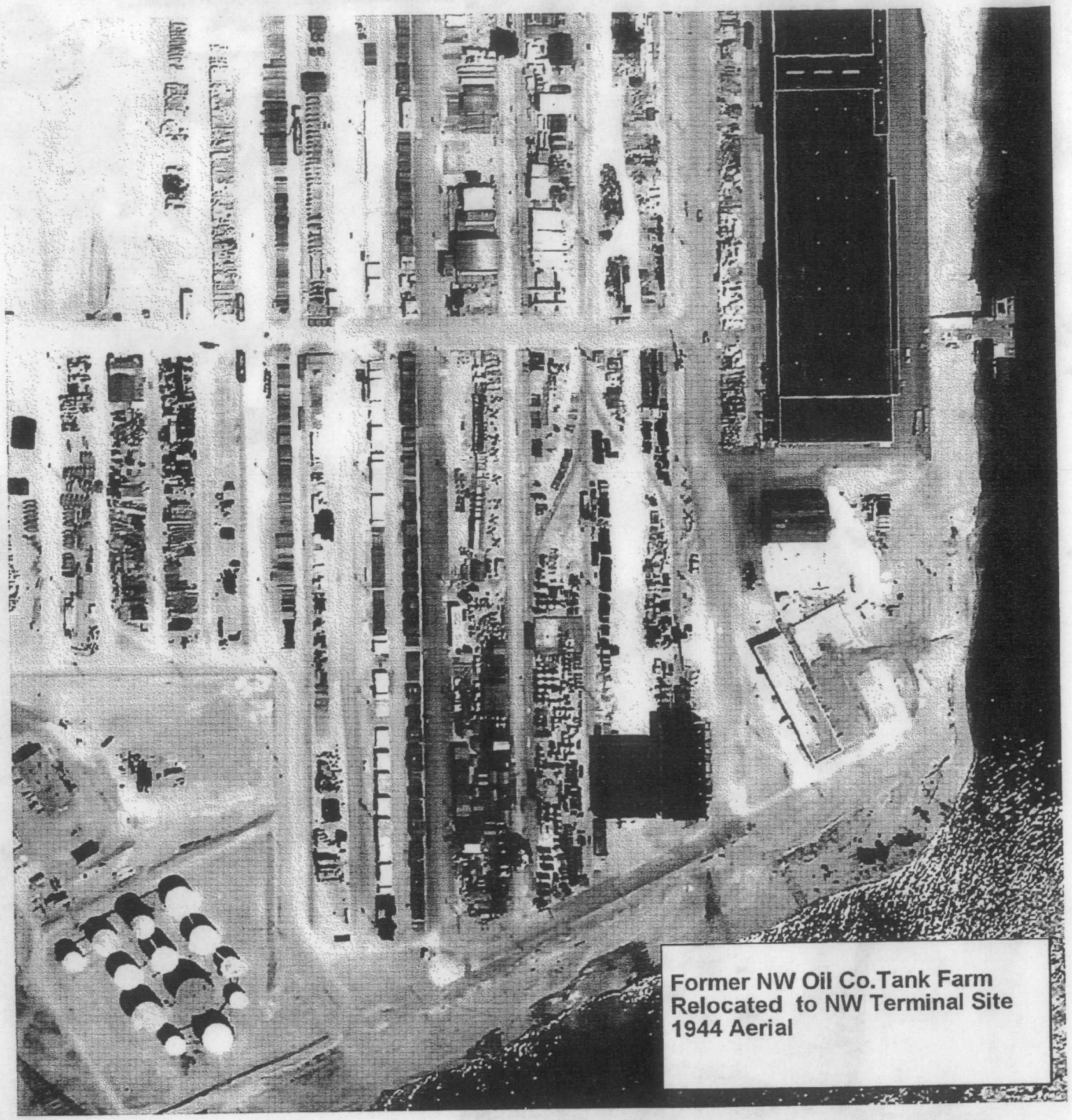
Former NW Oil Co. Tank Farm
1943 Aerial Photo

SCHN00260511



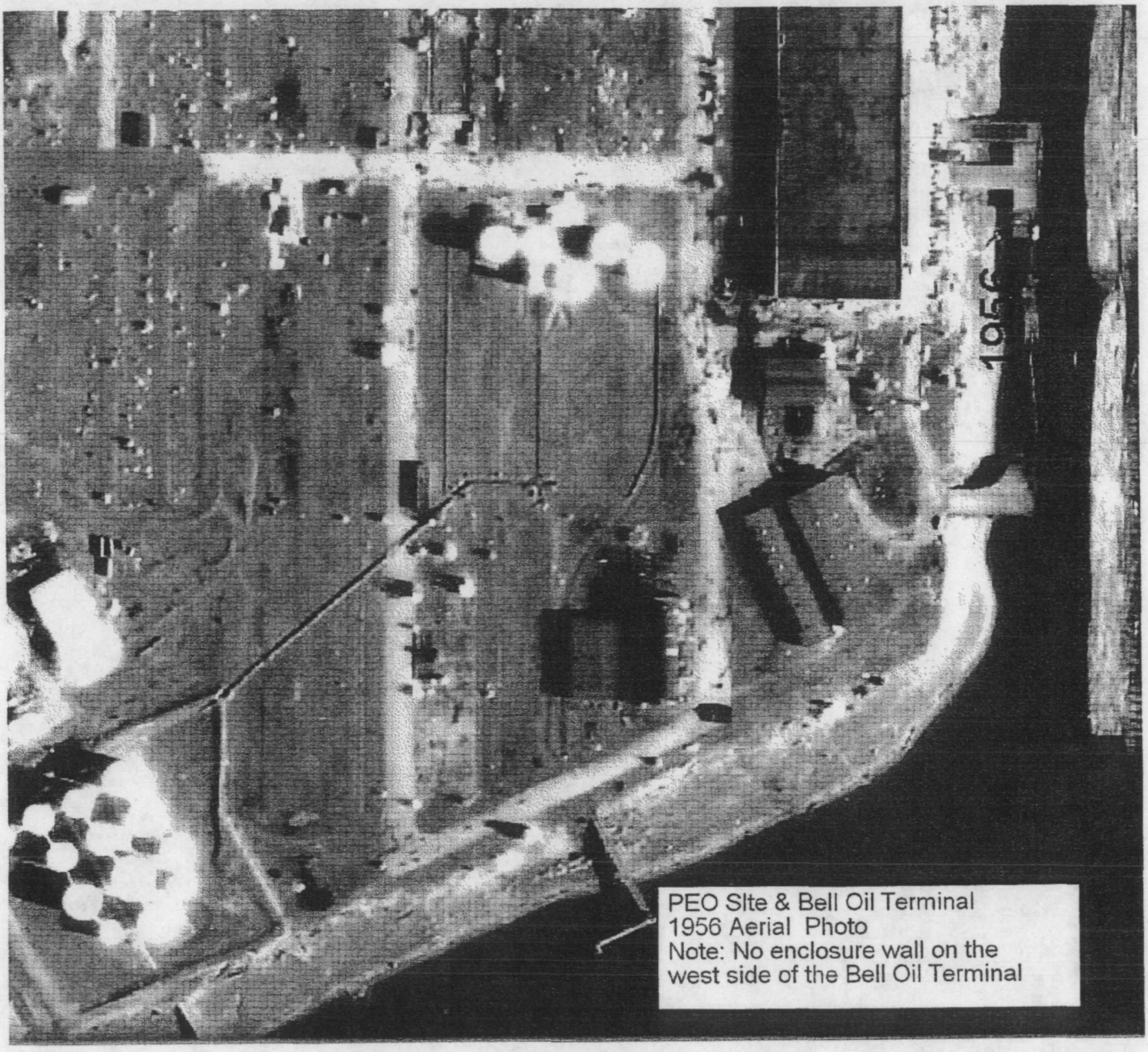
Former NW Oil Co. Tank Farm
1943 Aerial

SCHN00260512



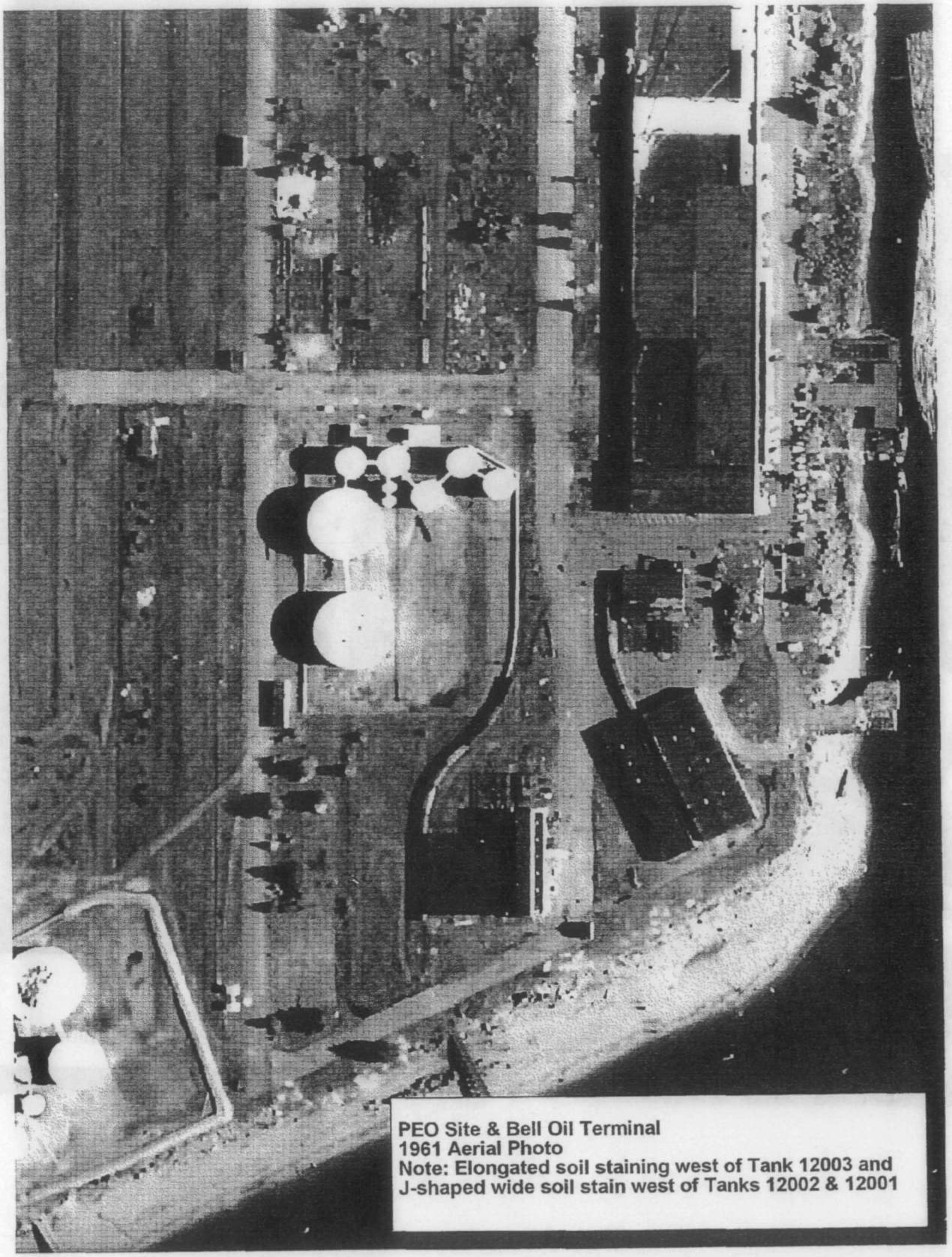
Former NW Oil Co.Tank Farm
Relocated to NW Terminal Site
1944 Aerial

SCHN00260513



PEO Slte & Bell Oil Terminal
1956 Aerial Photo
Note: No enclosure wall on the
west side of the Bell Oil Terminal

SCHN00260514



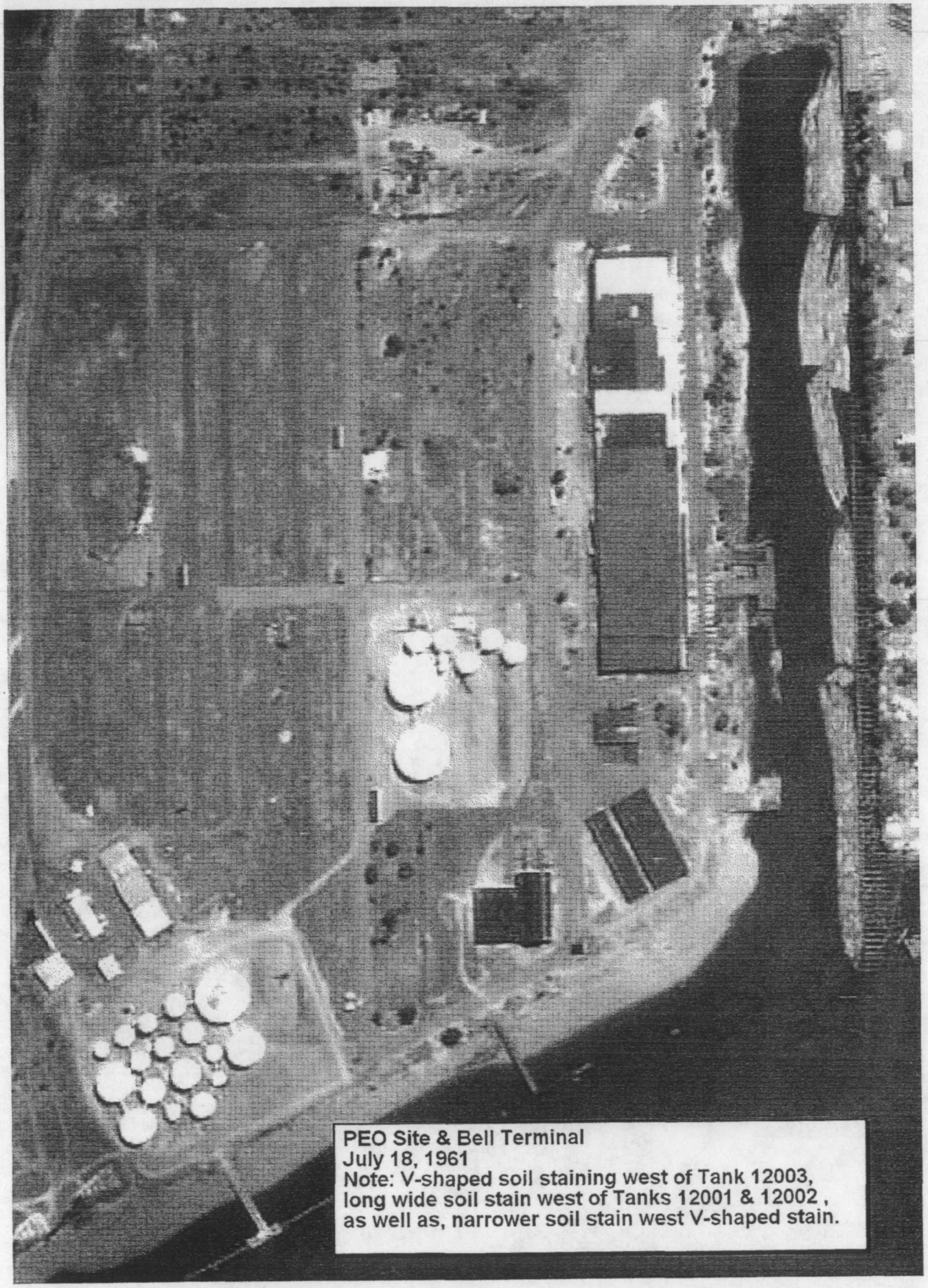
PEO Site & Bell Oil Terminal
1961 Aerial Photo
Note: Elongated soil staining west of Tank 12003 and J-shaped wide soil stain west of Tanks 12002 & 12001

SCHN00260515

PEO Site & Bell Terminal
June 13, 1961
Note: V-shaped soil staining west of Tank 12003, long wide soil stain west of Tanks 12001 & 12002 , as well as, narrower soil stain west of Tanks 1507 & 12003.

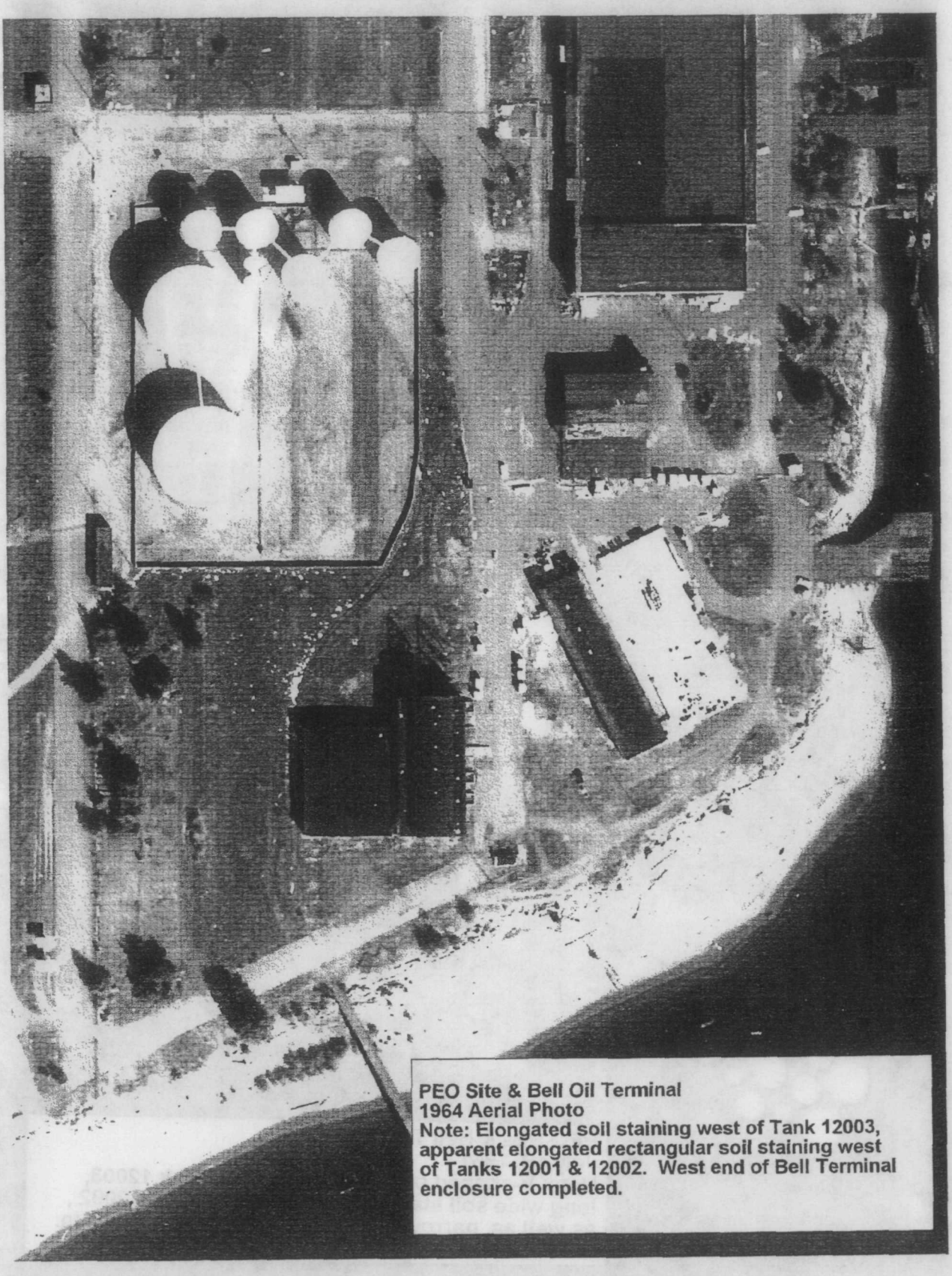
SCHN00260516

PEO Site & Bell Terminal #2
June 13, 1961
Note: V-shaped soil staining west of Tank 12003, long wide soil stain west of Tanks 12001 & 12002 , as well as, narrower soil stain west of Tanks 1507 & 12003.

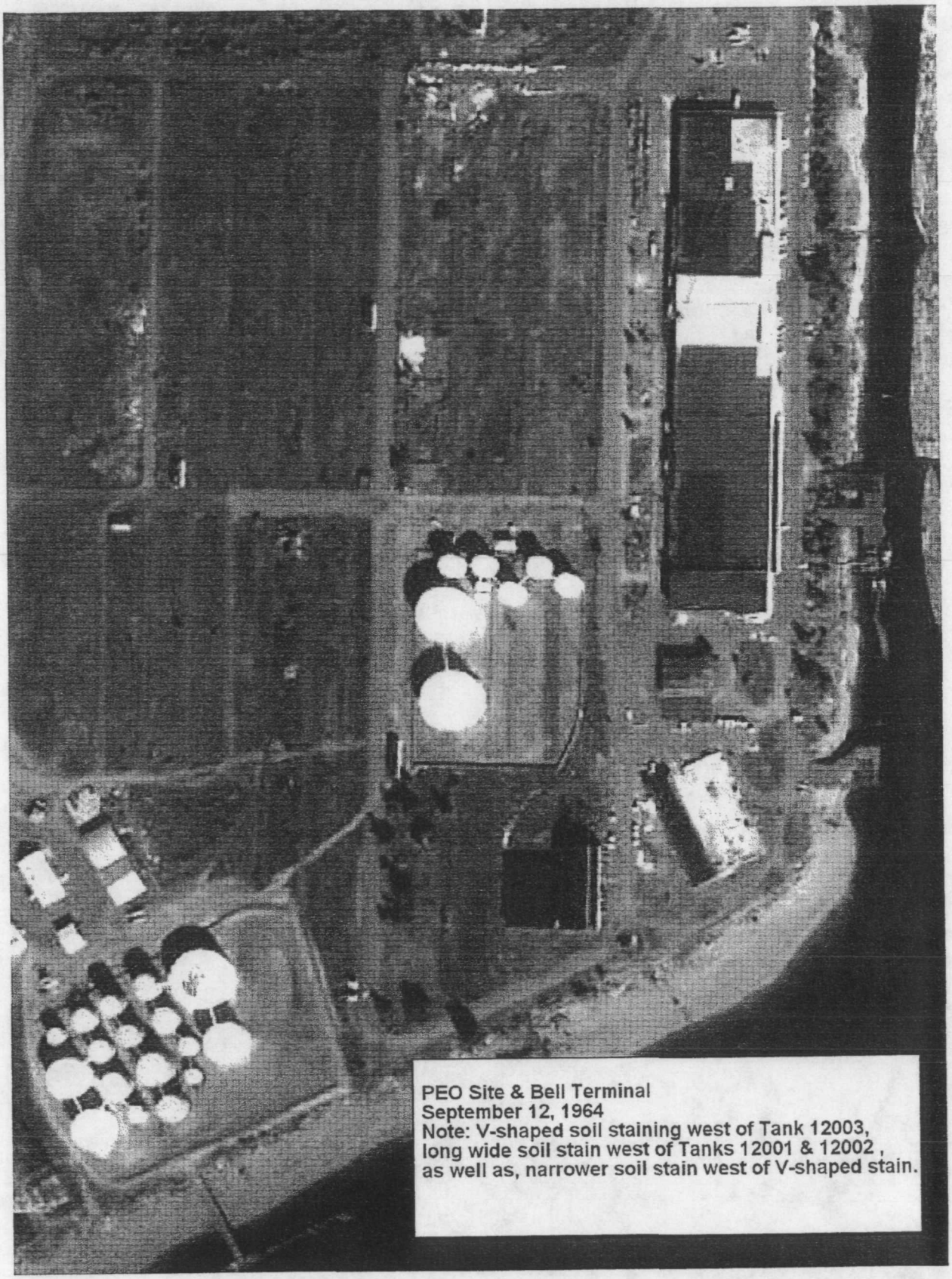


PEO Site & Bell Terminal
July 18, 1961
Note: V-shaped soil staining west of Tank 12003, long wide soil stain west of Tanks 12001 & 12002 , as well as, narrower soil stain west V-shaped stain.

SCHN00260518

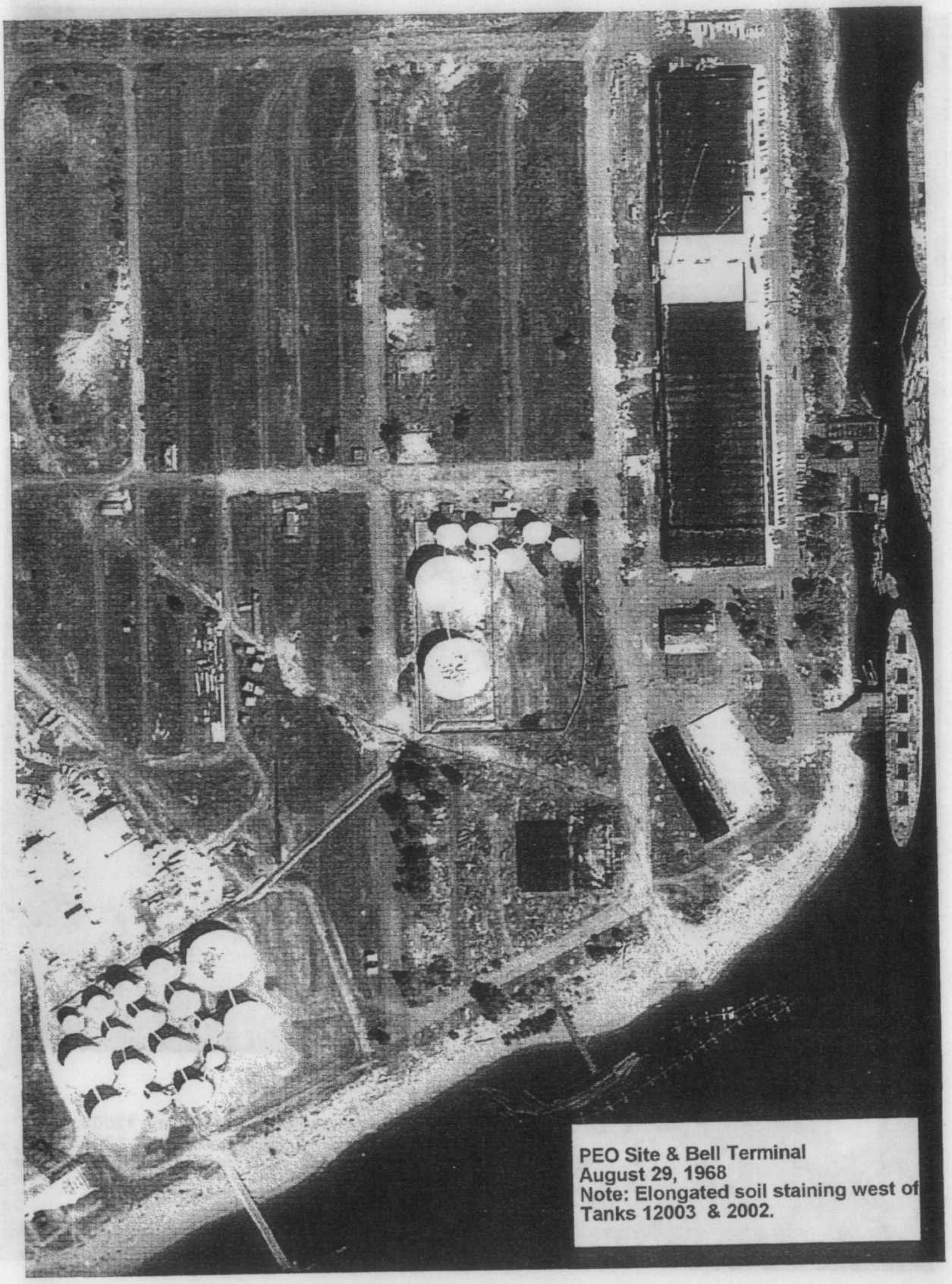


PEO Site & Bell Oil Terminal
1964 Aerial Photo
Note: Elongated soil staining west of Tank 12003, apparent elongated rectangular soil staining west of Tanks 12001 & 12002. West end of Bell Terminal enclosure completed.



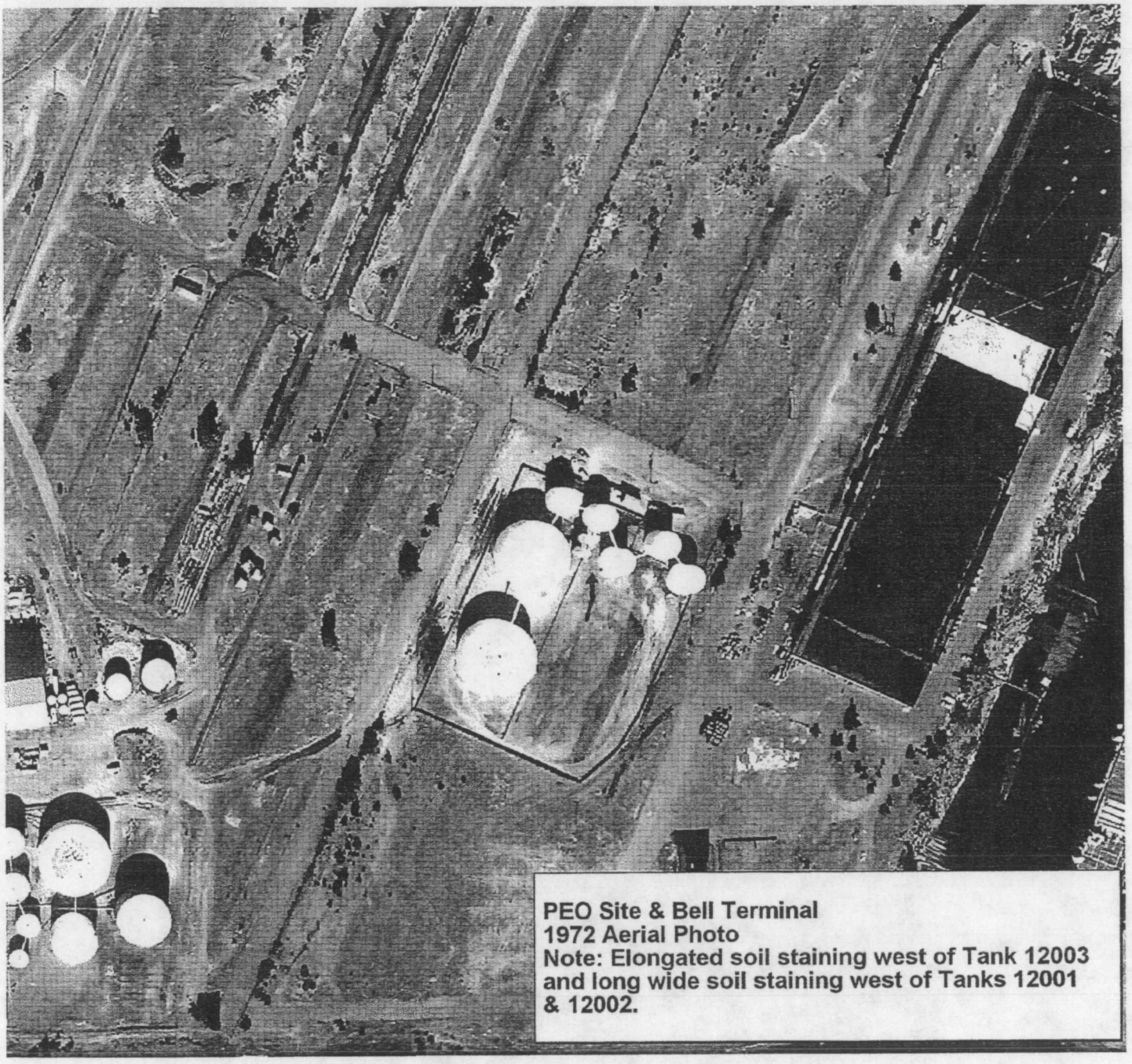
PEO Site & Bell Terminal
September 12, 1964
Note: V-shaped soil staining west of Tank 12003,
long wide soil stain west of Tanks 12001 & 12002 ,
as well as, narrower soil stain west of V-shaped stain.

SCHN00260520

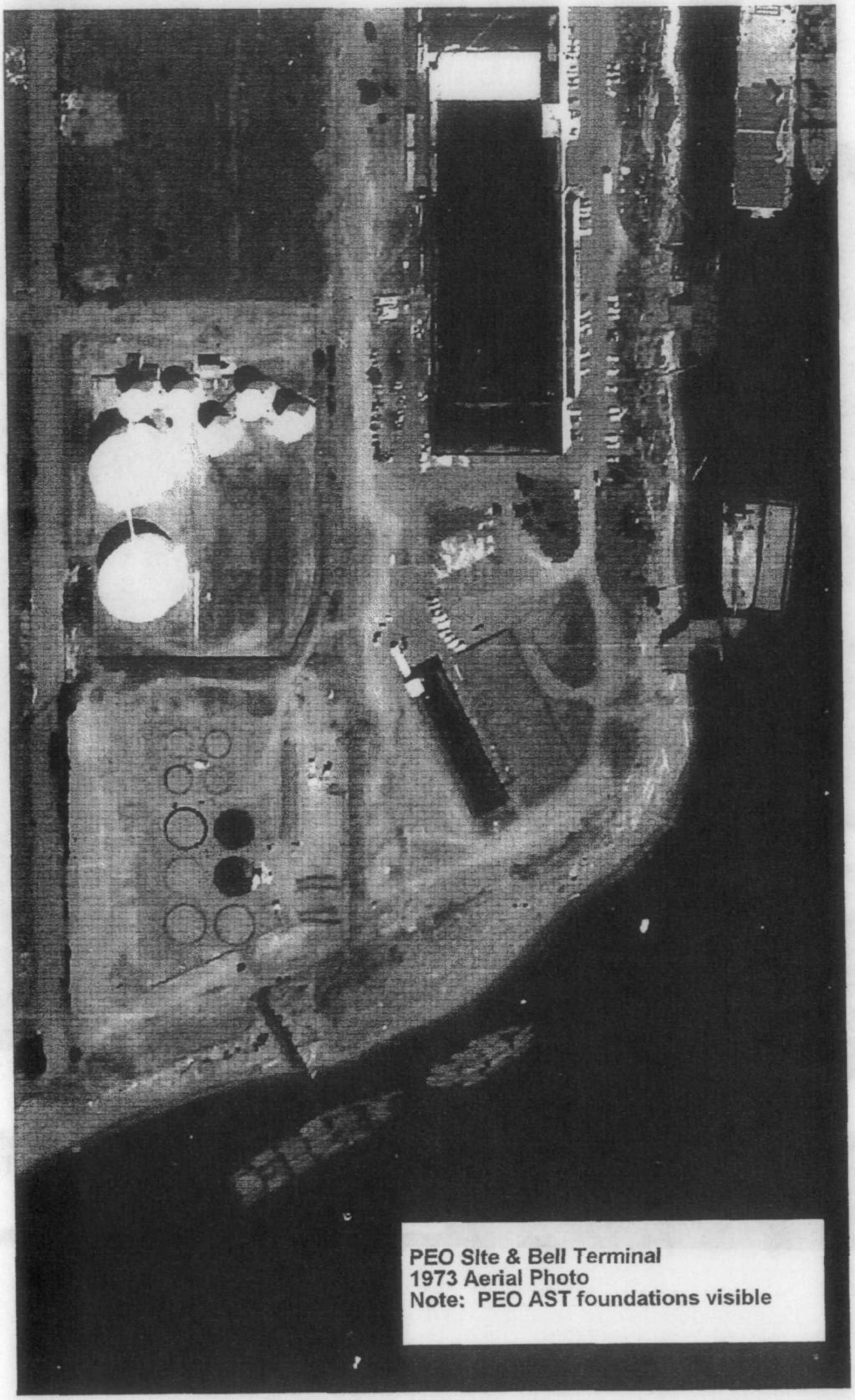


PEO Site & Bell Terminal
August 29, 1968
Note: Elongated soil staining west of Tanks 12003 & 2002.

SCHN00260521



PEO Site & Bell Terminal
1972 Aerial Photo
Note: Elongated soil staining west of Tank 12003 and long wide soil staining west of Tanks 12001 & 12002.

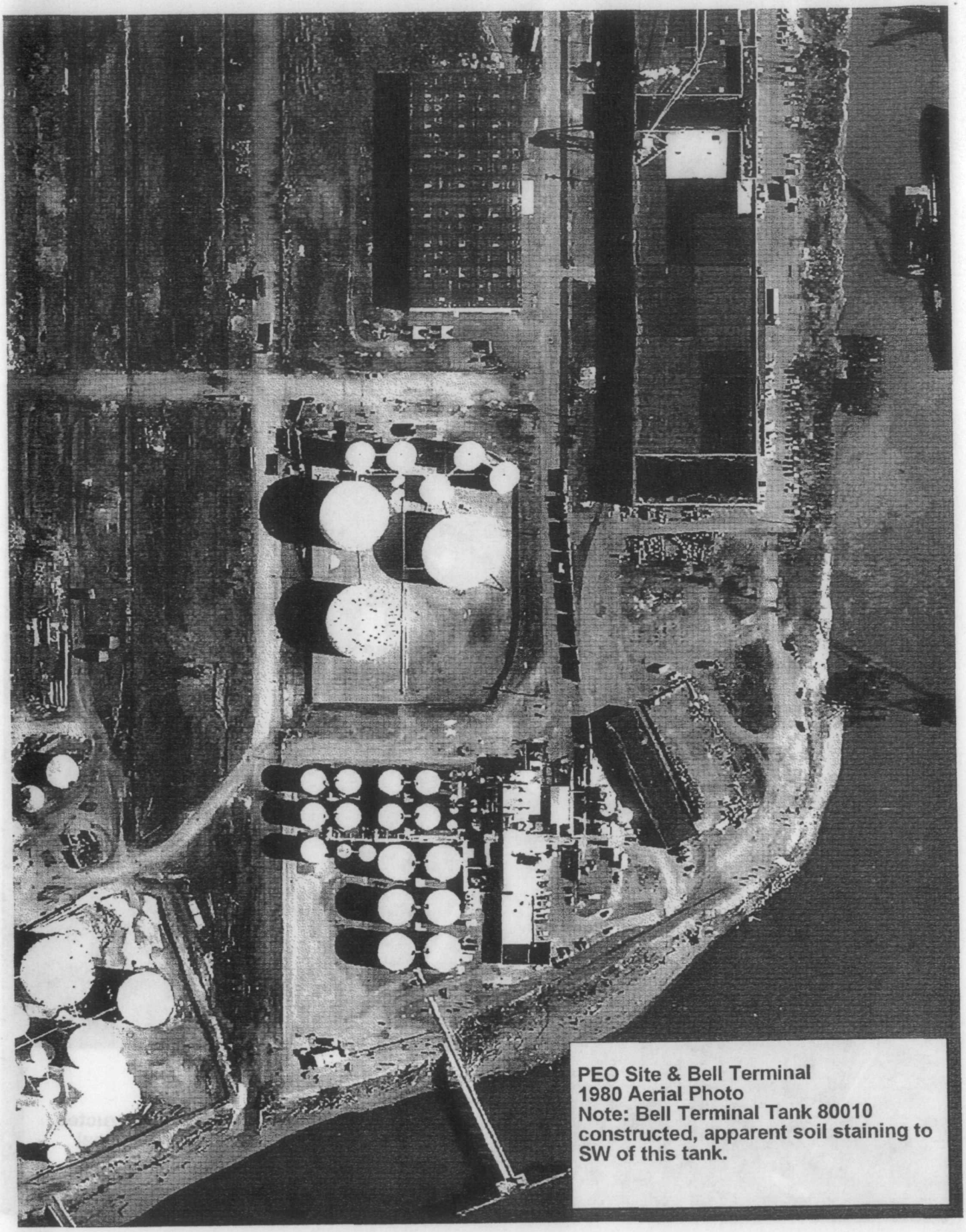


PEO Site & Bell Terminal
1973 Aerial Photo
Note: PEO AST foundations visible

SCHN00260523

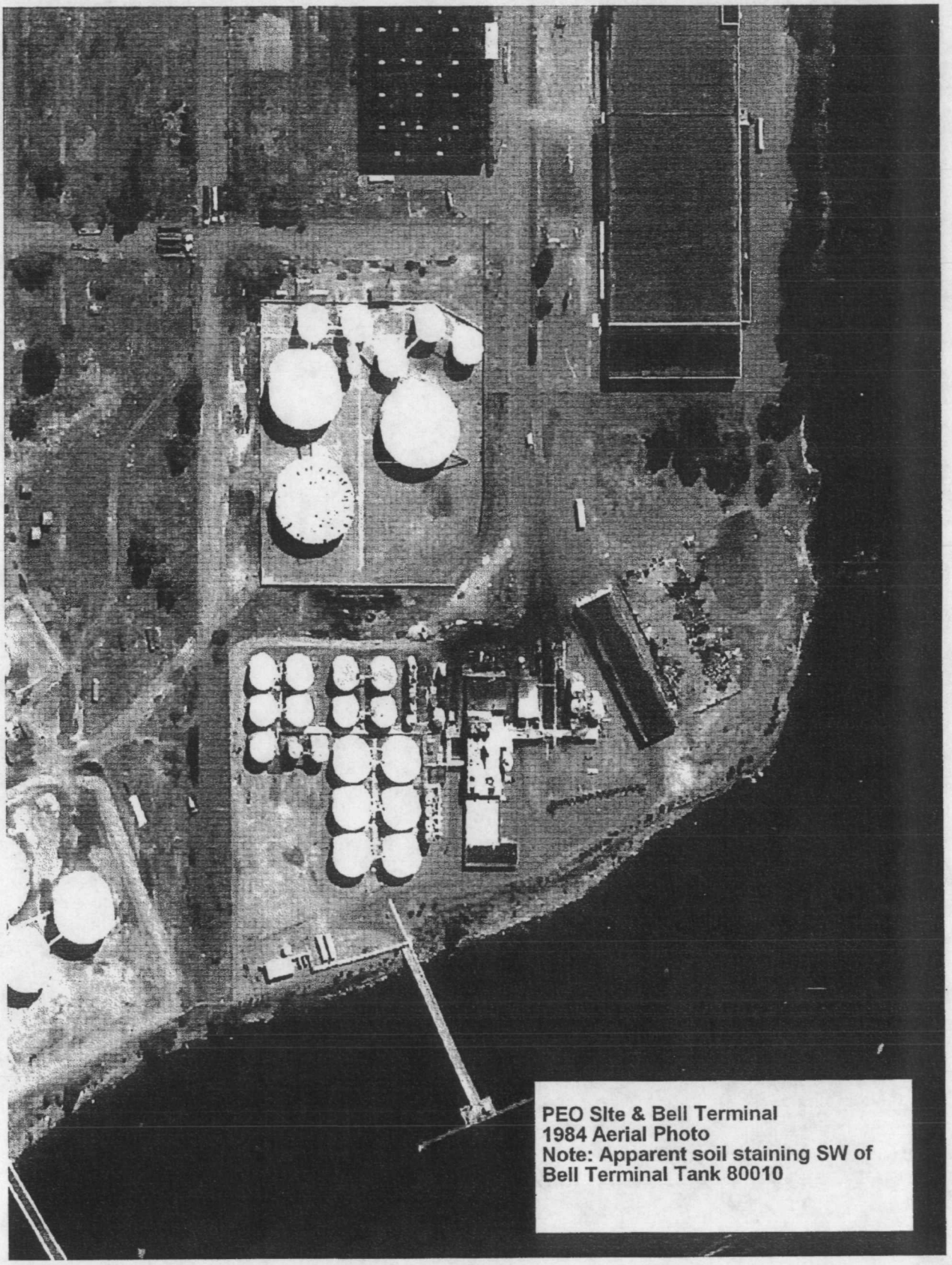
PEO Site & Bell Terminal
1977 Aerial
Note: Premier Edible Oils facility constructed and apparent earthen pad for Bell Terminal Tank 80010 is visible.

SCHN00260524



PEO Site & Bell Terminal
1980 Aerial Photo
Note: Bell Terminal Tank 80010 constructed, apparent soil staining to SW of this tank.

SCHN00260525

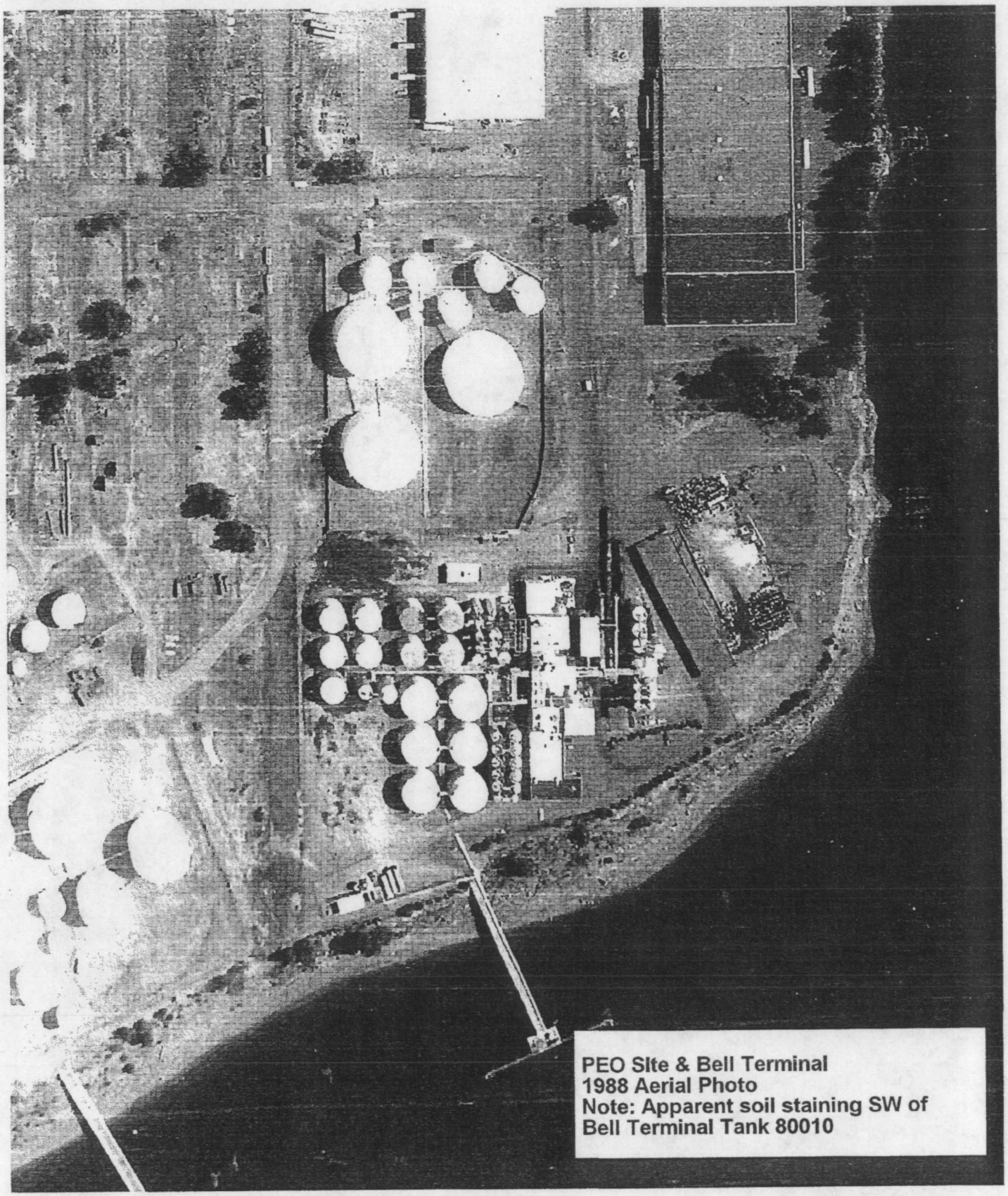


PEO Site & Bell Terminal
1984 Aerial Photo
Note: Apparent soil staining SW of
Bell Terminal Tank 80010

SCHN00260526

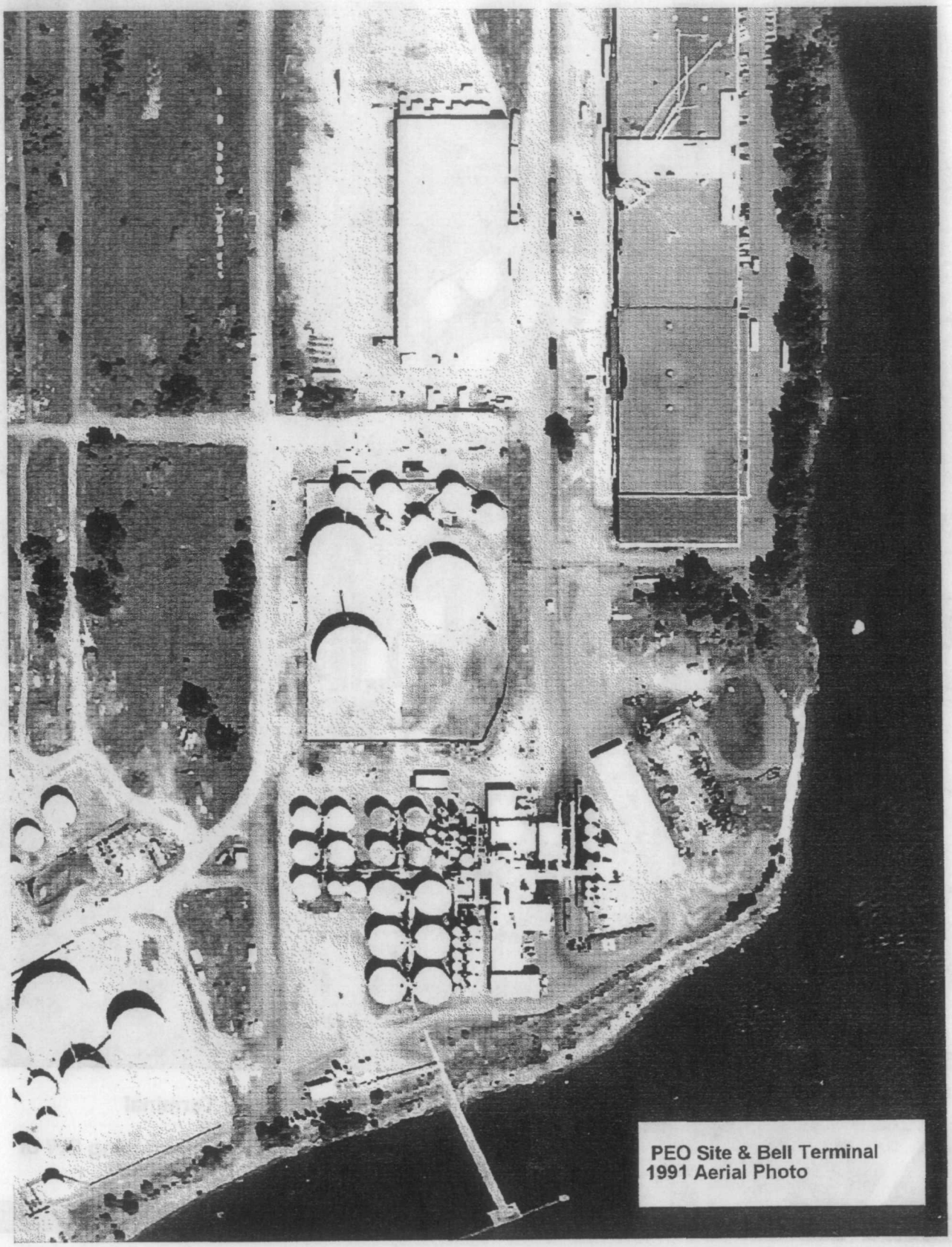
PEO Site & Bell Terminal
1986 Aerial Photo
Note: Apparent soil staining SW of
Bell Oil Terminal Tank 80010

SCHN00260527



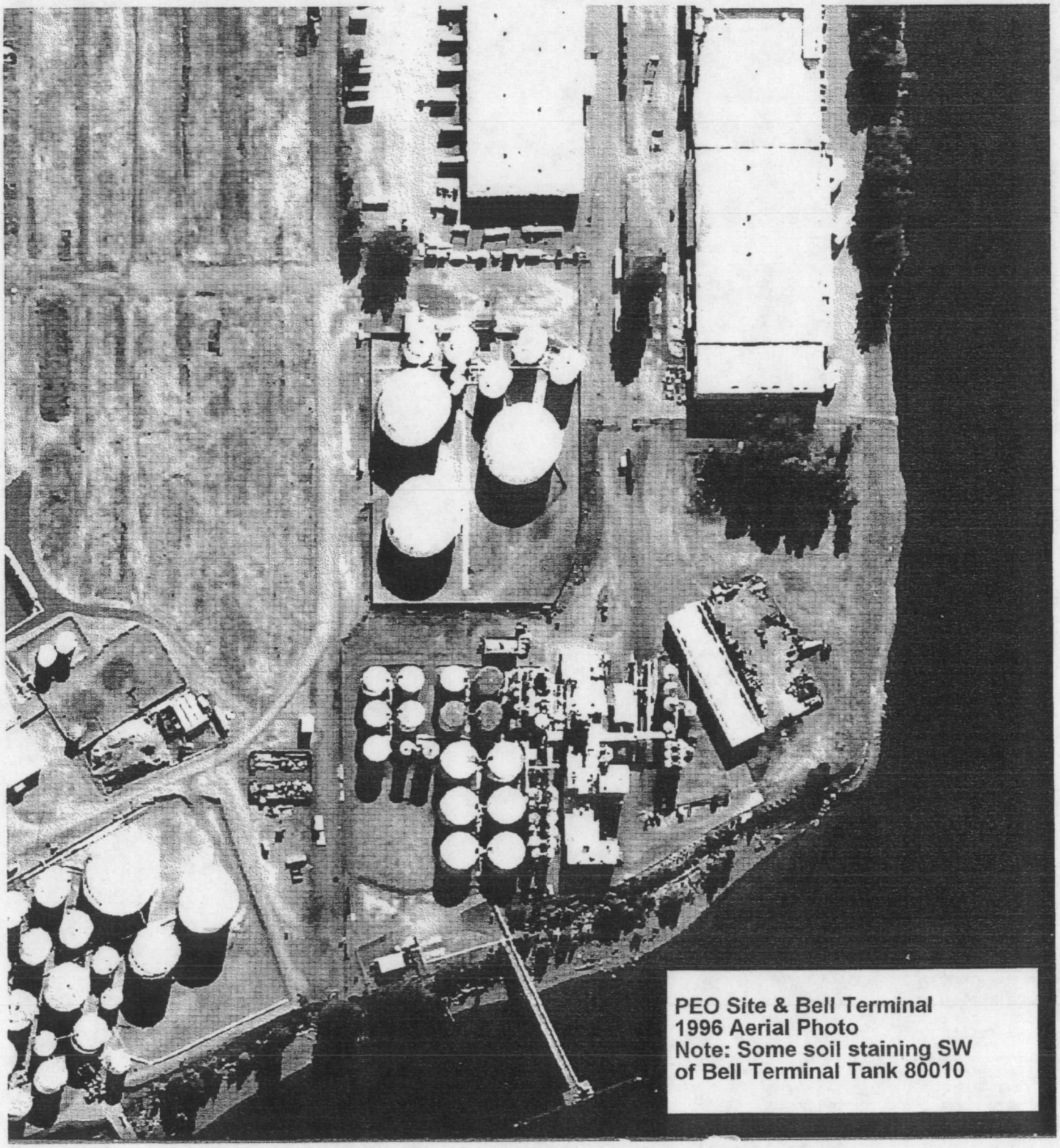
PEO Site & Bell Terminal
1988 Aerial Photo
Note: Apparent soil staining SW of
Bell Terminal Tank 80010

SCHN00260528



PEO Site & Bell Terminal
1991 Aerial Photo

SCHN00260529



PEO Site & Bell Terminal
1996 Aerial Photo
Note: Some soil staining SW
of Bell Terminal Tank 80010

SCHN00260530

Gradient
CORPORATION

August 4, 2005

Ms. Alicia Voss
Oregon Department of Environmental Quality
Northwest Region
2020 Southwest Fourth Avenue, 4th Floor
Portland, OR 97201

Subject: Schnitzer/Premier Edible Oils (PEO) Site – Quarterly Report

Dear Alicia:

On behalf of Schnitzer Investment Corp. (SIC), Gradient Corporation is submitting this Quarterly Report for the Premier Edible Oils (PEO) Site, as required by Section II, H of the Voluntary Agreement for Upland Remedial Investigation/Feasibility Study and Source Control Measures between SIC and the Oregon Department of Environmental Quality (DEQ). This Quarterly Report summarizes activities conducted during the time period quarter; describes activities planned for the next quarter; and discusses problems encountered during the quarter, if any, and actions taken to resolve those problems.

Summary of Project Activities

Between April 1 and June 30, 2005, SIC and its consultants, Gradient Corporation and URS, completed the following work at the PEO site:

- Ongoing communications with DEQ regarding next steps for evaluating PEO property and inter-relationships between PEO site evaluations and investigations conducted by Time Oil on the adjacent Bell Terminal property.
- Received DEQ comments regarding March 2005 draft *Work Plan for Additional Characterization of the Premier Edible Oils Property* on May 26, 2005. Scope of work included recommendations for coordinated sampling between the PEO and Time Oil Bell Terminal properties. Submitted letter response to DEQ comments on June 17, 2005.
- Ongoing review of remedial investigation efforts at Time Oil's Northwest Terminal to determine implications for evaluations of PEO property.
- Continued review of draft Conceptual Site Model (CSM) for the PEO site that was prepared by the Lower Willamette Group (LWG). Continued preparing SIC comments to correct the numerous erroneous and/or misleading statements in the draft CSM regarding contaminant sources and distribution for the PEO site.
- Received selected sediment data from the LWG Round 2 field sampling program. Began reviewing implications of data for assessing conditions in the vicinity of the PEO site.

Suite 803, 600 Stewart Street, Seattle, WA 98101 • (206) 267-2920 • fax: (206) 267-2921 • www.gradientcorp.com

Activities to be Conducted Next Quarter

The following activities are planned for the PEO site between July 1 and September 30, 2005:

- Continue evaluation of Time Oil's investigative data for the Bell Terminal site in light of proposed and ongoing data collection, including assessing implications of available data for potential impacts on PEO site from Time Oil site and assessing need for additional recommendations regarding further sampling on the Bell Terminal site.
- Continue communications with DEQ regarding proposed future efforts at PEO site and ongoing Time Oil activities on Bell Terminal site. As data become available, obtain additional information from DEQ regarding Time Oil's ongoing investigations and Bell Terminal site features.
- Continue working with DEQ to finalize *Work Plan for Additional Characterization of the Premier Edible Oils Property* and initiate additional efforts.
- Continue preparing SIC comments to correct errors in the LWG's draft CSM for the PEO site.
- Continue reviewing data from the LWG field sampling program as data become available.
- Work with DEQ during transition to new DEQ project management.

Issues to be Resolved/Recommended Actions

None.

Please contact me if you have any questions regarding this report or any of the completed or proposed activities.

Sincerely,

Cathy Petito Boyce /gb

Catherine Petito Boyce, S.M.
Principal Scientist

cc: J. Brown/James C. Brown & Associates
D. Coberley/URS
J. Jakubiak/SIC
T. Zelenka/SIC

Table 1
Groundwater Elevations - Wells with Measured Product
Schnitzer - Premier Edible Oils
Portland, OR
52-00180063

PERIOD: From 06/06/2001 thru 05/22/2002 - Inclusive

SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-02	6/6/2001	29.32	12:00	21.94	0.00	7.38	NA	7.38
MW-02	6/18/2001	29.32	12:00	25.37	1.95	3.95	-3.43	5.60
MW-02	7/2/2001	29.32	12:00	25.22	1.76	4.10	0.15	5.59
MW-02	7/16/2001	29.32	12:00	25.77	1.64	3.55	-0.55	4.94
MW-02	7/30/2001	29.32	12:00	25.82	1.86	3.50	-0.05	5.07
MW-02	8/13/2001	29.32	13:08	25.50	1.93	3.82	0.32	5.45
MW-02	8/27/2001	29.32	13:12	25.50	1.94	3.82	0.00	5.46
MW-02	10/10/2001	29.32	15:52	25.70	1.53	3.62	-0.20	4.91
MW-02	11/29/2001	29.32	10:30	21.13	0.00	8.19	4.57	8.19
MW-02	12/27/2001	29.32	11:36	20.72	0.35	8.60	0.41	8.90
MW-02	2/4/2002	29.32	10:55	20.30	0.96	9.02	0.42	9.83
MW-02	2/28/2002	29.32	14:26	24.15	4.01	5.17	-3.85	8.56
MW-02	3/14/2002	29.32	10:07	19.33	0.00	9.99	4.82	9.99
MW-02	4/23/2002	29.32	14:23	17.74	0.36	11.58	1.59	11.89
MW-02	5/22/2002	29.32	14:51	19.54	0.23	9.78	-1.80	9.98
MW-04	6/8/2001	29.46	12:00	21.10	3.20	8.36	NA	11.12
MW-04	6/18/2001	29.46	12:00	21.37	3.14	8.09	-0.27	10.80
MW-04	7/2/2001	29.46	12:00	21.30	2.98	8.16	0.07	10.73
MW-04	7/16/2001	29.46	12:00	22.51	3.91	6.95	-1.21	10.32
MW-04	7/30/2001	29.46	12:00	22.95	4.28	6.51	-0.44	10.20
MW-04	8/13/2001	29.46	13:16	23.40	4.71	6.06	-0.45	10.13
MW-04	8/27/2001	29.46	13:20	24.75	5.98	4.71	-1.35	9.87
MW-04	10/10/2001	29.46	16:12	24.10	4.75	5.36	0.65	9.46
MW-04	11/29/2001	29.46	10:41	20.62	2.94	8.84	3.48	11.38
MW-04	12/27/2001	29.46	11:40	16.80	1.04	12.66	3.82	13.56
MW-04	2/4/2002	29.46	11:00	16.17	0.85	13.29	0.63	14.02
MW-04	2/28/2002	29.46	14:35	16.98	1.08	12.48	-0.81	13.41
MW-04	3/14/2002	29.46	10:15	16.60	0.77	12.86	0.38	13.53
MW-04	4/23/2002	29.46	14:29	16.08	0.53	13.38	0.52	13.84
MW-04	5/22/2002	29.46	14:56	17.52	1.11	11.94	-1.44	12.90
MW-09	6/6/2001	29.60	12:00	22.18	0.00	7.42	NA	7.42
MW-09	6/18/2001	29.60	12:00	24.39	0.00	5.21	-2.21	5.21
MW-09	7/2/2001	29.60	12:00	24.31	0.00	5.29	0.08	5.29
MW-09	7/16/2001	29.60	12:00	24.99	0.00	4.61	-0.68	4.61
MW-09	7/30/2001	29.60	12:00	24.74	0.00	4.86	0.25	4.86
MW-09	8/13/2001	29.60	12:59	24.31	0.00	5.29	0.43	5.29
MW-09	8/27/2001	29.60	13:06	24.38	0.00	5.22	-0.07	5.22

All elevations relative to City of Portland Datum
Internal DRAFT

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Schnitzer - Premier Edible Oils
Portland, OR
52-00180063

PERIOD: From 06/06/2001 thru 05/22/2002 - Inclusive

SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-09	10/10/2001	29.60	15:34	24.79	0.00	4.81	-0.41	4.81
MW-09	11/29/2001	29.60	10:23	20.59	0.00	9.01	4.20	9.01
MW-09	12/27/2001	29.60	11:28	22.67	0.34	6.93	-2.08	7.22
MW-09	2/4/2002	29.60	10:48	20.89	0.14	8.71	1.78	8.83
MW-09	2/28/2002	29.60	14:12	21.95	0.35	7.65	-1.06	7.95
MW-09	3/14/2002	29.60	09:58	19.10	0.00	10.50	2.85	10.50
MW-09	4/23/2002	29.60	14:15	19.15	0.78	10.45	-0.05	11.11
MW-09	5/22/2002	29.60	14:42	19.34	0.00	10.26	-0.19	10.26
MW-11	6/6/2001	29.20	12:00	21.81	0.00	7.39	NA	7.39
MW-11	6/18/2001	29.20	12:00	23.49	0.00	5.71	-1.68	5.71
MW-11	7/2/2001	29.20	12:00	23.37	0.00	5.83	0.12	5.83
MW-11	7/16/2001	29.20	12:00	24.16	0.00	5.04	-0.79	5.04
MW-11	7/30/2001	29.20	12:00	24.02	0.00	5.18	0.14	5.18
MW-11	8/13/2001	29.20	13:01	23.73	0.00	5.47	0.29	5.47
MW-11	8/27/2001	29.20	13:02	23.67	0.00	5.53	0.06	5.53
MW-11	10/10/2001	29.20	15:38	24.18	0.00	5.02	-0.51	5.02
MW-11	11/29/2001	29.20	10:24	21.05	0.26	8.15	3.13	8.37
MW-11	12/27/2001	29.20	11:32	22.53	2.07	6.67	-1.48	8.42
MW-11	2/4/2002	29.20	10:53	20.03	0.40	9.17	2.50	9.51
MW-11	2/28/2002	29.20	14:22	21.22	0.81	7.98	-1.19	8.67
MW-11	3/14/2002	29.20	10:02	19.22	0.48	9.98	2.00	10.39
MW-11	4/23/2002	29.20	14:20	17.90	0.60	11.30	1.32	11.81
MW-11	5/22/2002	29.20	14:48	21.26	2.62	7.94	-3.36	10.16
MW-12	6/6/2001	29.21	12:00	21.75	0.00	7.46	NA	7.46
MW-12	6/18/2001	29.21	12:00	23.92	0.00	5.29	-2.17	5.29
MW-12	7/2/2001	29.21	12:00	23.88	0.00	5.33	0.04	5.33
MW-12	7/16/2001	29.21	12:00	24.54	0.00	4.67	-0.66	4.67
MW-12	7/30/2001	29.21	12:00	24.35	0.00	4.86	0.19	4.86
MW-12	8/13/2001	29.21	12:56	23.85	0.00	5.36	0.50	5.36
MW-12	8/27/2001	29.21	13:07	23.91	0.00	5.30	-0.06	5.30
MW-12	10/10/2001	29.21	15:32	24.33	0.00	4.88	-0.42	4.88
MW-12	11/29/2001	29.21	10:22	20.33	0.00	8.88	4.00	8.88
MW-12	12/27/2001	29.21	11:23	21.66	0.00	7.55	-1.33	7.55
MW-12	2/4/2002	29.21	10:46	20.17	0.01	9.04	1.49	9.04
MW-12	2/28/2002	29.21	14:08	21.22	0.21	7.99	-1.05	8.17
MW-12	3/14/2002	29.21	09:55	18.75	0.00	10.46	2.47	10.46
MW-12	4/23/2002	29.21	14:10	17.87	0.00	11.34	0.88	11.34

All elevations relative to City of Portland Datum
Internal DRAFT

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Schnitzer - Premier Edible Oils
Portland, OR
52-00180063

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SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-12	5/22/2002	29.21	14:40	19.06	0.10	10.15	-1.19	10.24
MW-13	6/6/2001	30.21	12:00	22.84	0.00	7.37	NA	7.37
MW-13	6/18/2001	30.21	12:00	24.80	0.00	5.41	-1.96	5.41
MW-13	7/2/2001	30.21	12:00	24.69	0.00	5.52	0.11	5.52
MW-13	7/16/2001	30.21	12:00	25.45	0.00	4.76	-0.76	4.76
MW-13	7/30/2001	30.21	12:00	25.25	0.00	4.96	0.20	4.96
MW-13	8/13/2001	30.21	13:04	24.82	0.00	5.39	0.43	5.39
MW-13	8/27/2001	30.21	13:04	24.80	0.00	5.41	0.02	5.41
MW-13	10/10/2001	30.21	15:45	25.65	0.44	4.56	-0.85	4.93
MW-13	11/29/2001	30.21	10:28	21.46	0.00	8.75	4.19	8.75
MW-13	12/27/2001	30.21	11:31	22.60	0.00	7.61	-1.14	7.61
MW-13	2/4/2002	30.21	10:51	21.09	0.02	9.12	1.51	9.14
MW-13	2/28/2002	30.21	14:20	21.89	0.03	8.32	-0.80	8.35
MW-13	3/14/2002	30.21	10:00	19.83	0.00	10.38	2.06	10.38
MW-13	4/23/2002	30.21	14:17	19.16	0.49	11.05	0.67	11.47
MW-13	5/22/2002	30.21	14:44	20.11	0.04	10.10	-0.95	10.13

All elevations relative to City of Portland Datum
Internal DRAFT

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 24, 2003 Service Request No: K2300633

Don Coberley
URS Corporation
111 SW Columbia
Suite 900
Portland, OR 97201

RE: Schnitzer PEO

Dear Don:

Enclosed are the results of the sample(s) submitted to our laboratory on January 29, 2003. For your reference, these analyses have been assigned our service request number K2300633.

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/dj

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.

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.

SCHN00260584

Case Narrative

SCHN00260585

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	URS Corporation	**Service Request No.:**	K2300633
Project:	Schnitzer PEO	**Date Received:**	1/29/03
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 II 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. Additional quality control analyses reported herein include: Laboratory Duplicate (DUP), Matrix Spike (MS), Matrix/Duplicate Matrix Spike (MS/DMS), and Laboratory Control Sample (LCS).

Sample Receipt

Two water samples were received for analysis at Columbia Analytical Services on 1/29/03. 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.

Total Metals

No anomalies associated with the analysis of these samples were observed.

Volatile Organic Compounds by EPA Method 8260B

Initial Calibration (ICAL) Exceptions:
The primary evaluation criterion was exceeded for the following analytes in ICAL ID CAL2324: Dichlorodifluoromethane, Carbon Tetrachloride, 1,2-Dibromo-3-chloropropane, and Hexachlorobutadiene. In accordance with CAS standard operating procedures, the alternative evaluation specified in the EPA method was performed using the mean Relative Standard Deviation (RSD) of all analytes in the calibration. The result of the mean RSD calculation was 10.0%. The calibration meets the alternative evaluation criteria.

Surrogate Exceptions:
The control criteria were exceeded for the Toluene-d8 and 4-Bromofluorobenzene surrogates in MS KWG0301266-1, and DMS KWG0301266-2. The associated matrix spike recoveries of target compounds were in control, indicating the analysis was in control. The surrogate outlier is flagged accordingly. No further corrective action was appropriate.

Semivolatile Organic Compounds by EPA Method 8270C

Initial Calibration (ICAL) Exceptions:
The primary evaluation criterion was exceeded for the following analytes in ICAL ID CAL2348: Hexachlorocyclopentadiene, 2-Fluorobiphenyl, 2-Nitroaniline, 2,6-Dinitrotoluene, 3-Nitroaniline, 2,4-Dinitrophenol, 4-Nitrophenol, 2,4-Dinitrotoluene, 4-Nitroaniline, 2-Methyl-4,6-dinitrophenol, Pentachlorophenol, Di-n-octyl Phthalate. In accordance with CAS standard operating procedures, the alternative evaluation specified in the EPA method was performed using the mean Relative Standard Deviation (RSD) of all analytes in the calibration. The result of the mean RSD calculation was 10.6%. The calibration meets the alternative evaluation criteria.

The primary evaluation criterion was exceeded for the following analytes in Initial Calibration (ICAL) ID CAL2377: 1,4-Dichlorobenzene, 1,2-Dichlorobenzene, Naphthalene, 2,6-Dinitrotoluene, 2,4-Dinitrophenol, 2,4-Dinitrotoluene, 4-Nitroaniline, Phenanthrene, Anthracene, Benzidine, 3,3'-Dichlorobenzidine, Di-n-octyl Phthalate, Indeno(1,2,3-

Approved by _____ **Date** 2/24/03

00005

cd)pyrene, Dibenz(a,h)anthracene. In accordance with CAS standard operating procedures, the alternative evaluation specified in the EPA method was performed using the mean Relative Standard Deviation (RSD) of all analytes in the calibration. The result of the mean RSD calculation was 11.7%. The calibration meets the alternative evaluation criteria.

Laboratory Control Sample (LCS) Exceptions:
The advisory criterion was exceeded for Aniline in LCS KWG0301056-3. As per the CAS/Kelso Standard Operating Procedure (SOP) for this method, these compounds are not included in the subset of analytes used to control the analysis. The recovery information reported for these analytes is for advisory purposes only (i.e. to provide additional detail related to the performance of each individual compound). No further corrective action was required.

Sample Notes and Discussion
The matrix spike samples extracted and analyzed with this project are not reported. The sample which was used for batch QC is a scrubber solution that the client informed us would have poor buffering capacity and matrix interferences. Consequently, the recovery and RPD for numerous analytes are outside control criteria.

Approved by _____ **Date** 2/24/03

Chain of Custody Documentation

00007

Columbia Analytical Services, Inc.
An Employee-Owned Company

CHAIN OF CUSTODY

SR#: K2300633

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222x07 • FAX (360) 638-1068

PAGE 1 OF 1 COC # 00008

PROJECT NAME: SCHNITZER PEO
PROJECT NUMBER:
PROJECT MANAGER: DM COBERLEY
COMPANY/ADDRESS: 111 SW COLUMBIA, SUITE 900
PORTLAND OR 97201
PHONE # 503.222.7200 FAX # 503.222.4292
SAMPLER'S SIGNATURE: DM Coberley

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Semivolatile Organics 625☐ 8270☒	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☐ 8151A☐	Chlorophenolics: 8141A☐ Tri☐ Tetra☐ PCP☐	PAHs 8310☐ SIM☐	Metals (Total or Dissolved) (See list 0800w)	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) NO_2+NO_3	TOX 9020☐ AOX 1650☐ 508☐	REMARKS
MW-M-012803	1/28/03	1500	1	H_2O	5	X	X								X				
MW-15-012803	1/28/03	1545	2	H_2O	5	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:

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:

Fe, Mn by method 6010

RELINQUISHED BY:	RECEIVED BY:	RELINQUISHED BY:	RECEIVED BY:
Signature: DM Coberley	Signature:	Signature:	Signature:
Printed Name: DM Coberley	Printed Name:	Printed Name:	Printed Name:
Date/Time: 1/28/03 1610	Date/Time: 1-28-03 4:15	Date/Time: 1-28-03 5:40	Date/Time: 1/29/03 0800
Firm: URS	Firm: CAS	Firm: CAS	Firm: CAS

RCOC #1 04/02

SCHN00260589

Columbia Analytical Services Inc.
Cooler Receipt And Preservation Form

Project/Client Schnitzer Work Order K23 00633

Cooler received on 1/8/03 and opened on 1/9/03 by FA

1.	Were custody seals on outside of cooler? If yes, how many and where?					Y	(N)
2.	Were seals intact and signature & date correct?					~~Y~~	N
3.	Is the shipper's airbill available and filed? If no, record airbill number: Courier					Y	N
4.	COC #						
	Temperature of cooler(s) upon receipt:	1.7					
	Temperature Blank:	1.3					
5.	Were custody papers properly filled out (ink, signed, etc.)?					(Y)	N
6.	Type of packing material present inserts, bubble wrap						
7.	Did all bottles arrive in good condition (unbroken)?					(Y)	N
8.	Were all bottle labels complete (*i.e.* analysis, preservation, etc.)?					(Y)	N
9.	Did all bottle labels and tags agree with custody papers?					(Y)	N
10.	Were the correct types of bottles used for the tests indicated?					(Y)	N
11.	Were all of the preserved bottles received at the lab with the appropriate pH?					Y	N
12.	Were VOA vials checked for absence of air bubbles, and if present, noted below?					(Y)	N
13.	Did the bottles originate from CAS/K or a branch laboratory?					(Y)	N
14.	Are CWA Microbiology samples received with > ½ the 24 hr. hold time remaining from collection?					~~Y~~	N
15.	Was Cl2/Res negative?					(Y)	N

Explain any discrepancies: _____

RESOLUTION: _____

Samples that required preservation or received out of temperature:

Sample ID	Reagent	Volume	Lot Number	Bottle Type	Rec'd out of Temperature	Initials

00009

CRFREV.DOC12/26/2002

SCHN00260590

Metals

SCHN00260591

METALS

- Cover Page -
INORGANIC ANALYSIS DATA PACKAGE

Client: Schnitzer Steel Products Co. Service Request: K2300633

Project No.:

Project Name: Schnitzer PEO

Sample No.	Lab Sample ID.
MW-14-012803	K2300633-001
MW-14-012803D	K2300633-001D
MW-14-012803S	K2300633-001S
MW-15-012803	K2300633-002
Method Blank	K2300633-MB

Were ICP interelement corrections applied? Yes/No YES

Were ICP background corrections applied? Yes/No YES

If yes-were raw data generated before application of background corrections? Yes/No NO

Comments: _____

I certify that this data package is in compliance with the terms and conditions of the contract, both technically and for completeness, for other than the conditions detailed above. Release of the data contained in this hardcopy data package and in the computer-readable data submitted on diskette has been authorized by the Laboratory Manager or the Manager's designee, as verified by the following signature.

Signature: _____ Date: 2/11/03

METALS

-1-

INORGANIC ANALYSIS DATA SHEET

Client:	Schnitzer Steel Products Co.	Service Request:	K2300633
Project No.:	NA	Date Collected:	01/28/03
Project Name:	Schnitzer PEO	Date Received:	01/29/03
Matrix:	WATER	Units:	µG/L
		Basis:	NA

Sample Name: MW-14-012803 Lab Code: K2300633-001

Analyte	Analysis Method	MRL	Dilution Factor	Date Extracted	Date Analyzed	Result	C	Q
Iron	6010B	20	1	1/31/03	2/11/03	2680		
Lead	7421	2.0	1	1/31/03	2/4/03	2.0	U	
Manganese	6010B	5.0	1	1/31/03	2/11/03	95.0		

% Solids: 0.0

Comments:

METALS

-1-

INORGANIC ANALYSIS DATA SHEET

Client:	Schnitzer Steel Products Co.	Service Request:	K2300633
Project No.:	NA	Date Collected:	01/28/03
Project Name:	Schnitzer PEO	Date Received:	01/29/03
Matrix:	WATER	Units:	µG/L
		Basis:	NA

Sample Name: MW-15-012803 Lab Code: K2300633-002

Analyte	Analysis Method	MRL	Dilution Factor	Date Extracted	Date Analyzed	Result	C	Q
Iron	6010B	20	1	1/31/03	2/11/03	705		
Lead	7421	2.0	1	1/31/03	2/4/03	2.0	U	
Manganese	6010B	5.0	1	1/31/03	2/11/03	2700		

% Solids: 0.0

Comments:

METALS

-1-

INORGANIC ANALYSIS DATA SHEET

Client: Schnitzer Steel Products Co.
Service Request: K2300633
Project No.: NA
Date Collected:
Project Name: Schnitzer PEO
Date Received:
Matrix: WATER
Units: µG/L
Basis: NA

Sample Name: Method Blank
Lab Code: K2300633-MB

Analyte	Analysis Method	MRL	Dilution Factor	Date Extracted	Date Analyzed	Result	C	Q
Iron	6010B	20	1	1/31/03	2/11/03	20	U	
Lead	7421	2.0	1	1/31/03	2/4/03	2.0	U	
Manganese	6010B	5.0	1	1/31/03	2/11/03	5.0	U	

% Solids: 0.0

Comments:

METALS
- 5a -
SPIKE SAMPLE RECOVERY

Client: Schnitzer Steel Products Co.
Service Request: K2300633
Project No.:
Units: µg/L
Project Name: Schnitzer PEO
Basis: NA
Matrix: WATER
% Solids: 0.0

Sample Name: MW-14-012803S
Lab Code: K2300633-001S

Analyte	Control Limit %R	Spike Result	C	Sample Result	C	Spike Added	%R	Q	Method
Iron	48 - 147	3670		2680		1000	99		6010B
Lead	54 - 122	39.6		2.0	U	40.0	99		7421
Manganese	72 - 126	617		95.0		500	104		6010B

An empty field in the Control Limit column indicates the control limit is not applicable.

METALS
-6-
DUPLICATES

Client: Schnitzer Steel Products Co.
Service Request: K2300633
Project No.:
Units: µg/L
Project Name: Schnitzer PEO
Basis: NA
Matrix: WATER
% Solids: 0.0

Sample Name: MW-14-012803D
Lab Code: K2300633-001D

Analyte	Control Limit(%)	Sample (S)	C	Duplicate (D)	C	RPD	Q	Method
Iron	20	2680		2660		1		6010B
Lead		2.0	U	2.0	U			7421
Manganese	20	95.0		93.4		2		6010B

An empty field in the Control Limit column indicates the control limit is not applicable.

Volatile Organic Compounds
Method 8260

SCHN00260598

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Collected:**	01/28/2003
Sample Matrix:	Water	**Date Received:**	01/29/2003

Volatile Organic Compounds

Sample Name:	MW-14-012803	**Units:**	ug/L
Lab Code:	K2300633-001	**Basis:**	NA
Extraction Method:	EPA 5030B	**Level:**	Low
Analysis Method:	8260B		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dichlorodifluoromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Chloromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Vinyl Chloride	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Bromomethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Chloroethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Trichlorofluoromethane	**0.88**		0.50	1	01/31/03	01/31/03	KWG0301266	
Acetone	ND	U	20	1	01/31/03	01/31/03	KWG0301266	
1,1-Dichloroethene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Carbon Disulfide	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Methylene Chloride	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
trans-1,2-Dichloroethene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,1-Dichloroethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
2-Butanone (MEK)	ND	U	20	1	01/31/03	01/31/03	KWG0301266	
2,2-Dichloropropane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
cis-1,2-Dichloroethene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Chloroform	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Bromochloromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,1,1-Trichloroethane (TCA)	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,1-Dichloropropene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Carbon Tetrachloride	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,2-Dichloroethane (EDC)	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Benzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Trichloroethene (TCE)	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,2-Dichloropropane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Bromodichloromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Dibromomethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
2-Hexanone	ND	U	20	1	01/31/03	01/31/03	KWG0301266	
cis-1,3-Dichloropropene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Toluene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
trans-1,3-Dichloropropene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,1,2-Trichloroethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
4-Methyl-2-pentanone (MIBK)	ND	U	20	1	01/31/03	01/31/03	KWG0301266	
1,3-Dichloropropane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Tetrachloroethene (PCE)	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	

Comments:

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Collected:**	01/28/2003
Sample Matrix:	Water	**Date Received:**	01/29/2003

Volatile Organic Compounds

Sample Name:	MW-14-012803	**Units:**	ug/L
Lab Code:	K2300633-001	**Basis:**	NA
Extraction Method:	EPA 5030B	**Level:**	Low
Analysis Method:	8260B		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dibromochloromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,2-Dibromoethane (EDB)	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
Chlorobenzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,1,1,2-Tetrachloroethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Ethylbenzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
m,p-Xylenes	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
o-Xylene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Styrene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Bromoform	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Isopropylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,1,2,2-Tetrachloroethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,2,3-Trichloropropane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Bromobenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
n-Propylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
2-Chlorotoluene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
4-Chlorotoluene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,3,5-Trimethylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
tert-Butylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,2,4-Trimethylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
sec-Butylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,3-Dichlorobenzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
4-Isopropyltoluene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,4-Dichlorobenzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
n-Butylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,2-Dichlorobenzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,2-Dibromo-3-chloropropane	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,2,4-Trichlorobenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,2,3-Trichlorobenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
Naphthalene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
Hexachlorobutadiene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	

Comments:

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Collected:**	01/28/2003
Sample Matrix:	Water	**Date Received:**	01/29/2003

Volatile Organic Compounds

Sample Name:	MW-14-012803	**Units:**	ug/L
Lab Code:	K2300633-001	**Basis:**	NA

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
Dibromofluoromethane	107	78-124	01/31/03	Acceptable
Toluene-d8	111	87-118	01/31/03	Acceptable
4-Bromofluorobenzene	106	81-113	01/31/03	Acceptable

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Collected:**	01/28/2003
Sample Matrix:	Water	**Date Received:**	01/29/2003

Volatile Organic Compounds

Sample Name:	MW-15-012803	**Units:**	ug/L
Lab Code:	K2300633-002	**Basis:**	NA
Extraction Method:	EPA 5030B	**Level:**	Low
Analysis Method:	8260B		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dichlorodifluoromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Chloromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Vinyl Chloride	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Bromomethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Chloroethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Trichlorofluoromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Acetone	ND	U	20	1	01/31/03	01/31/03	KWG0301266	
1,1-Dichloroethene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Carbon Disulfide	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Methylene Chloride	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
trans-1,2-Dichloroethene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,1-Dichloroethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
2-Butanone (MEK)	ND	U	20	1	01/31/03	01/31/03	KWG0301266	
2,2-Dichloropropane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
cis-1,2-Dichloroethene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Chloroform	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Bromochloromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,1,1-Trichloroethane (TCA)	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,1-Dichloropropene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Carbon Tetrachloride	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,2-Dichloroethane (EDC)	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Benzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Trichloroethene (TCE)	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,2-Dichloropropane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Bromodichloromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Dibromomethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
2-Hexanone	ND	U	20	1	01/31/03	01/31/03	KWG0301266	
cis-1,3-Dichloropropene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Toluene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
trans-1,3-Dichloropropene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,1,2-Trichloroethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
4-Methyl-2-pentanone (MIBK)	ND	U	20	1	01/31/03	01/31/03	KWG0301266	
1,3-Dichloropropane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Tetrachloroethene (PCE)	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	

Comments:

00021

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

Service Request: K2300633
Date Collected: 01/28/2003
Date Received: 01/29/2003

Volatile Organic Compounds

Sample Name: MW-15-012803
Lab Code: K2300633-002

Extraction Method: EPA 5030B
Analysis Method: 8260B

Units: ug/L
Basis: NA

Level: Low

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dibromochloromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,2-Dibromoethane (EDB)	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
Chlorobenzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,1,1,2-Tetrachloroethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Ethylbenzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
m,p-Xylenes	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
o-Xylene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Styrene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Bromoform	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Isopropylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,1,2,2-Tetrachloroethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,2,3-Trichloropropane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Bromobenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
n-Propylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
2-Chlorotoluene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
4-Chlorotoluene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,3,5-Trimethylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
tert-Butylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,2,4-Trimethylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
sec-Butylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,3-Dichlorobenzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
4-Isopropyltoluene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,4-Dichlorobenzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
n-Butylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,2-Dichlorobenzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,2-Dibromo-3-chloropropane	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,2,4-Trichlorobenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,2,3-Trichlorobenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
Naphthalene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
Hexachlorobutadiene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	

Comments:

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Collected:**	01/28/2003
Sample Matrix:	Water	**Date Received:**	01/29/2003

Volatile Organic Compounds

Sample Name:	MW-15-012803	**Units:**	ug/L
Lab Code:	K2300633-002	**Basis:**	NA

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
Dibromofluoromethane	107	78-124	01/31/03	Acceptable
Toluene-d8	111	87-118	01/31/03	Acceptable
4-Bromofluorobenzene	108	81-113	01/31/03	Acceptable

Comments:

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

Service Request: K2300633
Date Collected: NA
Date Received: NA

Volatile Organic Compounds

Sample Name: Method Blank
Lab Code: KWG0301266-4

Extraction Method: EPA 5030B
Analysis Method: 8260B

Units: ug/L
Basis: NA

Level: Low

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dichlorodifluoromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Chloromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Vinyl Chloride	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Bromomethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Chloroethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Trichlorofluoromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Acetone	ND	U	20	1	01/31/03	01/31/03	KWG0301266	
1,1-Dichloroethene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Carbon Disulfide	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Methylene Chloride	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
trans-1,2-Dichloroethene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,1-Dichloroethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
2-Butanone (MEK)	ND	U	20	1	01/31/03	01/31/03	KWG0301266	
2,2-Dichloropropane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
cis-1,2-Dichloroethene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Chloroform	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Bromochloromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,1,1-Trichloroethane (TCA)	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,1-Dichloropropene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Carbon Tetrachloride	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,2-Dichloroethane (EDC)	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Benzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Trichloroethene (TCE)	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,2-Dichloropropane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Bromodichloromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Dibromomethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
2-Hexanone	ND	U	20	1	01/31/03	01/31/03	KWG0301266	
cis-1,3-Dichloropropene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Toluene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
trans-1,3-Dichloropropene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,1,2-Trichloroethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
4-Methyl-2-pentanone (MIBK)	ND	U	20	1	01/31/03	01/31/03	KWG0301266	
1,3-Dichloropropane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Tetrachloroethene (PCE)	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	

Comments:

00024

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

Service Request: K2300633
Date Collected: NA
Date Received: NA

Volatile Organic Compounds

Sample Name: Method Blank
Lab Code: KWG0301266-4

Extraction Method: EPA 5030B
Analysis Method: 8260B

Units: ug/L
Basis: NA

Level: Low

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dibromochloromethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,2-Dibromoethane (EDB)	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
Chlorobenzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,1,1,2-Tetrachloroethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Ethylbenzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
m,p-Xylenes	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
o-Xylene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Styrene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Bromoform	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Isopropylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,1,2,2-Tetrachloroethane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,2,3-Trichloropropane	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
Bromobenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
n-Propylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
2-Chlorotoluene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
4-Chlorotoluene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,3,5-Trimethylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
tert-Butylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,2,4-Trimethylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
sec-Butylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,3-Dichlorobenzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
4-Isopropyltoluene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,4-Dichlorobenzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
n-Butylbenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,2-Dichlorobenzene	ND	U	0.50	1	01/31/03	01/31/03	KWG0301266	
1,2-Dibromo-3-chloropropane	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,2,4-Trichlorobenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
1,2,3-Trichlorobenzene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
Naphthalene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	
Hexachlorobutadiene	ND	U	2.0	1	01/31/03	01/31/03	KWG0301266	

Comments:

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Collected:**	NA
Sample Matrix:	Water	**Date Received:**	NA

Volatile Organic Compounds

Sample Name:	Method Blank	**Units:**	ug/L
Lab Code:	KWG0301266-4	**Basis:**	NA

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
Dibromofluoromethane	107	78-124	01/31/03	Acceptable
Toluene-d8	109	87-118	01/31/03	Acceptable
4-Bromofluorobenzene	106	81-113	01/31/03	Acceptable

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co. **Service Request:** K2300633
Project: Schnitzer PEO
Sample Matrix: Water

Surrogate Recovery Summary
Volatile Organic Compounds

Extraction Method: EPA 5030B **Units:** PERCENT
Analysis Method: 8260B **Level:** Low

Sample Name	Lab Code	Sur1	Sur2	Sur3
MW-14-012803	K2300633-001	107	111	106
MW-15-012803	K2300633-002	107	111	108
Method Blank	KWG0301266-4	107	109	106
MW-14-012803MS	KWG0301266-1	117	123 *	119 *
MW-14-012803DMS	KWG0301266-2	120	126 *	118 *
Lab Control Sample	KWG0301266-3	106	110	106

Surrogate Recovery Control Limits (%)

Sur1 =	Dibromofluoromethane	78-124
Sur2 =	Toluene-d8	87-118
Sur3 =	4-Bromofluorobenzene	81-113

Results flagged with an asterisk (*) indicate values outside control criteria.
Results flagged with a pound (#) indicate the control criteria is not applicable.

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Extracted:**	01/31/2003
Sample Matrix:	Water	**Date Analyzed:**	01/31/2003

Matrix Spike/Duplicate Matrix Spike Summary
Volatile Organic Compounds

Sample Name:	MW-14-012803	**Units:**	ug/L
Lab Code:	K2300633-001	**Basis:**	NA
Extraction Method:	EPA 5030B	**Level:**	Low
Analysis Method:	8260B	**Extraction Lot:**	KWG0301266

Analyte Name	Sample Result	MW-14-012803MS KWG0301266-1 Matrix Spike			MW-14-012803DMS KWG0301266-2 Duplicate Matrix Spike			%Rec Limits	RPD	RPD Limit
		Result	Expected	%Rec	Result	Expected	%Rec			
1,1-Dichloroethene	ND	9.55	10.0	96	10.4	10.0	104	67-157	9	30
Benzene	ND	8.99	10.0	90	10.0	10.0	100	76-138	11	30
Trichloroethene (TCE)	ND	9.05	10.0	91	9.94	10.0	99	66-149	9	30
Toluene	ND	8.99	10.0	90	9.93	10.0	99	82-131	10	30
Chlorobenzene	ND	8.42	10.0	84	9.15	10.0	92	70-131	8	30
1,2-Dichlorobenzene	ND	7.00	10.0	70	7.75	10.0	78	70-126	10	30
Naphthalene	ND	7.38	10.0	74	8.32	10.0	83	50-149	12	30

Results flagged with an asterisk (*) indicate values outside control criteria.

Results flagged with a pound (#) indicate the control criteria is not applicable.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

00028

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Extracted:**	01/31/2003
Sample Matrix:	Water	**Date Analyzed:**	01/31/2003

Lab Control Spike Summary
Volatile Organic Compounds

Extraction Method:	EPA 5030B	**Units:**	ug/L
Analysis Method:	8260B	**Basis:**	NA
		Level:	Low
		Extraction Lot:	KWG0301266

	Lab Control Sample KWG0301266-3 Lab Control Spike			
Analyte Name	**Result**	**Expected**	**%Rec**	**%Rec Limits**
Dichlorodifluoromethane	11.3	10.0	113	33-189
Chloromethane	8.83	10.0	88	66-128
Vinyl Chloride	9.77	10.0	98	76-135
Bromomethane	7.54	10.0	75	30-188
Chloroethane	9.62	10.0	96	79-131
Trichlorofluoromethane	9.30	10.0	93	73-127
Acetone	56.6	50.0	113	60-157
1,1-Dichloroethene	10.4	10.0	104	79-137
Carbon Disulfide	21.4	20.0	107	68-118
Methylene Chloride	11.0	10.0	110	68-135
trans-1,2-Dichloroethene	10.1	10.0	101	88-127
1,1-Dichloroethane	10.4	10.0	104	89-133
2-Butanone (MEK)	70.9	50.0	142	78-144
2,2-Dichloropropane	11.0	10.0	110	71-138
cis-1,2-Dichloroethene	9.88	10.0	99	90-126
Chloroform	10.7	10.0	107	88-117
Bromochloromethane	11.2	10.0	112	80-133
1,1,1-Trichloroethane (TCA)	10.5	10.0	105	83-122
1,1-Dichloropropene	10.4	10.0	104	87-137
Carbon Tetrachloride	10.7	10.0	107	87-131
1,2-Dichloroethane (EDC)	10.5	10.0	105	73-130
Benzene	10.5	10.0	105	90-120
Trichloroethene (TCE)	10.5	10.0	105	83-131
1,2-Dichloropropane	10.2	10.0	102	87-121
Bromodichloromethane	9.85	10.0	99	84-114
Dibromomethane	10.6	10.0	106	76-130
2-Hexanone	49.9	50.0	100	68-135
cis-1,3-Dichloropropene	10.4	10.0	104	90-126
Toluene	10.5	10.0	105	89-119
trans-1,3-Dichloropropene	9.78	10.0	98	77-113
1,1,2-Trichloroethane	10.4	10.0	104	81-116
4-Methyl-2-pentanone (MIBK)	48.4	50.0	97	79-138
1,3-Dichloropropane	10.2	10.0	102	76-129
Tetrachloroethene (PCE)	10.3	10.0	103	82-123
Dibromochloromethane	9.80	10.0	98	83-119
1,2-Dibromoethane (EDB)	10.2	10.0	102	74-130

Results flagged with an asterisk (*) indicate values outside control criteria.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

00029

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Extracted:**	01/31/2003
Sample Matrix:	Water	**Date Analyzed:**	01/31/2003

Lab Control Spike Summary
Volatile Organic Compounds

Extraction Method:	EPA 5030B	**Units:**	ug/L
Analysis Method:	8260B	**Basis:**	NA
		Level:	Low
		Extraction Lot:	KWG0301266

	Lab Control Sample KWG0301266-3 Lab Control Spike			
Analyte Name	**Result**	**Expected**	**%Rec**	**%Rec Limits**
Chlorobenzene	10.2	10.0	102	86-115
1,1,1,2-Tetrachloroethane	10.5	10.0	105	88-118
Ethylbenzene	10.2	10.0	102	89-124
m,p-Xylenes	21.2	20.0	106	90-122
o-Xylene	10.4	10.0	104	88-126
Styrene	10.4	10.0	104	91-123
Bromoform	10.5	10.0	105	76-125
Isopropylbenzene	9.54	10.0	95	82-123
1,1,2,2-Tetrachloroethane	9.34	10.0	93	78-117
1,2,3-Trichloropropane	10.1	10.0	101	75-127
Bromobenzene	9.98	10.0	100	76-129
n-Propylbenzene	9.81	10.0	98	83-128
2-Chlorotoluene	9.93	10.0	99	74-131
4-Chlorotoluene	9.87	10.0	99	87-119
1,3,5-Trimethylbenzene	10.1	10.0	101	85-128
tert-Butylbenzene	9.97	10.0	100	83-129
1,2,4-Trimethylbenzene	10.3	10.0	103	88-129
sec-Butylbenzene	10.2	10.0	102	84-133
1,3-Dichlorobenzene	9.67	10.0	97	87-116
4-Isopropyltoluene	9.88	10.0	99	81-126
1,4-Dichlorobenzene	10.3	10.0	103	86-115
n-Butylbenzene	10.3	10.0	103	79-134
1,2-Dichlorobenzene	8.89	10.0	89	85-113
1,2-Dibromo-3-chloropropane	10.3	10.0	103	55-136
1,2,4-Trichlorobenzene	9.42	10.0	94	76-130
1,2,3-Trichlorobenzene	9.32	10.0	93	70-134
Naphthalene	9.67	10.0	97	71-137
Hexachlorobutadiene	10.6	10.0	106	77-129

Results flagged with an asterisk (*) indicate values outside control criteria.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

00030

Semi Volatile Organic Compounds
Method 8270C

SCHN00260612

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Collected:**	01/28/2003
Sample Matrix:	Water	**Date Received:**	01/29/2003

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	MW-14-012803	**Units:**	ug/L
Lab Code:	K2300633-001	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
N-Nitrosodimethylamine	ND	U	24	1	01/30/03	02/07/03	KWG0301056	
Aniline	ND	U	24	1	01/30/03	02/07/03	KWG0301056	
Bis(2-chloroethyl) Ether	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Phenol	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
2-Chlorophenol	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
1,3-Dichlorobenzene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
1,4-Dichlorobenzene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
1,2-Dichlorobenzene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Benzyl alcohol	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Bis(2-chloroisopropyl) Ether	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
2-Methylphenol	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Hexachloroethane	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
N-Nitrosodi-n-propylamine	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
4-Methylphenol†	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Nitrobenzene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Isophorone	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
2-Nitrophenol	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
2,4-Dimethylphenol	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Bis(2-chloroethoxy)methane	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
2,4-Dichlorophenol	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Benzoic acid	ND	U	24	1	01/30/03	02/07/03	KWG0301056	
1,2,4-Trichlorobenzene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Naphthalene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
4-Chloroaniline	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Hexachlorobutadiene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
4-Chloro-3-methylphenol	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
2-Methylnaphthalene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Hexachlorocyclopentadiene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
2,4,6-Trichlorophenol	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
2,4,5-Trichlorophenol	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
2-Chloronaphthalene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
2-Nitroaniline	ND	U	24	1	01/30/03	02/07/03	KWG0301056	
Acenaphthylene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	

Comments:

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Collected:**	01/28/2003
Sample Matrix:	Water	**Date Received:**	01/29/2003

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	MW-14-012803	**Units:**	ug/L
Lab Code:	K2300633-001	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dimethyl Phthalate	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
2,6-Dinitrotoluene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Acenaphthene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
3-Nitroaniline	ND	U	24	1	01/30/03	02/07/03	KWG0301056	
2,4-Dinitrophenol	ND	U	24	1	01/30/03	02/07/03	KWG0301056	
Dibenzofuran	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
4-Nitrophenol	ND	U	24	1	01/30/03	02/07/03	KWG0301056	
2,4-Dinitrotoluene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Fluorene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
4-Chlorophenyl Phenyl Ether	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Diethyl Phthalate	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
4-Nitroaniline	ND	U	24	1	01/30/03	02/07/03	KWG0301056	
2-Methyl-4,6-dinitrophenol	ND	U	24	1	01/30/03	02/07/03	KWG0301056	
N-Nitrosodiphenylamine	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
4-Bromophenyl Phenyl Ether	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Hexachlorobenzene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Pentachlorophenol	ND	U	24	1	01/30/03	02/07/03	KWG0301056	
Phenanthrene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Anthracene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Di-n-butyl Phthalate	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Fluoranthene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Pyrene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Butyl Benzyl Phthalate	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
3,3'-Dichlorobenzidine	ND	U	24	1	01/30/03	02/07/03	KWG0301056	
Benz(a)anthracene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Chrysene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Bis(2-ethylhexyl) Phthalate	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Di-n-octyl Phthalate	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Benzo(b)fluoranthene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Benzo(k)fluoranthene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Benzo(a)pyrene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Indeno(1,2,3-cd)pyrene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	
Dibenz(a,h)anthracene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	

Comments:

00033

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Collected:**	01/28/2003
Sample Matrix:	Water	**Date Received:**	01/29/2003

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	MW-14-012803	**Units:**	ug/L
Lab Code:	K2300633-001	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Benzo(g,h,i)perylene	ND	U	9.6	1	01/30/03	02/07/03	KWG0301056	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
2-Fluorophenol	75	37-101	02/07/03	Acceptable
Phenol-d6	84	40-109	02/07/03	Acceptable
Nitrobenzene-d5	103	49-108	02/07/03	Acceptable
2-Fluorobiphenyl	81	56-104	02/07/03	Acceptable
2,4,6-Tribromophenol	86	44-129	02/07/03	Acceptable
Terphenyl-d14	113	22-140	02/07/03	Acceptable

† Analyte Comments

4-Methylphenol	This analyte cannot be separated from 3-Methylphenol.

Comments:

00034

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Collected:**	01/28/2003
Sample Matrix:	Water	**Date Received:**	01/29/2003

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	MW-15-012803	**Units:**	ug/L
Lab Code:	K2300633-002	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
N-Nitrosodimethylamine	ND	U	24	1	01/30/03	02/08/03	KWG0301056	
Aniline	ND	U	24	1	01/30/03	02/08/03	KWG0301056	
Bis(2-chloroethyl) Ether	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Phenol	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
2-Chlorophenol	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
1,3-Dichlorobenzene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
1,4-Dichlorobenzene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
1,2-Dichlorobenzene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Benzyl alcohol	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Bis(2-chloroisopropyl) Ether	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
2-Methylphenol	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Hexachloroethane	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
N-Nitrosodi-n-propylamine	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
4-Methylphenol†	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Nitrobenzene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Isophorone	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
2-Nitrophenol	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
2,4-Dimethylphenol	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Bis(2-chloroethoxy)methane	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
2,4-Dichlorophenol	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Benzoic acid	ND	U	24	1	01/30/03	02/08/03	KWG0301056	
1,2,4-Trichlorobenzene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Naphthalene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
4-Chloroaniline	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Hexachlorobutadiene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
4-Chloro-3-methylphenol	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
2-Methylnaphthalene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Hexachlorocyclopentadiene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
2,4,6-Trichlorophenol	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
2,4,5-Trichlorophenol	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
2-Chloronaphthalene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
2-Nitroaniline	ND	U	24	1	01/30/03	02/08/03	KWG0301056	
Acenaphthylene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	

Comments:

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Collected:**	01/28/2003
Sample Matrix:	Water	**Date Received:**	01/29/2003

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	MW-15-012803	**Units:**	ug/L
Lab Code:	K2300633-002	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dimethyl Phthalate	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
2,6-Dinitrotoluene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Acenaphthene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
3-Nitroaniline	ND	U	24	1	01/30/03	02/08/03	KWG0301056	
2,4-Dinitrophenol	ND	U	24	1	01/30/03	02/08/03	KWG0301056	
Dibenzofuran	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
4-Nitrophenol	ND	U	24	1	01/30/03	02/08/03	KWG0301056	
2,4-Dinitrotoluene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Fluorene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
4-Chlorophenyl Phenyl Ether	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Diethyl Phthalate	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
4-Nitroaniline	ND	U	24	1	01/30/03	02/08/03	KWG0301056	
2-Methyl-4,6-dinitrophenol	ND	U	24	1	01/30/03	02/08/03	KWG0301056	
N-Nitrosodiphenylamine	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
4-Bromophenyl Phenyl Ether	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Hexachlorobenzene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Pentachlorophenol	ND	U	24	1	01/30/03	02/08/03	KWG0301056	
Phenanthrene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Anthracene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Di-n-butyl Phthalate	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Fluoranthene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Pyrene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Butyl Benzyl Phthalate	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
3,3'-Dichlorobenzidine	ND	U	24	1	01/30/03	02/08/03	KWG0301056	
Benz(a)anthracene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Chrysene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Bis(2-ethylhexyl) Phthalate	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Di-n-octyl Phthalate	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Benzo(b)fluoranthene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Benzo(k)fluoranthene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Benzo(a)pyrene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Indeno(1,2,3-cd)pyrene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	
Dibenz(a,h)anthracene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	

Comments:

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Collected:**	01/28/2003
Sample Matrix:	Water	**Date Received:**	01/29/2003

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	MW-15-012803	**Units:**	ug/L
Lab Code:	K2300633-002	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Benzo(g,h,i)perylene	ND	U	9.6	1	01/30/03	02/08/03	KWG0301056	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
2-Fluorophenol	68	37-101	02/08/03	Acceptable
Phenol-d6	73	40-109	02/08/03	Acceptable
Nitrobenzene-d5	80	49-108	02/08/03	Acceptable
2-Fluorobiphenyl	84	56-104	02/08/03	Acceptable
2,4,6-Tribromophenol	88	44-129	02/08/03	Acceptable
Terphenyl-d14	66	22-140	02/08/03	Acceptable

† Analyte Comments

4-Methylphenol	This analyte cannot be separated from 3-Methylphenol.

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Collected:**	NA
Sample Matrix:	Water	**Date Received:**	NA

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	Method Blank	**Units:**	ug/L
Lab Code:	KWG0301056-4	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
N-Nitrosodimethylamine	ND	U	25	1	01/30/03	02/06/03	KWG0301056	
Aniline	ND	U	25	1	01/30/03	02/06/03	KWG0301056	
Bis(2-chloroethyl) Ether	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Phenol	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
2-Chlorophenol	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
1,3-Dichlorobenzene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
1,4-Dichlorobenzene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
1,2-Dichlorobenzene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Benzyl alcohol	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Bis(2-chloroisopropyl) Ether	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
2-Methylphenol	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Hexachloroethane	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
N-Nitrosodi-n-propylamine	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
4-Methylphenol†	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Nitrobenzene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Isophorone	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
2-Nitrophenol	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
2,4-Dimethylphenol	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Bis(2-chloroethoxy)methane	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
2,4-Dichlorophenol	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Benzoic acid	ND	U	25	1	01/30/03	02/06/03	KWG0301056	
1,2,4-Trichlorobenzene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Naphthalene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
4-Chloroaniline	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Hexachlorobutadiene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
4-Chloro-3-methylphenol	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
2-Methylnaphthalene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Hexachlorocyclopentadiene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
2,4,6-Trichlorophenol	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
2,4,5-Trichlorophenol	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
2-Chloronaphthalene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
2-Nitroaniline	ND	U	25	1	01/30/03	02/06/03	KWG0301056	
Acenaphthylene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	

Comments:

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Collected:**	NA
Sample Matrix:	Water	**Date Received:**	NA

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	Method Blank	**Units:**	ug/L
Lab Code:	KWG0301056-4	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dimethyl Phthalate	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
2,6-Dinitrotoluene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Acenaphthene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
3-Nitroaniline	ND	U	25	1	01/30/03	02/06/03	KWG0301056	
2,4-Dinitrophenol	ND	U	25	1	01/30/03	02/06/03	KWG0301056	
Dibenzofuran	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
4-Nitrophenol	ND	U	25	1	01/30/03	02/06/03	KWG0301056	
2,4-Dinitrotoluene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Fluorene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
4-Chlorophenyl Phenyl Ether	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Diethyl Phthalate	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
4-Nitroaniline	ND	U	25	1	01/30/03	02/06/03	KWG0301056	
2-Methyl-4,6-dinitrophenol	ND	U	25	1	01/30/03	02/06/03	KWG0301056	
N-Nitrosodiphenylamine	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
4-Bromophenyl Phenyl Ether	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Hexachlorobenzene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Pentachlorophenol	ND	U	25	1	01/30/03	02/06/03	KWG0301056	
Phenanthrene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Anthracene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Di-n-butyl Phthalate	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Fluoranthene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Pyrene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Butyl Benzyl Phthalate	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
3,3'-Dichlorobenzidine	ND	U	25	1	01/30/03	02/06/03	KWG0301056	
Benz(a)anthracene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Chrysene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Bis(2-ethylhexyl) Phthalate	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Di-n-octyl Phthalate	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Benzo(b)fluoranthene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Benzo(k)fluoranthene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Benzo(a)pyrene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Indeno(1,2,3-cd)pyrene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	
Dibenz(a,h)anthracene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	

Comments:

00039

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Collected:**	NA
Sample Matrix:	Water	**Date Received:**	NA

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	Method Blank	**Units:**	ug/L
Lab Code:	KWG0301056-4	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Benzo(g,h,i)perylene	ND	U	10	1	01/30/03	02/06/03	KWG0301056	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
2-Fluorophenol	76	37-101	02/06/03	Acceptable
Phenol-d6	88	40-109	02/06/03	Acceptable
Nitrobenzene-d5	107	49-108	02/06/03	Acceptable
2-Fluorobiphenyl	85	56-104	02/06/03	Acceptable
2,4,6-Tribromophenol	94	44-129	02/06/03	Acceptable
Terphenyl-d14	119	22-140	02/06/03	Acceptable

† Analyte Comments

4-Methylphenol	This analyte cannot be separated from 3-Methylphenol.

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co. **Service Request:** K2300633
Project: Schnitzer PEO
Sample Matrix: Water

Surrogate Recovery Summary
Semi-Volatile Organic Compounds by GC/MS

Extraction Method: EPA 3520C **Units:** PERCENT
Analysis Method: 8270C **Level:** Low

Sample Name	Lab Code	Sur1	Sur2	Sur3	Sur4	Sur5	Sur6
MW-14-012803	K2300633-001	75	84	103	81	86	113
MW-15-012803	K2300633-002	68	73	80	84	88	66
Method Blank	KWG0301056-4	76	88	107	85	94	119
Lab Control Sample	KWG0301056-3	75	85	96	77	95	101

Surrogate Recovery Control Limits (%)

Sur1 = 2-Fluorophenol	37-101	Sur5 = 2,4,6-Tribromophenol	44-129
Sur2 = Phenol-d6	40-109	Sur6 = Terphenyl-d14	22-140
Sur3 = Nitrobenzene-d5	49-108		
Sur4 = 2-Fluorobiphenyl	56-104		

Results flagged with an asterisk (*) indicate values outside control criteria.
Results flagged with a pound (#) indicate the control criteria is not applicable.

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Extracted:**	01/30/2003
Sample Matrix:	Water	**Date Analyzed:**	02/06/2003

Lab Control Spike Summary
Semi-Volatile Organic Compounds by GC/MS

Extraction Method:	EPA 3520C	**Units:**	ug/L
Analysis Method:	8270C	**Basis:**	NA
		Level:	Low
		Extraction Lot:	KWG0301056

	Lab Control Sample KWG0301056-3 Lab Control Spike			
Analyte Name	**Result**	**Expected**	**%Rec**	**%Rec Limits**
N-Nitrosodimethylamine	92.7	100	93	45-119
Aniline	9.55	100	10 *	23-110
Bis(2-chloroethyl) Ether	82.8	100	83	58-97
Phenol	74.6	100	75	33-112
2-Chlorophenol	78.7	100	79	38-112
1,3-Dichlorobenzene	69.2	100	69	50-94
1,4-Dichlorobenzene	65.9	100	66	51-89
1,2-Dichlorobenzene	67.6	100	68	52-94
Benzyl alcohol	89.4	100	89	59-106
Bis(2-chloroisopropyl) Ether	79.7	100	80	44-110
2-Methylphenol	78.6	100	79	46-108
Hexachloroethane	66.2	100	66	50-92
N-Nitrosodi-n-propylamine	89.9	100	90	55-102
4-Methylphenol	78.6	100	79	44-109
Nitrobenzene	89.1	100	89	56-106
Isophorone	97.4	100	97	66-106
2-Nitrophenol	92.2	100	92	47-116
2,4-Dimethylphenol	70.5	100	71	47-93
Bis(2-chloroethoxy)methane	83.5	100	84	66-97
2,4-Dichlorophenol	78.0	100	78	48-112
Benzoic acid	76.3	100	76	10-133
1,2,4-Trichlorobenzene	68.7	100	69	55-92
Naphthalene	71.8	100	72	56-95
4-Chloroaniline	66.8	100	67	58-105
Hexachlorobutadiene	68.3	100	68	52-101
4-Chloro-3-methylphenol	95.5	100	95	62-111
2-Methylnaphthalene	73.3	100	73	61-92
Hexachlorocyclopentadiene	24.0	100	24	10-71
2,4,6-Trichlorophenol	89.2	100	89	44-125
2,4,5-Trichlorophenol	89.4	100	89	58-113
2-Chloronaphthalene	80.8	100	81	66-96
2-Nitroaniline	105	100	105	65-119
Acenaphthylene	83.7	100	84	62-102
Dimethyl Phthalate	85.3	100	85	56-117
2,6-Dinitrotoluene	102	100	102	75-110

Results flagged with an asterisk (*) indicate values outside control criteria.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

00042

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300633
Project:	Schnitzer PEO	**Date Extracted:**	01/30/2003
Sample Matrix:	Water	**Date Analyzed:**	02/06/2003

Lab Control Spike Summary
Semi-Volatile Organic Compounds by GC/MS

Extraction Method:	EPA 3520C	**Units:**	ug/L
Analysis Method:	8270C	**Basis:**	NA
		Level:	Low
		Extraction Lot:	KWG0301056

Analyte Name	Lab Control Sample KWG0301056-3 Lab Control Spike Result	Expected	%Rec	%Rec Limits
Acenaphthene	77.2	100	77	60-103
3-Nitroaniline	95.8	100	96	65-129
2,4-Dinitrophenol	103	100	103	49-127
Dibenzofuran	77.4	100	77	63-102
4-Nitrophenol	96.4	100	96	45-132
2,4-Dinitrotoluene	102	100	102	75-120
Fluorene	75.3	100	75	67-107
4-Chlorophenyl Phenyl Ether	78.6	100	79	68-105
Diethyl Phthalate	77.9	100	78	62-117
4-Nitroaniline	99.7	100	100	54-142
2-Methyl-4,6-dinitrophenol	93.4	100	93	63-128
N-Nitrosodiphenylamine	83.6	100	84	59-108
4-Bromophenyl Phenyl Ether	90.1	100	90	70-111
Hexachlorobenzene	83.1	100	83	66-117
Pentachlorophenol	104	100	104	59-121
Phenanthrene	79.1	100	79	66-103
Anthracene	78.3	100	78	69-105
Di-n-butyl Phthalate	84.0	100	84	67-112
Fluoranthene	75.3	100	75	66-108
Pyrene	87.3	100	87	59-115
Butyl Benzyl Phthalate	96.0	100	96	70-114
3,3'-Dichlorobenzidine	60.6	100	61	35-130
Benz(a)anthracene	89.8	100	90	74-107
Chrysene	81.8	100	82	72-103
Bis(2-ethylhexyl) Phthalate	98.1	100	98	69-117
Di-n-octyl Phthalate	104	100	104	68-120
Benzo(b)fluoranthene	97.8	100	98	74-110
Benzo(k)fluoranthene	87.5	100	88	64-116
Benzo(a)pyrene	83.4	100	83	71-106
Indeno(1,2,3-cd)pyrene	96.0	100	96	62-123
Dibenz(a,h)anthracene	80.8	100	81	71-131
Benzo(g,h,i)perylene	85.1	100	85	67-115

Results flagged with an asterisk (*) indicate values outside control criteria.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

00043

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 24, 2003 Service Request No: K2300710

Don Coberley
URS Corporation
111 SW Columbia
Suite 900
Portland, OR 97201

RE: Schnitzer PEO/25693681

Dear Don:

Enclosed are the results of the sample(s) submitted to our laboratory on January 30, 2003. For your reference, these analyses have been assigned our service request number K2300710.

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/afs

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 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.

Case Narrative

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	URS Corporation	**Service Request No.:**	K2300710
Project:	Schnitzer PEO	**Date Received:**	1/30/03
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 II 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. Additional quality control analyses reported herein include: Laboratory Duplicate (DUP), Matrix Spike (MS), Matrix/Duplicate Matrix Spike (MS/DMS), and Laboratory Control Sample (LCS).

Sample Receipt

Two water samples were received for analysis at Columbia Analytical Services on 1/30/03. The samples were received by the laboratory in good condition and consistent with the accompanying chain of custody form. The samples were logged into the laboratory LIMS system and analyses were assigned. As standard operating procedure, once the samples were logged in, the samples were taken back to the secure sample control room and stored refrigerated at four degrees Celsius. However, when the samples were taken back to the sample control room they were accidentally left out overnight in the main room and not stored in a refrigerator. The main sample control room stays relatively cool (around 20 °C) but is not kept at a regulated 4 °C. The vials were of course sealed and it is not likely that the VOA results will be significantly affected by the temperature exceedence. However, as reference, a spiked VOA test vial was left out overnight in the sample control room and then tested to determine if there was a significant change in the vial VOA concentration. Subsequent analysis of the spiked VOA test vials indicated no significant loss of target analytes during the elevated temperature period. After the noted incident, the respective field samples were stored in a refrigerator at 4°C.

Total Metals

No anomalies associated with the analysis of these samples were observed.

Volatile Organic Compounds by EPA Method 8260B

Initial Calibration Exceptions:
The primary evaluation criterion was exceeded for the following analytes in Initial Calibration (ICAL) ID CAL2386: Bromomethane, Chloroethane, 1,1-Dichloroethene, and Methylene Chloride. In accordance with CAS standard operating procedures, the alternative evaluation specified in the EPA method was performed using the mean Relative Standard Deviation (RSD) of all analytes in the calibration. The result of the mean RSD calculation was 8.8%. The calibration meets the alternative evaluation criteria.

Matrix Spike Recovery Exceptions:
The control criteria for matrix spike recoveries of Trichloroethene for sample Batch QCMS, and Batch QCDMS are not applicable. The analyte concentration in the sample was significantly higher than the added spike concentration, preventing accurate evaluation of the spike recovery.

Elevated Method Reporting Limits:
Sample MW-10-012903 required dilution due to the presence of elevated levels of target analyte. The reporting limits are adjusted to reflect the dilution.

Approved by _____ **Date** 2/24/03

00005

Semi-Volatile Organic Compounds by EPA Method 8270C

Initial Calibration (ICAL) Exceptions:
The primary evaluation criterion was exceeded for the following analytes in ICAL ID CAL2378: Bis(2-chloroisopropyl) Ether, 2-Methylphenol, Hexachloroethane, 4-Methylphenol, 2,4-Dinitrophenol, Benzidine, Indeno(1,2,3-cd)pyrene. In accordance with CAS standard operating procedures, the alternative evaluation specified in the EPA method was performed using the mean Relative Standard Deviation (RSD) of all analytes in the calibration. The result of the mean RSD calculation was 8.3%. The calibration meets the alternative evaluation criteria.

Method Blank Exceptions:
The Method Blank KWG0301126-7 contained low levels of Bis(2-ethylhexyl) Phthalate above the Method Reporting Limit (MRL). In accordance with CAS QA/QC policy, all sample results less than twenty times the level found in the Method Blank are flagged as estimated. The samples were not re-extracted and reanalyzed as the analyte in question was not detected in the associated field samples. Therefore, the data quality is not significantly affected.

Laboratory Control Sample (LCS) Exceptions:
The advisory criterion was exceeded for Aniline and 4-Chloroaniline in LCS KWG0301126-6. As per the CAS/Kelso Standard Operating Procedure (SOP) for this method, these compounds are not included in the subset of analytes used to control the analysis. The recovery information reported for these analytes is for advisory purposes only (i.e. to provide additional detail related to the performance of each individual compound). No further corrective action was required.

Approved by _____ **Date** 2/24/03

00006

Chain of Custody Documentation

00007

Columbia Analytical Services, Inc.
An Employee-Owned Company

CHAIN OF CUSTODY

SR#: K2300710

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222x07 • FAX (360) 636-1068

PAGE 1 OF 1 COC #

PROJECT NAME: SCHNITZER PED
PROJECT NUMBER: 25693681
PROJECT MANAGER: Dm COBERLEY
COMPANY/ADDRESS: 111 SW COLUMBIA, SUITE 900
PORTLAND OR 97201
PHONE # 503.222.4700 | FAX # 503.222.4292
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 ☐	Hydrocarbons (*see below) Gas ☐ Diesel ☐ Oil ☐	8021 ☐ BTEX ☐ ☐ Fuel Fingerprint (FHC) ☐ NW-HCID Screen	Oil & Grease/TRPH 1664 HEM ☐ 1664 SGT ☐	PCB's Aroclors ☐	Congeners ☐	Pesticides/Herbicides 608 ☐ 8081A ☐ 8141A ☐ 8151A ☐	Chlorophenolics Tri ☐ Tetra ☐ 8151M	PAHs 8310 ☐ SIM ☐ POP ☐	Metals (Total ☐ 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) NO_2+NO_3	TOX 9020 ☐	AOX 1650 ☐ 506 ☐						REMARKS
MW-10-012903	1/29/03	1635		H_2O	5	X	X									X													
MW-12-012903	1/29/03	1700		H_2O	5	X	X									X													

REPORT REQUIREMENTS

___ 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
____ 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:

RECEIVED 1 TRIP 1/30/03 AV

RELINQUISHED BY:	RECEIVED BY:	RELINQUISHED BY:	RECEIVED BY:
Signature: Dm Coberley	Signature:	Signature:	Signature:
Date/Time: 1/30/03 1055	Date/Time: 1/30/03 1140	Date/Time:	Date/Time:
Printed Name: Dm Coberley	Printed Name:	Printed Name:	Printed Name:
Firm: ORS	Firm:	Firm:	Firm:

RCOC #1 04/02

SCHN00260632

Columbia Analytical Services Inc.
Cooler Receipt And Preservation Form

Project/Client VRS Work Order K23 00710

Cooler received on 1/30/03 and opened on 1/30/03 by AP

C

1.	Were custody seals on outside of cooler? — If yes, how many and where?		Y (N)
2.	Were seals intact and signature & date correct?		~~Y N~~
3.	Is the shipper's airbill available and filed? If no, record airbill number: N/A		~~Y N~~
4.	COC #		
	Temperature of cooler(s) upon receipt: 0.3		
	Temperature Blank: N/P		
5.	Were custody papers properly filled out (ink, signed, etc.)?		(Y) N
6.	Type of packing material present STYRO, INSERT		
7.	Did all bottles arrive in good condition (unbroken)?		(Y) N
8.	Were all bottle labels complete (*i.e.* analysis, preservation, etc.)?		(Y) N
9.	Did all bottle labels and tags agree with custody papers?		(Y) N
10.	Were the correct types of bottles used for the tests indicated?		(Y) N
11.	Were all of the preserved bottles received at the lab with the appropriate pH?		(Y) N
12.	Were VOA vials checked for absence of air bubbles, and if present, noted below?		(Y) N
13.	Did the bottles originate from CAS/K or a branch laboratory?		(Y) N
14.	Are CWA Microbiology samples received with > ½ the 24 hr. hold time remaining from collection?		~~Y N~~
15.	Was Cl2/Res negative?		(Y) N AP

Explain any discrepancies: RECEIVED 1 TRIP

RESOLUTION:

Samples that required preservation or received out of temperature:

Sample ID	Reagent	Volume	Lot Number	Bottle Type	Rec'd out of Temperature	Initials

CRFREV.DOC12/26/2002

Metals

SCHN00260634

METALS

- Cover Page -

INORGANIC ANALYSIS DATA PACKAGE

Client: Schnitzer Steel Products Co. Service Request: K2300710

Project No.: 25693681

Project Name: Schnitzer PEO

Sample No.	Lab Sample ID.
Batch QCD	K2300670-008D
Batch QCS	K2300670-008S
MW-10-012903	K2300710-001
MW-12-012903	K2300710-002
Method Blank	K2300710-MB

Were ICP interelement corrections applied? Yes/No YES

Were ICP background corrections applied? Yes/No YES

If yes-were raw data generated before application of background corrections? Yes/No NO

Comments: _____

I certify that this data package is in compliance with the terms and conditions of the contract, both technically and for completeness, for other than the conditions detailed above. Release of the data contained in this hardcopy data package and in the computer-readable data submitted on diskette has been authorized by the Laboratory Manager or the Manager's designee, as verified by the following signature.

Signature: _____ Date: 2/12/08

METALS

-1-

INORGANIC ANALYSIS DATA SHEET

Client:	Schnitzer Steel Products Co.	Service Request:	K2300710
Project No.:	25693681	Date Collected:	01/29/03
Project Name:	Schnitzer PEO	Date Received:	01/30/03
Matrix:	WATER	Units:	µG/L
		Basis:	NA

Sample Name: MW-10-012903 Lab Code: K2300710-001

Analyte	Analysis Method	MRL	Dilution Factor	Date Extracted	Date Analyzed	Result	C	Q
Iron	6010B	20	1	2/10/03	2/11/03	28400		
Lead	7421	2.0	1	2/3/03	2/4/03	2.0	U	
Manganese	6010B	5.0	1	2/10/03	2/11/03	2910		

% Solids: 0.0

Comments:

METALS

-1-

INORGANIC ANALYSIS DATA SHEET

Client:	Schnitzer Steel Products Co.	Service Request:	K2300710
Project No.:	25693681	Date Collected:	01/29/03
Project Name:	Schnitzer PEO	Date Received:	01/30/03
Matrix:	WATER	Units:	µG/L
		Basis:	NA

Sample Name: MW-12-012903 Lab Code: K2300710-002

Analyte	Analysis Method	MRL	Dilution Factor	Date Extracted	Date Analyzed	Result	C	Q
Iron	6010B	20	1	2/10/03	2/11/03	78900		
Lead	7421	2.0	1	2/3/03	2/4/03	2.0	U	
Manganese	6010B	5.0	1	2/10/03	2/11/03	4060		

% Solids: 0.0

Comments:

00013

Form I - IN

METALS

-1-

INORGANIC ANALYSIS DATA SHEET

Client: Schnitzer Steel Products Co.
Project No.: 25693681
Project Name: Schnitzer PEO
Matrix: WATER

Service Request: K2300710
Date Collected:
Date Received:
Units: µG/L
Basis: NA

Sample Name: Method Blank
Lab Code: K2300710-MB

Analyte	Analysis Method	MRL	Dilution Factor	Date Extracted	Date Analyzed	Result	C	Q
Iron	6010B	20	1	2/10/03	2/11/03	20	U	
Lead	7421	2.0	1	2/3/03	2/4/03	2.0	U	
Manganese	6010B	5.0	1	2/10/03	2/11/03	5.0	U	

% Solids: 0.0

Comments:

00014

Form I - IN

SCHN00260638

METALS
-5a-
SPIKE SAMPLE RECOVERY

Client: Schnitzer Steel Products Co.
Service Request: K2300710
Project No.: 25693681
Units: µg/L
Project Name: Schnitzer PEO
Basis: NA
Matrix: WATER
% Solids: 0.0

Sample Name: Batch QCS
Lab Code: K2300670-008S

Analyte	Control Limit %R	Spike Result	C	Sample Result	C	Spike Added	%R	Q	Method
Iron	48 - 147	1030		20.0	U	1000	103		6010B
Lead	54 - 122	40.5		2.0	U	40.0	101		7421
Manganese	72 - 126	520		5.0	U	500	104		6010B

An empty field in the Control Limit column indicates the control limit is not applicable.

METALS
-6-
DUPLICATES

Client:	Schnitzer Steel Products Co.	Service Request:	K2300710
Project No.:	25693681	Units:	µg/L
Project Name:	Schnitzer PEO	Basis:	NA
Matrix:	WATER	% Solids:	0.0

Sample Name:Batch QCD Lab Code: K2300670-008D

Analyte	Control Limit(%)	Sample (S)	C	Duplicate (D)	C	RPD	Q	Method
Iron		20	U	20	U			6010B
Lead		2.0	U	2.0	U			7421
Manganese		5.0	U	5.0	U			6010B

An empty field in the Control Limit column indicates the control limit is not applicable.

Volatile Organic Compounds
Method 8260

SCHN00260641

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client: Schnitzer Steel Products Co.
Project: Schnitzer PEO/25693681
Sample Matrix: Water

Service Request: K2300710
Date Collected: 01/29/2003
Date Received: 01/30/2003

Volatile Organic Compounds

Sample Name: MW-10-012903
Lab Code: K2300710-001

Extraction Method: EPA 5030B
Analysis Method: 8260B

Units: ug/L
Basis: NA

Level: Low

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dichlorodifluoromethane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Chloromethane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Vinyl Chloride	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Bromomethane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Chloroethane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Trichlorofluoromethane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Acetone	ND	U	40	2	02/12/03	02/12/03	KWG0301671	
1,1-Dichloroethene	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Carbon Disulfide	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Methylene Chloride	ND	U	4.0	2	02/12/03	02/12/03	KWG0301671	
trans-1,2-Dichloroethene	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
1,1-Dichloroethane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
2-Butanone (MEK)	ND	U	40	2	02/12/03	02/12/03	KWG0301671	
2,2-Dichloropropane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
cis-1,2-Dichloroethene	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Chloroform	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Bromochloromethane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
1,1,1-Trichloroethane (TCA)	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
1,1-Dichloropropene	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Carbon Tetrachloride	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
1,2-Dichloroethane (EDC)	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Benzene	**6.1**	D	1.0	2	02/12/03	02/12/03	KWG0301671	
Trichloroethene (TCE)	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
1,2-Dichloropropane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Bromodichloromethane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Dibromomethane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
2-Hexanone	ND	U	40	2	02/12/03	02/12/03	KWG0301671	
cis-1,3-Dichloropropene	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Toluene	**1.9**	D	1.0	2	02/12/03	02/12/03	KWG0301671	
trans-1,3-Dichloropropene	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
1,1,2-Trichloroethane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
4-Methyl-2-pentanone (MIBK)	ND	U	40	2	02/12/03	02/12/03	KWG0301671	
1,3-Dichloropropane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Tetrachloroethene (PCE)	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	

Comments:

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Collected:**	01/29/2003
Sample Matrix:	Water	**Date Received:**	01/30/2003

Volatile Organic Compounds

Sample Name:	MW-10-012903	**Units:**	ug/L
Lab Code:	K2300710-001	**Basis:**	NA
Extraction Method:	EPA 5030B	**Level:**	Low
Analysis Method:	8260B		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dibromochloromethane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
1,2-Dibromoethane (EDB)	ND	U	4.0	2	02/12/03	02/12/03	KWG0301671	
Chlorobenzene	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
1,1,1,2-Tetrachloroethane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Ethylbenzene	**74**	D	1.0	2	02/12/03	02/12/03	KWG0301671	
m,p-Xylenes	**9.1**	D	1.0	2	02/12/03	02/12/03	KWG0301671	
o-Xylene	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Styrene	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Bromoform	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Isopropylbenzene	**94**	D	4.0	2	02/12/03	02/12/03	KWG0301671	
1,1,2,2-Tetrachloroethane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
1,2,3-Trichloropropane	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
Bromobenzene	ND	U	4.0	2	02/12/03	02/12/03	KWG0301671	
n-Propylbenzene	**310**	D	40	20	02/12/03	02/12/03	KWG0301671	
2-Chlorotoluene	ND	U	4.0	2	02/12/03	02/12/03	KWG0301671	
4-Chlorotoluene	ND	U	4.0	2	02/12/03	02/12/03	KWG0301671	
1,3,5-Trimethylbenzene	ND	U	4.0	2	02/12/03	02/12/03	KWG0301671	
tert-Butylbenzene	ND	U	4.0	2	02/12/03	02/12/03	KWG0301671	
1,2,4-Trimethylbenzene	ND	U	4.0	2	02/12/03	02/12/03	KWG0301671	
sec-Butylbenzene	**13**	D	4.0	2	02/12/03	02/12/03	KWG0301671	
1,3-Dichlorobenzene	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
4-Isopropyltoluene	ND	U	4.0	2	02/12/03	02/12/03	KWG0301671	
1,4-Dichlorobenzene	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
n-Butylbenzene	**15**	D	4.0	2	02/12/03	02/12/03	KWG0301671	
1,2-Dichlorobenzene	ND	U	1.0	2	02/12/03	02/12/03	KWG0301671	
1,2-Dibromo-3-chloropropane	ND	U	4.0	2	02/12/03	02/12/03	KWG0301671	
1,2,4-Trichlorobenzene	ND	U	4.0	2	02/12/03	02/12/03	KWG0301671	
1,2,3-Trichlorobenzene	ND	U	4.0	2	02/12/03	02/12/03	KWG0301671	
Naphthalene	ND	U	4.0	2	02/12/03	02/12/03	KWG0301671	
Hexachlorobutadiene	ND	U	4.0	2	02/12/03	02/12/03	KWG0301671	

Comments:

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Collected:**	01/29/2003
Sample Matrix:	Water	**Date Received:**	01/30/2003

Volatile Organic Compounds

Sample Name:	MW-10-012903	**Units:**	ug/L
Lab Code:	K2300710-001	**Basis:**	NA

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
Dibromofluoromethane	99	78-124	02/12/03	Acceptable
Toluene-d8	103	87-118	02/12/03	Acceptable
4-Bromofluorobenzene	98	81-113	02/12/03	Acceptable

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Collected:**	01/29/2003
Sample Matrix:	Water	**Date Received:**	01/30/2003

Volatile Organic Compounds

Sample Name:	MW-12-012903	**Units:**	ug/L
Lab Code:	K2300710-002	**Basis:**	NA
Extraction Method:	EPA 5030B	**Level:**	Low
Analysis Method:	8260B		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dichlorodifluoromethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Chloromethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Vinyl Chloride	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Bromomethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Chloroethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Trichlorofluoromethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Acetone	ND	U	20	1	02/12/03	02/12/03	KWG0301671	
1,1-Dichloroethene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Carbon Disulfide	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Methylene Chloride	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
trans-1,2-Dichloroethene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,1-Dichloroethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
2-Butanone (MEK)	ND	U	20	1	02/12/03	02/12/03	KWG0301671	
2,2-Dichloropropane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
cis-1,2-Dichloroethene	**0.90**		0.50	1	02/12/03	02/12/03	KWG0301671	
Chloroform	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Bromochloromethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,1,1-Trichloroethane (TCA)	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,1-Dichloropropene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Carbon Tetrachloride	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,2-Dichloroethane (EDC)	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Benzene	**61**	D	5.0	10	02/12/03	02/12/03	KWG0301671	
Trichloroethene (TCE)	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,2-Dichloropropane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Bromodichloromethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Dibromomethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
2-Hexanone	ND	U	20	1	02/12/03	02/12/03	KWG0301671	
cis-1,3-Dichloropropene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Toluene	**14**		0.50	1	02/12/03	02/12/03	KWG0301671	
trans-1,3-Dichloropropene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,1,2-Trichloroethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
4-Methyl-2-pentanone (MIBK)	ND	U	20	1	02/12/03	02/12/03	KWG0301671	
1,3-Dichloropropane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Tetrachloroethene (PCE)	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	

Comments:

00021

Client: Schnitzer Steel Products Co.
Project: Schnitzer PEO/25693681
Sample Matrix: Water

Service Request: K2300710
Date Collected: 01/29/2003
Date Received: 01/30/2003

Volatile Organic Compounds

Sample Name: MW-12-012903
Lab Code: K2300710-002

Extraction Method: EPA 5030B
Analysis Method: 8260B

Units: ug/L
Basis: NA
Level: Low

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dibromochloromethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,2-Dibromoethane (EDB)	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
Chlorobenzene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,1,1,2-Tetrachloroethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Ethylbenzene	**3.8**		0.50	1	02/12/03	02/12/03	KWG0301671	
m,p-Xylenes	**21**		0.50	1	02/12/03	02/12/03	KWG0301671	
o-Xylene	**5.6**		0.50	1	02/12/03	02/12/03	KWG0301671	
Styrene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Bromoform	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Isopropylbenzene	**24**		2.0	1	02/12/03	02/12/03	KWG0301671	
1,1,2,2-Tetrachloroethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,2,3-Trichloropropane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Bromobenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
n-Propylbenzene	**30**		2.0	1	02/12/03	02/12/03	KWG0301671	
2-Chlorotoluene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
4-Chlorotoluene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
1,3,5-Trimethylbenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
tert-Butylbenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
1,2,4-Trimethylbenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
sec-Butylbenzene	**3.1**		2.0	1	02/12/03	02/12/03	KWG0301671	
1,3-Dichlorobenzene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
4-Isopropyltoluene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
1,4-Dichlorobenzene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
n-Butylbenzene	**4.2**		2.0	1	02/12/03	02/12/03	KWG0301671	
1,2-Dichlorobenzene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,2-Dibromo-3-chloropropane	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
1,2,4-Trichlorobenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
1,2,3-Trichlorobenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
Naphthalene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
Hexachlorobutadiene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	

Comments:

Client: Schnitzer Steel Products Co.
Project: Schnitzer PEO/25693681
Sample Matrix: Water

Service Request: K2300710
Date Collected: 01/29/2003
Date Received: 01/30/2003

Volatile Organic Compounds

Sample Name: MW-12-012903
Lab Code: K2300710-002

Units: ug/L
Basis: NA

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
Dibromofluoromethane	91	78-124	02/12/03	Acceptable
Toluene-d8	100	87-118	02/12/03	Acceptable
4-Bromofluorobenzene	105	81-113	02/12/03	Acceptable

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Collected:**	NA
Sample Matrix:	Water	**Date Received:**	NA

Volatile Organic Compounds

Sample Name:	Method Blank	**Units:**	ug/L
Lab Code:	KWG0301671-4	**Basis:**	NA
Extraction Method:	EPA 5030B	**Level:**	Low
Analysis Method:	8260B		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dichlorodifluoromethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Chloromethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Vinyl Chloride	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Bromomethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Chloroethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Trichlorofluoromethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Acetone	ND	U	20	1	02/12/03	02/12/03	KWG0301671	
1,1-Dichloroethene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Carbon Disulfide	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Methylene Chloride	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
trans-1,2-Dichloroethene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,1-Dichloroethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
2-Butanone (MEK)	ND	U	20	1	02/12/03	02/12/03	KWG0301671	
2,2-Dichloropropane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
cis-1,2-Dichloroethene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Chloroform	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Bromochloromethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,1,1-Trichloroethane (TCA)	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,1-Dichloropropene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Carbon Tetrachloride	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,2-Dichloroethane (EDC)	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Benzene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Trichloroethene (TCE)	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,2-Dichloropropane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Bromodichloromethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Dibromomethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
2-Hexanone	ND	U	20	1	02/12/03	02/12/03	KWG0301671	
cis-1,3-Dichloropropene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Toluene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
trans-1,3-Dichloropropene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,1,2-Trichloroethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
4-Methyl-2-pentanone (MIBK)	ND	U	20	1	02/12/03	02/12/03	KWG0301671	
1,3-Dichloropropane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Tetrachloroethene (PCE)	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	

Comments:

00024

SCHN00260648

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Collected:**	NA
Sample Matrix:	Water	**Date Received:**	NA

Volatile Organic Compounds

Sample Name:	Method Blank	**Units:**	ug/L
Lab Code:	KWG0301671-4	**Basis:**	NA
Extraction Method:	EPA 5030B	**Level:**	Low
Analysis Method:	8260B		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dibromochloromethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,2-Dibromoethane (EDB)	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
Chlorobenzene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,1,1,2-Tetrachloroethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Ethylbenzene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
m,p-Xylenes	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
o-Xylene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Styrene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Bromoform	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Isopropylbenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
1,1,2,2-Tetrachloroethane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,2,3-Trichloropropane	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
Bromobenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
n-Propylbenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
2-Chlorotoluene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
4-Chlorotoluene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
1,3,5-Trimethylbenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
tert-Butylbenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
1,2,4-Trimethylbenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
sec-Butylbenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
1,3-Dichlorobenzene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
4-Isopropyltoluene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
1,4-Dichlorobenzene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
n-Butylbenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
1,2-Dichlorobenzene	ND	U	0.50	1	02/12/03	02/12/03	KWG0301671	
1,2-Dibromo-3-chloropropane	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
1,2,4-Trichlorobenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
1,2,3-Trichlorobenzene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
Naphthalene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	
Hexachlorobutadiene	ND	U	2.0	1	02/12/03	02/12/03	KWG0301671	

Comments:

00025

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Collected:**	NA
Sample Matrix:	Water	**Date Received:**	NA

Volatile Organic Compounds

Sample Name:	Method Blank	**Units:**	ug/L
Lab Code:	KWG0301671-4	**Basis:**	NA

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
Dibromofluoromethane	106	78-124	02/12/03	Acceptable
Toluene-d8	101	87-118	02/12/03	Acceptable
4-Bromofluorobenzene	96	81-113	02/12/03	Acceptable

Comments:

00025A

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co. **Service Request:** K2300710
Project: Schnitzer PEO/25693681
Sample Matrix: Water

Surrogate Recovery Summary
Volatile Organic Compounds

Extraction Method: EPA 5030B **Units:** PERCENT
Analysis Method: 8260B **Level:** Low

Sample Name	Lab Code	Sur1	Sur2	Sur3
MW-10-012903	K2300710-001	99	103	98
MW-12-012903	K2300710-002	91	100	105
Method Blank	KWG0301671-4	106	101	96
Batch QC	K2300883-017	106	101	94
Batch QCMS	KWG0301671-1	100	103	99
Batch QCDMS	KWG0301671-2	99	103	99
Lab Control Sample	KWG0301671-3	104	105	100

Surrogate Recovery Control Limits (%)

Sur1 = Dibromofluoromethane	78-124
Sur2 = Toluene-d8	87-118
Sur3 = 4-Bromofluorobenzene	81-113

Results flagged with an asterisk (*) indicate values outside control criteria.
Results flagged with a pound (#) indicate the control criteria is not applicable.

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Extracted:**	02/12/2003
Sample Matrix:	Water	**Date Analyzed:**	02/12/2003

Matrix Spike/Duplicate Matrix Spike Summary
Volatile Organic Compounds

Sample Name:	Batch QC	**Units:**	ug/L
Lab Code:	K2300883-017	**Basis:**	NA
Extraction Method:	EPA 5030B	**Level:**	Low
Analysis Method:	8260B	**Extraction Lot:**	KWG0301671

Analyte Name	Sample Result	Batch QCMS KWG0301671-1 Matrix Spike			Batch QCDMS KWG0301671-2 Duplicate Matrix Spike			%Rec Limits	RPD	RPD Limit
		Result	Expected	%Rec	Result	Expected	%Rec			
1,1-Dichloroethene	3.4	14.8	10.0	114	14.3	10.0	110	67-157	3	30
Benzene	ND	10.7	10.0	107	10.4	10.0	104	76-138	3	30
Trichloroethene (TCE)	84	79.0E	10.0	-47 #	83.1E	10.0	-6 #	66-149	5	30
Toluene	ND	10.9	10.0	109	10.7	10.0	107	82-131	3	30
Chlorobenzene	ND	10.5	10.0	105	10.4	10.0	104	70-131	1	30
1,2-Dichlorobenzene	ND	10.4	10.0	104	10.2	10.0	102	70-126	2	30
Naphthalene	ND	12.3	10.0	123	12.4	10.0	124	50-149	1	30

Results flagged with an asterisk (*) indicate values outside control criteria.

Results flagged with a pound (#) indicate the control criteria is not applicable.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

00027

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Extracted:**	02/12/2003
Sample Matrix:	Water	**Date Analyzed:**	02/12/2003

Lab Control Spike Summary
Volatile Organic Compounds

Extraction Method:	EPA 5030B	**Units:**	ug/L
Analysis Method:	8260B	**Basis:**	NA
		Level:	Low
		Extraction Lot:	KWG0301671

	Lab Control Sample KWG0301671-3 Lab Control Spike			
Analyte Name	**Result**	**Expected**	**%Rec**	**%Rec Limits**
Dichlorodifluoromethane	14.0	10.0	140	33-189
Chloromethane	8.81	10.0	88	66-128
Vinyl Chloride	11.6	10.0	116	76-135
Bromomethane	11.2	10.0	112	30-188
Chloroethane	11.3	10.0	113	79-131
Trichlorofluoromethane	12.1	10.0	121	73-127
Acetone	52.0	50.0	104	60-157
1,1-Dichloroethene	12.3	10.0	123	79-137
Carbon Disulfide	19.3	20.0	97	68-118
Methylene Chloride	9.78	10.0	98	68-135
trans-1,2-Dichloroethene	10.2	10.0	102	88-127
1,1-Dichloroethane	9.47	10.0	95	89-133
2-Butanone (MEK)	49.2	50.0	98	78-144
2,2-Dichloropropane	9.86	10.0	99	71-138
cis-1,2-Dichloroethene	10.0	10.0	100	90-126
Chloroform	10.6	10.0	106	88-117
Bromochloromethane	10.1	10.0	101	80-133
1,1,1-Trichloroethane (TCA)	11.2	10.0	112	83-122
1,1-Dichloropropene	10.4	10.0	104	87-137
Carbon Tetrachloride	12.6	10.0	126	87-131
1,2-Dichloroethane (EDC)	10.7	10.0	107	73-130
Benzene	9.91	10.0	99	90-120
Trichloroethene (TCE)	10.2	10.0	102	83-131
1,2-Dichloropropane	8.94	10.0	89	87-121
Bromodichloromethane	10.4	10.0	104	84-114
Dibromomethane	10.5	10.0	105	76-130
2-Hexanone	41.5	50.0	83	68-135
cis-1,3-Dichloropropene	10.2	10.0	102	90-126
Toluene	9.98	10.0	100	89-119
trans-1,3-Dichloropropene	9.45	10.0	95	77-113
1,1,2-Trichloroethane	9.49	10.0	95	81-116
4-Methyl-2-pentanone (MIBK)	47.0	50.0	94	79-138
1,3-Dichloropropane	9.61	10.0	96	76-129
Tetrachloroethene (PCE)	9.35	10.0	94	82-123
Dibromochloromethane	10.2	10.0	102	83-119
1,2-Dibromoethane (EDB)	9.57	10.0	96	74-130

Results flagged with an asterisk (*) indicate values outside control criteria.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

00028

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Extracted:**	02/12/2003
Sample Matrix:	Water	**Date Analyzed:**	02/12/2003

Lab Control Spike Summary
Volatile Organic Compounds

Extraction Method:	EPA 5030B	**Units:**	ug/L
Analysis Method:	8260B	**Basis:**	NA
		Level:	Low
		Extraction Lot:	KWG0301671

	Lab Control Sample KWG0301671-3 Lab Control Spike			
Analyte Name	**Result**	**Expected**	**%Rec**	**%Rec Limits**
Chlorobenzene	9.90	10.0	99	86-115
1,1,1,2-Tetrachloroethane	10.5	10.0	105	88-118
Ethylbenzene	10.5	10.0	105	89-124
m,p-Xylenes	21.2	20.0	106	90-122
o-Xylene	10.6	10.0	106	88-126
Styrene	10.9	10.0	109	91-123
Bromoform	10.1	10.0	101	76-125
Isopropylbenzene	10.3	10.0	103	82-123
1,1,2,2-Tetrachloroethane	9.86	10.0	99	78-117
1,2,3-Trichloropropane	10.6	10.0	106	75-127
Bromobenzene	9.81	10.0	98	76-129
n-Propylbenzene	10.7	10.0	107	83-128
2-Chlorotoluene	10.2	10.0	102	74-131
4-Chlorotoluene	10.4	10.0	104	87-119
1,3,5-Trimethylbenzene	10.8	10.0	108	85-128
tert-Butylbenzene	10.3	10.0	103	83-129
1,2,4-Trimethylbenzene	11.1	10.0	111	88-129
sec-Butylbenzene	10.9	10.0	109	84-133
1,3-Dichlorobenzene	10.4	10.0	104	87-116
4-Isopropyltoluene	10.8	10.0	108	81-126
1,4-Dichlorobenzene	9.93	10.0	99	86-115
n-Butylbenzene	10.4	10.0	104	79-134
1,2-Dichlorobenzene	9.87	10.0	99	85-113
1,2-Dibromo-3-chloropropane	9.03	10.0	90	55-136
1,2,4-Trichlorobenzene	10.2	10.0	102	76-130
1,2,3-Trichlorobenzene	9.88	10.0	99	70-134
Naphthalene	11.2	10.0	112	71-137
Hexachlorobutadiene	9.07	10.0	91	77-129

Results flagged with an asterisk (*) indicate values outside control criteria.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

00029

Semi Volatile Organic Compounds
Method 8270C

SCHN00260655

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Collected:**	01/29/2003
Sample Matrix:	Water	**Date Received:**	01/30/2003

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	MW-10-012903	**Units:**	ug/L
Lab Code:	K2300710-001	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
N-Nitrosodimethylamine	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
Aniline	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
Bis(2-chloroethyl) Ether	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Phenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2-Chlorophenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
1,3-Dichlorobenzene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
1,4-Dichlorobenzene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
1,2-Dichlorobenzene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Benzyl alcohol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Bis(2-chloroisopropyl) Ether	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2-Methylphenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Hexachloroethane	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
N-Nitrosodi-n-propylamine	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
4-Methylphenol†	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Nitrobenzene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Isophorone	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2-Nitrophenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2,4-Dimethylphenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Bis(2-chloroethoxy)methane	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2,4-Dichlorophenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Benzoic acid	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
1,2,4-Trichlorobenzene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Naphthalene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
4-Chloroaniline	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Hexachlorobutadiene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
4-Chloro-3-methylphenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2-Methylnaphthalene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Hexachlorocyclopentadiene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2,4,6-Trichlorophenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2,4,5-Trichlorophenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2-Chloronaphthalene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2-Nitroaniline	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
Acenaphthylene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	

Comments:

00031

SCHN00260656

Client: Schnitzer Steel Products Co.
Project: Schnitzer PEO/25693681
Sample Matrix: Water

Service Request: K2300710
Date Collected: 01/29/2003
Date Received: 01/30/2003

Semi-Volatile Organic Compounds by GC/MS

Sample Name: MW-10-012903
Lab Code: K2300710-001

Extraction Method: EPA 3520C
Analysis Method: 8270C

Units: ug/L
Basis: NA

Level: Low

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dimethyl Phthalate	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2,6-Dinitrotoluene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Acenaphthene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
3-Nitroaniline	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
2,4-Dinitrophenol	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
Dibenzofuran	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
4-Nitrophenol	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
2,4-Dinitrotoluene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Fluorene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
4-Chlorophenyl Phenyl Ether	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Diethyl Phthalate	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
4-Nitroaniline	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
2-Methyl-4,6-dinitrophenol	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
N-Nitrosodiphenylamine	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
4-Bromophenyl Phenyl Ether	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Hexachlorobenzene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Pentachlorophenol	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
Phenanthrene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Anthracene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Di-n-butyl Phthalate	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Fluoranthene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Pyrene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Butyl Benzyl Phthalate	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
3,3'-Dichlorobenzidine	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
Benz(a)anthracene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Chrysene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Bis(2-ethylhexyl) Phthalate	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Di-n-octyl Phthalate	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Benzo(b)fluoranthene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Benzo(k)fluoranthene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Benzo(a)pyrene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Indeno(1,2,3-cd)pyrene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Dibenz(a,h)anthracene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Collected:**	01/29/2003
Sample Matrix:	Water	**Date Received:**	01/30/2003

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	MW-10-012903	**Units:**	ug/L
Lab Code:	K2300710-001	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Benzo(g,h,i)perylene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
2-Fluorophenol	69	37-101	02/08/03	Acceptable
Phenol-d6	78	40-109	02/08/03	Acceptable
Nitrobenzene-d5	70	49-108	02/08/03	Acceptable
2-Fluorobiphenyl	78	56-104	02/08/03	Acceptable
2,4,6-Tribromophenol	88	44-129	02/08/03	Acceptable
Terphenyl-d14	110	22-140	02/08/03	Acceptable

† Analyte Comments

4-Methylphenol	This analyte cannot be separated from 3-Methylphenol.

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Collected:**	01/29/2003
Sample Matrix:	Water	**Date Received:**	01/30/2003

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	MW-12-012903	**Units:**	ug/L
Lab Code:	K2300710-002	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
N-Nitrosodimethylamine	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
Aniline	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
Bis(2-chloroethyl) Ether	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Phenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2-Chlorophenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
1,3-Dichlorobenzene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
1,4-Dichlorobenzene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
1,2-Dichlorobenzene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Benzyl alcohol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Bis(2-chloroisopropyl) Ether	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2-Methylphenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Hexachloroethane	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
N-Nitrosodi-n-propylamine	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
4-Methylphenol†	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Nitrobenzene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Isophorone	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2-Nitrophenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2,4-Dimethylphenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Bis(2-chloroethoxy)methane	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2,4-Dichlorophenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Benzoic acid	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
1,2,4-Trichlorobenzene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Naphthalene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
4-Chloroaniline	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Hexachlorobutadiene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
4-Chloro-3-methylphenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2-Methylnaphthalene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Hexachlorocyclopentadiene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2,4,6-Trichlorophenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2,4,5-Trichlorophenol	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2-Chloronaphthalene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2-Nitroaniline	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
Acenaphthylene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	

Comments:

00034

SCHN00260659

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Collected:**	01/29/2003
Sample Matrix:	Water	**Date Received:**	01/30/2003

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	MW-12-012903	**Units:**	ug/L
Lab Code:	K2300710-002	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dimethyl Phthalate	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
2,6-Dinitrotoluene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Acenaphthene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
3-Nitroaniline	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
2,4-Dinitrophenol	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
Dibenzofuran	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
4-Nitrophenol	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
2,4-Dinitrotoluene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Fluorene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
4-Chlorophenyl Phenyl Ether	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Diethyl Phthalate	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
4-Nitroaniline	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
2-Methyl-4,6-dinitrophenol	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
N-Nitrosodiphenylamine	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
4-Bromophenyl Phenyl Ether	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Hexachlorobenzene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Pentachlorophenol	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
Phenanthrene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Anthracene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Di-n-butyl Phthalate	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Fluoranthene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Pyrene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Butyl Benzyl Phthalate	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
3,3'-Dichlorobenzidine	ND	U	24	1	01/31/03	02/08/03	KWG0301126	
Benz(a)anthracene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Chrysene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Bis(2-ethylhexyl) Phthalate	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Di-n-octyl Phthalate	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Benzo(b)fluoranthene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Benzo(k)fluoranthene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Benzo(a)pyrene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Indeno(1,2,3-cd)pyrene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	
Dibenz(a,h)anthracene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	

Comments:

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Collected:**	01/29/2003
Sample Matrix:	Water	**Date Received:**	01/30/2003

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	MW-12-012903	**Units:**	ug/L
Lab Code:	K2300710-002	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Benzo(g,h,i)perylene	ND	U	9.6	1	01/31/03	02/08/03	KWG0301126	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
2-Fluorophenol	68	37-101	02/08/03	Acceptable
Phenol-d6	87	40-109	02/08/03	Acceptable
Nitrobenzene-d5	65	49-108	02/08/03	Acceptable
2-Fluorobiphenyl	79	56-104	02/08/03	Acceptable
2,4,6-Tribromophenol	107	44-129	02/08/03	Acceptable
Terphenyl-d14	68	22-140	02/08/03	Acceptable

† **Analyte Comments**

4-Methylphenol	This analyte cannot be separated from 3-Methylphenol.

Comments:

00036

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Collected:**	NA
Sample Matrix:	Water	**Date Received:**	NA

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	Method Blank	**Units:**	ug/L
Lab Code:	KWG0301126-7	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
N-Nitrosodimethylamine	ND	U	25	1	01/31/03	02/07/03	KWG0301126	
Aniline	ND	U	25	1	01/31/03	02/07/03	KWG0301126	
Bis(2-chloroethyl) Ether	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Phenol	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
2-Chlorophenol	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
1,3-Dichlorobenzene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
1,4-Dichlorobenzene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
1,2-Dichlorobenzene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Benzyl alcohol	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Bis(2-chloroisopropyl) Ether	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
2-Methylphenol	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Hexachloroethane	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
N-Nitrosodi-n-propylamine	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
4-Methylphenol†	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Nitrobenzene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Isophorone	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
2-Nitrophenol	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
2,4-Dimethylphenol	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Bis(2-chloroethoxy)methane	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
2,4-Dichlorophenol	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Benzoic acid	ND	U	25	1	01/31/03	02/07/03	KWG0301126	
1,2,4-Trichlorobenzene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Naphthalene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
4-Chloroaniline	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Hexachlorobutadiene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
4-Chloro-3-methylphenol	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
2-Methylnaphthalene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Hexachlorocyclopentadiene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
2,4,6-Trichlorophenol	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
2,4,5-Trichlorophenol	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
2-Chloronaphthalene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
2-Nitroaniline	ND	U	25	1	01/31/03	02/07/03	KWG0301126	
Acenaphthylene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	

Comments:

00037

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Collected:**	NA
Sample Matrix:	Water	**Date Received:**	NA

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	Method Blank	**Units:**	ug/L
Lab Code:	KWG0301126-7	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Dimethyl Phthalate	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
2,6-Dinitrotoluene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Acenaphthene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
3-Nitroaniline	ND	U	25	1	01/31/03	02/07/03	KWG0301126	
2,4-Dinitrophenol	ND	U	25	1	01/31/03	02/07/03	KWG0301126	
Dibenzofuran	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
4-Nitrophenol	ND	U	25	1	01/31/03	02/07/03	KWG0301126	
2,4-Dinitrotoluene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Fluorene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
4-Chlorophenyl Phenyl Ether	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Diethyl Phthalate	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
4-Nitroaniline	ND	U	25	1	01/31/03	02/07/03	KWG0301126	
2-Methyl-4,6-dinitrophenol	ND	U	25	1	01/31/03	02/07/03	KWG0301126	
N-Nitrosodiphenylamine	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
4-Bromophenyl Phenyl Ether	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Hexachlorobenzene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Pentachlorophenol	ND	U	25	1	01/31/03	02/07/03	KWG0301126	
Phenanthrene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Anthracene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Di-n-butyl Phthalate	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Fluoranthene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Pyrene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Butyl Benzyl Phthalate	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
3,3'-Dichlorobenzidine	ND	U	25	1	01/31/03	02/07/03	KWG0301126	
Benz(a)anthracene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Chrysene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Bis(2-ethylhexyl) Phthalate	**16**		10	1	01/31/03	02/07/03	KWG0301126	
Di-n-octyl Phthalate	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Benzo(b)fluoranthene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Benzo(k)fluoranthene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Benzo(a)pyrene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Indeno(1,2,3-cd)pyrene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	
Dibenz(a,h)anthracene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	

Comments:

SCHN00260663

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Collected:**	NA
Sample Matrix:	Water	**Date Received:**	NA

Semi-Volatile Organic Compounds by GC/MS

Sample Name:	Method Blank	**Units:**	ug/L
Lab Code:	KWG0301126-7	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C		

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Benzo(g,h,i)perylene	ND	U	10	1	01/31/03	02/07/03	KWG0301126	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
2-Fluorophenol	74	37-101	02/07/03	Acceptable
Phenol-d6	83	40-109	02/07/03	Acceptable
Nitrobenzene-d5	85	49-108	02/07/03	Acceptable
2-Fluorobiphenyl	85	56-104	02/07/03	Acceptable
2,4,6-Tribromophenol	84	44-129	02/07/03	Acceptable
Terphenyl-d14	106	22-140	02/07/03	Acceptable

† Analyte Comments

4-Methylphenol	This analyte cannot be separated from 3-Methylphenol.

Comments:

00039

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co. **Service Request:** K2300710
Project: Schnitzer PEO/25693681
Sample Matrix: Water

Surrogate Recovery Summary
Semi-Volatile Organic Compounds by GC/MS

Extraction Method: EPA 3520C **Units:** PERCENT
Analysis Method: 8270C **Level:** Low

Sample Name	Lab Code	Sur1	Sur2	Sur3	Sur4	Sur5	Sur6
MW-10-012903	K2300710-001	69	78	70	78	88	110
MW-12-012903	K2300710-002	68	87	65	79	107	68
Method Blank	KWG0301126-7	74	83	85	85	84	106
Batch QC	K2300370-005	63	70	69	74	82	87
Batch QCMS	KWG0301126-4	73	78	84	88	98	99
Batch QCDMS	KWG0301126-5	75	83	88	80	104	98
Lab Control Sample	KWG0301126-6	71	76	72	79	88	94

Surrogate Recovery Control Limits (%)

Sur1 = 2-Fluorophenol	37-101	Sur5 = 2,4,6-Tribromophenol	44-129
Sur2 = Phenol-d6	40-109	Sur6 = Terphenyl-d14	22-140
Sur3 = Nitrobenzene-d5	49-108		
Sur4 = 2-Fluorobiphenyl	56-104		

Results flagged with an asterisk (*) indicate values outside control criteria.
Results flagged with a pound (#) indicate the control criteria is not applicable.

00040

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Extracted:**	01/31/2003
Sample Matrix:	Water	**Date Analyzed:**	02/07/2003

Matrix Spike/Duplicate Matrix Spike Summary
Semi-Volatile Organic Compounds by GC/MS

Sample Name:	Batch QC	**Units:**	ug/L
Lab Code:	K2300370-005	**Basis:**	NA
Extraction Method:	EPA 3520C	**Level:**	Low
Analysis Method:	8270C	**Extraction Lot:**	KWG0301126

Analyte Name	Sample Result	Batch QCMS KWG0301126-4 Matrix Spike			Batch QCDMS KWG0301126-5 Duplicate Matrix Spike			%Rec Limits	RPD	RPD Limit
		Result	Expected	%Rec	Result	Expected	%Rec			
Phenol	ND	154	200	77	152	200	76	38-110	1	30
2-Chlorophenol	ND	167	200	83	171	200	85	46-105	2	30
1,4-Dichlorobenzene	ND	153	200	76	152	200	76	46-93	0	30
N-Nitrosodi-n-propylamine	ND	152	200	76	168	200	84	43-117	10	30
1,2,4-Trichlorobenzene	ND	165	200	83	162	200	81	52-96	2	30
4-Chloro-3-methylphenol	ND	173	200	86	182	200	91	47-131	5	30
Acenaphthene	ND	180	200	90	174	200	87	58-101	4	30
4-Nitrophenol	ND	183	200	91	182	200	91	49-136	0	30
2,4-Dinitrotoluene	ND	195	200	97	196	200	98	61-137	1	30
Pentachlorophenol	ND	200	200	100	201	200	101	43-136	1	30
Pyrene	ND	172	200	86	171	200	86	32-128	1	30

Results flagged with an asterisk (*) indicate values outside control criteria.

Results flagged with a pound (#) indicate the control criteria is not applicable.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

00041

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Extracted:**	01/31/2003
Sample Matrix:	Water	**Date Analyzed:**	02/07/2003

Lab Control Spike Summary
Semi-Volatile Organic Compounds by GC/MS

Extraction Method:	EPA 3520C	**Units:**	ug/L
Analysis Method:	8270C	***Basis:***	NA
		Level:	Low
		Extraction Lot:	KWG0301126

	Lab Control Sample KWG0301126-6 Lab Control Spike				%Rec
Analyte Name	**Result**	**Expected**	**%Rec**		**Limits**
N-Nitrosodimethylamine	75.8	100	76		45-119
Aniline	ND	100	0	*	23-110
Bis(2-chloroethyl) Ether	75.0	100	75		58-97
Phenol	67.0	100	67		33-112
2-Chlorophenol	73.8	100	74		38-112
1,3-Dichlorobenzene	72.2	100	72		50-94
1,4-Dichlorobenzene	70.9	100	71		51-89
1,2-Dichlorobenzene	72.8	100	73		52-94
Benzyl alcohol	70.4	100	70		59-106
Bis(2-chloroisopropyl) Ether	70.5	100	70		44-110
2-Methylphenol	71.2	100	71		46-108
Hexachloroethane	70.7	100	71		50-92
N-Nitrosodi-n-propylamine	68.0	100	68		55-102
4-Methylphenol	69.5	100	70		44-109
Nitrobenzene	75.1	100	75		56-106
Isophorone	83.4	100	83		66-106
2-Nitrophenol	77.7	100	78		47-116
2,4-Dimethylphenol	69.6	100	70		47-93
Bis(2-chloroethoxy)methane	75.1	100	75		66-97
2,4-Dichlorophenol	76.1	100	76		48-112
Benzoic acid	22.5	100	22		10-133
1,2,4-Trichlorobenzene	73.4	100	73		55-92
Naphthalene	73.7	100	74		56-95
4-Chloroaniline	14.0	100	14	*	58-105
Hexachlorobutadiene	73.8	100	74		52-101
4-Chloro-3-methylphenol	76.7	100	77		62-111
2-Methylnaphthalene	68.1	100	68		61-92
Hexachlorocyclopentadiene	23.7	100	24		10-71
2,4,6-Trichlorophenol	81.5	100	81		44-125
2,4,5-Trichlorophenol	84.6	100	85		58-113
2-Chloronaphthalene	86.1	100	86		66-96
2-Nitroaniline	83.0	100	83		65-119
Acenaphthylene	83.0	100	83		62-102
Dimethyl Phthalate	84.9	100	85		56-117
2,6-Dinitrotoluene	88.4	100	88		75-110

Results flagged with an asterisk (*) indicate values outside control criteria.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

00042

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2300710
Project:	Schnitzer PEO/25693681	**Date Extracted:**	01/31/2003
Sample Matrix:	Water	**Date Analyzed:**	02/07/2003

Lab Control Spike Summary
Semi-Volatile Organic Compounds by GC/MS

Extraction Method:	EPA 3520C	**Units:**	ug/L
Analysis Method:	8270C	**Basis:**	NA
		Level:	Low
		Extraction Lot:	KWG0301126

	Lab Control Sample KWG0301126-6 Lab Control Spike			
Analyte Name	**Result**	**Expected**	**%Rec**	**%Rec Limits**
Acenaphthene	80.8	100	81	60-103
3-Nitroaniline	81.5	100	81	65-129
2,4-Dinitrophenol	84.7	100	85	49-127
Dibenzofuran	79.0	100	79	63-102
4-Nitrophenol	88.2	100	88	45-132
2,4-Dinitrotoluene	91.5	100	92	75-120
Fluorene	83.5	100	83	67-107
4-Chlorophenyl Phenyl Ether	83.2	100	83	68-105
Diethyl Phthalate	90.0	100	90	62-117
4-Nitroaniline	84.6	100	85	54-142
2-Methyl-4,6-dinitrophenol	89.1	100	89	63-128
N-Nitrosodiphenylamine	87.7	100	88	59-108
4-Bromophenyl Phenyl Ether	85.9	100	86	70-111
Hexachlorobenzene	85.9	100	86	66-117
Pentachlorophenol	86.4	100	86	59-121
Phenanthrene	83.3	100	83	66-103
Anthracene	82.7	100	83	69-105
Di-n-butyl Phthalate	90.5	100	91	67-112
Fluoranthene	90.9	100	91	66-108
Pyrene	78.2	100	78	59-115
Butyl Benzyl Phthalate	83.9	100	84	70-114
3,3'-Dichlorobenzidine	49.6	100	50	35-130
Benz(a)anthracene	83.9	100	84	74-107
Chrysene	83.4	100	83	72-103
Bis(2-ethylhexyl) Phthalate	96.4	100	96	69-117
Di-n-octyl Phthalate	89.0	100	89	68-120
Benzo(b)fluoranthene	88.0	100	88	74-110
Benzo(k)fluoranthene	83.7	100	84	64-116
Benzo(a)pyrene	80.8	100	81	71-106
Indeno(1,2,3-cd)pyrene	90.2	100	90	62-123
Dibenz(a,h)anthracene	89.0	100	89	71-131
Benzo(g,h,i)perylene	89.7	100	90	67-115

Results flagged with an asterisk (*) indicate values outside control criteria.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

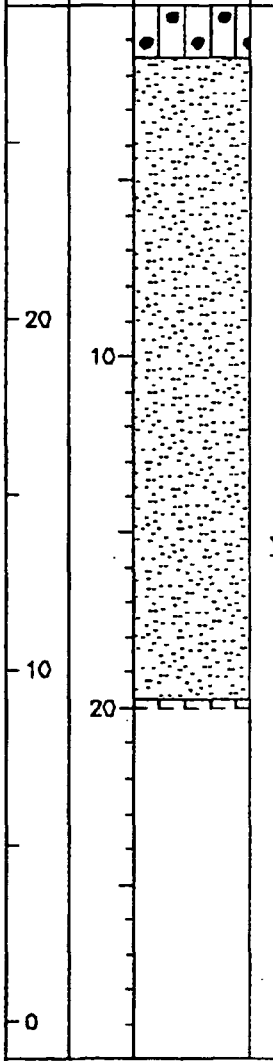
00043

URS

Site Id: GP-BLT-56

Location: Bell Terminal	Elevation: 28.91'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 10/09/01 - 10/09/01
Project Number: 52-00180083	State Plane North: 718067.48
Drilling Method: Direct Push	State Plane East: 7618210.51
Total Depth: 20.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	Static Water Level: 15.65'

Remarks: BG = Background (varies)



USCS Code	Material Description	PID
GM	BROWN SILTY GRAVEL.	
SP	BROWN SAND, medium dense, fine to medium grained, trace fines [moist].	
		11 ppm
		10 ppm
		4 ppm
		5 ppm
	Becomes gray colored. Hydrocarbon odor.	2 ppm
	Trace SILT.	17 ppm
	Becomes saturated.	20 ppm
	Slight hydrocarbon odor.	81 ppm
	DARK GRAY POORLY GRADED SAND, fine to medium grained, trace fines [wet].	9.5 ppm
	Very slight hydrocarbon odor.	
ML	DARK GRAY SILT, soft [wet].	
	Boring terminated at 20 feet bgs. Water sample collected, screened interval 16-20 feet bgs.	

SCHN00260910

URS

Site Id: GP-BLT-57

		Location: Bell Terminal	Elevation: 28.68'
		Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils		Date(s): 10/09/01 - 10/09/01	State Plane North: 718026.31
Project Number: 52-00180063		Drilling Method: Direct Push	State Plane East: 7618209.05
Total Depth: 20.00'	Borehole Dia.: 2.00in	Contractor: GeoTech	Static Water Level: 15.55'

Remarks: BG = Background (varies)

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM	SILTY GRAVEL	
				SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, no odor, [moist].	
						BG ppm
20						BG ppm
	10					BG ppm
					Becomes gray colored, with hydrocarbon odor.	14.3 ppm
					Returns to brownish-yellow color, possible slough.	
					Returns to gray color, with hydrocarbon odor.	5.5 ppm
			▼		Trace fines, becomes [wet], slight hydrocarbon odor.	12.9 ppm 29.5 ppm 2.9 ppm
10				ML	GRAY SILT, trace clay, slight hydrocarbon odor [moist].	2.7 ppm
	20				Boring terminated at 20 feet bgs. Water sample collected, screened interval 16-20 feet bgs.	
0						

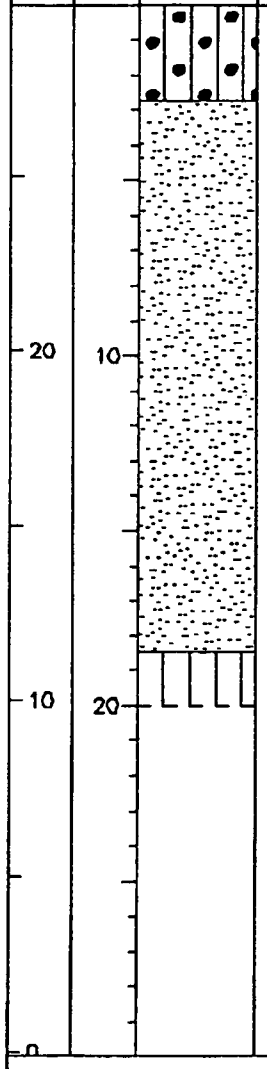
SCHN00260911

URS

Site Id: GP-BLT-58

		Location: Bell Terminal	Elevation: 29.86'
		Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils		Date(s): 10/09/01 - 10/09/01	State Plane North: 718059.83
Project Number: 52-00180063		Drilling Method: Direct Push	State Plane East: 7618139.31
Total Depth: 20.00'	Borehole Dia.: 2.00in	Contractor: GeoTech	Static Water Level:

Remarks: BG = Background (varies)



Water Level	USCS Code	Material Description	PID
	GM	BROWN SILTY GRAVEL	
	SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, trace fines, no odor [moist].	BG ppm
			BG ppm
			BG ppm
		Becomes orange colored (oxidized).	
		Becomes gray colored, no hydrocarbon odor, some wood fragments.	BG ppm
	ML	Gray SILT, medium stiff [moist-dry].	BG ppm
		Terminate boring at 20 feet bgs. Insufficient water in boring for water sample.	

SCHN00260912

URS

Site Id: GP-BLT-59

Location: Bell Terminal		Elevation: 29.50'
Logged By: Don Coberley		Datum: COP
Project Name: Premier Edible Oils		Date(s): 10/09/01 - 10/09/01	State Plane North: 718004.18
Project Number: 52-0D180063		Drilling Method: Direct Push	State Plane East: 7618161.81
Total Depth: 18.00'	Borehole Dia.: 2.00in	Contractor: GeoTech	Static Water Level: 16.00'

Remarks: BG = Background (varies)

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM	BROWN SILTY GRAVEL	BG ppm
				SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, no stain or odor [moist].	
						BG ppm
						BG ppm
20	10					BG ppm
					Becomes gray colored, with hydrocarbon odor.	4.4 ppm
						10.3 ppm
						6 ppm
						35 ppm
					Becomes [wet], sheen to water, with hydrocarbon odor	39.5 ppm
				ML	GRAY SILT, soft-medium stiff.	16.3 ppm
						28.4 ppm
10	20				Terminate boring at 18 feet bgs. Water sample collected, screened interval 14-18 feet bgs.	
0						

SCHN00260913

URS

Site Id: GP-BLT-60

Location: Bell Terminal	Elevation: 29.28'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 10/09/01 - 10/09/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 20.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	State Plane North: 718112.05
	State Plane East: 7618211.62
	Static Water Level: 16.50'

Remarks: BG = Background (varies)

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM	BROWN SILTY GRAVEL	BG ppm
				SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, trace fines [moist].	
						BG ppm
-20	10				Laminations.	BG ppm
						BG ppm
					Dark gray-brown colored zone.	
					Becomes gray colored, no hydrocarbon odor [wet].	
-10	20			ML	GRAY SILT, soft-medium stiff, no odor, with black wood fragments [moist].	BG ppm
					Boring terminated at 20 feet bgs. Water sample collected, screened interval 16-20 feet bgs.	
-0						

SCHN00260914

URS

Site Id: GP-BLT-61

Location: Bell Terminal	Elevation: 29.04'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 10/09/01 - 10/09/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 18.00'	Borehole Dia.: 2.00in
	Contractor: GeoTech
	State Plane North: 717979.05
	State Plane East: 7618207.26
	Static Water Level: 15.84'

Remarks: BG = Background (varies)

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM	BROWN SILTY GRAVEL, *medium dense [moist].*	BG ppm
				SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, trace fines [moist].	
						BG ppm
20	10				Laminations.	BG ppm
						BG ppm
						BG ppm
					Becomes gray colored, with hydrocarbon odor.	108 ppm
					Grains slightly shiny, with hydrocarbon odor.	
10				ML	GRAY SILT, soft-slightly stiff, slight hydrocarbon odor [moist].	
	20				*Boring terminated at 18 feet bgs. Water sample collected, screened interval 14-18 feet bgs.*	
0						

SCHN00260915

URS

Site Id: GP-BLT-62

Location: Bell Terminal	Elevation: 29.53'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 10/09/01 - 10/09/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 20.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	Static Water Level: 17.31'
	State Plane North: 717933.42
	State Plane East: 7618206.57

Remarks: BG = Background (varies)

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM	BROWN SILTY GRAVEL	BG ppm
				SP	BROWN TO BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, trace fines [moist].	
						BG ppm
						BG ppm
20	10					BG ppm
						BG ppm
					Becomes orange colored, possible oxidation.	
					Becomes gray colored, no odor [wet].	BG ppm
10	20			ML	GRAY SILT, soft-medium stiff, no odor [moist-wet].	BG ppm
					Boring terminated at 20 feet bgs. Water sample collected, screened interval 16-20 feet bgs.	
0						

SCHN00260916

URS

Site Id: GP-BLT-63	
Location: Bell Terminal	Elevation: 29.43'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 10/09/01 - 10/10/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 18.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	State Plane North: 718039.75
	State Plane East: 7618182.71
	Static Water Level: 16.29'

Remarks: BG = Background (varies)
Rig malfunction at about 16ft bgs during drilling on 10/9/01. Remainder of boring completed about 3ft south of initial boring on 10/10/01.

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM	BROWN SLTY GRAVEL, medium dense [moist].	BG ppm
				SP	BROWN TO BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, trace fines [moist].	
						BG ppm
						BG ppm
20	10					
						BG ppm
						BG ppm
						43 ppm
					Becomes gray colored, with hydrocarbon odor.	4 ppm
			▼		DARK GRAY POORLY GRADED SAND, medium dense, fine to medium grained, strong hydrocarbon odor, slight sheen on water [wet].	
				ML	GRAY SILT, soft-slightly stiff, wood chip at contact [moist-wet].	
10	20				Boring terminated at 18 feet bgs. Water sample collected, screened interval 14-18 feet bgs.	
0						

SCHN00260917

URS

Site Id: GP-FPL-64

Location: Bell Terminal	Elevation: 27.90'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 10/10/01 - 10/10/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 20.00'	Borehole Dia.: 2.00in
Contractor: GeoTech	Static Water Level:
State Plane North: 718060.58	
State Plane East: 7618075.69	

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM	BROWN SILTY GRAVEL WITH SAND, medium dense, contains concrete fragments, no stain or odor [moist].	
				SP	BROWNISH-YELLOW TO BROWN SAND, medium dense, fine to medium grained, some fines, no stain or odor [moist].	
					Gray colored zone, indistinct over 2" thick.	
20						
	10				Scattered laminations.	
					Slightly more brownish-yellow color.	
					Wood fragments.	
					Becomes gray colored, no hydrocarbon odor.	
				ML		
10					Gray SILT, soft-slightly stiff, charred branch in sample, no hydrocarbon odor [wet].	
					Becomes [moist].	
	20				With SAND interbeds, fine grained, no odor, [dry-moist].	
					Boring terminated at 20 feet bgs. Insufficient water for sample.	
0						

SCHN00260918

Gradient
CORPORATION

April 17, 2003

Ms. Alicia Voss
Oregon Department of Environmental Quality
Northwest Region
2020 Southwest Fourth Avenue, 4th Floor
Portland, OR 97201

Re: Schnitzer/Premier Edible Oils (PEO) Site – Quarterly Report

Dear Ms. Voss:

On behalf of Schnitzer Investment Corp. (SIC), Gradient Corporation is submitting this seventh Quarterly Report for the Premier Edible Oils (PEO) Site, as required by Section II, H of the Voluntary Agreement for Upland Remedial Investigation/Feasibility Study and Source Control Measures between SIC and the Oregon Department of Environmental Quality (DEQ). This Quarterly Report summarizes activities conducted during the time period quarter; describes activities planned for the next quarter; and discusses problems encountered during the quarter, if any, and actions taken to resolve those problems.

Summary of Project Activities

Between January 1 and March 31, 2003, SIC and its consultants, Gradient Corporation and URS, completed the following work at the PEO site:

- Following receipt of DEQ approval, conducted fourth quarterly groundwater monitoring event on January 28 and 29 in accordance with the approach presented in the October 14, 2002 submittal to DEQ. Communicated with DEQ regarding the timing of the sampling event.
- Measured water levels from site wells on one occasion (January 28, 2003).
- Conducted shoreline reconnaissance surveys on three occasions (January 13, February 26, and March 18, 2003). Memos documenting these surveys accompany this quarterly report.
- Continued compilation of documentation of site activities.

Activities to be Conducted Next Quarter

The following activities are planned for the PEO site between April 1 and June 30, 2003:

- Submit the data from the fourth quarterly groundwater monitoring event. Preliminary unvalidated data from this sampling event accompany this quarterly report.
- Validate data from four quarterly groundwater monitoring events and preliminary remedial investigation.
- Continue to synthesize and evaluate site data. Arrange for site status meeting with DEQ.

I41703s

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www.gradientcorp.com

- Complete and submit report summarizing results of tidal monitoring evaluations.
- Receive from DEQ and evaluate Time Oil's investigative data for the Bell Terminal site. Review implications of available data for potential impacts on PEO site from Time Oil site.

Issues to be Resolved/Recommended Actions

None.

As we previously noted, we appreciate the slight extension that you approved for our submittal of this report. Please contact me if you have any questions regarding this report or any of the completed or proposed activities.

Sincerely,

GRADIENT CORPORATION

Catherine Petito Boyce, S.M.
Principal Scientist

cc: J. Brown/James C. Brown & Associates
D. Coberly/URS
J. Jakubiak/SIC
T. Zelenka/SIC

Documentation of Shoreline Reconnaissance Surveys
January – March 2003

Premier Edible Oils Site

SCHN00260922

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 1/13/03

Re: Premier Edible Oils Site – River Bank Reconnaissance, 1/13/03

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The reconnaissance was conducted between 1:15 pm and 2:00 pm.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 2/26/03

Re: Premier Edible Oils Site – River Bank Reconnaissance, 2/26/03

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The reconnaissance was conducted between 8:15 am and 9:00 am.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 3/18/03

Re: Premier Edible Oils Site – River Bank Reconnaissance, 3/18/03

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The reconnaissance was conducted between 11:30 am and 12:15 pm.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

Preliminary Unvalidated Data from
Fourth Quarterly Groundwater Sampling Event

Premier Edible Oils Site

Table A-1
Summary of Groundwater Elevations and
Product Observation Data
June 2001 - January 2003
25693679

PERIOD: From 06/06/2001 thru 01/28/2003 - Inclusive

SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-01	6/6/2001	28.37	12:00	20.92	0.00	7.45	NA	7.45
MW-01	6/18/2001	28.37	12:00	21.48	0.00	6.89	-0.56	6.89
MW-01	7/2/2001	28.37	12:00	21.60	0.00	6.77	-0.12	6.77
MW-01	7/16/2001	28.37	12:00	22.22	0.00	6.15	-0.62	6.15
MW-01	7/30/2001	28.37	12:00	22.37	0.00	6.00	-0.15	6.00
MW-01	8/13/2001	28.37	12:40	22.43	0.00	5.94	-0.06	5.94
MW-01	8/27/2001	28.37	12:45	22.33	0.00	6.04	0.10	6.04
MW-01	10/10/2001	28.37	15:10	22.81	0.00	5.56	-0.48	5.56
MW-01	11/29/2001	28.37	10:08	21.17	0.00	7.20	1.64	7.20
MW-01	12/27/2001	28.37	11:12	17.76	0.00	10.61	3.41	10.61
MW-01	2/4/2002	28.37	10:35	17.31	0.00	11.06	0.45	11.06
MW-01	2/28/2002	28.37	13:53	18.45	0.00	9.92	-1.14	9.92
MW-01	3/14/2002	28.37	09:34	18.61	0.00	9.76	-0.16	9.76
MW-01	4/23/2002	28.37	13:53	15.85	0.00	12.52	2.76	12.52
MW-01	5/22/2002	28.37	14:29	18.36	0.00	10.01	-2.51	10.01
MW-01	6/21/2002	28.37	13:31	15.90	0.00	12.47	2.46	12.47
MW-01	7/26/2002	28.37	12:55	18.48	0.00	9.89	-2.58	9.89
MW-01	8/29/2002	28.37	12:51	20.73	0.00	7.64	-2.25	7.64
MW-01	10/17/2002	28.37	11:59	22.03	0.00	6.34	-1.30	6.34
MW-01	10/30/2002	28.37	11:16	22.18	0.00	6.19	-0.15	6.19
MW-01	11/22/2002	28.37	10:55	21.45	0.00	6.92	0.73	6.92
MW-01	12/31/2002	28.37	10:53	20.20	0.00	8.17	1.25	8.17
MW-01	1/28/2003	28.37	12:00	19.35	0.00	9.02	0.85	9.02
MW-02	6/6/2001	29.32	12:00	21.94	0.00	7.38	NA	7.38
MW-02	6/18/2001	29.32	12:00	25.37	1.95	3.95	-3.43	5.60
MW-02	7/2/2001	29.32	12:00	25.22	1.76	4.10	0.15	5.59
MW-02	7/16/2001	29.32	12:00	25.77	1.64	3.55	-0.55	4.94
MW-02	7/30/2001	29.32	12:00	25.82	1.86	3.50	-0.05	5.07
MW-02	8/13/2001	29.32	13:08	25.50	1.93	3.82	0.32	5.45
MW-02	8/27/2001	29.32	13:12	25.50	1.94	3.82	0.00	5.46
MW-02	10/10/2001	29.32	15:52	25.70	1.53	3.62	-0.20	4.91
MW-02	11/29/2001	29.32	10:30	21.13	0.00	8.19	4.57	8.19
MW-02	12/27/2001	29.32	11:36	20.72	0.35	8.60	0.41	8.90
MW-02	2/4/2002	29.32	10:55	20.30	0.96	9.02	0.42	9.83
MW-02	2/28/2002	29.32	14:26	24.15	4.01	5.17	-3.85	8.56
MW-02	3/14/2002	29.32	10:07	19.33	0.00	9.99	4.82	9.99
MW-02	4/23/2002	29.32	14:23	17.74	0.36	11.58	1.59	11.89
MW-02	5/22/2002	29.32	14:51	19.54	0.23	9.78	-1.80	9.98

All elevations relative to City of Portland Datum

Table A-1
Summary of Groundwater Elevations and
Product Observation Data
June 2001 - January 2003
25693679

PERIOD: From 06/06/2001 thru 01/28/2003 - Inclusive

SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-02	6/21/2002	29.32	13:53	16.70	0.00	12.62	2.84	12.62
MW-02	7/26/2002	29.32	13:27	21.86	1.80	7.46	-5.16	8.98
MW-02	8/29/2002	29.32	13:19	23.75	1.35	5.57	-1.89	6.71
MW-02	10/17/2002	29.32	12:20	25.38	1.58	3.94	-1.63	5.28
MW-02	10/30/2002	29.32	11:31	25.19	0.46	4.13	0.19	4.52
MW-02	11/22/2002	29.32	11:25	22.62	0.00	6.70	2.57	6.70
MW-02	12/31/2002	29.32	11:25	20.78	0.00	8.54	1.84	8.54
MW-02	1/28/2003	29.32	12:03	21.00	0.55	8.32	-0.22	8.79
MW-03	6/6/2001	29.79	12:00	21.38	0.00	8.41	NA	8.41
MW-03	6/18/2001	29.79	12:00	21.71	0.00	8.08	-0.33	8.08
MW-03	7/2/2001	29.79	12:00	21.71	0.00	8.08	0.00	8.08
MW-03	7/16/2001	29.79	12:00	22.40	0.00	7.39	-0.69	7.39
MW-03	7/30/2001	29.79	12:00	23.41	0.00	6.38	-1.01	6.38
MW-03	8/13/2001	29.79	12:28	23.80	0.00	5.99	-0.39	5.99
MW-03	8/13/2001	29.79	13:21	23.77	0.00	6.02	0.03	6.02
MW-03	8/27/2001	29.79	12:34	23.73	0.00	6.06	0.04	6.06
MW-03	10/10/2001	29.79	15:19	24.29	0.00	5.50	-0.56	5.50
MW-03	11/29/2001	29.79	10:15	21.67	0.00	8.12	2.62	8.12
MW-03	12/27/2001	29.79	11:16	18.13	0.00	11.66	3.54	11.66
MW-03	2/4/2002	29.79	10:38	17.53	0.00	12.26	0.60	12.26
MW-03	2/28/2002	29.79	13:42	18.65	0.00	11.14	-1.12	11.14
MW-03	3/14/2002	29.79	10:20	18.88	0.00	10.91	-0.23	10.91
MW-03	4/23/2002	29.79	13:42	17.06	0.00	12.73	1.82	12.73
MW-03	5/22/2002	29.79	14:20	18.98	0.00	10.81	-1.92	10.81
MW-03	6/21/2002	29.79	13:20	17.09	0.00	12.70	1.89	12.70
MW-03	7/26/2002	29.79	12:45	19.11	0.00	10.68	-2.02	10.68
MW-03	7/26/2002	29.79	13:33	19.12	0.00	10.67	-0.01	10.67
MW-03	8/29/2002	29.79	12:50	21.05	0.00	8.74	-1.93	8.74
MW-03	10/17/2002	29.79	12:02	22.13	0.00	7.66	-1.08	7.66
MW-03	10/30/2002	29.79	11:34	22.51	0.00	7.28	-0.38	7.28
MW-03	11/22/2002	29.79	11:33	22.12	0.00	7.67	0.39	7.67
MW-03	12/31/2002	29.79	11:30	20.60	0.00	9.19	1.52	9.19
MW-03	1/28/2003	29.79	11:07	19.71	0.00	10.08	0.89	10.08
MW-04	6/8/2001	29.46	12:00	21.10	3.20	8.36	NA	11.12
MW-04	6/18/2001	29.46	12:00	21.37	3.14	8.09	-0.27	10.80
MW-04	7/2/2001	29.46	12:00	21.30	2.98	8.16	0.07	10.73
MW-04	7/16/2001	29.46	12:00	22.51	3.91	6.95	-1.21	10.32

All elevations relative to City of Portland Datum

Table A-1
Summary of Groundwater Elevations and
Product Observation Data
June 2001 - January 2003
25693679

PERIOD: From 06/06/2001 thru 01/28/2003 - Inclusive

SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-04	7/30/2001	29.46	12:00	22.95	4.28	6.51	-0.44	10.20
MW-04	8/13/2001	29.46	13:16	23.40	4.71	6.06	-0.45	10.13
MW-04	8/27/2001	29.46	13:20	24.75	5.98	4.71	-1.35	9.87
MW-04	10/10/2001	29.46	16:12	24.10	4.75	5.36	0.65	9.46
MW-04	11/29/2001	29.46	10:41	20.62	2.94	8.84	3.48	11.38
MW-04	12/27/2001	29.46	11:40	16.80	1.04	12.66	3.82	13.56
MW-04	2/4/2002	29.46	11:00	16.17	0.85	13.29	0.63	14.02
MW-04	2/28/2002	29.46	14:35	16.98	1.08	12.48	-0.81	13.41
MW-04	3/14/2002	29.46	10:15	16.60	0.77	12.86	0.38	13.53
MW-04	4/23/2002	29.46	14:29	16.08	0.53	13.38	0.52	13.84
MW-04	5/22/2002	29.46	14:56	17.52	1.11	11.94	-1.44	12.90
MW-04	6/21/2002	29.46	13:58	16.13	0.31	13.33	1.39	13.60
MW-04	7/26/2002	29.46	13:34	17.73	0.82	11.73	-1.60	12.44
MW-04	8/29/2002	29.46	13:25	18.63	0.90	10.83	-0.90	11.61
MW-04	10/17/2002	29.46	12:28	19.56	1.03	9.90	-0.93	10.79
MW-04	10/30/2002	29.46	11:35	19.83	1.15	9.63	-0.27	10.62
MW-04	11/22/2002	29.46	11:35	20.05	1.45	9.41	-0.22	10.66
MW-04	12/31/2002	29.46	11:33	18.26	0.93	11.20	1.79	12.00
MW-04	1/28/2003	29.46	12:13	17.52	0.96	11.94	0.74	12.77
MW-05	6/6/2001	29.39	12:00	21.70	0.00	7.69	NA	7.69
MW-05	6/18/2001	29.39	12:00	22.48	0.00	6.91	-0.78	6.91
MW-05	7/2/2001	29.39	12:00	22.58	0.00	6.81	-0.10	6.81
MW-05	7/16/2001	29.39	12:00	23.33	0.00	6.06	-0.75	6.06
MW-05	7/30/2001	29.39	12:00	23.49	0.00	5.90	-0.16	5.90
MW-05	8/13/2001	29.39	12:44	23.52	0.00	5.87	-0.03	5.87
MW-05	8/27/2001	29.39	12:52	23.38	0.00	6.01	0.14	6.01
MW-05	10/10/2001	29.39	15:13	23.92	0.00	5.47	-0.54	5.47
MW-05	11/29/2001	29.39	10:13	21.92	0.00	7.47	2.00	7.47
MW-05	12/27/2001	29.39	11:14	18.69	0.00	10.70	3.23	10.70
MW-05	2/4/2002	29.39	10:37	18.14	0.00	11.25	0.55	11.25
MW-05	2/28/2002	29.39	13:58	19.33	0.00	10.06	-1.19	10.06
MW-05	3/14/2002	29.39	09:38	19.24	0.00	10.15	0.09	10.15
MW-05	4/23/2002	29.39	13:59	16.99	0.00	12.40	2.25	12.40
MW-05	5/22/2002	29.39	14:32	19.18	0.00	10.21	-2.19	10.21
MW-05	6/21/2002	29.39	13:34	16.89	0.00	12.50	2.29	12.50
MW-05	7/26/2002	29.39	13:03	19.43	0.00	9.96	-2.54	9.96
MW-05	8/29/2002	29.39	12:54	21.83	0.00	7.56	-2.40	7.56
MW-05	10/17/2002	29.39	11:50	23.18	0.00	6.21	-1.35	6.21

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Product Observation Data
June 2001 - January 2003
25693679

PERIOD: From 06/06/2001 thru 01/28/2003 - Inclusive

SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-05	10/30/2002	29.39	11:09	23.33	0.00	6.06	-0.15	6.06
MW-05	11/22/2002	29.39	10:57	22.42	0.00	6.97	0.91	6.97
MW-05	12/31/2002	29.39	10:56	20.92	0.00	8.47	1.50	8.47
MW-05	1/28/2003	29.39	11:25	20.24	0.00	9.15	0.68	9.15
MW-06	6/6/2001	29.36	12:00	21.74	0.00	7.62	NA	7.62
MW-06	6/18/2001	29.36	12:00	22.41	0.00	6.95	-0.67	6.95
MW-06	7/2/2001	29.36	12:00	22.51	0.00	6.85	-0.10	6.85
MW-06	7/16/2001	29.36	12:00	23.19	0.00	6.17	-0.68	6.17
MW-06	7/30/2001	29.36	12:00	23.37	0.00	5.99	-0.18	5.99
MW-06	8/13/2001	29.36	12:46	23.41	0.00	5.95	-0.04	5.95
MW-06	8/27/2001	29.36	12:54	23.37	0.00	5.99	0.04	5.99
MW-06	10/10/2001	29.36	15:21	23.78	0.00	5.58	-0.41	5.58
MW-06	11/29/2001	29.36	10:16	21.77	0.00	7.59	2.01	7.59
MW-06	12/27/2001	29.36	11:17	18.48	0.00	10.88	3.29	10.88
MW-06	2/4/2002	29.36	10:40	17.94	0.00	11.42	0.54	11.42
MW-06	2/28/2002	29.36	14:00	19.19	0.00	10.17	-1.25	10.17
MW-06	3/14/2002	29.36	09:40	19.33	0.00	10.03	-0.14	10.03
MW-06	4/23/2002	29.36	14:01	16.90	0.00	12.46	2.43	12.46
MW-06	5/22/2002	29.36	14:34	19.13	0.00	10.23	-2.23	10.23
MW-06	6/21/2002	29.36	13:36	16.90	0.00	12.46	2.23	12.46
MW-06	7/26/2002	29.36	13:05	19.27	0.00	10.09	-2.37	10.09
MW-06	8/29/2002	29.36	12:59	21.63	0.00	7.73	-2.36	7.73
MW-06	10/17/2002	29.36	12:04	23.03	0.00	6.33	-1.40	6.33
MW-06	10/30/2002	29.36	11:12	23.19	0.00	6.17	-0.16	6.17
MW-06	11/22/2002	29.36	11:00	22.33	0.00	7.03	0.86	7.03
MW-06	12/31/2002	29.36	11:00	20.72	0.00	8.64	1.61	8.64
MW-06	1/28/2003	29.36	11:27	20.09	0.00	9.27	0.63	9.27
MW-07	6/6/2001	28.46	12:00	21.01	0.00	7.45	NA	7.45
MW-07	6/18/2001	28.46	12:00	22.17	0.00	6.29	-1.16	6.29
MW-07	7/2/2001	28.46	12:00	22.20	0.00	6.26	-0.03	6.26
MW-07	7/16/2001	28.46	12:00	22.84	0.00	5.62	-0.64	5.62
MW-07	7/30/2001	28.46	12:00	22.92	0.00	5.54	-0.08	5.54
MW-07	8/13/2001	28.46	12:49	22.80	0.00	5.66	0.12	5.66
MW-07	8/27/2001	28.46	12:57	22.68	0.00	5.78	0.12	5.78
MW-07	10/10/2001	28.46	15:24	23.17	0.00	5.29	-0.49	5.29
MW-07	11/29/2001	28.46	10:18	20.28	0.00	8.18	2.89	8.18
MW-07	12/27/2001	28.46	11:19	18.93	0.00	9.53	1.35	9.53

All elevations relative to City of Portland Datum

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Product Observation Data
June 2001 - January 2003
25693679

PERIOD: From 06/06/2001 thru 01/28/2003 - Inclusive

SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-07	2/4/2002	28.46	10:42	18.13	0.00	10.33	0.80	10.33
MW-07	2/28/2002	28.46	14:04	19.38	0.00	9.08	-1.25	9.08
MW-07	3/14/2002	28.46	09:45	18.69	0.00	9.77	0.69	9.77
MW-07	4/23/2002	28.46	14:05	16.30	0.00	12.16	2.39	12.16
MW-07	5/22/2002	28.46	14:35	18.66	0.00	9.80	-2.36	9.80
MW-07	6/21/2002	28.46	13:37	15.95	0.00	12.51	2.71	12.51
MW-07	7/26/2002	28.46	13:06	19.14	0.00	9.32	-3.19	9.32
MW-07	8/29/2002	28.46	13:01	21.38	0.00	7.08	-2.24	7.08
MW-07	10/17/2002	28.46	12:05	22.64	0.00	5.82	-1.26	5.82
MW-07	10/30/2002	28.46	11:14	22.74	0.00	5.72	-0.10	5.72
MW-07	11/22/2002	28.46	11:01	21.62	0.00	6.84	1.12	6.84
MW-07	12/31/2002	28.46	11:02	19.56	0.00	8.90	2.06	8.90
MW-07	1/28/2003	28.46	11:30	19.65	0.00	8.81	-0.09	8.81
MW-08	6/6/2001	29.06	12:00	21.64	0.00	7.42	NA	7.42
MW-08	6/18/2001	29.06	12:00	22.68	0.00	6.38	-1.04	6.38
MW-08	7/2/2001	29.06	12:00	22.70	0.00	6.36	-0.02	6.36
MW-08	7/16/2001	29.06	12:00	23.40	0.00	5.66	-0.70	5.66
MW-08	7/30/2001	29.06	12:00	23.48	0.00	5.58	-0.08	5.58
MW-08	8/13/2001	29.06	12:53	23.37	0.00	5.69	0.11	5.69
MW-08	8/27/2001	29.06	12:59	23.25	0.00	5.81	0.12	5.81
MW-08	10/10/2001	29.06	15:28	23.73	0.00	5.33	-0.48	5.33
MW-08	11/29/2001	29.06	10:19	21.25	0.00	7.81	2.48	7.81
MW-08	12/27/2001	29.06	11:21	19.30	0.00	9.76	1.95	9.76
MW-08	2/4/2002	29.06	10:43	18.58	0.00	10.48	0.72	10.48
MW-08	2/28/2002	29.06	14:06	19.73	0.00	9.33	-1.15	9.33
MW-08	3/14/2002	29.06	09:47	19.30	0.00	9.76	0.43	9.76
MW-08	4/23/2002	29.06	14:07	16.90	0.00	12.16	2.40	12.16
MW-08	5/22/2002	29.06	14:37	19.14	0.00	9.92	-2.24	9.92
MW-08	6/21/2002	29.06	13:39	16.58	0.00	12.48	2.56	12.48
MW-08	7/26/2002	29.06	13:08	19.65	0.00	9.41	-3.07	9.41
MW-08	8/29/2002	29.06	13:03	21.86	0.00	7.20	-2.21	7.20
MW-08	10/17/2002	29.06	12:07	23.20	0.00	5.86	-1.34	5.86
MW-08	10/30/2002	29.06	11:15	23.26	0.00	5.80	-0.06	5.80
MW-08	11/22/2002	29.06	11:08	22.20	0.00	6.86	1.06	6.86
MW-08	12/31/2002	29.06	11:05	20.55	0.00	8.51	1.65	8.51
MW-08	1/28/2003	29.06	11:32	20.23	0.00	8.83	0.32	8.83
MW-09	6/6/2001	29.60	12:00	22.18	0.00	7.42	NA	7.42

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Table A-1
Summary of Groundwater Elevations and
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June 2001 - January 2003
25693679

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SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-09	6/18/2001	29.60	12:00	24.39	0.00	5.21	-2.21	5.21
MW-09	7/2/2001	29.60	12:00	24.31	0.00	5.29	0.08	5.29
MW-09	7/16/2001	29.60	12:00	24.99	0.00	4.61	-0.68	4.61
MW-09	7/30/2001	29.60	12:00	24.74	0.00	4.86	0.25	4.86
MW-09	8/13/2001	29.60	12:59	24.31	0.00	5.29	0.43	5.29
MW-09	8/27/2001	29.60	13:06	24.38	0.00	5.22	-0.07	5.22
MW-09	10/10/2001	29.60	15:34	24.79	0.00	4.81	-0.41	4.81
MW-09	11/29/2001	29.60	10:23	20.59	0.00	9.01	4.20	9.01
MW-09	12/27/2001	29.60	11:28	22.67	0.34	6.93	-2.08	7.22
MW-09	2/4/2002	29.60	10:48	20.89	0.14	8.71	1.78	8.83
MW-09	2/28/2002	29.60	14:12	21.95	0.35	7.65	-1.06	7.95
MW-09	3/14/2002	29.60	09:58	19.10	0.00	10.50	2.85	10.50
MW-09	4/23/2002	29.60	14:15	19.15	0.78	10.45	-0.05	11.11
MW-09	5/22/2002	29.60	14:42	19.34	0.00	10.26	-0.19	10.26
MW-09	6/21/2002	29.60	13:47	16.54	0.00	13.06	2.80	13.06
MW-09	7/26/2002	29.60	13:15	21.55	0.00	8.05	-5.01	8.05
MW-09	8/29/2002	29.60	13:09	23.58	0.26	6.02	-2.03	6.24
MW-09	10/17/2002	29.60	12:13	24.53	0.00	5.07	-0.95	5.07
MW-09	10/30/2002	29.60	11:19	24.49	0.00	5.11	0.04	5.11
MW-09	11/22/2002	29.60	11:15	23.01	0.00	6.59	1.48	6.59
MW-09	12/31/2002	29.60	11:12	20.84	0.00	8.76	2.17	8.76
MW-09	1/28/2003	29.60	11:42	21.00	0.09	8.60	-0.16	8.68
MW-10	6/6/2001	29.06	12:00	21.57	0.00	7.49	NA	7.49
MW-10	6/18/2001	29.06	12:00	24.33	0.00	4.73	-2.76	4.73
MW-10	7/2/2001	29.06	12:00	24.23	0.00	4.83	0.10	4.83
MW-10	7/16/2001	29.06	12:00	25.12	0.00	3.94	-0.89	3.94
MW-10	7/30/2001	29.06	12:00	24.87	0.00	4.19	0.25	4.19
MW-10	8/13/2001	29.06	12:55	23.74	0.00	5.32	1.13	5.32
MW-10	8/27/2001	29.06	13:08	24.00	0.00	5.06	-0.26	5.06
MW-10	10/10/2001	29.06	15:31	24.30	0.00	4.76	-0.30	4.76
MW-10	11/29/2001	29.06	10:21	19.91	0.00	9.15	4.39	9.15
MW-10	12/27/2001	29.06	11:22	21.88	0.00	7.18	-1.97	7.18
MW-10	2/4/2002	29.06	10:45	20.20	0.00	8.86	1.68	8.86
MW-10	2/28/2002	29.06	14:08	21.08	0.00	7.98	-0.88	7.98
MW-10	3/14/2002	29.06	09:56	18.55	0.00	10.51	2.53	10.51
MW-10	4/23/2002	29.06	14:09	17.99	0.00	11.07	0.56	11.07
MW-10	5/22/2002	29.06	14:39	18.70	0.00	10.36	-0.71	10.36
MW-10	6/21/2002	29.06	13:45	15.95	0.00	13.11	2.75	13.11

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SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-10	7/26/2002	29.06	13:10	21.07	0.00	7.99	-5.12	7.99
MW-10	8/29/2002	29.06	13:05	22.92	0.00	6.14	-1.85	6.14
MW-10	10/17/2002	29.06	12:09	24.65	0.00	4.41	-1.73	4.41
MW-10	10/30/2002	29.06	11:16	23.98	0.00	5.08	0.67	5.08
MW-10	11/22/2002	29.06	11:11	22.48	0.00	6.58	1.50	6.58
MW-10	12/31/2002	29.06	11:08	20.45	0.00	8.61	2.03	8.61
MW-10	1/28/2003	29.06	11:37	20.29	0.00	8.77	0.16	8.77
MW-11	6/6/2001	29.20	12:00	21.81	0.00	7.39	NA	7.39
MW-11	6/18/2001	29.20	12:00	23.49	0.00	5.71	-1.68	5.71
MW-11	7/2/2001	29.20	12:00	23.37	0.00	5.83	0.12	5.83
MW-11	7/16/2001	29.20	12:00	24.16	0.00	5.04	-0.79	5.04
MW-11	7/30/2001	29.20	12:00	24.02	0.00	5.18	0.14	5.18
MW-11	8/13/2001	29.20	13:01	23.73	0.00	5.47	0.29	5.47
MW-11	8/27/2001	29.20	13:02	23.67	0.00	5.53	0.06	5.53
MW-11	10/10/2001	29.20	15:38	24.18	0.00	5.02	-0.51	5.02
MW-11	11/29/2001	29.20	10:24	21.05	0.26	8.15	3.13	8.37
MW-11	12/27/2001	29.20	11:32	22.53	2.07	6.67	-1.48	8.42
MW-11	2/4/2002	29.20	10:53	20.03	0.40	9.17	2.50	9.51
MW-11	2/28/2002	29.20	14:22	21.22	0.81	7.98	-1.19	8.67
MW-11	3/14/2002	29.20	10:02	19.22	0.48	9.98	2.00	10.39
MW-11	4/23/2002	29.20	14:20	17.90	0.60	11.30	1.32	11.81
MW-11	5/22/2002	29.20	14:48	21.26	2.62	7.94	-3.36	10.16
MW-11	6/21/2002	29.20	13:51	16.70	0.00	12.50	4.56	12.50
MW-11	7/26/2002	29.20	13:21	21.44	1.27	7.76	-4.74	8.83
MW-11	8/29/2002	29.20	13:15	22.95	0.51	6.25	-1.51	6.68
MW-11	10/17/2002	29.20	12:18	24.42	0.78	4.78	-1.47	5.44
MW-11	10/30/2002	29.20	11:30	24.43	0.76	4.77	-0.01	5.41
MW-11	11/22/2002	29.20	11:22	22.62	0.26	6.58	1.81	6.80
MW-11	12/31/2002	29.20	11:20	20.70	0.21	8.50	1.92	8.68
MW-11	1/28/2003	29.20	11:59	20.55	0.08	8.65	0.15	8.72
MW-12	6/6/2001	29.21	12:00	21.75	0.00	7.46	NA	7.46
MW-12	6/18/2001	29.21	12:00	23.92	0.00	5.29	-2.17	5.29
MW-12	7/2/2001	29.21	12:00	23.88	0.00	5.33	0.04	5.33
MW-12	7/16/2001	29.21	12:00	24.54	0.00	4.67	-0.66	4.67
MW-12	7/30/2001	29.21	12:00	24.35	0.00	4.86	0.19	4.86
MW-12	8/13/2001	29.21	12:56	23.85	0.00	5.36	0.50	5.36
MW-12	8/27/2001	29.21	13:07	23.91	0.00	5.30	-0.06	5.30

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SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-12	10/10/2001	29.21	15:32	24.33	0.00	4.88	-0.42	4.88
MW-12	11/29/2001	29.21	10:22	20.33	0.00	8.88	4.00	8.88
MW-12	12/27/2001	29.21	11:23	21.66	0.00	7.55	-1.33	7.55
MW-12	2/4/2002	29.21	10:46	20.17	0.01	9.04	1.49	9.04
MW-12	2/28/2002	29.21	14:08	21.22	0.21	7.99	-1.05	8.17
MW-12	3/14/2002	29.21	09:55	18.75	0.00	10.46	2.47	10.46
MW-12	4/23/2002	29.21	14:10	17.87	0.00	11.34	0.88	11.34
MW-12	5/22/2002	29.21	14:40	19.06	0.10	10.15	-1.19	10.24
MW-12	6/21/2002	29.21	13:46	16.25	0.00	12.96	2.81	12.96
MW-12	7/26/2002	29.21	13:11	21.32	0.47	7.89	-5.07	8.29
MW-12	8/29/2002	29.21	13:07	22.85	0.00	6.36	-1.53	6.36
MW-12	10/17/2002	29.21	12:11	24.12	0.00	5.09	-1.27	5.09
MW-12	10/30/2002	29.21	11:17	24.03	0.00	5.18	0.09	5.18
MW-12	11/22/2002	29.21	11:14	22.55	0.00	6.66	1.48	6.66
MW-12	12/31/2002	29.21	11:10	20.22	0.00	8.99	2.33	8.99
MW-12	1/28/2003	29.21	11:39	20.52	0.00	8.69	-0.30	8.69
MW-13	6/6/2001	30.21	12:00	22.84	0.00	7.37	NA	7.37
MW-13	6/18/2001	30.21	12:00	24.80	0.00	5.41	-1.96	5.41
MW-13	7/2/2001	30.21	12:00	24.69	0.00	5.52	0.11	5.52
MW-13	7/16/2001	30.21	12:00	25.45	0.00	4.76	-0.76	4.76
MW-13	7/30/2001	30.21	12:00	25.25	0.00	4.96	0.20	4.96
MW-13	8/13/2001	30.21	13:04	24.82	0.00	5.39	0.43	5.39
MW-13	8/27/2001	30.21	13:04	24.80	0.00	5.41	0.02	5.41
MW-13	10/10/2001	30.21	15:45	25.65	0.44	4.56	-0.85	4.93
MW-13	11/29/2001	30.21	10:28	21.46	0.00	8.75	4.19	8.75
MW-13	12/27/2001	30.21	11:31	22.60	0.00	7.61	-1.14	7.61
MW-13	2/4/2002	30.21	10:51	21.09	0.02	9.12	1.51	9.14
MW-13	2/28/2002	30.21	14:20	21.89	0.03	8.32	-0.80	8.35
MW-13	3/14/2002	30.21	10:00	19.83	0.00	10.38	2.06	10.38
MW-13	4/23/2002	30.21	14:17	19.16	0.49	11.05	0.67	11.47
MW-13	5/22/2002	30.21	14:44	20.11	0.04	10.10	-0.95	10.13
MW-13	6/21/2002	30.21	13:49	17.35	0.00	12.86	2.76	12.86
MW-13	7/26/2002	30.21	13:17	22.25	0.60	7.96	-4.90	8.47
MW-13	8/29/2002	30.21	13:12	24.11	0.32	6.10	-1.86	6.37
MW-13	10/17/2002	30.21	12:15	25.29	0.35	4.92	-1.18	5.22
MW-13	10/30/2002	30.21	11:24	25.20	0.31	5.01	0.09	5.27
MW-13	11/22/2002	30.21	11:18	23.53	0.00	6.68	1.67	6.68
MW-13	12/31/2002	30.21	11:15	21.48	0.00	8.73	2.05	8.73

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MW-13	1/28/2003	30.21	11:50	21.56	0.05	8.65	-0.08	8.69
MW-15	6/6/2001	30.48	12:00	22.81	0.00	7.67	NA	7.67
MW-15	6/18/2001	30.48	12:00	24.58	0.00	5.90	-1.77	5.90
MW-15	7/2/2001	30.48	12:00	24.45	0.00	6.03	0.13	6.03
MW-15	7/16/2001	30.48	12:00	25.43	0.00	5.05	-0.98	5.05
MW-15	7/30/2001	30.48	12:00	25.33	0.00	5.15	0.10	5.15
MW-15	8/13/2001	30.48	13:28	24.90	0.00	5.58	0.43	5.58
MW-15	8/27/2001	30.48	12:42	25.10	0.00	5.38	-0.20	5.38
MW-15	10/10/2001	30.48	14:55	25.30	0.00	5.18	-0.20	5.18
MW-15	11/29/2001	30.48	10:03	22.35	0.00	8.13	2.95	8.13
MW-15	12/27/2001	30.48	11:07	21.64	0.00	8.84	0.71	8.84
MW-15	2/4/2002	30.48	10:26	20.77	0.00	9.71	0.87	9.71
MW-15	2/28/2002	30.48	13:48	21.31	0.00	9.17	-0.54	9.17
MW-15	3/14/2002	30.48	09:28	0.00	0.00	30.48	21.31	30.48
MW-15	3/14/2002	30.48	09:28	20.30	0.00	10.18	-20.30	10.18
MW-15	4/23/2002	30.48	13:45	18.97	0.00	11.51	1.33	11.51
MW-15	5/22/2002	30.48	14:24	20.44	0.00	10.04	-1.47	10.04
MW-15	6/21/2002	30.48	13:25	17.85	0.00	12.63	2.59	12.63
MW-15	7/26/2002	30.48	12:50	21.34	0.00	9.14	-3.49	9.14
MW-15	8/29/2002	30.48	12:45	23.48	0.00	7.00	-2.14	7.00
MW-15	10/17/2002	30.48	11:53	24.85	0.00	5.63	-1.37	5.63
MW-15	10/30/2002	30.48	11:03	24.96	0.00	5.52	-0.11	5.52
MW-15	11/22/2002	30.48	10:48	23.60	0.00	6.88	1.36	6.88
MW-15	12/31/2002	30.48	10:42	22.07	0.00	8.41	1.53	8.41
MW-15	1/28/2003	30.48	12:00	21.82	0.00	8.66	0.25	8.66
MW-16	6/6/2001	30.03	12:00	22.44	0.00	7.59	NA	7.59
MW-16	6/18/2001	30.03	12:00	24.48	0.00	5.55	-2.04	5.55
MW-16	7/2/2001	30.03	12:00	24.39	0.00	5.64	0.09	5.64
MW-16	7/16/2001	30.03	12:00	25.46	0.00	4.57	-1.07	4.57
MW-16	7/30/2001	30.03	12:00	25.31	0.00	4.72	0.15	4.72
MW-16	8/13/2001	30.03	12:37	24.65	0.00	5.38	0.66	5.38
MW-16	8/27/2001	30.03	12:47	24.80	0.00	5.23	-0.15	5.23
MW-16	10/10/2001	30.03	15:03	24.95	0.00	5.08	-0.15	5.08
MW-16	11/29/2001	30.03	10:06	21.50	0.00	8.53	3.45	8.53
MW-16	12/27/2001	30.03	11:10	21.86	0.00	8.17	-0.36	8.17
MW-16	2/4/2002	30.03	10:30	20.71	0.00	9.32	1.15	9.32
MW-16	2/28/2002	30.03	13:52	21.33	0.00	8.70	-0.62	8.70

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MW-16	3/14/2002	30.03	09:32	19.73	0.00	10.30	1.60	10.30
MW-16	4/23/2002	30.03	13:52	18.73	0.00	11.30	1.00	11.30
MW-16	5/22/2002	30.03	14:28	19.94	0.00	10.09	-1.21	10.09
MW-16	6/21/2002	30.03	13:29	17.28	0.00	12.75	2.66	12.75
MW-16	7/26/2002	30.03	12:54	21.35	0.00	8.68	-4.07	8.68
MW-16	8/29/2002	30.03	12:50	23.37	0.00	6.66	-2.02	6.66
MW-16	10/17/2002	30.03	11:58	24.88	0.00	5.15	-1.51	5.15
MW-16	10/30/2002	30.03	11:07	24.78	0.00	5.25	0.10	5.25
MW-16	11/22/2002	30.03	10:52	23.20	0.00	6.83	1.58	6.83
MW-16	12/31/2002	30.03	10:50	21.45	0.00	8.58	1.75	8.58
MW-16	1/28/2003	30.03	11:19	21.45	0.00	8.58	0.00	8.58
MW-17	6/6/2001	29.91	12:00	22.51	0.00	7.40	NA	7.40
MW-17	6/18/2001	29.91	12:00	22.98	0.00	6.93	-0.47	6.93
MW-17	7/2/2001	29.91	12:00	23.11	0.00	6.80	-0.13	6.80
MW-17	7/16/2001	29.91	12:00	23.64	0.00	6.27	-0.53	6.27
MW-17	7/30/2001	29.91	12:00	23.86	0.00	6.05	-0.22	6.05
MW-17	8/13/2001	29.91	12:36	23.95	0.00	5.96	-0.09	5.96
MW-17	8/27/2001	29.91	12:48	23.86	0.00	6.05	0.09	6.05
MW-17	10/10/2001	29.91	15:03	24.31	0.00	5.60	-0.45	5.60
MW-17	11/29/2001	29.91	10:07	22.80	0.00	7.11	1.51	7.11
MW-17	12/27/2001	29.91	11:11	19.30	0.00	10.61	3.50	10.61
MW-17	2/4/2002	29.91	10:29	18.88	0.00	11.03	0.42	11.03
MW-17	2/28/2002	29.91	13:51	20.14	0.00	9.77	-1.26	9.77
MW-17	3/14/2002	29.91	09:31	20.38	0.00	9.53	-0.24	9.53
MW-17	4/23/2002	29.91	13:50	17.37	0.00	12.54	3.01	12.54
MW-17	5/22/2002	29.91	14:27	20.09	0.00	9.82	-2.72	9.82
MW-17	6/21/2002	29.91	13:28	17.51	0.00	12.40	2.58	12.40
MW-17	7/26/2002	29.91	12:53	20.11	0.00	9.80	-2.60	9.80
MW-17	8/29/2002	29.91	12:48	22.27	0.00	7.64	-2.16	7.64
MW-17	10/17/2002	29.91	11:57	23.52	0.00	6.39	-1.25	6.39
MW-17	10/30/2002	29.91	11:06	23.70	0.00	6.21	-0.18	6.21
MW-17	11/22/2002	29.91	10:51	23.03	0.00	6.88	0.67	6.88
MW-17	12/31/2002	29.91	10:48	21.79	0.00	8.12	1.24	8.12
MW-17	1/28/2003	29.91	11:18	20.98	0.00	8.93	0.81	8.93
STAFF-GAGE	6/6/2001	0.00	12:00	-7.67	0.00	7.67	NA	7.67
STAFF-GAGE	6/18/2001	0.00	12:00	-4.07	0.00	4.07	-3.60	4.07
STAFF-GAGE	7/2/2001	0.00	12:00	-3.97	0.00	3.97	-0.10	3.97

All elevations relative to City of Portland Datum

Table A-1
Summary of Groundwater Elevations and
Product Observation Data
June 2001 - January 2003
25693679

PERIOD: From 06/06/2001 thru 01/28/2003 - Inclusive

SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
STAFF-GAGE	7/16/2001	0.00	12:00	-3.14	0.00	3.14	-0.83	3.14
STAFF-GAGE	7/30/2001	0.00	12:00	-3.50	0.00	3.50	0.36	3.50
STAFF-GAGE	8/13/2001	0.00	12:00	-5.19	0.00	5.19	1.69	5.19
STAFF-GAGE	8/27/2001	0.00	12:38	-4.68	0.00	4.68	-0.51	4.68
STAFF-GAGE	10/10/2001	0.00	15:00	-4.83	0.00	4.83	0.15	4.83
STAFF-GAGE	11/29/2001	0.00	10:10	-9.47	0.00	9.47	4.64	9.47
STAFF-GAGE	12/27/2001	0.00	11:30	-6.52	0.00	6.52	-2.95	6.52
STAFF-GAGE	2/4/2002	0.00	10:33	-8.60	0.00	8.60	2.08	8.60
STAFF-GAGE	2/28/2002	0.00	13:54	-6.25	0.00	6.25	-2.35	6.25
STAFF-GAGE	3/14/2002	0.00	10:40	-9.15	0.00	9.15	2.90	9.15
STAFF-GAGE	4/23/2002	0.00	13:55	-9.55	0.00	9.55	0.40	9.55
STAFF-GAGE	5/22/2002	0.00	14:12	-9.05	0.00	9.05	-0.50	9.05
STAFF-GAGE	6/21/2002	0.00	13:30	-10.43	0.00	10.43	1.38	10.43
STAFF-GAGE	7/26/2002	0.00	13:00	-4.75	0.00	4.75	-5.68	4.75
STAFF-GAGE	8/29/2002	0.00	14:00	-5.20	0.00	5.20	0.45	5.20
STAFF-GAGE	10/17/2002	0.00	11:20	-2.45	0.00	2.45	-2.75	2.45
STAFF-GAGE	10/30/2002	0.00	10:30	-2.95	0.00	2.95	0.50	2.95
STAFF-GAGE	11/22/2002	0.00	10:30	-5.15	0.00	5.15	2.20	5.15
STAFF-GAGE	12/31/2002	0.00	10:06	-7.80	0.00	7.80	2.65	7.80
STAFF-GAGE	1/28/2003	0.00	11:21	-7.35	0.00	7.35	-0.45	7.35

All elevations relative to City of Portland Datum

Organics in Groundwater - Monitoring Wells
Methods 8260 and 8270C
Schnitzer - Premier Edible Oils, Portland OR
Unvalidated Data - January 2003
25693679

PERIOD: From 01/28/2003 thru 01/29/2003 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE SAMPLE ID DATE	MW-03 MW-3-012903 01/29/2003	MW-05 MW-5-012903 01/29/2003	MW-06 MW-6-012903 01/29/2003	MW-07 MW-7-012903 01/29/2003	MW-08 MW-8-012903 01/29/2003	MW-10 MW-8-012903 01/29/2003
1,1,1,2-Tetrachloroethane	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
1,1,1-Trichloroethane	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
1,1,2,2-Tetrachloroethane	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
1,1,2-Trichloroethane	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
1,1-Dichloroethane	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
1,1-Dichloroethylene	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
1,1-Dichloropropene	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
1,2,3-Trichlorobenzene	(ug/l)	2.0U	20U	5.0U	2.0U	2.0U	4.0U
1,2,3-Trichloropropane	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
1,2,4-Trichlorobenzene	(ug/l)	9.6U	20U	9.6U	9.6U	9.6U	9.6U
1,2-Dichloroethane	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
1,2-Dichloropropane	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
1,3-Dichloropropane	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
2-Hexanone	(ug/l)	20U	200U	50U	20U	20U	40U
2-Methylnaphthalene	(ug/l)	9.6U	73	100	9.6U	9.6U	9.6U
Acenaphthene	(ug/l)	9.6U	0.63J	2.6J	9.6U	0.66J	0.31J
Acenaphthylene	(ug/l)	9.6U	9.6U	9.6U	9.6U	9.6U	9.6U
Acetone	(ug/l)	20U	200U	50U	20U	20U	40U
Anthracene	(ug/l)	9.6U	9.6U	9.6U	9.6U	9.6U	9.6U
Benzene	(ug/l)	0.50U	5.0U	1.3U	0.50U	2.6	6.1
Benzo(a)anthracene	(ug/l)	9.6U	9.6U	9.6U	9.6U	9.6U	9.6U

Analyses by Columbia Analytical Services (Kelso, WA)
U = Non-detect, with MRL; J = Estimate

Organics in Groundwater - Monitoring Wells
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PERIOD: From 01/28/2003 thru 01/29/2003 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE SAMPLE ID DATE	MW-03 MW-3-012903 01/29/2003	MW-05 MW-5-012903 01/29/2003	MW-06 MW-6-012903 01/29/2003	MW-07 MW-7-012903 01/29/2003	MW-08 MW-8-012903 01/29/2003	MW-10 MW-8-012903 01/29/2003
Bromobenzene	(ug/l)	2.0U	20U	5.0U	2.0U	2.0U	4.0U
Bromodichloromethane	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Bromoform	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Carbon disulfide	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Carbon tetrachloride	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Chlorobenzene	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Chlorobromomethane	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Chloroethane	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Chloroform	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Chrysene	(ug/l)	9.6U	9.6U	9.6U	9.6U	9.6U	9.6U
cis-1,2-Dichloroethylene	(ug/l)	0.50U	5.0U	42	0.50U	49	1.0U
cis-1,3-Dichloropropene	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Dibenzofuran	(ug/l)	9.6U	9.6U	2.4J	9.6U	9.6U	9.6U
Dibromochloromethane	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Dichlorodifluoromethane	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Ethylbenzene	(ug/l)	0.50U	1500	110	0.50U	4.6	74
Fluoranthene	(ug/l)	9.6U	9.6U	9.6U	9.6U	9.6U	9.6U
Fluorene	(ug/l)	9.6U	0.51J	4.8J	9.6U	0.75J	9.6U
Methyl bromide	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Methyl chloride	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Methylene bromide	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U

Analyses by Columbia Analytical Services (Kelso, WA)
U = Non-detect, with MRL; J = Estimate

Organics in Groundwater - Monitoring Wells
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PERIOD: From 01/28/2003 thru 01/29/2003 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE SAMPLE ID DATE	MW-03 MW-3-012903 01/29/2003	MW-05 MW-5-012903 01/29/2003	MW-06 MW-6-012903 01/29/2003	MW-07 MW-7-012903 01/29/2003	MW-08 MW-8-012903 01/29/2003	MW-10 MW-8-012903 01/29/2003
Methylene chloride	(ug/l)	2.0U	20U	5.0U	2.0U	2.0U	4.0U
Naphthalene	(ug/l)	9.6U	340	110	9.6U	9.6U	9.6U
n-Butylbenzene	(ug/l)	2.8	20U	59	2.0U	41	15
n-Propylbenzene	(ug/l)	2.0U	150	620	2.0U	180	310
o-Xylene	(ug/l)	0.50U	30	7.7	0.50U	0.50U	1.0U
p-Cymene	(ug/l)	2.0U	20U	11	2.0U	2.0U	4.0U
Phenanthrene	(ug/l)	9.6U	9.6U	1.9J	9.6U	9.6U	9.6U
Pyrene	(ug/l)	9.6U	9.6U	9.6U	9.6U	9.6U	9.6U
sec-Butylbenzene	(ug/l)	2.7	24	35	2.0U	16U	13
Styrene	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
tert-Butylbenzene	(ug/l)	2.0U	20U	5.0U	2.0U	2.0U	4.0U
Tetrachloroethylene	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Toluene	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.74	1.9
trans-1,2-dichloroethene	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
trans-1,3-Dichloropropene	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Trichloroethylene	(ug/l)	0.87	5.0U	1.8	0.50U	2.4	1.0U
Trichlorofluoromethane	(ug/l)	0.50U	5.0U	1.3U	0.50U	0.50U	1.0U
Vinyl chloride	(ug/l)	0.50U	5.0U	1.3U	0.50U	11	1.0U
Xylene (total)	(ug/l)	0.50U	3900	290	0.50U	1.9	9.1

Analyses by Columbia Analytical Services (Kelso, WA)
U = Non-detect, with MRL; J = Estimate

Organics in Groundwater - Monitoring Wells
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Unvalidated Data - January 2003
25693679

PERIOD: From 01/28/2003 thru 01/29/2003 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE SAMPLE ID DATE	MW-12 MW-8-012903 01/29/2003	MW-14 MW-14-012803 01/28/2003	MW-15 MW-15-012803 01/28/2003	MW-16 MW-16-012803 01/28/2003	MW-17 MW-17-012903 01/29/2003
1,1,1,2-Tetrachloroethane	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
1,1,1-Trichloroethane	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.60U
1,1,2,2-Tetrachloroethane	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
1,1,2-Trichloroethane	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
1,1-Dichloroethane	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
1,1-Dichloroethylene	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
1,1-Dichloropropene	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
1,2,3-Trichlorobenzene	(ug/l)	2.0U	2.0U	2.0U	2.0U	2.0U
1,2,3-Trichloropropane	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
1,2,4-Trichlorobenzene	(ug/l)	9.6U	9.6U	9.6U	9.6U	9.6U
1,2-Dichloroethane	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
1,2-Dichloropropane	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
1,3-Dichloropropane	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
2-Hexanone	(ug/l)	20U	20U	20U	20U	20U
2-Methylnaphthalene	(ug/l)	0.65J	9.6U	9.6U	9.6U	9.6U
Acenaphthene	(ug/l)	1.7J	9.6U	9.6U	9.6U	9.6U
Acenaphthylene	(ug/l)	9.6U	9.6U	9.6U	9.6U	9.6U
Acetone	(ug/l)	20U	20U	20U	20U	20U
Anthracene	(ug/l)	9.6U	9.6U	9.6U	9.6U	9.6U
Benzene	(ug/l)	61	0.50U	0.50U	0.50U	0.50U
Benzo(a)anthracene	(ug/l)	9.6U	9.6U	9.6U	9.6U	9.6U

Analyses by Columbia Analytical Services (Kelso, WA)
U = Non-detect, with MRL; J = Estimate

Organics in Groundwater - Monitoring Wells
Methods 8260 and 8270C
Schnitzer - Premier Edible Oils, Portland OR
Unvalidated Data - January 2003
25693679

PERIOD: From 01/28/2003 thru 01/29/2003 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE SAMPLE ID DATE	MW-12 MW-8-012903 01/29/2003	MW-14 MW-14-012803 01/28/2003	MW-15 MW-15-012803 01/28/2003	MW-16 MW-16-012803 01/28/2003	MW-17 MW-17-012903 01/29/2003
Bromobenzene	(ug/l)	2.0U	2.0U	2.0U	2.0U	2.0U
Bromodichloromethane	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
Bromoform	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
Carbon disulfide	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
Carbon tetrachloride	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
Chlorobenzene	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
Chlorobromomethane	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
Chloroethane	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
Chloroform	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
Chrysene	(ug/l)	9.6U	9.6U	9.6U	9.6U	9.6U
cis-1,2-Dichloroethylene	(ug/l)	0.80	0.50U	0.50U	0.50U	0.50U
cis-1,3-Dichloropropene	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
Dibenzofuran	(ug/l)	0.77J	9.6U	9.6U	9.6U	9.6U
Dibromochloromethane	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
Dichlorodifluoromethane	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
Ethylbenzene	(ug/l)	3.8	0.50U	0.50U	0.50U	0.50U
Fluoranthene	(ug/l)	9.6U	9.6U	9.6U	9.6U	9.6U
Fluorene	(ug/l)	3.4J	9.6U	9.6U	9.6U	9.6U
Methyl bromide	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
Methyl chloride	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U
Methylene bromide	(ug/l)	0.50U	0.50U	0.50U	0.50U	0.50U

Analyses by Columbia Analytical Services (Kelso, WA)
U = Non-detect, with MRL; J = Estimate

Organics in Groundwater - Monitoring Wells
Methods 8260 and 8270C
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Unvalidated Data - January 2003
25693879

PERIOD: From 01/28/2003 thru 01/29/2003 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT		SITE SAMPLE ID DATE	MW-12 MW-8-012903 01/29/2003	MW-14 MW-14-012803 01/28/2003	MW-15 MW-15-012803 01/28/2003	MW-16 MW-16-012803 01/28/2003	MW-17 MW-17-012903 01/29/2003
Methylene chloride	(ug/l)		2.0U	2.0U	2.0U	2.0U	2.0U
Naphthalene	(ug/l)		9.6U	9.6U	9.6U	9.6U	9.6U
n-Butylbenzene	(ug/l)		4.2	2.0U	2.0U	2.0U	2.0U
n-Propylbenzene	(ug/l)		30	2.0U	2.0U	2.0U	2.0U
o-Xylene	(ug/l)		5.6	0.50U	0.50U	0.50U	0.50U
p-Cymene	(ug/l)		2.0U	2.0U	2.0U	2.0U	2.0U
Phenanthrene	(ug/l)		1.0J	9.6U	9.6U	9.6U	9.6U
Pyrene	(ug/l)		9.6U	9.6U	9.6U	9.6U	9.6U
sec-Butylbenzene	(ug/l)		3.1	2.0U	2.0U	2.0U	2.0U
Styrene	(ug/l)		0.50U	0.50U	0.50U	0.50U	0.50U
tert-Butylbenzene	(ug/l)		2.0U	2.0U	2.0U	2.0U	2.0U
Tetrachloroethylene	(ug/l)		0.50U	0.50U	0.50U	0.50U	0.50U
Toluene	(ug/l)		14	0.50U	0.50U	0.50U	0.50U
trans-1,2-dichloroethene	(ug/l)		0.50U	0.50U	0.50U	0.50U	0.50U
trans-1,3-Dichloropropene	(ug/l)		0.50U	0.50U	0.50U	0.50U	0.50U
Trichloroethylene	(ug/l)		0.50U	0.50U	0.50U	0.50U	0.50U
Trichlorofluoromethane	(ug/l)		0.50U	0.88	0.50U	0.50U	0.50U
Vinyl chloride	(ug/l)		0.50U	0.50U	0.50U	0.50U	0.50U
Xylene (total)	(ug/l)		21	0.50U	0.50U	0.50U	0.50U

Analyses by Columbia Analytical Services (Kelso, WA)
U = Non-detect, with MRL; J = Estimate

Inorganics in Groundwater - Monitoring Wells
Schnitzer - Premier Edible Oils, Portland OR
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25693879

PERIOD: From 01/28/2003 thru 01/29/2003 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE SAMPLE ID DATE	MW-03 MW-3-012903 01/29/2003	MW-05 MW-5-012903 01/29/2003	MW-06 MW-6-012903 01/29/2003	MW-07 MW-7-012903 01/29/2003	MW-08 MW-8-012903 01/29/2003	MW-10 MW-8-012903 01/29/2003
Arsenic	(ug/l)	16.8	16.2	--	--	--	--
Chromium	(ug/l)	5U	5U	--	--	--	--
Copper	(ug/l)	10U	10U	--	--	--	--
Iron	(ug/l)	228	18100	83900	114	46400	28400
Lead	(ug/l)	2U	56.5	16.3	2U	2U	2U
Manganese	(ug/l)	39.6	11900	2540	5U	4050	2910
Nickel	(ug/l)	20U	20U	--	--	--	--
Silver	(ug/l)	10U	10U	--	--	--	--
Zinc	(ug/l)	10U	10U	--	--	--	--

Analyses by Columbia Analytical Services (Kelso, WA)
U = Non-detect, with MRL; -- Not analyzed

Inorganics in Groundwater - Monitoring Wells
Schnitzer - Premier Edible Oils, Portland OR
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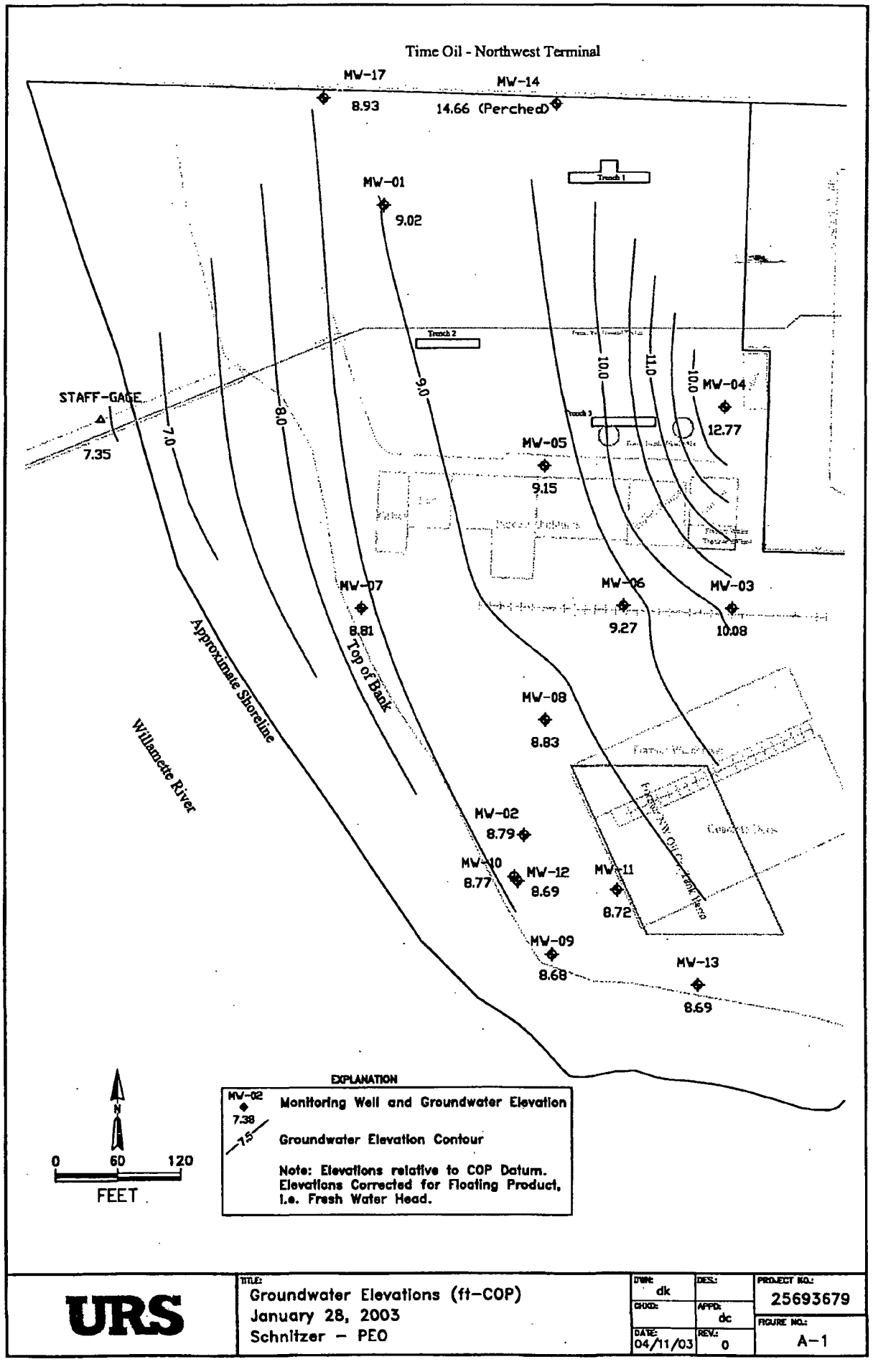
25693679

PERIOD: From 01/28/2003 thru 01/29/2003 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE SAMPLE ID DATE	MW-12 MW-8-012903 01/29/2003	MW-14 MW-14-012803 01/28/2003	MW-15 MW-15-012803 01/28/2003	MW-16 MW-16-012803 01/28/2003	MW-17 MW-17-012903 01/29/2003
Arsenic	(ug/l)	--	--	--	--	--
Chromium	(ug/l)	--	--	--	--	--
Copper	(ug/l)	--	--	--	--	--
Iron	(ug/l)	78900	2680	705	12200	31
Lead	(ug/l)	2U	2U	2U	2U	2U
Manganese	(ug/l)	4060	95	2700	1610	25.3
Nickel	(ug/l)	--	--	--	--	--
Silver	(ug/l)	--	--	--	--	--
Zinc	(ug/l)	--	--	--	--	--

Analyses by Columbia Analytical Services (Kelso, WA)
U = Non-detect, with MRL; -- Not analyzed

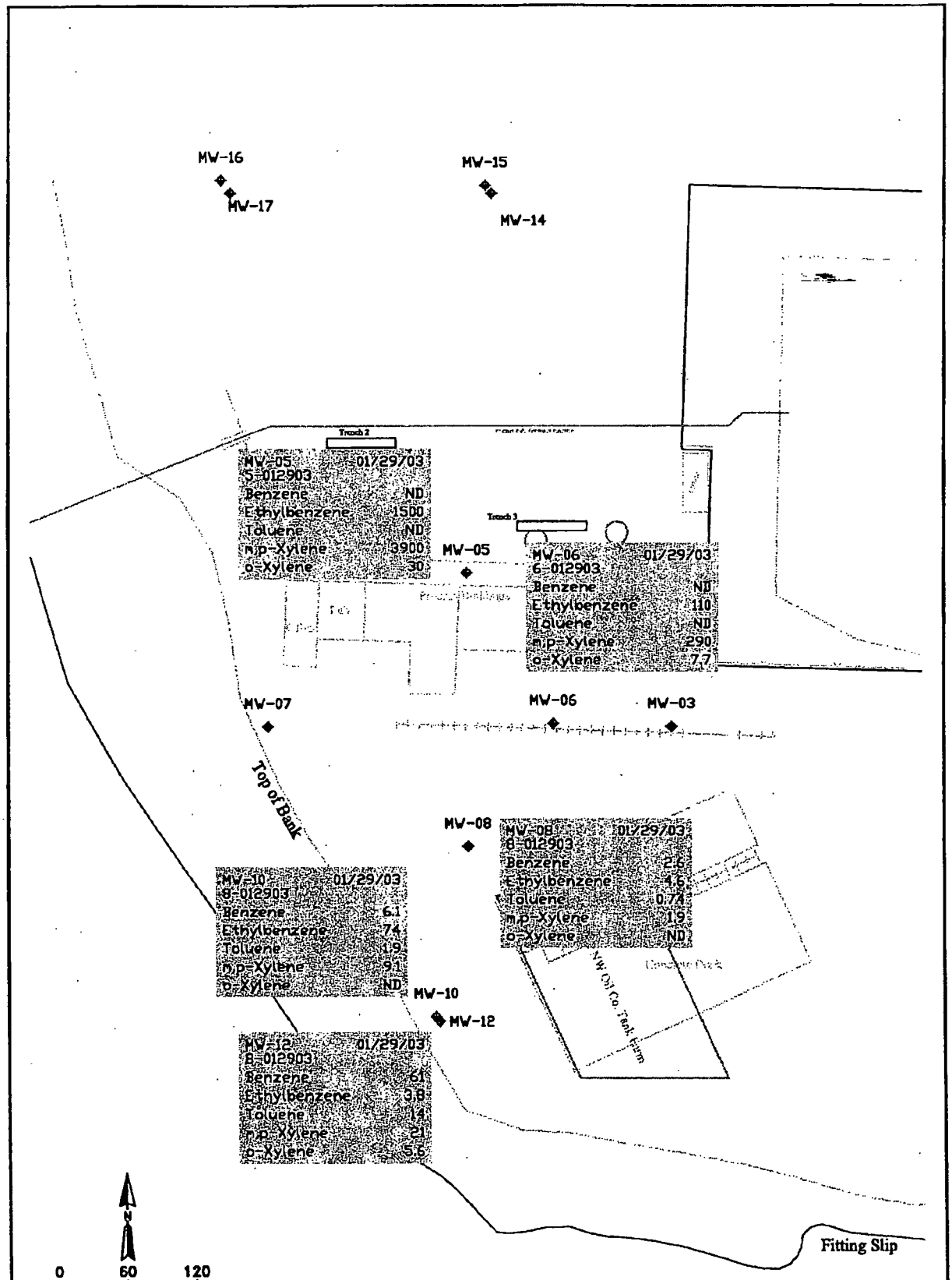


URS

TITLE:
Groundwater Elevations (ft-COP)
January 28, 2003
Schnitzer – PEO

DWN: dk	DES.:	PROJECT NO.: 25693679
CHKD:	APPD: dc	
DATE: 04/11/03	REV.: 0	FIGURE NO.: A-1

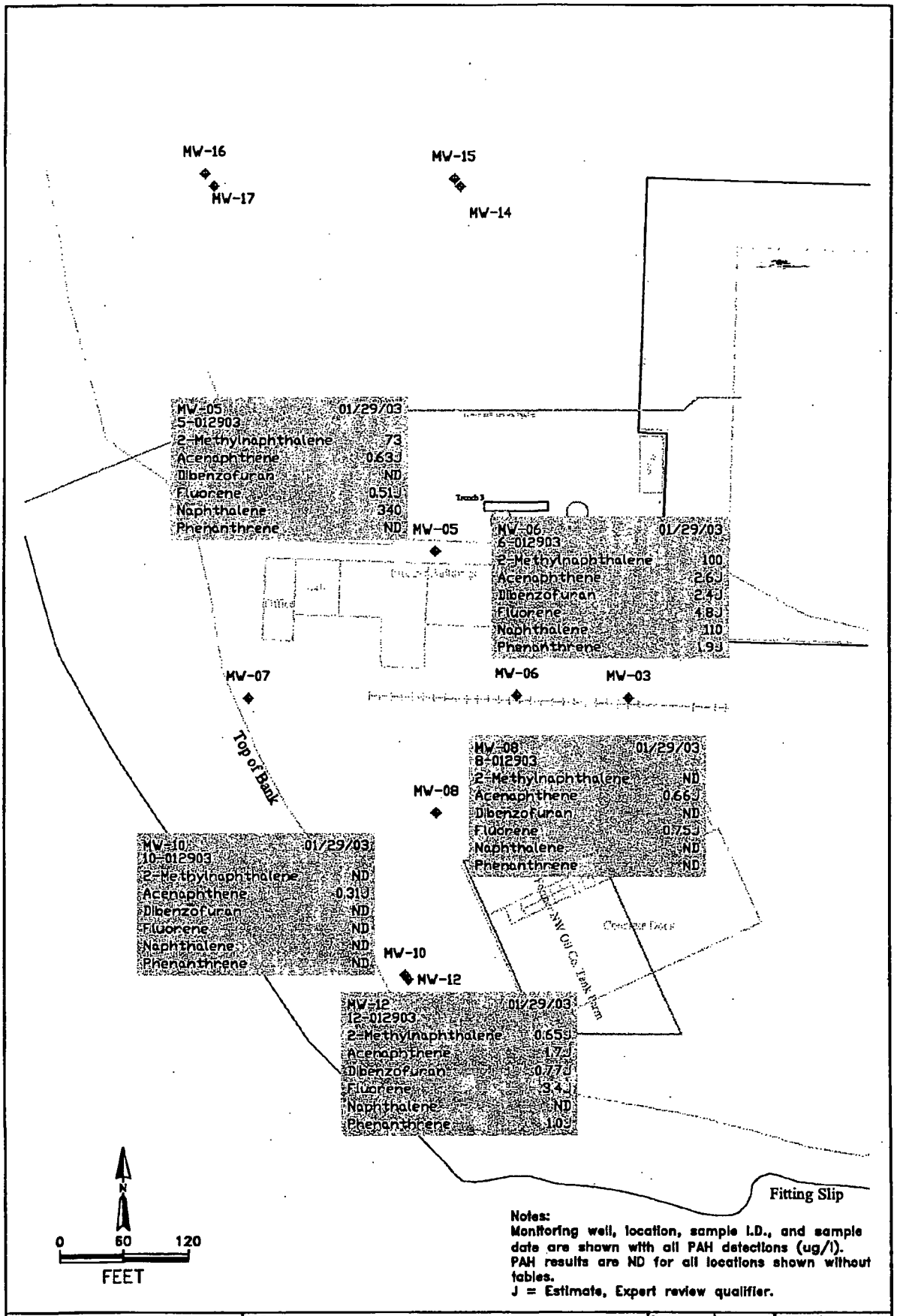
SCHN00260946



Note:
Monitoring well, location, sample I.D., and sample date are shown with all BTEX detections (ug/l). BTEX results are ND for all locations shown without tables.

URS	TITLE: BTEX Concentrations in Groundwater (ug/l) January 28–29, 2003 Schnitzer – PEO	DWN: dk	DES.:	PROJECT NO.: 25693679
		CHKD:	APPD: dc	FIGURE NO.: A–2
		DATE: 04/11/03	REV.: 0	

SCHN00260947

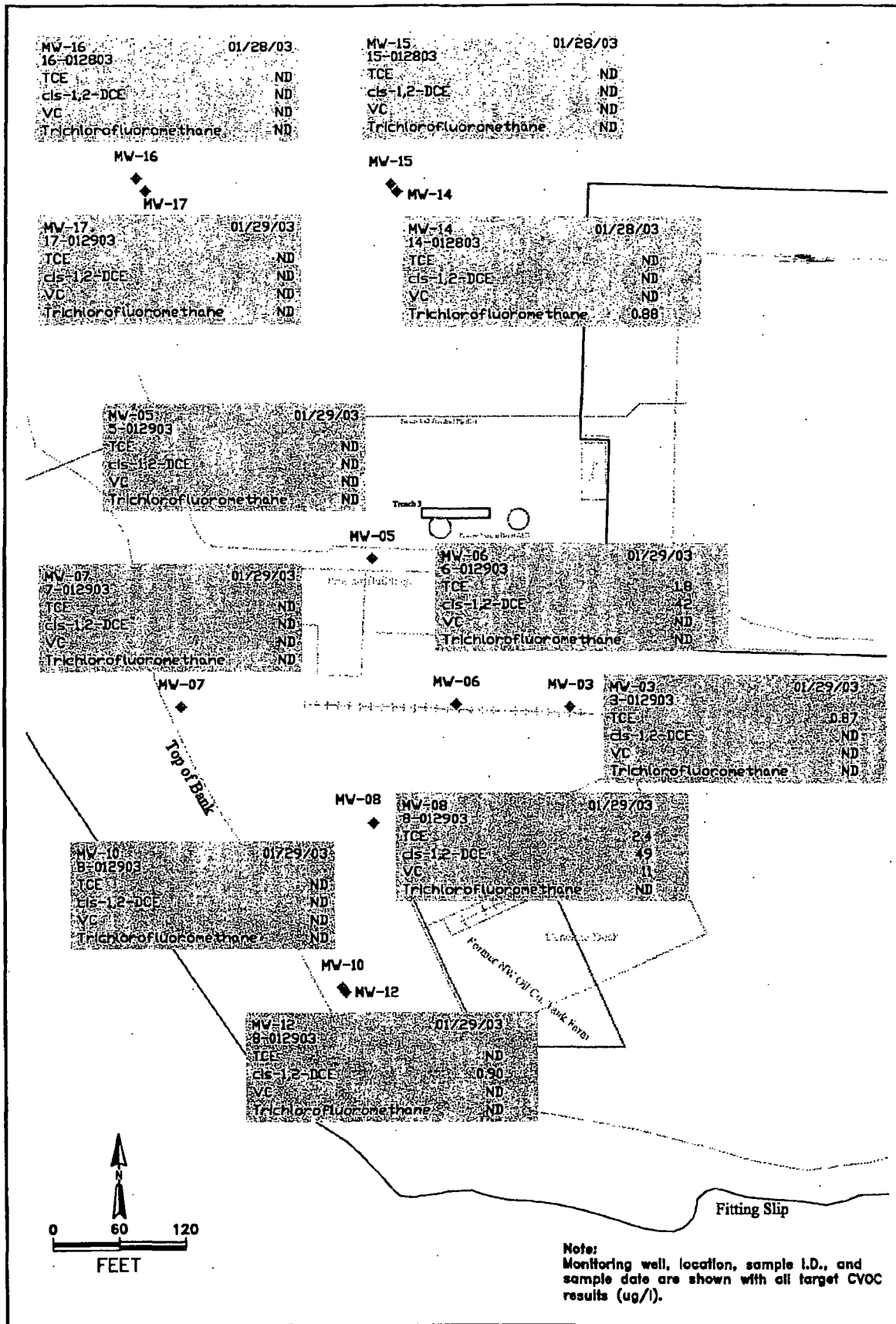


URS

PAH Concentrations In Groundwater (ug/l)
January 28-29, 2003
Schnitzer – PEO

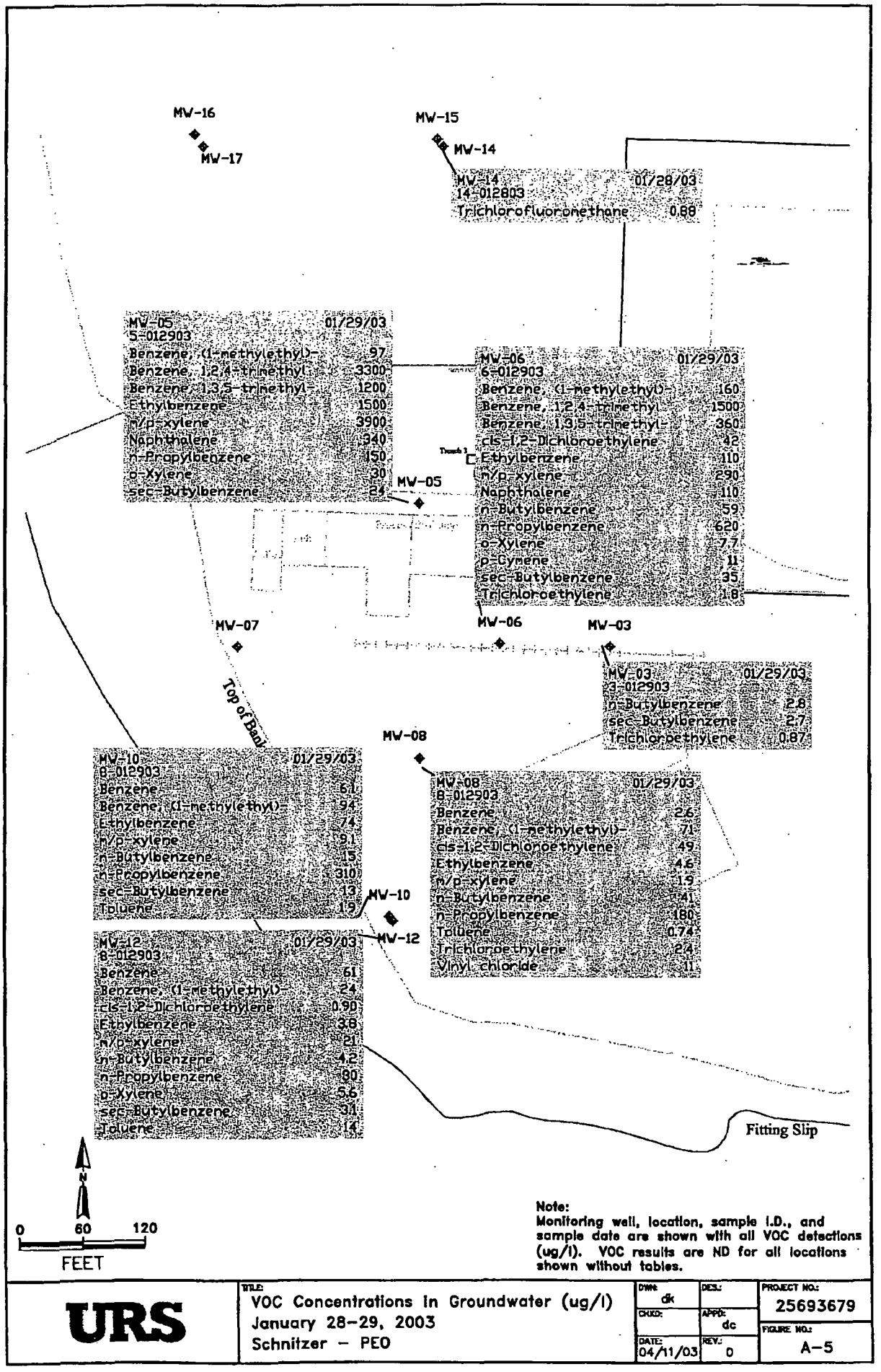
DWN: dk	DES.:	PROJECT NO.: 25693679
CHKD:	APPD: dc	FIGURE NO.: A-3
DATE: 04/11/03	REV.: 0	

SCHN00260948



URS

TITLE: CVOC Concentrations in Groundwater (ug/l) January 28-29, 2003 Schnitzer – PEO	DWN: dk	DES.:	PROJECT NO.: 25693679
	CHKD:	APPD: dc	FIGURE NO.: A-4
	DATE: 04/11/03	REV.: 0	



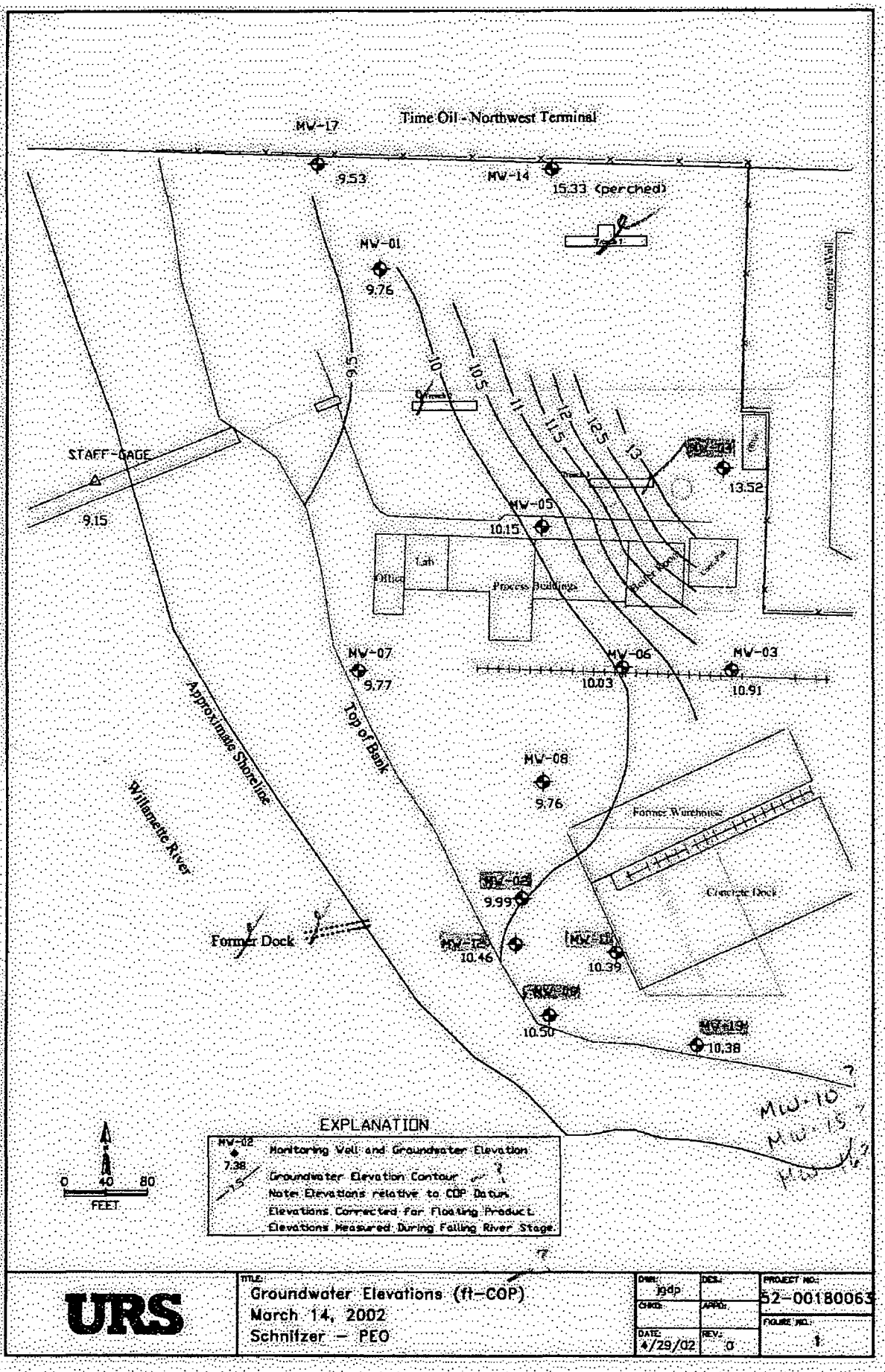
Note:
Monitoring well, location, sample I.D., and sample date are shown with all VOC detections (ug/l). VOC results are ND for all locations shown without tables.

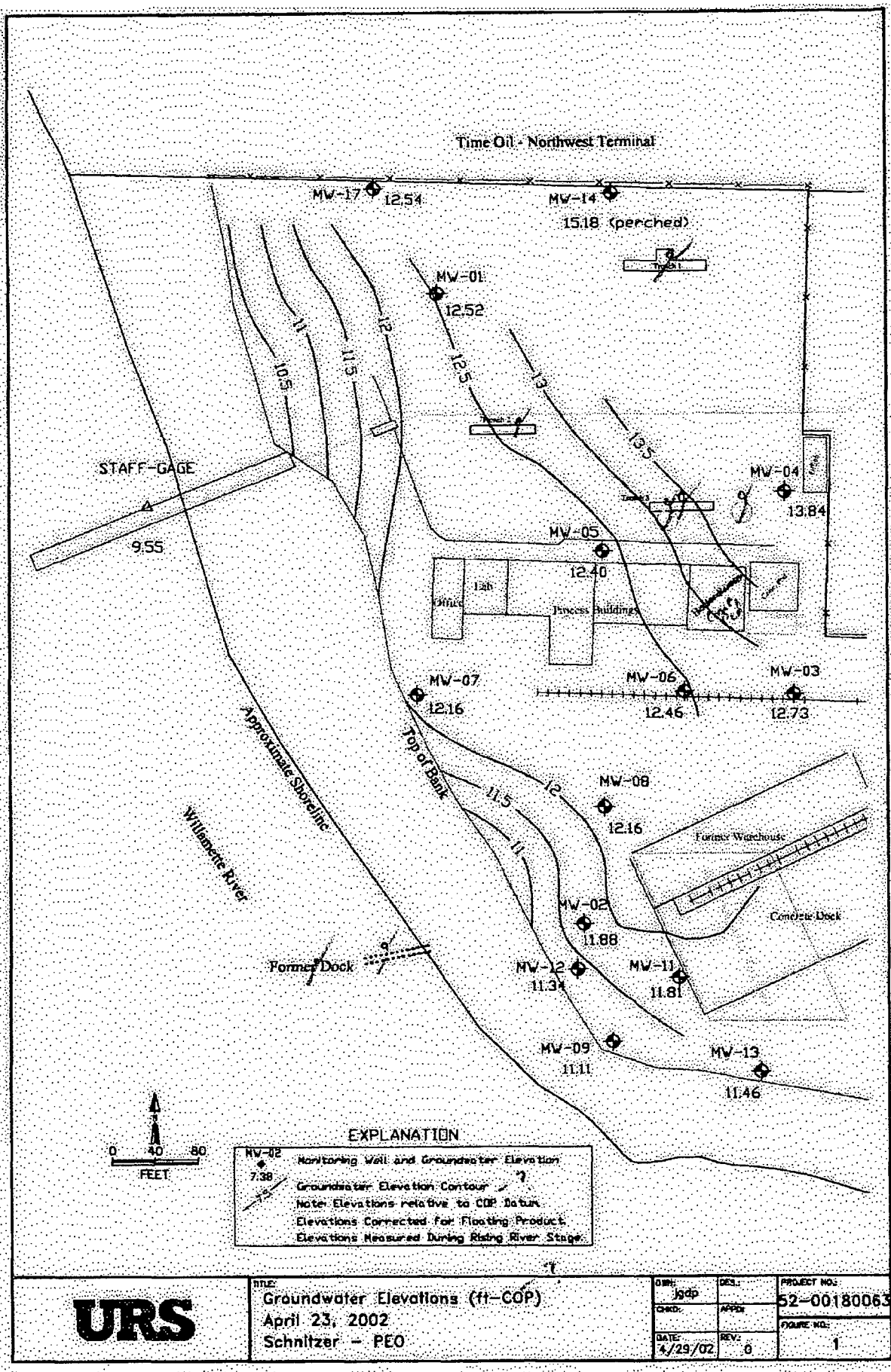
URS

VOC Concentrations In Groundwater (ug/l)
January 28-29, 2003
Schnitzer - PEO

DWN: dk	DES.:	PROJECT NO.: 25693679
CHKD:	APP'D: dc	FIGURE NO.: A-5
DATE: 04/11/03	REV.: 0	

SCHN00260950


Time Oil - Northwest Terminal
MW-17
9.53
MW-14
15.33 (perched)
MW-01
9.76
9.5
10
10.5
11
11.5
12
12.5
13
Concrete Wall
STAFF-GAGE
9.15
MW-04
13.52
MW-05
10.15
Lab
Office
Process Buildings
Boiler Room
Garage
MW-07
9.77
MW-06
10.03
MW-03
10.91
Approximate Shoreline
Top of Bank
Willamette River
MW-08
9.76
Former Warehouse
Concrete Dock
MW-02
9.99
Former Dock
MW-12
10.46
MW-11
10.39
MW-09
10.50
MW-10
10.38
MW-10 ?
MW-15 ?
EXPLANATION
MW-02
7.38
Monitoring Well and Groundwater Elevation
Groundwater Elevation Contour
Note: Elevations relative to COP Datum.
Elevations Corrected for Floating Product.
Elevations Measured During Falling River Stage.
0
40
80
FEET
URS
TITLE:
Groundwater Elevations (ft-COP)
March 14, 2002
Schnitzer - PEO
DWN: jgdp
DES:
CHKD:
APPD:
DATE: 4/29/02
REV: 0
PROJECT NO.: 52-00180063
FIGURE NO.: 1

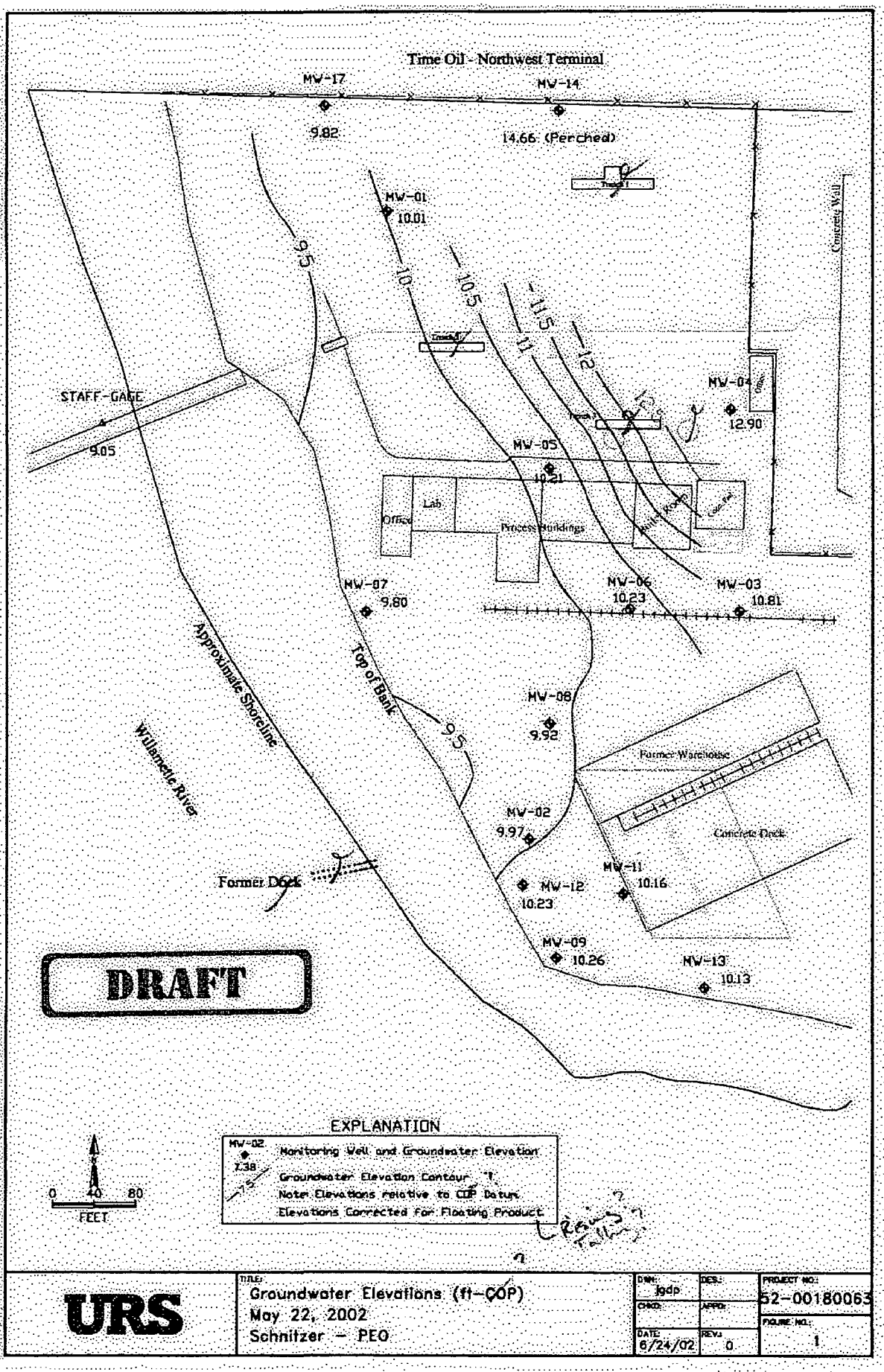


URS

TITLE:
Groundwater Elevations (ft-COP)
April 23, 2002
Schnitzer - PEO

DRN: jdp	DES.:	PROJECT NO.: 52-00180063	
CHKD.:	APPD.:		
DATE: 4/29/02	REV.: 0	FIGURE NO.: 1	

SCHN00260952



URS	TITLE: Groundwater Elevations (ft-COP) May 22, 2002 Schnitzer – PEO	DWN: jgdp	DES.:	PROJECT NO.: 52-00180063
		CHKD:	APPD:	FIGURE NO.: 1
		DATE: 6/24/02	REV.: 0	

SCHN00260953

Gradient
CORPORATION

July 11, 2003

Ms. Alicia Voss
Oregon Department of Environmental Quality
Northwest Region
2020 Southwest Fourth Avenue, 4th Floor
Portland, OR 97201

Subject: Schnitzer/Premier Edible Oils (PEO) Site – Quarterly Report

Dear Alicia:

On behalf of Schnitzer Investment Corp. (SIC), Gradient Corporation is submitting this eighth Quarterly Report for the Premier Edible Oils (PEO) Site, as required by Section II, H of the Voluntary Agreement for Upland Remedial Investigation/Feasibility Study and Source Control Measures between SIC and the Oregon Department of Environmental Quality (DEQ). This Quarterly Report summarizes activities conducted during the time period quarter; describes activities planned for the next quarter; and discusses problems encountered during the quarter, if any, and actions taken to resolve those problems.

Summary of Project Activities

Between April 1 and June 30, 2003, SIC and its consultants, Gradient Corporation and URS, completed the following work at the PEO site:

- Submitted preliminary unvalidated data from the fourth quarterly groundwater monitoring event.
- Conducted shoreline reconnaissance surveys on three occasions (May 21, June 27, and July 11, 2003). Memos documenting these surveys accompany this quarterly report.
- Conducted validation of data from four quarterly groundwater monitoring events and preliminary remedial investigation.
- Received from DEQ and began evaluating Time Oil's investigative data for the Bell Terminal site, focusing on implications of available data for potential impacts on PEO site from Time Oil site.
- Continued compilation of documentation of site activities.

Activities to be Conducted Next Quarter

The following activities are planned for the PEO site between July 1 and September 30, 2003:

- Complete validation of data from four quarterly groundwater monitoring events and preliminary remedial investigation.
- Continue to synthesize and evaluate site data, including tidal monitoring evaluations.

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- Continue evaluating Time Oil's investigative data for the Bell Terminal site, including assessing implications of available data for potential impacts on PEO site from Time Oil site.
- Arrange for meeting with DEQ to discuss site status and next steps.

Issues to be Resolved/Recommended Actions

None.

Please contact me if you have any questions regarding this report or any of the completed or proposed activities.

Sincerely,

Catherine Petito Boyce, S.M.
Principal Scientist

cc: J. Brown/James C. Brown & Associates
D. Coberly/URS
J. Jakubiak/SIC
T. Zelenka/SIC

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 5/21/03

Re: Premier Edible Oils Site – River Bank Reconnaissance, 5/21/03

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry do to dry weather conditions. The reconnaissance was conducted between 1:00 pm and 1:45 pm.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 6/27/03

Re: Premier Edible Oils Site – River Bank Reconnaissance, 6/27/03

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry do to dry weather conditions. The reconnaissance was conducted between 12:05 pm and 12:48 pm.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 7/11/03

Re: Premier Edible Oils Site – River Bank Reconnaissance, 7/11/03

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry do to dry weather conditions. The reconnaissance was conducted between 11:30 am and 12:03 pm.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

Jim J Fla

SCHNITZER INVESTMENT CORP.

2501 S.E. Columbia Way Vancouver, Washington 98661
Voice (360) 693-3644, (503) 224-9900 FAX (360) 693-1833

April 15, 2002

Ms. Alicia Voss
Oregon Department of Environmental Quality
Northwest Region
2020 Southwest Fourth Avenue, 4th Floor
Portland, OR 97201

Dear Alicia:

This letter provides the third Quarterly Report for the Premier Edible Oils (PEO) Site, as required by Section II, H of Schnitzer Investment Corp.'s (SIC's) Voluntary Agreement for Upland Remedial Investigation/Feasibility Study and Source Control Measures. The Quarterly Report summarizes activities conducted during the time period quarter; describes the next quarter; provides sampling, test results and other data generated during the quarter, if not previously submitted; discusses problems encountered during the quarter and actions taken to resolve those problems.

Summary of Project Activities

Between January 1, 2002 and March 31, 2002, Schnitzer Investment Corp. (SIC) and their consultants, Bridgewater Group and URS, completed the following work at the PEO site:

- Measured water levels from site wells on three occasions (February 4, February 28, and March 14).
- Submitted a letter report containing, Preliminary Results – Geoprobe Investigation, Time Oil – Bell Terminal facility, western area (February 11, 2002), by Bridgewater Group, inc., dated February 11, 2002.
- Installed new staff gauge at dock on February 11. Gauge was later surveyed by Wolf Surveying.
- Collected and analyzed groundwater samples from 14 site monitoring wells (MW-2, MW-3, MW-5, MW-6, MW-7, MW-8, MW-9, MW-10, and MW-12 through MW-17) on March 14 and 15.
- Conducted a shoreline reconnaissance survey March 14.
- Mr. Bill Cobb, Bridgewater Group's Project Manager, has moved to the east coast during the past quarter and SIC has retained Gradient Corporation to take over Bridgwater Groups role at the PEO Site. The Project Manager for Gradient is Catherine Petito Boyce.

Activities to be Conducted Next Quarter

The following activities are planned for the PEO site between March 30 and June 30, 2002:

- Conduct a quarterly groundwater-sampling event during June 2002.
- Submit a memorandum regarding the results of the third quarterly groundwater-sampling event.
- Submit a memorandum regarding results of March shoreline reconnaissance survey.
- Evaluate quarterly groundwater data and propose well locations and analytes, if needed, for subsequent fourth quarterly groundwater sampling event.
- Continue to collect and evaluate water level and tidal monitoring data.
- Receive and evaluate Time Oil's investigative report for the Bell Terminal site.

Issues to be Resolved/Recommended Actions

None.

If you have any questions regarding completed or proposed activities, please call.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Gradient
CORPORATION

July 11, 2002

Ms. Alicia Voss
Oregon Department of Environmental Quality
Northwest Region
2020 Southwest Fourth Avenue, 4th Floor
Portland, OR 97201

Subject: Schnitzer/Premier Edible Oils (PEO) Site – Quarterly Report

Dear Alicia:

On behalf of Schnitzer Investment Corporation (SIC), Gradient Corporation is submitting this fourth Quarterly Report for the Premier Edible Oils (PEO) Site, as required by Section II, H of the Voluntary Agreement for Upland Remedial Investigation/Feasibility Study and Source Control Measures between SIC and the Oregon Department of Environmental Quality (DEQ). This Quarterly Report summarizes activities conducted during the time period quarter; describes activities planned for the next quarter; and discusses problems encountered during the quarter and actions taken to resolve those problems.

Summary of Project Activities

Between April 1 and June 30, 2002, SIC and its consultants, Gradient Corporation, Bridgewater Group, Inc., and URS, completed the following work at the PEO site:

- Submitted a letter report entitled *Results – Geoprobe Investigation, Time Oil – Bell Terminal facility, western area*, prepared by Bridgewater Group, Inc., dated April 18, 2002. The April 18 report also contained the analytical data from the second quarterly groundwater monitoring event conducted on October 9 and 10, 2001.
- Measured water levels from site wells on three occasions (April 23, May 22, and June 21, 2002)
- Compiled analytical results from the third quarterly groundwater monitoring event conducted on March 14 and 15, 2002. During this monitoring effort, groundwater samples were collected and analyzed from 14 monitoring wells (MW-2, MW-3, MW-5 through MW-10, and MW-12 through MW-17). The data from the third quarterly groundwater monitoring event will be submitted to DEQ in August.
- Conducted shoreline reconnaissance surveys on three occasions (April 18, May 17, and June 20, 2002). Memos documenting the surveys will be submitted to DEQ in August.

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Activities to be Conducted Next Quarter

The following activities are planned for the PEO site between July 1 and September 30, 2002:

- Submit the data from the third quarterly groundwater monitoring event.
- Conduct the fourth quarterly groundwater monitoring event. DEQ will be notified prior to the sampling event.
- Continue to collect and evaluate water level and tidal monitoring data.
- Complete and submit report summarizing results of tidal monitoring evaluations.
- Review and provide comments on ODEQ's Environmental Cleanup Site Information Site Summary Report.
- Receive and evaluate Time Oil's investigative data for the Bell Terminal site.

Issues to be Resolved/Recommended Actions

None.

Please contact me if you have any questions regarding this report or any of the completed or proposed activities.

Sincerely,

Catherine Petito Boyce, S.M.
Principal Scientist

cc: J. Brown/James C. Brown & Associates
D. Coberly/URS
J. Jakubiak/SIC
T. Zelenka/SIC

SCHN00260962

Gradient
CORPORATION

April 26, 2004

Ms. Alicia Voss
Oregon Department of Environmental Quality
Northwest Region
2020 Southwest Fourth Avenue, 4th Floor
Portland, OR 97201

Subject: Schnitzer/Premier Edible Oils (PEO) Site – Quarterly Report

Dear Alicia:

On behalf of Schnitzer Investment Corp. (SIC), Gradient Corporation is submitting this Quarterly Report for the Premier Edible Oils (PEO) Site, as required by Section II, H of the Voluntary Agreement for Upland Remedial Investigation/Feasibility Study and Source Control Measures between SIC and the Oregon Department of Environmental Quality (DEQ). This Quarterly Report summarizes activities conducted during the time period quarter; describes activities planned for the next quarter; and discusses problems encountered during the quarter, if any, and actions taken to resolve those problems.

Summary of Project Activities

Between January 1 and March 31, 2003, SIC and its consultants, Gradient Corporation and URS, completed the following work at the PEO site:

- Continued communications with DEQ regarding next steps for evaluating PEO property and inter-relationships between PEO site evaluations and investigations conducted by Time Oil on the adjacent Bell Terminal property.
- Prepared technical memorandum briefly describing additional investigations proposed for the PEO site, focusing on information required to enhance characterization of the southern portion of the PEO site. Memorandum submitted to DEQ on March 4, 2004.
- Received additional information from DEQ regarding 1990 removal of underground storage tank from Time Oil's Bell Terminal facility.
- Continued validating and analyzing site data.

Activities to be Conducted Next Quarter

The following activities are planned for the PEO site between April 1 and June 30, 2004:

- Update documentation of recommendations for additional sampling on the Bell Terminal site following receipt of Time Oil data from September sampling event and November quarterly groundwater monitoring event.
- Following receipt of additional Time Oil data, continue evaluating Time Oil's investigative data for the Bell Terminal site (and updating previous evaluations in

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SCHN00260971

light of ongoing data collection), including assessing implications of available data for potential impacts on PEO site from Time Oil site.

- Continue communications with DEQ regarding proposed additional investigations for PEO site and ongoing Time Oil activities on Bell Terminal site. Obtain additional information from DEQ regarding Time Oil investigations and site features, including information regarding chemical analyses conducted during Time Oil's preliminary evaluation of the Bell Terminal facility and available information regarding construction and maintenance of the Bell Terminal facility.
- Complete validation of data from four quarterly groundwater monitoring events, preliminary remedial investigation, and focused site characterization.
- Continue to synthesize and evaluate site data, including tidal monitoring evaluations.

Issues to be Resolved/Recommended Actions

None.

We appreciate the slight extension for our submittal of this quarterly report. Please contact me if you have any questions regarding this report or any of the completed or proposed activities.

Sincerely,

Catherine Petito Boyce, S.M.
Principal Scientist

cc: J. Brown/James C. Brown & Associates
D. Coberly/URS
J. Jakubiak/SIC
T. Zelenka/SIC

SCHN00260972

Gradient
CORPORATION

April 26, 2004

Ms. Alicia Voss
Oregon Department of Environmental Quality
Northwest Region
2020 Southwest Fourth Avenue, 4th Floor
Portland, OR 97201

Subject: Schnitzer/Premier Edible Oils (PEO) Site – Quarterly Report

Dear Alicia:

On behalf of Schnitzer Investment Corp. (SIC), Gradient Corporation is submitting this Quarterly Report for the Premier Edible Oils (PEO) Site, as required by Section II, H of the Voluntary Agreement for Upland Remedial Investigation/Feasibility Study and Source Control Measures between SIC and the Oregon Department of Environmental Quality (DEQ). This Quarterly Report summarizes activities conducted during the time period quarter; describes activities planned for the next quarter; and discusses problems encountered during the quarter, if any, and actions taken to resolve those problems.

Summary of Project Activities

Between January 1 and March 31, 2003, SIC and its consultants, Gradient Corporation and URS, completed the following work at the PEO site:

- Continued communications with DEQ regarding next steps for evaluating PEO property and inter-relationships between PEO site evaluations and investigations conducted by Time Oil on the adjacent Bell Terminal property.
- Prepared technical memorandum briefly describing additional investigations proposed for the PEO site, focusing on information required to enhance characterization of the southern portion of the PEO site. Memorandum submitted to DEQ on March 4, 2004.
- Received additional information from DEQ regarding 1990 removal of underground storage tank from Time Oil's Bell Terminal facility.
- Continued validating and analyzing site data.

Activities to be Conducted Next Quarter

The following activities are planned for the PEO site between April 1 and June 30, 2004:

- Update documentation of recommendations for additional sampling on the Bell Terminal site following receipt of Time Oil data from September sampling event and November quarterly groundwater monitoring event.
- Following receipt of additional Time Oil data, continue evaluating Time Oil's investigative data for the Bell Terminal site (and updating previous evaluations in

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light of ongoing data collection), including assessing implications of available data for potential impacts on PEO site from Time Oil site.

- Continue communications with DEQ regarding proposed additional investigations for PEO site and ongoing Time Oil activities on Bell Terminal site. Obtain additional information from DEQ regarding Time Oil investigations and site features, including information regarding chemical analyses conducted during Time Oil's preliminary evaluation of the Bell Terminal facility and available information regarding construction and maintenance of the Bell Terminal facility.
- Complete validation of data from four quarterly groundwater monitoring events, preliminary remedial investigation, and focused site characterization.
- Continue to synthesize and evaluate site data, including tidal monitoring evaluations.

Issues to be Resolved/Recommended Actions

None.

We appreciate the slight extension for our submittal of this quarterly report. Please contact me if you have any questions regarding this report or any of the completed or proposed activities.

Sincerely,

Cathy Petito Boyce

Catherine Petito Boyce, S.M.
Principal Scientist

cc: J. Brown/James C. Brown & Associates
D. Coberly/URS
J. Jakubiak/SIC
T. Zelenka/SIC

SCHN00260974

Gradient
CORPORATION

January 12, 2004

Ms. Alicia Voss
Oregon Department of Environmental Quality
Northwest Region
2020 Southwest Fourth Avenue, 4th Floor
Portland, OR 97201

Subject: Schnitzer/Premier Edible Oils (PEO) Site – Quarterly Report

Dear Alicia:

On behalf of Schnitzer Investment Corp. (SIC), Gradient Corporation is submitting this Quarterly Report for the Premier Edible Oils (PEO) Site, as required by Section II, H of the Voluntary Agreement for Upland Remedial Investigation/Feasibility Study and Source Control Measures between SIC and the Oregon Department of Environmental Quality (DEQ). This Quarterly Report summarizes activities conducted during the time period quarter; describes activities planned for the next quarter; and discusses problems encountered during the quarter, if any, and actions taken to resolve those problems.

Summary of Project Activities

Between October 1 and December 31, 2003, SIC and its consultants, Gradient Corporation and URS, completed the following work at the PEO site:

- Met with DEQ on December 11, 2003 to discuss status of PEO site investigations, next steps for evaluating PEO property, and inter-relationships between PEO site evaluations and investigations conducted by Time Oil on the adjacent Bell Terminal property.
- Conducted shoreline reconnaissance surveys on three occasions (October 14, November 13, and December 1). Memos documenting these surveys accompany this quarterly report. As agreed with DEQ in our December 11 meeting, these surveys will no longer be conducted on a monthly basis. Conducted from September 2001 through December 2003, these monthly surveys have provided sufficient information regarding the absence of visible seeps or sheens on the PEO site shoreline under a broad spectrum of conditions.
- Continued conducting validation of data from four quarterly groundwater monitoring events and preliminary remedial investigation. Conducted validation of data from focused site characterization.
- Continued evaluating Time Oil's investigative data for the Bell Terminal site (including additional updates received from DEQ), focusing on implications of available data for potential impacts on PEO site from Time Oil site. Continued preparing supporting documentation for recommendations regarding additional investigations on the Bell Terminal facility that we submitted to DEQ on September 17.
- Continued compilation of documentation of site activities.

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Activities to be Conducted Next Quarter

The following activities are planned for the PEO site between January 1 and March 31, 2004:

- Prepare technical memorandum briefly describing additional investigations proposed for the PEO site, focusing on information required to enhance characterization of the southern portion of the PEO site.
- Update documentation of recommendations for additional sampling on the Bell Terminal site following receipt of Time Oil data from September sampling event and November quarterly groundwater monitoring event.
- Continue evaluating Time Oil's investigative data for the Bell Terminal site (and updating previous evaluations in light of ongoing data collection), including assessing implications of available data for potential impacts on PEO site from Time Oil site.
- Continue communications with DEQ regarding proposed additional investigations for PEO site and ongoing Time Oil activities on Bell Terminal site. Obtain additional information from DEQ regarding Time Oil investigations and site features.
- Complete validation of data from four quarterly groundwater monitoring events, preliminary remedial investigation, and focused site characterization.
- Continue to synthesize and evaluate site data, including tidal monitoring evaluations.

Issues to be Resolved/Recommended Actions

None.

Please contact me if you have any questions regarding this report or any of the completed or proposed activities.

Sincerely,

Catherine Petito Boyce, S.M.
Principal Scientist

cc: J. Brown/James C. Brown & Associates
D. Coberly/URS
J. Jakubiak/SIC
T. Zelenka/SIC

SCHN00260977

Documentation of Shoreline Reconnaissance Surveys
October – December 2003

Premier Edible Oils Site

SCHN00260978

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 10/14/03

Re: Premier Edible Oils Site – River Bank Reconnaissance, 10/14/03

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry do to dry weather conditions. The reconnaissance was conducted between 4:00 pm and 4:33 pm.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 11/13/03

Re: Premier Edible Oils Site – River Bank Reconnaissance, 11/13/03

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry do to dry weather conditions. The reconnaissance was conducted between 8:00 am and 8:43 am.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 12/2/03

Re: Premier Edible Oils Site – River Bank Reconnaissance, 12/1/03

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry do to dry weather conditions. The reconnaissance was conducted between 2:55 pm and 3:45 pm.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

Gradient
CORPORATION

October 15, 2003

Ms. Alicia Voss
Oregon Department of Environmental Quality
Northwest Region
2020 Southwest Fourth Avenue, 4th Floor
Portland, OR 97201

Subject: Schnitzer/Premier Edible Oils (PEO) Site – Quarterly Report

Dear Alicia:

On behalf of Schnitzer Investment Corp. (SIC), Gradient Corporation is submitting this ninth Quarterly Report for the Premier Edible Oils (PEO) Site, as required by Section II, H of the Voluntary Agreement for Upland Remedial Investigation/Feasibility Study and Source Control Measures between SIC and the Oregon Department of Environmental Quality (DEQ). This Quarterly Report summarizes activities conducted during the time period quarter; describes activities planned for the next quarter; and discusses problems encountered during the quarter, if any, and actions taken to resolve those problems.

Summary of Project Activities

Between July 1 and September 30, 2003, SIC and its consultants, Gradient Corporation and URS, completed the following work at the PEO site:

- Conducted shoreline reconnaissance surveys on three occasions (August 15, September 24, and October 14, 2003). Memos documenting these surveys accompany this quarterly report.
- On September 17, 2003, submitted preliminary recommendations to DEQ regarding sampling being conducted by Time Oil at its Bell Terminal site.
- Continued validation of data from four quarterly groundwater monitoring events and preliminary remedial investigation.
- Received additional information from DEQ and continued evaluating Time Oil's investigative data for the Bell Terminal site, focusing on implications of available data for potential impacts on the PEO site from the Time Oil site.
- Communicated with DEQ regarding status of Time Oil investigations, obtaining additional documentation of Time Oil investigations, and scheduling of status report meeting.
- Continued compilation of documentation of site activities.

IQ_101503_202017

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Activities to be Conducted Next Quarter

The following activities are planned for the PEO site between October 1 and December 31, 2003:

- Complete validation of data from four quarterly groundwater monitoring events and preliminary remedial investigation.
- Continue to synthesize and evaluate site data.
- Continue evaluating Time Oil's investigative data for the Bell Terminal site, including assessing implications of available data for potential impacts on PEO site from Time Oil site.
- Arrange for meeting with DEQ to discuss site status, investigations on Bell Terminal site, and next steps.

Issues to be Resolved/Recommended Actions

None.

Please contact me if you have any questions regarding this report or any of the completed or proposed activities.

Sincerely,

Cathy Petito Boyce

Catherine Petito Boyce, S.M.
Principal Scientist

cc: J. Brown/James C. Brown & Associates
D. Coberly/URS
J. Jakubiak/SIC
T. Zelenka/SIC

Documentation of Shoreline Reconnaissance Surveys
August – October 2003

Premier Edible Oils Site

IQ_101503_202017

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SCHN00260985

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 8/15/03

Re: Premier Edible Oils Site – River Bank Reconnaissance, 8/15/03

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry due to dry weather conditions. The reconnaissance was conducted between 12:30 pm and 1:16 pm.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 9/24/03

Re: Premier Edible Oils Site – River Bank Reconnaissance, 9/24/03

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry due to dry weather conditions. The reconnaissance was conducted between 9:22 am and 10:30 am.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 10/14/03

Re: Premier Edible Oils Site – River Bank Reconnaissance, 10/14/03

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry due to dry weather conditions. The reconnaissance was conducted between 4:00 pm and 4:33 pm.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

Gradient
CORPORATION

July 11, 2003

Ms. Alicia Voss
Oregon Department of Environmental Quality
Northwest Region
2020 Southwest Fourth Avenue, 4th Floor
Portland, OR 97201

Subject: Schnitzer/Premier Edible Oils (PEO) Site – Quarterly Report

Dear Alicia:

On behalf of Schnitzer Investment Corp. (SIC), Gradient Corporation is submitting this eighth Quarterly Report for the Premier Edible Oils (PEO) Site, as required by Section II, H of the Voluntary Agreement for Upland Remedial Investigation/Feasibility Study and Source Control Measures between SIC and the Oregon Department of Environmental Quality (DEQ). This Quarterly Report summarizes activities conducted during the time period quarter; describes activities planned for the next quarter; and discusses problems encountered during the quarter, if any, and actions taken to resolve those problems.

Summary of Project Activities

Between April 1 and June 30, 2003, SIC and its consultants, Gradient Corporation and URS, completed the following work at the PEO site:

- Submitted preliminary unvalidated data from the fourth quarterly groundwater monitoring event.
- Conducted shoreline reconnaissance surveys on three occasions (May 21, June 27, and July 11, 2003). Memos documenting these surveys accompany this quarterly report.
- Conducted validation of data from four quarterly groundwater monitoring events and preliminary remedial investigation.
- Received from DEQ and began evaluating Time Oil's investigative data for the Bell Terminal site, focusing on implications of available data for potential impacts on PEO site from Time Oil site.
- Continued compilation of documentation of site activities.

Activities to be Conducted Next Quarter

The following activities are planned for the PEO site between July 1 and September 30, 2003:

- Complete validation of data from four quarterly groundwater monitoring events and preliminary remedial investigation.
- Continue to synthesize and evaluate site data, including tidal monitoring evaluations.

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- Continue evaluating Time Oil's investigative data for the Bell Terminal site, including assessing implications of available data for potential impacts on PEO site from Time Oil site.
- Arrange for meeting with DEQ to discuss site status and next steps.

Issues to be Resolved/Recommended Actions

None.

Please contact me if you have any questions regarding this report or any of the completed or proposed activities.

Sincerely,

Catherine Petito Boyce, S.M.
Principal Scientist

cc: J. Brown/James C. Brown & Associates
D. Coberly/URS
J. Jakubiak/SIC
T. Zelenka/SIC

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 5/21/03

Re: Premier Edible Oils Site – River Bank Reconnaissance, 5/21/03

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry do to dry weather conditions. The reconnaissance was conducted between 1:00 pm and 1:45 pm.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 6/27/03

Re: Premier Edible Oils Site – River Bank Reconnaissance, 6/27/03

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry do to dry weather conditions. The reconnaissance was conducted between 12:05 pm and 12:48 pm.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 7/11/03

Re: Premier Edible Oils Site – River Bank Reconnaissance, 7/11/03

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry do to dry weather conditions. The reconnaissance was conducted between 11:30 am and 12:03 pm.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

Gradient
CORPORATION

October 14, 2002

Ms. Alicia Voss
Oregon Department of Environmental Quality
Northwest Region
2020 Southwest Fourth Avenue, 4th Floor
Portland, OR 97201

Re: Schnitzer/Premier Edible Oils (PEO) Site – Quarterly Report

Dear Ms. Voss:

On behalf of Schnitzer Investment Corp. (SIC), Gradient Corporation is submitting this fifth Quarterly Report for the Premier Edible Oils (PEO) Site, as required by Section II, H of the Voluntary Agreement for Upland Remedial Investigation/Feasibility Study and Source Control Measures between SIC and the Oregon Department of Environmental Quality (DEQ). This Quarterly Report summarizes activities conducted during the time period quarter; describes activities planned for the next quarter; and discusses problems encountered during the quarter and actions taken to resolve those problems.

Summary of Project Activities

Between July 1 and September 30, 2002, SIC and its consultants, Gradient Corporation, and URS, completed the following work at the PEO site:

- Met with DEQ on July 10, 2002 to discuss the status of activities on the PEO site and the neighboring Time Oil Northwest Terminals site.
- Measured water levels from site wells on two occasions (July 26 and August 29, 2002).
- Conducted shoreline reconnaissance surveys on three occasions (July 5, August 15, and September 15, 2002).
- Continued compilation of documentation of site activities.

Activities to be Conducted Next Quarter

The following activities are planned for the PEO site between October 1 and December 31, 2002:

- Review and provide comments on ODEQ's Environmental Cleanup Site Information Site Summary Report. This review accompanies this quarterly report.
- Submit the data from the third quarterly groundwater monitoring event. These data accompany this quarterly report.
- Submit documentation of the shoreline reconnaissance surveys. Memos documenting monthly surveys conducted between March and September 2002 accompany this quarterly report.

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- Conduct the fourth quarterly groundwater monitoring event. DEQ will be notified prior to the sampling event.
- Continue to collect and evaluate water level data.
- Complete and submit report summarizing results of tidal monitoring evaluations.
- Receive from DEQ and evaluate Time Oil's investigative data for the Bell Terminal site. Review implications of available data for potential impacts on PEO site from Time Oil site.

Issues to be Resolved/Recommended Actions

None.

Please contact me if you have any questions regarding this report or any of the completed or proposed activities.

Sincerely,

Catherine Petito Boyce, S.M.
Principal Scientist

cc: J. Brown/James C. Brown & Associates
D. Coberly/URS
J. Jakubiak/SIC
T. Zelenka/SIC

SCHN00261004

Proposed Amendments to
ODEQ's Environmental Cleanup Site Information (ECSI)
Site Summary Report

Premier Edible Oils Site (Site ID: 2013)

Submitted by Schnitzer Investment Corp.
October 14, 2002

Environmental Cleanup Site Information Database
Site Summary Report - Details for Site ID 2013

This report shows data entered as of September 16, 2002 at 9:25:37 AM

See the bottom of this page for a key to certain acronyms and terms used in the report below

Site Information			
Site ID: 2013	Site Name: Premier Edible Oils		CERCLIS No:
	Address: 10400 N Burgard ~~WAY~~ Way Portland 97203		
	County: Multnomah		Region: Northwest
	Investigation Status: Listed on CRL or Inventory	NPL Site: N	Orphan Site: N / Study Area: N
Property:	Twnshp/Range/Sect: 2N, 1W, 35		Tax Lots: 57
	Latitude: 45 deg. 36 ' 51"	Longitude: -122 deg. 46 ' 58"	Site Size: 18.5 acres
Other Site Names:			
	Schnitzer Investment Corp.		
	Portland Harbor Sediment Study		
	C & T Quincy Foods (SEE ECSI 2355)		
Operations:			
	Name: C & T Quincy Foods of Portland		
	Comments: .		
	Years of Operation: ~~November 1996 - 1999~~January 1997-May 1998		
	SIC Code: 2079		Operating Status: Inactive
	Name: Premier Edible Oils Corporation		
	Comments: Also known as PALMCO, a subsidiary of Mitsubishi Corporation.		
	Years of Operation: ~~August 1994 - February 1997~~1973-January 1997		
	SIC Code: 2079		Operating Status: Inactive
	Name: American Metallic Chemicals		
	Comments: .		
	Years of Operation: 1950s		
	SIC Code:		Operating Status: Inactive
	Name: Oregon Shipbuilding		
	Comments:		
	Years of Operation: December 1943-1945		
	SIC Code:		Operating Status: Inactive
	Name: Northwest Oil Company		

SCHN00261006

Comments:

Years of Operation: February 1941-December 1943

SIC Code:

Operating Status: Inactive

Contamination Information	
Hazardous Substances/Waste Types:	Petroleum hydrocarbons, BTEX, PAHs, and VOCs, including chlorinated solvents, on site. In adjacent river sediments: mercury, cobalt, antimony, barium, PAHs, copper, zinc, manganese, arsenic, carbazole, dibenzofuran, methylnaphthalene, and bis(2-ethylhexyl)phthalate.

Manner and Time of Release:

Contamination Information:	Property owner submitted an 11/96 Phase II ESA to DEQ in February 1997, which documented groundwater contamination at this site. Primary contaminants included petroleum hydrocarbons, particularly BTEX and other petroleum-based VOCs. Several well points also contained low levels of chlorinated solvents. The property owner and operator concluded that the contamination originated from the adjacent Time Oil site (ECSI #170). (6/17/99 JMW/SAP) Weston sampling results from the Portland Harbor Sediment Study revealed mercury, cobalt, antimony, barium, PAHs, zinc, copper, manganese, arsenic, carbazole, dibenzofuran, methylnaphthalene, and bis(2-ethylhexyl)phthalate in river sediments adjacent to the site. DEQ has not determined the source(s) of these contaminants. (7/4/02 ACV/VCP) Results of investigation activities conducted through 2001 indicate groundwater impacts in several different locations on the site. Free-phase petroleum is present on groundwater at the southwest corner of the site and appears to be from historic site operations. Low level chlorinated solvents, PAHs, and VOCs usually associated with gasoline were detected with the free-phase petroleum. This contaminated groundwater plume appears to be distinct from impacted groundwater toward the northeast part of the property. Activities on adjacent Time Oil property appear to have contributed to groundwater contamination in northeast part of property. Further groundwater investigation is planned in 2002 to more fully characterize groundwater conditions.

Pathways:

Environmental/Health Threats:	

Status of Investigative or Remedial Action: (6/17/99 JMW/SAP) Based on initial sampling results from a river sediment quality study, the C & T Quincy Foods/Premier Edible Oils (PEO) site has been identified as a potential source of contamination to the Portland Harbor. DEQ sent a Site Assessment review notice to C & T Quincy Foods 3/2/99, but has received no response. A site screening is scheduled (level II priority). (2/1/00 JMW/SAP) PEO information combined with the Schnitzer Investment Corporation (SIC) Strategy Recommendation - SEE ECSI #2355. (9/1/00 ACV/VCP) DEQ is reviewing site investigation information conducted by Schnitzer. (12/21/00 ACV/VCP) DEQ issued a file review memo summarizing additional information submitted by PEO, SIC, and Time Oil on December 21, 2000. DEQ proposed that SIC, as the property owner, take over the remedial investigation for PEO. (7/17/01 ACV/VCP) Negotiations for formal

SCHN00261007

agreement started in March 2001. Soil and groundwater investigation running concurrent with negotiations. Free-phase petroleum discovered at two locations on-site. (11/1/01 ACV/VCP) SIC conducted off-site groundwater investigation, on upgradient/adjacent Bell Terminal (Time Oil) property in September 2001. Preliminary results anticipated in December 2001. (1/4/02 ACV/VCP) New groundwater data confirms contamination from historic operations in the southwestern portion of the site. Premier Edible Oils should be added to the Confirmed Release List.

Data Sources	1997-1996 Level-Phase I and Phase II ESAS documenting the presence of petroleum hydrocarbons and chlorinated solvents in groundwater and petroleum in soils; EPA, 1998 Portland Harbor Sediment Investigation Report; September 1998 Focused Site Characterization; September 2001 Preliminary RI; April 2002 Bell Terminal geoprobe investigation; quarterly groundwater monitoring data from on-site wells with results through October 2001.

Substance Contamination Information

Substance	Media Contaminated	Concentration Level	Date Recorded	Lab Data	Agency Observation	Owner Operator Admission
BENZENE	Groundwater	6.8 ppb	11/23/1996	Y		
BUTYLBENZENE,n-	Groundwater	220 ppb	11/23/1996	Y		
BUTYLBENZENE,sec-	Groundwater	81 ppb	11/23/1996	Y		
CHLOROETHANE	Groundwater	11.6 ppb	11/23/1996	Y		
~~CUMENE~~	~~Groundwater~~	~~350 ppb~~	~~11/23/1996~~	~~Y~~		
DICHLOROETHANE,1,1-	Groundwater	3.5 ppb	11/23/1996	Y		
DIESEL - FUEL OIL	Groundwater	19 ppm	11/23/1996	Y		
DIESEL - FUEL OIL	Soil	3,900 ppm	11/23/1996	Y		
ETHYLBENZENE	Groundwater	2,600 ppb	11/23/1996	Y		
GASOLINE	Groundwater	7.1 ppm	11/23/1996	Y		
GASOLINE	Soil	1,500 ppm	11/23/1996	Y		
ISOPROPYLBENZENE	Groundwater	350 ppb	11/23/1996	Y		
ISOPROPYLTOLUENE,p-	Groundwater	58 ppb	11/23/1996	Y		
NAPHTHALENE	Groundwater	1,900 ppb	11/23/1996	Y		

SCHN00261008

PROPYLBENZENE,n-	Groundwater	1,000 ppb	11/23/1996	Y		
~~STYRENE~~	~~Groundwater~~	~~400 ppb~~	~~11/23/1996~~	~~Y~~		
TRICHLOROETHANE,1,1,1-	Groundwater	2.5 ppb	11/23/1996	Y		
TRIMETHYLBENZENE,1,2,4-	Groundwater	5,200 ppb	11/23/1996	Y		
TRIMETHYLBENZENE,1,3,5-	Groundwater	1,200 ppb	11/23/1996	Y		
XYLENEs	Groundwater	3,953 ppb	11/23/1996	Y		

Investigative, Remedial and Administrative Actions

Action	Start Date	Compl. Date	Resp. Staff	Agency Code	Region	Lead Pgm.
SITE EVALUATION	03/11/1997	03/11/1997	Gil Wistar	DEQ	NW	SAS
Site added to database	03/11/1997	03/11/1997	Gil Wistar	DEQ	NW	SAS
Site Screening recommended (EV)	06/17/1999	06/17/1999	Steve Fortuna	DEQ	NW	VCS
Letter Agreement	12/01/1999	07/01/2000	Alicia Voss	DEQ	NW	VCS
REMEDIAL INVESTIGATION	03/06/2001		Alicia Voss	DEQ	NW	VCS
NEGOTIATIONS	03/06/2001		Alicia Voss	DEQ	NW	VCS
Proposal for Confirmed Release List recommended	01/04/2002	01/04/2002	Alicia Voss	DEQ	NW	VCS
Facility proposed for Confirmed Release List	01/08/2002	01/08/2002	Kim Van Patten	DEQ	NW	VCS
Facility placed on Confirmed Release List	03/29/2002	03/29/2002	Kim Van Patten	DEQ	NW	VCS

Key to certain acronyms and terms in this report:

CERCLIS No.: The U.S. EPA's Hazardous Waste Site identification number, shown only if EPA has been involved at the site.

Region: DEQ divides the state into three regions (E, NW, and W); the regional office shown is responsible for site investigation/cleanup.

NPL Site: Is the site on EPA's Superfund List? (Y/N).

Orphan Site: Has DEQ's Orphan Program been active at this site? (Y/N). The Orphan Program cleans up high-priority sites where owners and operators responsible for the contamination are absent, or are unwilling or unable to use their own resources for cleanup.

Study Area: Is this site a Study Area? (Y/N). ECSI assigns unique Site ID numbers to both individual sites and to Study Areas, which are groupings of individual ECSI sites that may be contributing to a larger, area-wide problem.

SIC Code: The Standard Industrial Classification code assigned to the operation described in

SCHN00261009

this part of the report.
Pathways: A description of human or environmental resources that site contamination could affect.
Lead Pgm: This column refers to the Cleanup Program affiliation of the DEQ employee responsible for the action shown. SAS = Site Assessment; VCS = Voluntary Cleanup; SRS = Site Response (enforcement cleanup).

For more information about this page please contact Gil Wistar at (503) 229-5512 or via email at wistar.gil@deq.state.or.us.

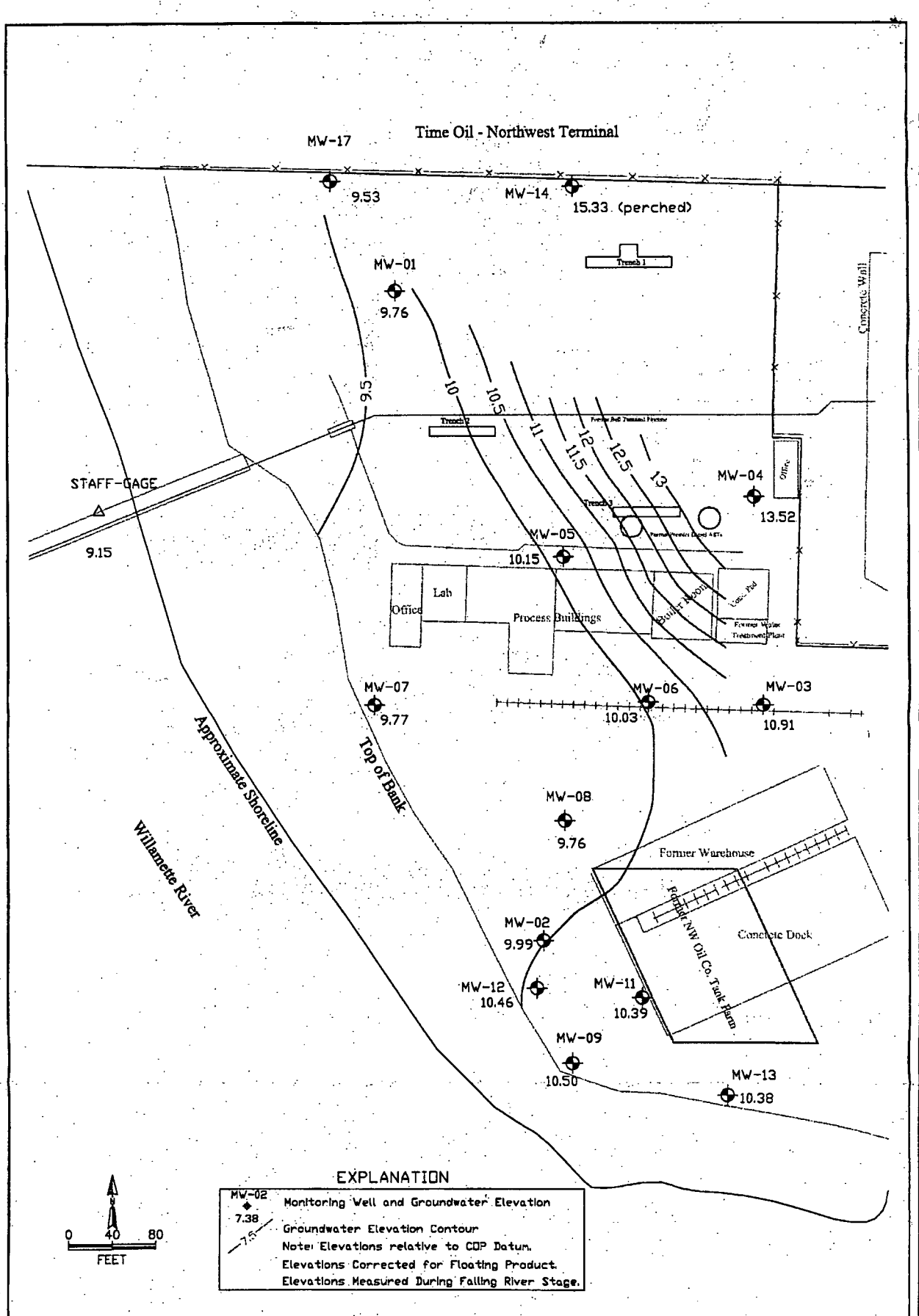
DEQ Online is the official web site for the Oregon Department of Environmental Quality.

SCHN00261010

Initial Report of Data from Third Quarterly Groundwater Sampling Event and Proposed Modifications for Fourth Quarterly Groundwater Sampling Event

Premier Edible Oils Site

SCHN00261011

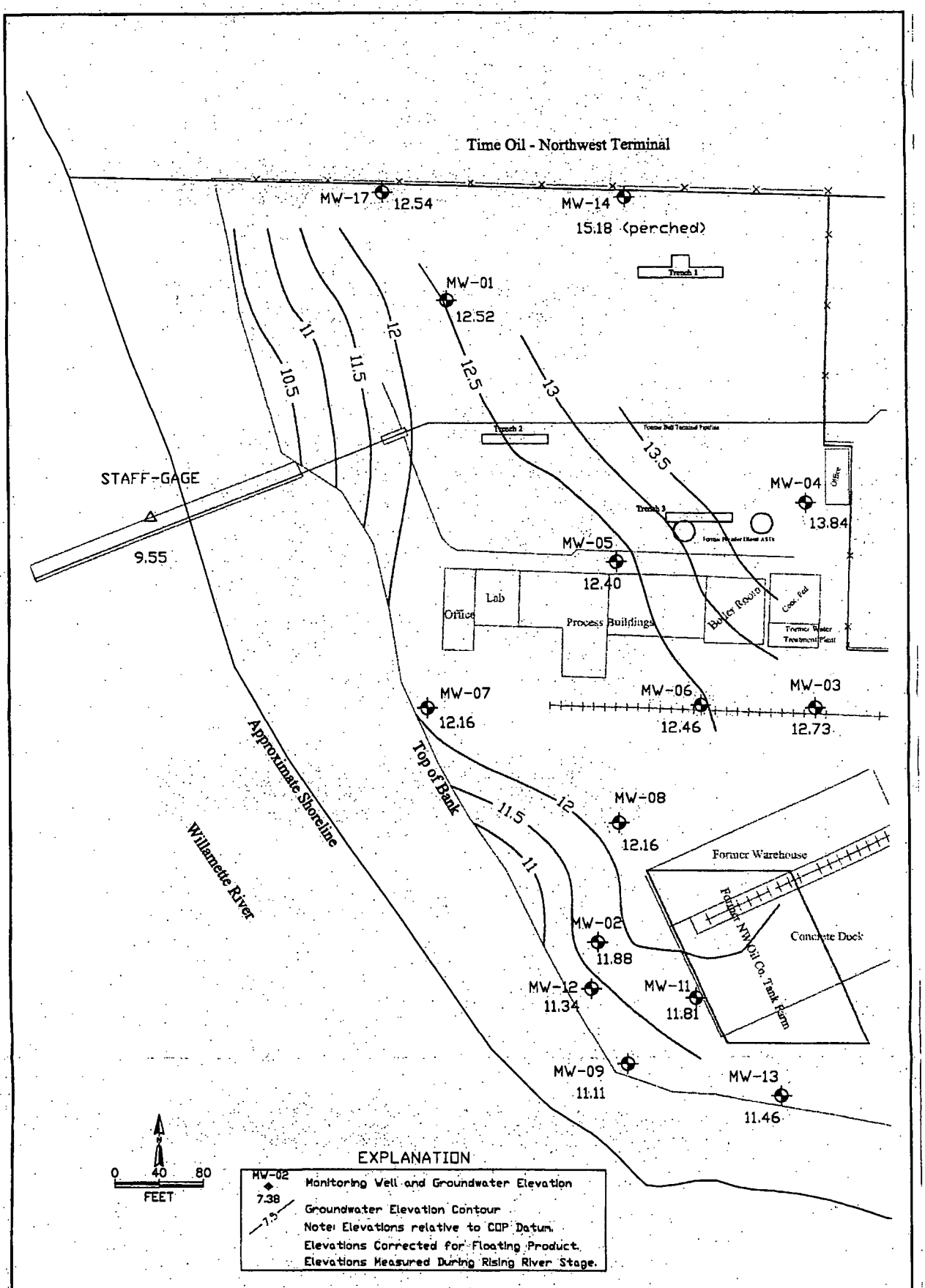


URS

TITLE:
Groundwater Elevations (ft-COP)
March 14, 2002
Schnitzer - PEO

DWN: jgdp	DES.:	PROJECT NO.: 52-00180063
CHKD:	APPD:	
DATE: 4/29/02	REV.: 0	FIGURE NO.: A-1

SCHN00261012

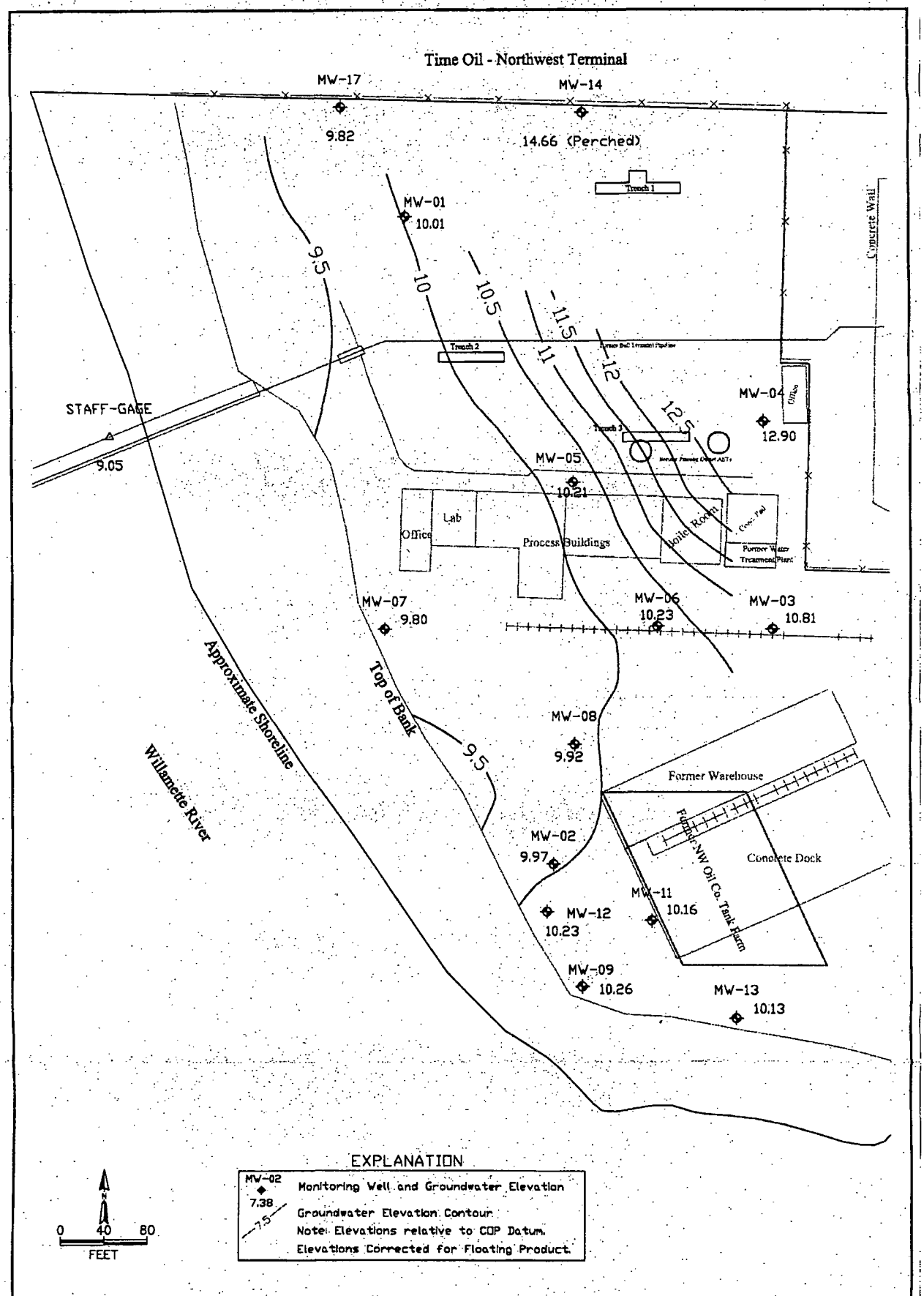


URS

TITLE:
Groundwater Elevations (ft-COP)
April 23, 2002
Schnitzer - PEO

DWN:	DES.:	PROJECT NO.:
jgdp		52-00180063
CHKD:	APPD:	FIGURE NO.:
DATE: 4/29/02	REV.: 0	A-2

SCHN00261013

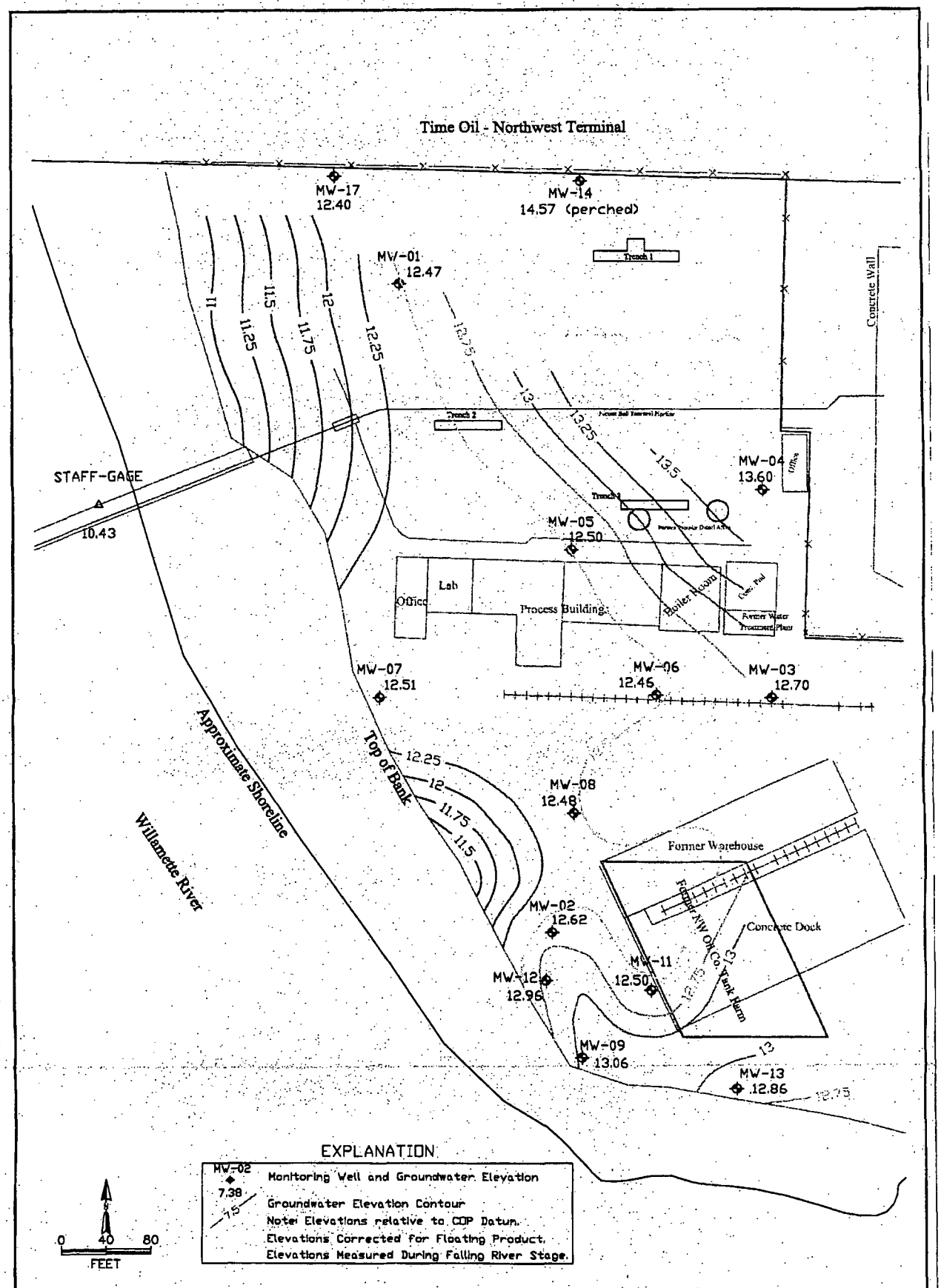


URS

TITLE:
Groundwater Elevations (ft-COP)
May 22, 2002
Schnitzer - PEO

DWN: jgdp	DES:	PROJECT NO.: 52-00180063	
CHKD:	APPD:		
DATE: 6/24/02	REV.: 0	FIGURE NO.: A-3	

SCHN00261014

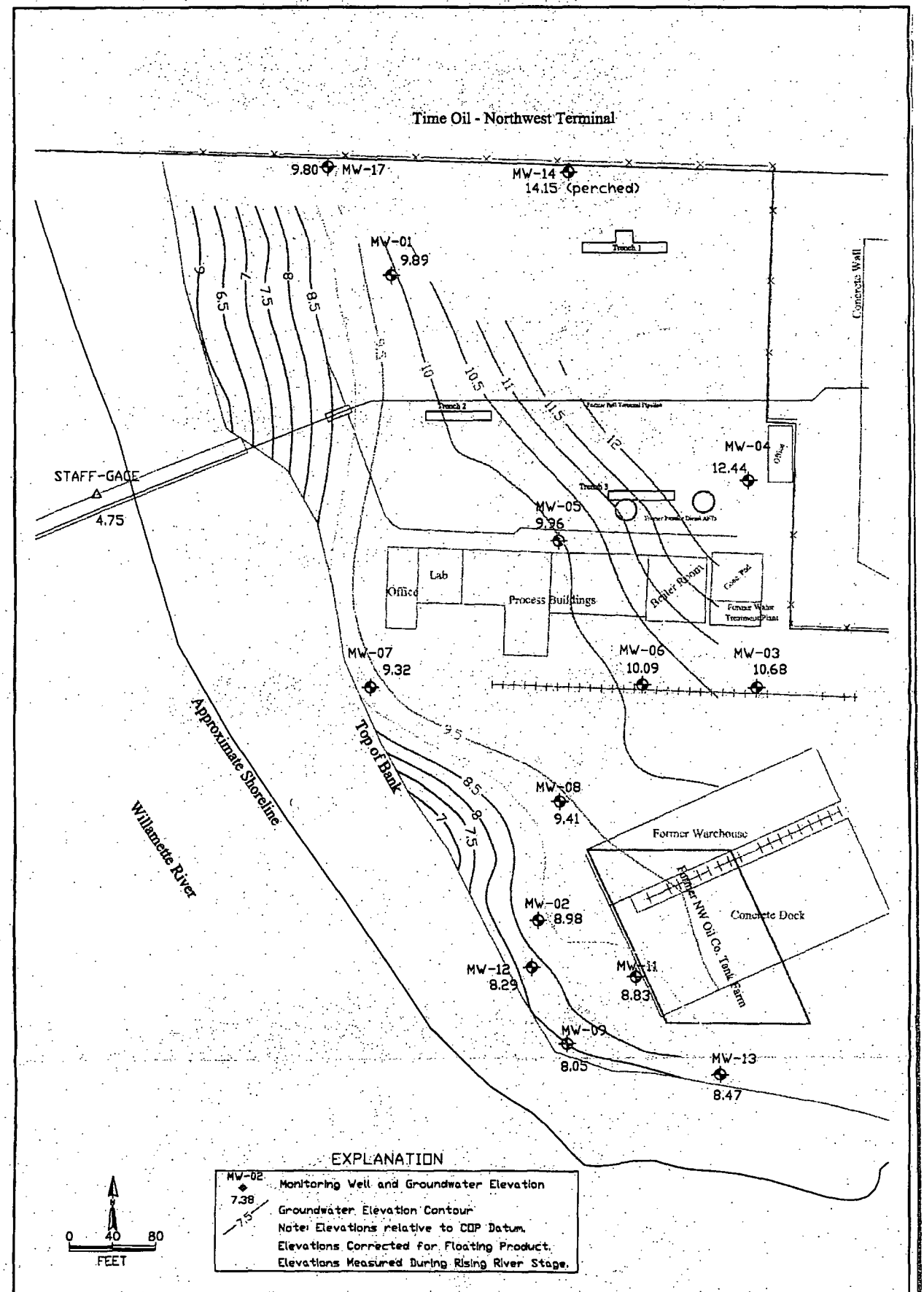


URS

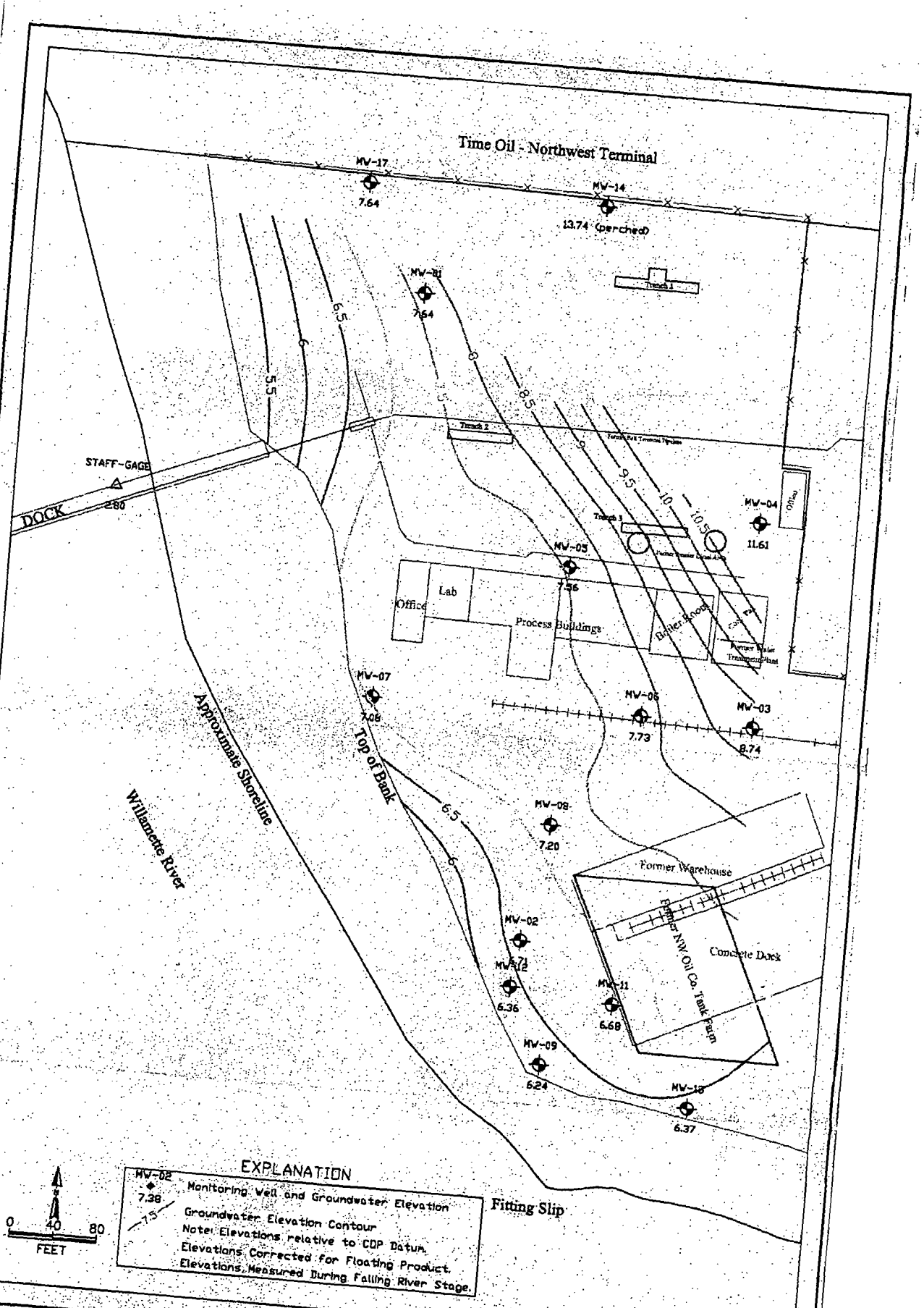
TITLE:
Groundwater Elevations (ft-COP)
June 21, 2002
Schnitzer - PEO

DWN:	DES.:	PROJECT NO.:
jgdp		25693679
CHKD:	APPD:	FIGURE NO.:
DATE: 8/7/02	REV.: 0	A-4

SCHN00261015



SCHN00261016

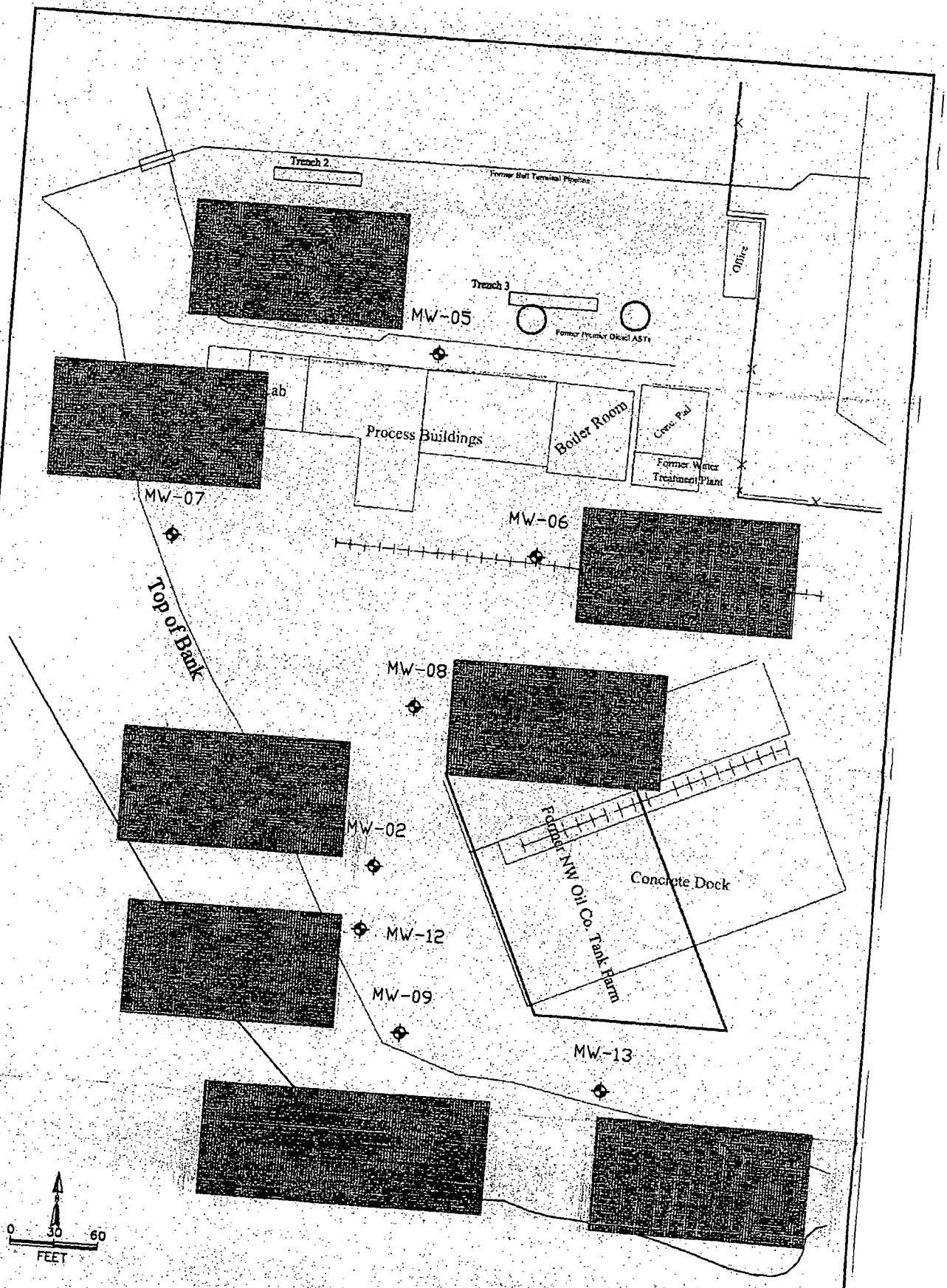


URS

TITLE:
Groundwater Elevations – 8/29/02
Schnitzer – Premier Edible Oils
Portland, OR

DWN: jgdp	DES.:	PROJECT NO.: 25693679
CHKD:	APPD:	
DATE: 10/3/02	REV.: 0	FIGURE NO.: A-6

SCHN00261017

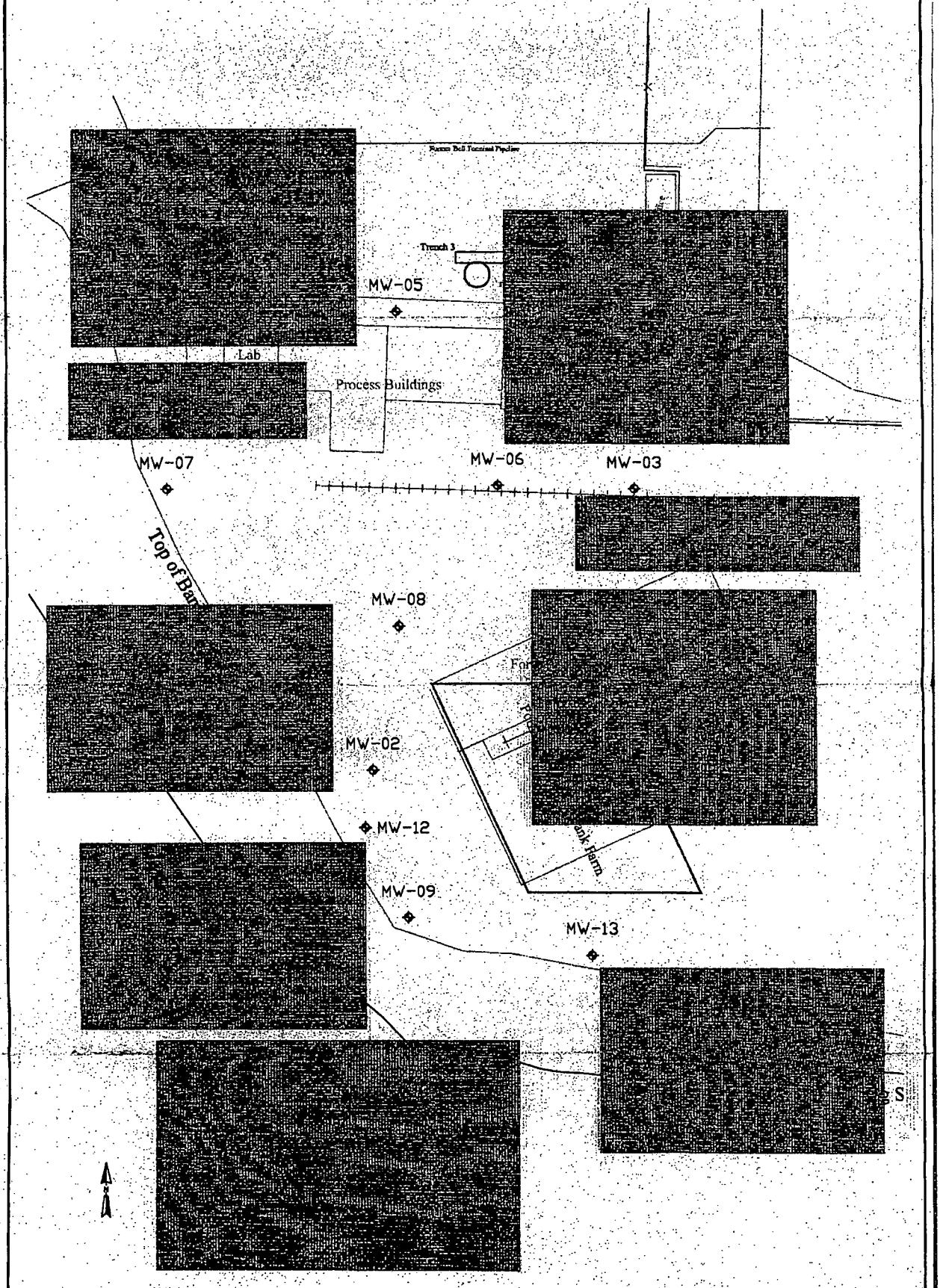


URS

TITLE:
BTEX Concentrations in Groundwater
March 14/15, 2002
Schnitzer – PEO

DWN: jgdp	DES.:	PROJECT NO.: 52-00180063	
CHKD:	APPD:		
DATE: 6/24/02	REV.: 0	FIGURE NO.: A-7	

SCHN00261018

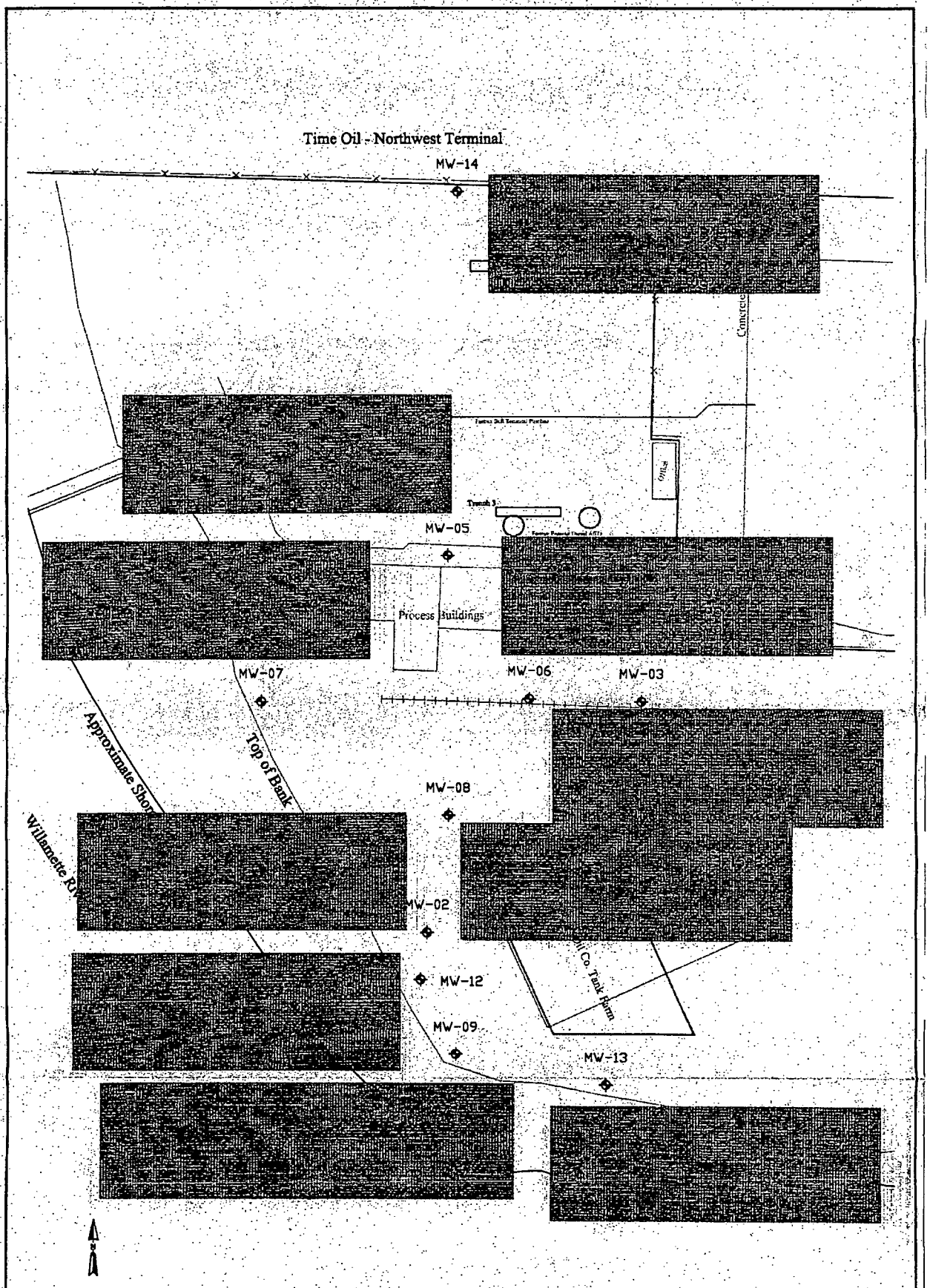


URS

TITLE:
PAH Concentrations in Groundwater
March 14/15, 2002
Schnitzer - PEO

DWN: jgdp	DES.:	PROJECT NO.: 52-00180063
CHKD:	APPD:	FIGURE NO.: A-8
DATE: 6/24/02	REV.: 0	

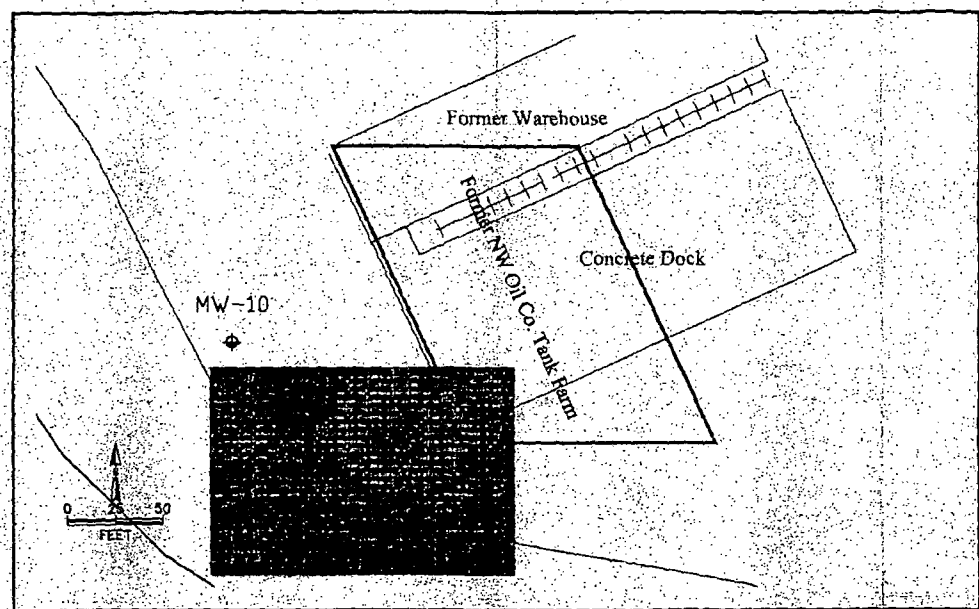
SCHN00261019



URS

TITLE:
CVOC Concentrations in Groundwater
March 14/15, 2002
Schnitzer - PEO

DWN:	DES.:	PROJECT NO.:
jgdp		52-00180063
CHKD:	APPD.:	
DATE: 6/24/02	REV.: 0	FIGURE NO.: A-9



URS

TITLE: VOC Concentrations in Deep Groundwater
March 15, 2002
Schnitzer - PEO

DWN: jgdp	DES:	PROJECT NO.: 52-00180063
CHKD:	APPD:	FIGURE NO.: A-10
DATE: 6/24/02	REV.: 0	

SCHN00261021

Documentation of Shoreline Reconnaissance Surveys
March – September 2002

Premier Edible Oils Site

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 9/15/02

Re: Premier Edible Oils Site – River Bank Reconnaissance, 9/15/02

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from approximately MW-13 location (along Slip), to MW-7 location (along Willamette River).

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry do to dry weather conditions. The reconnaissance was conducted between 9:20 am and 10:00 am.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 8/15/02

Re: Premier Edible Oils Site – River Bank Reconnaissance, 8/15/02

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank along the Slip to the Time Oil fence line along Willamette River.

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry do to dry weather conditions. The reconnaissance was conducted between 7:30 am and 9:00 am.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 7/5/2002

Re: Premier Edible Oils Site – River Bank Reconnaissance, 7/5/02

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from approximately MW-13 location (along Slip), to MW-7 location (along Willamette River).

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry do to dry weather conditions. The reconnaissance was conducted between 11:00 am and 11:45 am.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 6/20/02

Re: Premier Edible Oils Site – River Bank Reconnaissance, 6/20/02

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from approximately MW-13 location (along Slip), to MW-7 location (along Willamette River).

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry do to dry weather conditions. The reconnaissance was conducted between 10:45 am and 11:15 am.

Groundwater seeps, hydrocarbon product or hydrocarbon sheen were not observed during the reconnaissance event.

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 5/17/02

Re: Premier Edible Oils Site – River Bank Reconnaissance, 5/17/02

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from approximately MW-13 location (along Slip), to MW-7 location (along Willamette River).

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry do to dry weather conditions. The reconnaissance was conducted between 9:20 am and 10:35 am.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka, Cathy Petito Boyce

Date: 4/18/02

Re: Premier Edible Oils Site – River Bank Reconnaissance, 4/18/02

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product or sheen. I walked the entire river bank from approximately MW-13 location (along Slip), to MW-7 location (along Willamette River).

I observed conditions from the top of the bank to the water line. I looked for evidence of hydrocarbon product or sheen. I paid particular attention to the base of the bank and the water line. The majority of the bank was dry do to dry weather conditions. The reconnaissance was conducted between 9:35 am and 10:25 am.

No groundwater seeps, hydrocarbon product or hydrocarbon sheen were observed during the reconnaissance event.

Memorandum

URS

To: Jim Jakubiak, Schnitzer

From: Donald M. Coberley

Date: April 1, 2002

Subject: River bank reconnaissance, March 15, 2002; Premier Edible Oils facility

I completed a reconnaissance of the river bank at the Premier Edible Oils facility to look for evidence of hydrocarbon product during the recent groundwater sampling event. I observed the river bank from approximately the MW-13 location (on the boat slip), west to MW-9 (at the junction of the boat slip and the Willamette River), and then north along the river to approximately the MW-7 location.

I observed conditions from the top of the bank to the water line. I looked for hydrocarbon sheen or blooms, or evidence of free phase hydrocarbon. I paid particular attention to the water line and to the sharp break in slope at the base of the bank.

The majority of the bank was wet due to intermittent drizzle prior to my reconnaissance. The reconnaissance was conducted between about 12:00 and 1:00. According to provisional data provided by the US Geological Survey, the Willamette River elevation (as measured at a station located on the Morrison Bridge) was falling during the reconnaissance period.

I saw no evidence of hydrocarbon, as free phase, sheen, or blooms during the reconnaissance. I also did not observe any discrete seeps flowing out of the bank.

SCHN00261029

Memorandum

Gradient
CORPORATION

To: Alicia Voss/Oregon DEQ **Date:** October 14, 2002

From: Cathy Petito Boyce

Subject: Initial Report of Data from Third Quarterly Groundwater Sampling Event and Proposed Modifications for Fourth Quarterly Groundwater Sampling at PEO Site

On behalf of Schnitzer Investment Corp. (Schnitzer), Gradient Corporation (Gradient) has prepared this technical memorandum presenting data collected during the most recent round of quarterly groundwater sampling at the Premier Edible Oils (PEO) site. Groundwater elevation data and product observation data collected between June 2001 and September 2002 are also summarized. This memorandum provides the results of chemical analyses conducted on the samples collected during the third quarterly sampling event and discusses modifications to the sampling approach that are proposed for implementation in the fourth quarterly sampling event. After we have discussed your feedback on this memorandum, we will proceed with the fourth quarterly sampling event.

On March 14 and 15, 2002, URS conducted the third quarterly groundwater sampling event at the PEO site. Groundwater samples were collected from all monitoring wells, with the exception of well MW-01 (which has no prior detections), and wells MW-04 and MW-11 (where non-aqueous phase liquid [NAPL] was observed at the time of the sampling event). All groundwater samples were analyzed for volatile organic compounds (VOCs), polycyclic aromatic hydrocarbon (PAH) compounds, and selected metals (*i.e.*, arsenic, chromium, copper, iron, lead, manganese, nickel, silver, and zinc). Groundwater elevation data and product observations have also been collected on a monthly basis at the site, including during the March sampling event. The elevation and product data that have been collected to date (*i.e.*, from June 2001 to August 2002) are attached to this memorandum in Table A-1. The unvalidated third quarter analytical results (including both detected and non-detected sample results) are summarized in Table A-2. Figures illustrating the groundwater elevation data from March to August 2002 and the groundwater chemistry data from the third quarterly sampling event are included in Figures A-1 through A-10.

9725 SE 36th Street, Suite 404, Mercer Island, WA 98040 • (206) 275-4774 • Facsimile (206) 275-4775 •
www.gradientcorp.com

Consistent with previous discussions among staff of the Oregon Department of Environmental Quality (DEQ), Schnitzer, and Schnitzer's consultants, it is our understanding that DEQ is willing to consider modifications to the existing sampling parameters based on the results from the previous three sampling events. Based on a review of the data from the preceding three events, the following well locations and analytes are proposed for inclusion in the fourth quarterly sampling event.

Organic Compounds

Organic compounds associated with petroleum hydrocarbons (*i.e.*, VOCs and PAH compounds) were detected at all locations sampled in March 2002. Therefore, no modifications to the sampling locations or procedures for organic compounds are proposed for the fourth sampling event. Specifically, groundwater samples for chemical analysis will be collected from all monitoring wells at the PEO site, with the exception of those locations where NAPL is present. All groundwater samples collected during the fourth sampling event will be analyzed for VOCs and PAH compounds.

Metals

Detected metals concentrations were compared with ambient water quality criteria for freshwater chronic exposures. These values were chosen as benchmarks for this comparison because use of site groundwater or adjacent surface water as a drinking water supply is not a current or likely future use. Instead, criteria based on exposures associated with potential discharges to nearby surface water were selected as the most relevant basis for this screening level comparison. The results of this comparison are summarized in Table 1. With the exception of lead, no metals concentrations exceeding the ambient water quality criteria were observed in this sampling round. Lead concentrations exceeded the water quality criteria at two sampled locations (MW-05 and MW-06). Ambient water quality criteria are not available for iron and manganese; however, these two metals have been detected at all sampled wells at the site at concentrations ranging to 91 mg/L for iron and 10.4 mg/L for manganese.

SCHN00261031

Table 1.
Comparison of Detected Metals Concentrations in Groundwater and Ambient Water Quality Criteria

Constituent	Maximum Detected Concentration (Location)[a]	Second Highest Detected Concentration (Location)[a]	Ambient Water Quality Criteria (AWQC)[a]	Number of Detected Concentrations > AWQC
Arsenic	32.4 (MW-09)	31 (MW-09)[b]	150	0
Chromium	1.5 (MW-09)	1.4 (MW-12)	11[c]	0
Copper	3 (MW-05)	2.1 (MW-09)	9	0
Lead	40.2 (MW-05)[d]	15.3 (MW-06)[d]	2.5	2
Nickel	5.2 (MW-05)	4.6 (MW-03)	52	0
Silver	ND	ND	3.4	0
Zinc	5 (MW-15)	4.7 (MW-06)	120	0

Notes:

ND – Not detected in any sample.

[a] – Groundwater concentrations and AWQC in units of µg/L.

[b] – Two samples were collected at MW-09. The next highest concentration was 29 µg/L (MW-02).

[c] – This AWQC is based on hexavalent chromium.

[d] – These concentrations are greater than the AWQC concentration.

These results are consistent with observations based on the first two groundwater sampling events as presented in the January 2, 2002 technical memorandum from Bridgewater Group, Inc. to Oregon DEQ regarding *Proposed Locations and Analytes – Third Quarter Groundwater Sampling at PEO Site.* In those analyses, observed concentrations for 5 of the 7 metals with ambient water quality criteria exceeded the criteria at only 1 location (MW-11). A groundwater sample was not collected from well MW-11 for chemical analysis during the third groundwater sampling event because NAPL was observed at that location at the time of the sampling event. Concentrations exceeding the criteria were observed at two other locations for copper (MW-3 and MW-5) and one other location for lead (MW-5).

SCHN00261032

Based on these results, the following locations and metals analyses are proposed for the fourth groundwater sampling event:

- If a groundwater sample can be collected for analysis from well MW-11, this sample will be analyzed for all metals.
- If a groundwater sample can be collected for analysis from well MW-11, the groundwater samples collected from wells MW-3 and MW-5 will be analyzed for copper and lead only. If a groundwater sample cannot be collected for analysis from well MW-11, the groundwater samples collected from wells MW-3 and MW-5 will be analyzed for all metals.
- Lead analyses will also be conducted for groundwater samples collected from wells MW-14 and MW-15.
- Groundwater samples from all sampled locations will be analyzed for iron and manganese.

Please contact me (at 206-275-4774) or Jim Jakubiak of Schnitzer (at 503-286-6976) if you have any questions regarding these proposed modifications. As noted above, once DEQ has approved the proposed sampling locations and analytes, Schnitzer will conduct the fourth groundwater sampling event.

cc: J. Brown/James C. Brown & Associates
D. Coberly/URS
J. Jakubiak/Schnitzer

SCHN00261033

Attachment

Tables and Figures Summarizing
Selected Groundwater Data
For PEO Site

SCHN00261034

List of Tables and Figures

Table A-1. Summary of Groundwater Elevation and Product Observation Data (June 2001 – August 2002)

Table A-2. Summary of Analytical Chemistry Results for Groundwater (Unvalidated data – March 2002)

Figure A-1. Groundwater Elevations – March 14, 2002

Figure A-2. Groundwater Elevations – April 23, 2002

Figure A-3. Groundwater Elevations – May 22, 2002

Figure A-4. Groundwater Elevations – June 21, 2002

Figure A-5. Groundwater Elevations – July 26, 2002

Figure A-6. Groundwater Elevations – August 29, 2002

Figure A-7. BTEX Concentrations in Groundwater – March 14/15, 2002

Figure A-8. PAH Concentrations in Groundwater – March 14/15, 2002

Figure A-9. CVOC Concentrations in Groundwater – March 14/15, 2002

Figure A-10. VOC Concentrations in Deep Groundwater – March 14/15, 2002

SCHN00261035

Table A-1
Summary of Groundwater Elevations and
Product Observation Data
June 2001 - August 2002
25694284

PERIOD: From 06/06/2001 thru 08/29/2002 - Inclusive

SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-01	6/6/2001	28.37	12:00	20.92	0.00	7.45	NA	7.45
MW-01	6/18/2001	28.37	12:00	21.48	0.00	6.89	-0.56	6.89
MW-01	7/2/2001	28.37	12:00	21.60	0.00	6.77	-0.12	6.77
MW-01	7/16/2001	28.37	12:00	22.22	0.00	6.15	-0.62	6.15
MW-01	7/30/2001	28.37	12:00	22.37	0.00	6.00	-0.15	6.00
MW-01	8/13/2001	28.37	12:40	22.43	0.00	5.94	-0.06	5.94
MW-01	8/27/2001	28.37	12:45	22.33	0.00	6.04	0.10	6.04
MW-01	10/10/2001	28.37	15:10	22.81	0.00	5.56	-0.48	5.56
MW-01	11/29/2001	28.37	10:08	21.17	0.00	7.20	1.64	7.20
MW-01	12/27/2001	28.37	11:12	17.76	0.00	10.61	3.41	10.61
MW-01	2/4/2002	28.37	10:35	17.31	0.00	11.06	0.45	11.06
MW-01	2/28/2002	28.37	13:53	18.45	0.00	9.92	-1.14	9.92
MW-01	3/14/2002	28.37	09:34	18.61	0.00	9.76	-0.16	9.76
MW-01	4/23/2002	28.37	13:53	15.85	0.00	12.52	2.76	12.52
MW-01	5/22/2002	28.37	14:29	18.36	0.00	10.01	-2.51	10.01
MW-01	6/21/2002	28.37	13:31	15.90	0.00	12.47	2.46	12.47
MW-01	7/26/2002	28.37	12:55	18.48	0.00	9.89	-2.58	9.89
MW-01	8/29/2002	28.37	12:51	20.73	0.00	7.64	-2.25	7.64
MW-02	6/6/2001	29.32	12:00	21.94	0.00	7.38	NA	7.38
MW-02	6/18/2001	29.32	12:00	25.37	1.95	3.95	-3.43	5.60
MW-02	7/2/2001	29.32	12:00	25.22	1.76	4.10	0.15	5.59
MW-02	7/16/2001	29.32	12:00	25.77	1.64	3.55	-0.55	4.94
MW-02	7/30/2001	29.32	12:00	25.82	1.86	3.50	-0.05	5.07
MW-02	8/13/2001	29.32	13:08	25.50	1.93	3.82	0.32	5.45
MW-02	8/27/2001	29.32	13:12	25.50	1.94	3.82	0.00	5.46
MW-02	10/10/2001	29.32	15:52	25.70	1.53	3.62	-0.20	4.91
MW-02	11/29/2001	29.32	10:30	21.13	0.00	8.19	4.57	8.19
MW-02	12/27/2001	29.32	11:36	20.72	0.35	8.60	0.41	8.90
MW-02	2/4/2002	29.32	10:55	20.30	0.96	9.02	0.42	9.83
MW-02	2/28/2002	29.32	14:26	24.15	4.01	5.17	-3.85	8.56
MW-02	3/14/2002	29.32	10:07	19.33	0.00	9.99	4.82	9.99
MW-02	4/23/2002	29.32	14:23	17.74	0.36	11.58	1.59	11.89
MW-02	5/22/2002	29.32	14:51	19.54	0.23	9.78	-1.80	9.98
MW-02	6/21/2002	29.32	13:53	16.70	0.00	12.62	2.84	12.62
MW-02	7/26/2002	29.32	13:27	21.86	1.80	7.46	-5.16	8.98
MW-02	8/29/2002	29.32	13:19	23.75	1.35	5.57	-1.89	6.71
MW-03	6/6/2001	29.79	12:00	21.38	0.00	8.41	NA	8.41

All elevations relative to City of Portland Datum

Table A-1
Summary of Groundwater Elevations and
Product Observation Data
June 2001 - August 2002
25694284

PERIOD: From 06/06/2001 thru 08/29/2002 - Inclusive

SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-03	6/18/2001	29.79	12:00	21.71	0.00	8.08	-0.33	8.08
MW-03	7/2/2001	29.79	12:00	21.71	0.00	8.08	0.00	8.08
MW-03	7/16/2001	29.79	12:00	22.40	0.00	7.39	-0.69	7.39
MW-03	7/30/2001	29.79	12:00	23.41	0.00	6.38	-1.01	6.38
MW-03	8/13/2001	29.79	12:28	23.80	0.00	5.99	-0.39	5.99
MW-03	8/13/2001	29.79	13:21	23.77	0.00	6.02	0.03	6.02
MW-03	8/27/2001	29.79	12:34	23.73	0.00	6.06	0.04	6.06
MW-03	10/10/2001	29.79	15:19	24.29	0.00	5.50	-0.56	5.50
MW-03	11/29/2001	29.79	10:15	21.67	0.00	8.12	2.62	8.12
MW-03	12/27/2001	29.79	11:16	18.13	0.00	11.66	3.54	11.66
MW-03	2/4/2002	29.79	10:38	17.53	0.00	12.26	0.60	12.26
MW-03	2/28/2002	29.79	13:42	18.65	0.00	11.14	-1.12	11.14
MW-03	3/14/2002	29.79	10:20	18.88	0.00	10.91	-0.23	10.91
MW-03	4/23/2002	29.79	13:42	17.06	0.00	12.73	1.82	12.73
MW-03	5/22/2002	29.79	14:20	18.98	0.00	10.81	-1.92	10.81
MW-03	6/21/2002	29.79	13:20	17.09	0.00	12.70	1.89	12.70
MW-03	7/26/2002	29.79	12:45	19.11	0.00	10.68	-2.02	10.68
MW-03	7/26/2002	29.79	13:33	19.12	0.00	10.67	-0.01	10.67
MW-03	8/29/2002	29.79	12:50	21.05	0.00	8.74	-1.93	8.74
MW-04	6/8/2001	29.46	12:00	21.10	3.20	8.36	NA	11.12
MW-04	6/18/2001	29.46	12:00	21.37	3.14	8.09	-0.27	10.80
MW-04	7/2/2001	29.46	12:00	21.30	2.98	8.16	0.07	10.73
MW-04	7/16/2001	29.46	12:00	22.51	3.91	6.95	-1.21	10.32
MW-04	7/30/2001	29.46	12:00	22.95	4.28	6.51	-0.44	10.20
MW-04	8/13/2001	29.46	13:16	23.40	4.71	6.06	-0.45	10.13
MW-04	8/27/2001	29.46	13:20	24.75	5.98	4.71	-1.35	9.87
MW-04	10/10/2001	29.46	16:12	24.10	4.75	5.36	0.65	9.46
MW-04	11/29/2001	29.46	10:41	20.62	2.94	8.84	3.48	11.38
MW-04	12/27/2001	29.46	11:40	16.80	1.04	12.66	3.82	13.56
MW-04	2/4/2002	29.46	11:00	16.17	0.85	13.29	0.63	14.02
MW-04	2/28/2002	29.46	14:35	16.98	1.08	12.48	-0.81	13.41
MW-04	3/14/2002	29.46	10:15	16.60	0.77	12.86	0.38	13.53
MW-04	4/23/2002	29.46	14:29	16.08	0.53	13.38	0.52	13.84
MW-04	5/22/2002	29.46	14:56	17.52	1.11	11.94	-1.44	12.90
MW-04	6/21/2002	29.46	13:58	16.13	0.31	13.33	1.39	13.60
MW-04	7/26/2002	29.46	13:34	17.73	0.82	11.73	-1.60	12.44
MW-04	8/29/2002	29.46	13:25	18.63	0.90	10.83	-0.90	11.61

All elevations relative to City of Portland Datum

Table A-1
Summary of Groundwater Elevations and
Product Observation Data
June 2001 - August 2002
25694284

PERIOD: From 06/06/2001 thru 08/29/2002 - Inclusive

SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-05	6/6/2001	29.39	12:00	21.70	0.00	7.69	NA	7.69
MW-05	6/18/2001	29.39	12:00	22.48	0.00	6.91	-0.78	6.91
MW-05	7/2/2001	29.39	12:00	22.58	0.00	6.81	-0.10	6.81
MW-05	7/16/2001	29.39	12:00	23.33	0.00	6.06	-0.75	6.06
MW-05	7/30/2001	29.39	12:00	23.49	0.00	5.90	-0.16	5.90
MW-05	8/13/2001	29.39	12:44	23.52	0.00	5.87	-0.03	5.87
MW-05	8/27/2001	29.39	12:52	23.38	0.00	6.01	0.14	6.01
MW-05	10/10/2001	29.39	15:13	23.92	0.00	5.47	-0.54	5.47
MW-05	11/29/2001	29.39	10:13	21.92	0.00	7.47	2.00	7.47
MW-05	12/27/2001	29.39	11:14	18.69	0.00	10.70	3.23	10.70
MW-05	2/4/2002	29.39	10:37	18.14	0.00	11.25	0.55	11.25
MW-05	2/28/2002	29.39	13:58	19.33	0.00	10.06	-1.19	10.06
MW-05	3/14/2002	29.39	09:38	19.24	0.00	10.15	0.09	10.15
MW-05	4/23/2002	29.39	13:59	16.99	0.00	12.40	2.25	12.40
MW-05	5/22/2002	29.39	14:32	19.18	0.00	10.21	-2.19	10.21
MW-05	6/21/2002	29.39	13:34	16.89	0.00	12.50	2.29	12.50
MW-05	7/26/2002	29.39	13:03	19.43	0.00	9.96	-2.54	9.96
MW-05	8/29/2002	29.39	12:54	21.83	0.00	7.56	-2.40	7.56
MW-06	6/6/2001	29.36	12:00	21.74	0.00	7.62	NA	7.62
MW-06	6/18/2001	29.36	12:00	22.41	0.00	6.95	-0.67	6.95
MW-06	7/2/2001	29.36	12:00	22.51	0.00	6.85	-0.10	6.85
MW-06	7/16/2001	29.36	12:00	23.19	0.00	6.17	-0.68	6.17
MW-06	7/30/2001	29.36	12:00	23.37	0.00	5.99	-0.18	5.99
MW-06	8/13/2001	29.36	12:46	23.41	0.00	5.95	-0.04	5.95
MW-06	8/27/2001	29.36	12:54	23.37	0.00	5.99	0.04	5.99
MW-06	10/10/2001	29.36	15:21	23.78	0.00	5.58	-0.41	5.58
MW-06	11/29/2001	29.36	10:16	21.77	0.00	7.59	2.01	7.59
MW-06	12/27/2001	29.36	11:17	18.48	0.00	10.88	3.29	10.88
MW-06	2/4/2002	29.36	10:40	17.94	0.00	11.42	0.54	11.42
MW-06	2/28/2002	29.36	14:00	19.19	0.00	10.17	-1.25	10.17
MW-06	3/14/2002	29.36	09:40	19.33	0.00	10.03	-0.14	10.03
MW-06	4/23/2002	29.36	14:01	16.90	0.00	12.46	2.43	12.46
MW-06	5/22/2002	29.36	14:34	19.13	0.00	10.23	-2.23	10.23
MW-06	6/21/2002	29.36	13:36	16.90	0.00	12.46	2.23	12.46
MW-06	7/26/2002	29.36	13:05	19.27	0.00	10.09	-2.37	10.09
MW-06	8/29/2002	29.36	12:59	21.63	0.00	7.73	-2.36	7.73
MW-07	6/6/2001	28.46	12:00	21.01	0.00	7.45	NA	7.45

All elevations relative to City of Portland Datum

Table A-1
Summary of Groundwater Elevations and
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June 2001 - August 2002
25694284

PERIOD: From 06/06/2001 thru 08/29/2002 - Inclusive

SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-07	6/18/2001	28.46	12:00	22.17	0.00	6.29	-1.16	6.29
MW-07	7/2/2001	28.46	12:00	22.20	0.00	6.26	-0.03	6.26
MW-07	7/16/2001	28.46	12:00	22.84	0.00	5.62	-0.64	5.62
MW-07	7/30/2001	28.46	12:00	22.92	0.00	5.54	-0.08	5.54
MW-07	8/13/2001	28.46	12:49	22.80	0.00	5.66	0.12	5.66
MW-07	8/27/2001	28.46	12:57	22.68	0.00	5.78	0.12	5.78
MW-07	10/10/2001	28.46	15:24	23.17	0.00	5.29	-0.49	5.29
MW-07	11/29/2001	28.46	10:18	20.28	0.00	8.18	2.89	8.18
MW-07	12/27/2001	28.46	11:19	18.93	0.00	9.53	1.35	9.53
MW-07	2/4/2002	28.46	10:42	18.13	0.00	10.33	0.80	10.33
MW-07	2/28/2002	28.46	14:04	19.38	0.00	9.08	-1.25	9.08
MW-07	3/14/2002	28.46	09:45	18.69	0.00	9.77	0.69	9.77
MW-07	4/23/2002	28.46	14:05	16.30	0.00	12.16	2.39	12.16
MW-07	5/22/2002	28.46	14:35	18.66	0.00	9.80	-2.36	9.80
MW-07	6/21/2002	28.46	13:37	15.95	0.00	12.51	2.71	12.51
MW-07	7/26/2002	28.46	13:06	19.14	0.00	9.32	-3.19	9.32
MW-07	8/29/2002	28.46	13:01	21.38	0.00	7.08	-2.24	7.08
MW-08	6/6/2001	29.06	12:00	21.64	0.00	7.42	NA	7.42
MW-08	6/18/2001	29.06	12:00	22.68	0.00	6.38	-1.04	6.38
MW-08	7/2/2001	29.06	12:00	22.70	0.00	6.36	-0.02	6.36
MW-08	7/16/2001	29.06	12:00	23.40	0.00	5.66	-0.70	5.66
MW-08	7/30/2001	29.06	12:00	23.48	0.00	5.58	-0.08	5.58
MW-08	8/13/2001	29.06	12:53	23.37	0.00	5.69	0.11	5.69
MW-08	8/27/2001	29.06	12:59	23.25	0.00	5.81	0.12	5.81
MW-08	10/10/2001	29.06	15:28	23.73	0.00	5.33	-0.48	5.33
MW-08	11/29/2001	29.06	10:19	21.25	0.00	7.81	2.48	7.81
MW-08	12/27/2001	29.06	11:21	19.30	0.00	9.76	1.95	9.76
MW-08	2/4/2002	29.06	10:43	18.58	0.00	10.48	0.72	10.48
MW-08	2/28/2002	29.06	14:06	19.73	0.00	9.33	-1.15	9.33
MW-08	3/14/2002	29.06	09:47	19.30	0.00	9.76	0.43	9.76
MW-08	4/23/2002	29.06	14:07	16.90	0.00	12.16	2.40	12.16
MW-08	5/22/2002	29.06	14:37	19.14	0.00	9.92	-2.24	9.92
MW-08	6/21/2002	29.06	13:39	16.58	0.00	12.48	2.56	12.48
MW-08	7/26/2002	29.06	13:08	19.65	0.00	9.41	-3.07	9.41
MW-08	8/29/2002	29.06	13:03	21.86	0.00	7.20	-2.21	7.20
MW-09	6/6/2001	29.60	12:00	22.18	0.00	7.42	NA	7.42
MW-09	6/18/2001	29.60	12:00	24.39	0.00	5.21	-2.21	5.21

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June 2001 - August 2002
25694284

PERIOD: From 06/06/2001 thru 08/29/2002 - Inclusive

SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-09	7/2/2001	29.60	12:00	24.31	0.00	5.29	0.08	5.29
MW-09	7/16/2001	29.60	12:00	24.99	0.00	4.61	-0.68	4.61
MW-09	7/30/2001	29.60	12:00	24.74	0.00	4.86	0.25	4.86
MW-09	8/13/2001	29.60	12:59	24.31	0.00	5.29	0.43	5.29
MW-09	8/27/2001	29.60	13:06	24.38	0.00	5.22	-0.07	5.22
MW-09	10/10/2001	29.60	15:34	24.79	0.00	4.81	-0.41	4.81
MW-09	11/29/2001	29.60	10:23	20.59	0.00	9.01	4.20	9.01
MW-09	12/27/2001	29.60	11:28	22.67	0.34	6.93	-2.08	7.22
MW-09	2/4/2002	29.60	10:48	20.89	0.14	8.71	1.78	8.83
MW-09	2/28/2002	29.60	14:12	21.95	0.35	7.65	-1.06	7.95
MW-09	3/14/2002	29.60	09:58	19.10	0.00	10.50	2.85	10.50
MW-09	4/23/2002	29.60	14:15	19.15	0.78	10.45	-0.05	11.11
MW-09	5/22/2002	29.60	14:42	19.34	0.00	10.26	-0.19	10.26
MW-09	6/21/2002	29.60	13:47	16.54	0.00	13.06	2.80	13.06
MW-09	7/26/2002	29.60	13:15	21.55	0.00	8.05	-5.01	8.05
MW-09	8/29/2002	29.60	13:09	23.58	0.26	6.02	-2.03	6.24
MW-10	6/6/2001	29.06	12:00	21.57	0.00	7.49	NA	7.49
MW-10	6/18/2001	29.06	12:00	24.33	0.00	4.73	-2.76	4.73
MW-10	7/2/2001	29.06	12:00	24.23	0.00	4.83	0.10	4.83
MW-10	7/16/2001	29.06	12:00	25.12	0.00	3.94	-0.89	3.94
MW-10	7/30/2001	29.06	12:00	24.87	0.00	4.19	0.25	4.19
MW-10	8/13/2001	29.06	12:55	23.74	0.00	5.32	1.13	5.32
MW-10	8/27/2001	29.06	13:08	24.00	0.00	5.06	-0.26	5.06
MW-10	10/10/2001	29.06	15:31	24.30	0.00	4.76	-0.30	4.76
MW-10	11/29/2001	29.06	10:21	19.91	0.00	9.15	4.39	9.15
MW-10	12/27/2001	29.06	11:22	21.88	0.00	7.18	-1.97	7.18
MW-10	2/4/2002	29.06	10:45	20.20	0.00	8.86	1.68	8.86
MW-10	2/28/2002	29.06	14:08	21.08	0.00	7.98	-0.88	7.98
MW-10	3/14/2002	29.06	09:56	18.55	0.00	10.51	2.53	10.51
MW-10	4/23/2002	29.06	14:09	17.99	0.00	11.07	0.56	11.07
MW-10	5/22/2002	29.06	14:39	18.70	0.00	10.36	-0.71	10.36
MW-10	6/21/2002	29.06	13:45	15.95	0.00	13.11	2.75	13.11
MW-10	7/26/2002	29.06	13:10	21.07	0.00	7.99	-5.12	7.99
MW-10	8/29/2002	29.06	13:05	22.92	0.00	6.14	-1.85	6.14
MW-11	6/6/2001	29.20	12:00	21.81	0.00	7.39	NA	7.39
MW-11	6/18/2001	29.20	12:00	23.49	0.00	5.71	-1.68	5.71
MW-11	7/2/2001	29.20	12:00	23.37	0.00	5.83	0.12	5.83

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Table A-1
Summary of Groundwater Elevations and
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June 2001 - August 2002
25694284

PERIOD: From 06/06/2001 thru 08/29/2002 - Inclusive

SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-11	7/16/2001	29.20	12:00	24.16	0.00	5.04	-0.79	5.04
MW-11	7/30/2001	29.20	12:00	24.02	0.00	5.18	0.14	5.18
MW-11	8/13/2001	29.20	13:01	23.73	0.00	5.47	0.29	5.47
MW-11	8/27/2001	29.20	13:02	23.67	0.00	5.53	0.06	5.53
MW-11	10/10/2001	29.20	15:38	24.18	0.00	5.02	-0.51	5.02
MW-11	11/29/2001	29.20	10:24	21.05	0.26	8.15	3.13	8.37
MW-11	12/27/2001	29.20	11:32	22.53	2.07	6.67	-1.48	8.42
MW-11	2/4/2002	29.20	10:53	20.03	0.40	9.17	2.50	9.51
MW-11	2/28/2002	29.20	14:22	21.22	0.81	7.98	-1.19	8.67
MW-11	3/14/2002	29.20	10:02	19.22	0.48	9.98	2.00	10.39
MW-11	4/23/2002	29.20	14:20	17.90	0.60	11.30	1.32	11.81
MW-11	5/22/2002	29.20	14:48	21.26	2.62	7.94	-3.36	10.16
MW-11	6/21/2002	29.20	13:51	16.70	0.00	12.50	4.56	12.50
MW-11	7/26/2002	29.20	13:21	21.44	1.27	7.76	-4.74	8.83
MW-11	8/29/2002	29.20	13:15	22.95	0.51	6.25	-1.51	6.68
MW-12	6/6/2001	29.21	12:00	21.75	0.00	7.46	NA	7.46
MW-12	6/18/2001	29.21	12:00	23.92	0.00	5.29	-2.17	5.29
MW-12	7/2/2001	29.21	12:00	23.88	0.00	5.33	0.04	5.33
MW-12	7/16/2001	29.21	12:00	24.54	0.00	4.67	-0.66	4.67
MW-12	7/30/2001	29.21	12:00	24.35	0.00	4.86	0.19	4.86
MW-12	8/13/2001	29.21	12:56	23.85	0.00	5.36	0.50	5.36
MW-12	8/27/2001	29.21	13:07	23.91	0.00	5.30	-0.06	5.30
MW-12	10/10/2001	29.21	15:32	24.33	0.00	4.88	-0.42	4.88
MW-12	11/29/2001	29.21	10:22	20.33	0.00	8.88	4.00	8.88
MW-12	12/27/2001	29.21	11:23	21.66	0.00	7.55	-1.33	7.55
MW-12	2/4/2002	29.21	10:46	20.17	0.01	9.04	1.49	9.04
MW-12	2/28/2002	29.21	14:08	21.22	0.21	7.99	-1.05	8.17
MW-12	3/14/2002	29.21	09:55	18.75	0.00	10.46	2.47	10.46
MW-12	4/23/2002	29.21	14:10	17.87	0.00	11.34	0.88	11.34
MW-12	5/22/2002	29.21	14:40	19.08	0.10	10.15	-1.19	10.24
MW-12	6/21/2002	29.21	13:46	16.25	0.00	12.96	2.81	12.96
MW-12	7/26/2002	29.21	13:11	21.32	0.47	7.89	-5.07	8.29
MW-12	8/29/2002	29.21	13:07	22.85	0.00	6.36	-1.53	6.36
MW-13	6/6/2001	30.21	12:00	22.84	0.00	7.37	NA	7.37
MW-13	6/18/2001	30.21	12:00	24.80	0.00	5.41	-1.96	5.41
MW-13	7/2/2001	30.21	12:00	24.69	0.00	5.52	0.11	5.52
MW-13	7/16/2001	30.21	12:00	25.45	0.00	4.76	-0.76	4.76

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June 2001 - August 2002
25694284

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SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-13	7/30/2001	30.21	12:00	25.25	0.00	4.96	0.20	4.96
MW-13	8/13/2001	30.21	13:04	24.82	0.00	5.39	0.43	5.39
MW-13	8/27/2001	30.21	13:04	24.80	0.00	5.41	0.02	5.41
MW-13	10/10/2001	30.21	15:45	25.65	0.44	4.56	-0.85	4.93
MW-13	11/29/2001	30.21	10:28	21.46	0.00	8.75	4.19	8.75
MW-13	12/27/2001	30.21	11:31	22.60	0.00	7.61	-1.14	7.61
MW-13	2/4/2002	30.21	10:51	21.09	0.02	9.12	1.51	9.14
MW-13	2/28/2002	30.21	14:20	21.89	0.03	8.32	-0.80	8.35
MW-13	3/14/2002	30.21	10:00	19.83	0.00	10.38	2.06	10.38
MW-13	4/23/2002	30.21	14:17	19.16	0.49	11.05	0.67	11.47
MW-13	5/22/2002	30.21	14:44	20.11	0.04	10.10	-0.95	10.13
MW-13	6/21/2002	30.21	13:49	17.35	0.00	12.86	2.76	12.86
MW-13	7/26/2002	30.21	13:17	22.25	0.60	7.96	-4.90	8.47
MW-13	8/29/2002	30.21	13:12	24.11	0.32	6.10	-1.86	6.37
MW-14	6/6/2001	30.72	12:00	17.28	0.00	13.44	NA	13.44
MW-14	6/18/2001	30.72	12:00	17.33	0.00	13.39	-0.05	13.39
MW-14	7/2/2001	30.72	12:00	17.40	0.00	13.32	-0.07	13.32
MW-14	7/16/2001	30.72	12:00	17.48	0.00	13.24	-0.08	13.24
MW-14	7/30/2001	30.72	12:00	17.55	0.00	13.17	-0.07	13.17
MW-14	8/13/2001	30.72	12:33	17.65	0.00	13.07	-0.10	13.07
MW-14	8/27/2001	30.72	12:41	17.74	0.00	12.98	-0.09	12.98
MW-14	10/10/2001	30.72	14:59	18.03	0.00	12.69	-0.29	12.69
MW-14	11/29/2001	30.72	10:05	17.49	0.00	13.23	0.54	13.23
MW-14	12/27/2001	30.72	11:08	15.27	0.00	15.45	2.22	15.45
MW-14	2/4/2002	30.72	10:27	15.01	0.00	15.71	0.26	15.71
MW-14	2/28/2002	30.72	13:49	15.39	0.00	15.33	-0.38	15.33
MW-14	3/14/2002	30.72	09:29	15.39	0.00	15.33	0.00	15.33
MW-14	4/23/2002	30.72	13:48	15.54	0.00	15.18	-0.15	15.18
MW-14	5/22/2002	30.72	14:26	16.06	0.00	14.66	-0.52	14.66
MW-14	6/21/2002	30.72	13:26	16.15	0.00	14.57	-0.09	14.57
MW-14	7/26/2002	30.72	12:51	16.57	0.00	14.15	-0.42	14.15
MW-14	8/29/2002	30.72	12:46	16.98	0.00	13.74	-0.41	13.74
MW-15	6/6/2001	30.48	12:00	22.81	0.00	7.67	NA	7.67
MW-15	6/18/2001	30.48	12:00	24.58	0.00	5.90	-1.77	5.90
MW-15	7/2/2001	30.48	12:00	24.45	0.00	6.03	0.13	6.03
MW-15	7/16/2001	30.48	12:00	25.43	0.00	5.05	-0.98	5.05
MW-15	7/30/2001	30.48	12:00	25.33	0.00	5.15	0.10	5.15

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MW-15	8/13/2001	30.48	13:28	24.90	0.00	5.58	0.43	5.58
MW-15	8/27/2001	30.48	12:42	25.10	0.00	5.38	-0.20	5.38
MW-15	10/10/2001	30.48	14:55	25.30	0.00	5.18	-0.20	5.18
MW-15	11/29/2001	30.48	10:03	22.35	0.00	8.13	2.95	8.13
MW-15	12/27/2001	30.48	11:07	21.64	0.00	8.84	0.71	8.84
MW-15	2/4/2002	30.48	10:26	20.77	0.00	9.71	0.87	9.71
MW-15	2/28/2002	30.48	13:48	21.31	0.00	9.17	-0.54	9.17
MW-15	3/14/2002	30.48	09:28	0.00	0.00	30.48	21.31	30.48
MW-15	3/14/2002	30.48	09:28	20.30	0.00	10.18	-20.30	10.18
MW-15	4/23/2002	30.48	13:45	18.97	0.00	11.51	1.33	11.51
MW-15	5/22/2002	30.48	14:24	20.44	0.00	10.04	-1.47	10.04
MW-15	6/21/2002	30.48	13:25	17.85	0.00	12.63	2.59	12.63
MW-15	7/26/2002	30.48	12:50	21.34	0.00	9.14	-3.49	9.14
MW-15	8/29/2002	30.48	12:45	23.48	0.00	7.00	-2.14	7.00
MW-16	6/6/2001	30.03	12:00	22.44	0.00	7.59	NA	7.59
MW-16	6/18/2001	30.03	12:00	24.48	0.00	5.55	-2.04	5.55
MW-16	7/2/2001	30.03	12:00	24.39	0.00	5.64	0.09	5.64
MW-16	7/16/2001	30.03	12:00	25.46	0.00	4.57	-1.07	4.57
MW-16	7/30/2001	30.03	12:00	25.31	0.00	4.72	0.15	4.72
MW-16	8/13/2001	30.03	12:37	24.65	0.00	5.38	0.66	5.38
MW-16	8/27/2001	30.03	12:47	24.80	0.00	5.23	-0.15	5.23
MW-16	10/10/2001	30.03	15:03	24.95	0.00	5.08	-0.15	5.08
MW-16	11/29/2001	30.03	10:06	21.50	0.00	8.53	3.45	8.53
MW-16	12/27/2001	30.03	11:10	21.86	0.00	8.17	-0.36	8.17
MW-16	2/4/2002	30.03	10:30	20.71	0.00	9.32	1.15	9.32
MW-16	2/28/2002	30.03	13:52	21.33	0.00	8.70	-0.62	8.70
MW-16	3/14/2002	30.03	09:32	19.73	0.00	10.30	1.60	10.30
MW-16	4/23/2002	30.03	13:52	18.73	0.00	11.30	1.00	11.30
MW-16	5/22/2002	30.03	14:28	19.94	0.00	10.09	-1.21	10.09
MW-16	6/21/2002	30.03	13:29	17.28	0.00	12.75	2.66	12.75
MW-16	7/26/2002	30.03	12:54	21.35	0.00	8.68	-4.07	8.68
MW-16	8/29/2002	30.03	12:50	23.37	0.00	6.66	-2.02	6.66
MW-17	6/6/2001	29.91	12:00	22.51	0.00	7.40	NA	7.40
MW-17	6/18/2001	29.91	12:00	22.98	0.00	6.93	-0.47	6.93
MW-17	7/2/2001	29.91	12:00	23.11	0.00	6.80	-0.13	6.80
MW-17	7/16/2001	29.91	12:00	23.64	0.00	6.27	-0.53	6.27
MW-17	7/30/2001	29.91	12:00	23.86	0.00	6.05	-0.22	6.05

All elevations relative to City of Portland Datum

Table A-1
Summary of Groundwater Elevations and
Product Observation Data
June 2001 - August 2002
25694284

PERIOD: From 06/06/2001 thru 08/29/2002 - Inclusive

SITE	DATE	MP ELEVATION (feet)	TIME	DEPTH TO WATER (feet)	FLOATING PRODUCT THICKNESS (feet)	WATER ELEV. (feet)	DELTA WATER ELEV (feet)	EQUIV. FRESH WATER HEAD (feet)
MW-17	8/13/2001	29.91	12:36	23.95	0.00	5.96	-0.09	5.96
MW-17	8/27/2001	29.91	12:48	23.86	0.00	6.05	0.09	6.05
MW-17	10/10/2001	29.91	15:03	24.31	0.00	5.60	-0.45	5.60
MW-17	11/29/2001	29.91	10:07	22.80	0.00	7.11	1.51	7.11
MW-17	12/27/2001	29.91	11:11	19.30	0.00	10.61	3.50	10.61
MW-17	2/4/2002	29.91	10:29	18.88	0.00	11.03	0.42	11.03
MW-17	2/28/2002	29.91	13:51	20.14	0.00	9.77	-1.26	9.77
MW-17	3/14/2002	29.91	09:31	20.38	0.00	9.53	-0.24	9.53
MW-17	4/23/2002	29.91	13:50	17.37	0.00	12.54	3.01	12.54
MW-17	5/22/2002	29.91	14:27	20.09	0.00	9.82	-2.72	9.82
MW-17	6/21/2002	29.91	13:28	17.51	0.00	12.40	2.58	12.40
MW-17	7/26/2002	29.91	12:53	20.11	0.00	9.80	-2.60	9.80
MW-17	8/29/2002	29.91	12:48	22.27	0.00	7.64	-2.16	7.64
STAFF-GAGE	6/6/2001	0.00	12:00	-7.67	0.00	7.67	NA	7.67
STAFF-GAGE	6/18/2001	0.00	12:00	-4.07	0.00	4.07	-3.60	4.07
STAFF-GAGE	7/2/2001	0.00	12:00	-3.97	0.00	3.97	-0.10	3.97
STAFF-GAGE	7/16/2001	0.00	12:00	-3.14	0.00	3.14	-0.83	3.14
STAFF-GAGE	7/30/2001	0.00	12:00	-3.50	0.00	3.50	0.36	3.50
STAFF-GAGE	8/13/2001	0.00	12:00	-5.19	0.00	5.19	1.69	5.19
STAFF-GAGE	8/27/2001	0.00	12:38	-4.68	0.00	4.68	-0.51	4.68
STAFF-GAGE	10/10/2001	0.00	15:00	-4.83	0.00	4.83	0.15	4.83
STAFF-GAGE	11/29/2001	0.00	10:10	-9.47	0.00	9.47	4.64	9.47
STAFF-GAGE	12/27/2001	0.00	11:30	-6.52	0.00	6.52	-2.95	6.52
STAFF-GAGE	2/4/2002	0.00	10:33	-8.60	0.00	8.60	2.08	8.60
STAFF-GAGE	2/28/2002	0.00	13:54	-6.25	0.00	6.25	-2.35	6.25
STAFF-GAGE	3/14/2002	0.00	10:40	-9.15	0.00	9.15	2.90	9.15
STAFF-GAGE	4/23/2002	0.00	13:55	-9.55	0.00	9.55	0.40	9.55
STAFF-GAGE	5/22/2002	0.00	14:12	-9.05	0.00	9.05	-0.50	9.05
STAFF-GAGE	6/21/2002	0.00	13:30	-10.43	0.00	10.43	1.38	10.43
STAFF-GAGE	7/26/2002	0.00	13:00	-4.75	0.00	4.75	-5.68	4.75
STAFF-GAGE	8/29/2002	0.00	14:00	-2.80	0.00	2.80	-1.95	2.80

All elevations relative to City of Portland Datum

Table A-2
Summary of Analytical Chemistry Results for Groundwater
Unvalidated Data - March 2002

25694284

PERIOD: From 03/14/2002 thru 03/15/2002 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE DATE	MW-02 03/15/2002	MW-03 03/14/2002	MW-05 03/14/2002	MW-06 03/15/2002
1,1,1,2-Tetrachloroethane	(ug/l)	<1	<0.5	<13	<13
1,1,1-Trichloroethane	(ug/l)	<1	<0.5	<13	<13
1,1,2,2-Tetrachloroethane	(ug/l)	<1	<0.5	<13	<13
1,1,2-Trichloroethane	(ug/l)	<1	<0.5	<13	<13
1,1-Dichloroethane	(ug/l)	<1	<0.5	<13	<13
1,1-Dichloroethylene	(ug/l)	<1	<0.5	<13	<13
1,1-Dichloropropene	(ug/l)	<1	<0.5	<13	<13
1,2,3-Trichlorobenzene	(ug/l)	<4	<2	<50	<50
1,2,3-Trichloropropane	(ug/l)	<1	<0.5	<13	<13
1,2,4-Trichlorobenzene	(ug/l)	<4	<2	<50	<50
1,2-Dichloroethane	(ug/l)	<1	<0.5	<13	<13
1,2-Dichloropropane	(ug/l)	<1.8	<0.5	<13	<13
1,3-Dichloropropane	(ug/l)	<1	<0.5	<13	<13
2-Hexanone	(ug/l)	<40	<20	<500	<500
2-Methylnaphthalene	(ug/l)	0.58	0.032	190	280
Acenaphthene	(ug/l)	1.9	<0.02	0.59	1.2
Acenaphthylene	(ug/l)	<0.02	<0.02	0.18	0.36
Acetone	(ug/l)	<40	<20	<500	<500
Anthracene	(ug/l)	0.094	<0.02	0.09	0.13
Arsenic	(ug/l)	29	1.2	16.1	23.3
Benzene	(ug/l)	50	<0.5	<13	<13
Benzene, (1-methylethyl)-	(ug/l)	35	<2	98	190
Benzene, 1,2,4-trimethyl	(ug/l)	<4	<2	3200	1700
Benzene, 1,3,5-trimethyl-	(ug/l)	<4	<2	1000	690
Benzo(a)anthracene	(ug/l)	<0.02	<0.02	<0.02	0.035
Benzo(a)pyrene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Benzo(ghi)perylene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Benzo(k)fluoranthene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Benzo[b]fluoranthene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Bromobenzene	(ug/l)	<4	<2	<50	<50

Analyses by Columbia Analytical Services
(Kelso, WA)

- -=Not analyzed

Table A-2
Summary of Analytical Chemistry Results for Groundwater
Unvalidated Data - March 2002

25694284

PERIOD: From 03/14/2002 thru 03/15/2002 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE DATE	MW-02 03/15/2002	MW-03 03/14/2002	MW-05 03/14/2002	MW-06 03/15/2002
Bromodichloromethane	(ug/l)	<1	<0.5	<13	<13
Bromoform	(ug/l)	<1	<0.5	<13	<13
Carbon disulfide	(ug/l)	<1	<0.5	<13	<13
Carbon tetrachloride	(ug/l)	<1	<0.5	<13	<13
Chlorobenzene	(ug/l)	<1	<0.5	<13	<13
Chlorobromomethane	(ug/l)	<1	<0.5	<13	<13
Chloroethane	(ug/l)	<1	<0.5	<13	<13
Chloroform	(ug/l)	<1	<0.5	<13	<13
Chromium	(ug/l)	1.1	0.2	1.1	0.7
Chrysene	(ug/l)	<0.02	<0.02	0.021	0.039
cis-1,2-Dichloroethylene	(ug/l)	4.7	<0.5	<13	19
cis-1,3-Dichloropropene	(ug/l)	<1	<0.5	<13	<13
Copper	(ug/l)	0.6	0.8	3	1.1
DBCP	(ug/l)	<4	<2	<50	<50
Dibenzo(a,h)anthracene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Dibenzofuran	(ug/l)	0.8	<0.02	0.056	0.94
Dibromochloromethane	(ug/l)	<1	<0.5	<13	<13
Dichlorodifluoromethane	(ug/l)	<1	<0.5	<13	<13
EDB	(ug/l)	<4	<2	<50	<50
Ethylbenzene	(ug/l)	18	<0.5	1400	150
Fluoranthene	(ug/l)	0.021	<0.02	0.14	0.09
Fluorene	(ug/l)	3.4	<0.02	0.43	2.3
Hexachlorobutadiene	(ug/l)	<4	<2	<50	<50
Indeno(1,2,3-cd)pyrene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Iron	(ug/l)	75500	678	19500	66100
Lead	(ug/l)	0.48	2.17	40.2	15.3
m/p-xylene	(ug/l)	20	<0.5	3500	490
Manganese	(ug/l)	3880	140	9260	2100
m-Dichlorobenzene	(ug/l)	<1	<0.5	<13	<13
Methyl bromide	(ug/l)	<1	<0.5	<13	<13

Analyses by Columbia Analytical Services (Kelso, WA)

- -=Not analyzed

Table A-2
Summary of Analytical Chemistry Results for Groundwater
Unvalidated Data - March 2002

25694284

PERIOD: From 03/14/2002 thru 03/15/2002 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE DATE	MW-02 03/15/2002	MW-03 03/14/2002	MW-05 03/14/2002	MW-06 03/15/2002
Methyl chloride	(ug/l)	<1	<0.5	<13	<13
Methyl ethyl ketone	*(ug/l)*	*<40*	*<20*	*<500*	*<500*
Methyl isobutyl ketone (MIBK)	(ug/l)	<40	<20	<500	<500
Methylene bromide	(ug/l)	<1	<0.5	<13	<13
Methylene chloride	(ug/l)	<4	<2	<50	<50
Naphthalene	(ug/l)	2.5	0.19	800	180
n-Butylbenzene	(ug/l)	7.3	5.9	80	130
Nickel	(ug/l)	2.4	4.6	5.2	3.3
n-Propylbenzene	(ug/l)	52	3.1	160	600
o-Chlorotoluene	(ug/l)	<4	<2	<50	<50
o-Dichlorobenzene	(ug/l)	<1	<0.5	<13	<13
o-Xylene	(ug/l)	6.5	<0.5	27	15
p-Chlorotoluene	(ug/l)	<4	<2	<50	<50
p-Cymene	(ug/l)	9	<2	<50	<50
p-Dichlorobenzene	(ug/l)	<1	<0.5	<13	<13
Phenanthrene	(ug/l)	2.1	<0.02	0.24	2.6
Pyrene	(ug/l)	0.027	<0.02	0.18	0.14
sec-Butylbenzene	(ug/l)	5.4	4.8	<50	<50
sec-Dichloropropane	(ug/l)	<1	<0.5	<13	<13
Silver	(ug/l)	<0.02	<0.02	<0.02	<0.02
Styrene	(ug/l)	<1	<0.5	<13	<13
tert-Butylbenzene	(ug/l)	<4	<2	<50	<50
Tetrachloroethylene	(ug/l)	<1	<0.5	<13	<13
Toluene	(ug/l)	12	<0.5	<13	<13
trans-1,2-dichloroethene	(ug/l)	<1	<0.5	<13	<13
trans-1,3-Dichloropropene	(ug/l)	<1	<0.5	<13	<13
Trichloroethylene	(ug/l)	<1	<0.5	<13	<13
Trichlorofluoromethane	(ug/l)	<1	<0.5	<13	<13
Vinyl chloride	(ug/l)	4.8	<0.5	<13	<13
Zinc	(ug/l)	0.8	1.2	23.9	4.7

Analyses by Columbia Analytical Services (Kelso, WA)

- -=Not analyzed

Table A-2
Summary of Analytical Chemistry Results for Groundwater
Unvalidated Data - March 2002

25694284

PERIOD: From 03/14/2002 thru 03/15/2002 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE DATE	MW-07 03/14/2002	MW-08 03/15/2002	MW-09 03/15/2002	MW-09 03/15/2002
1,1,1,2-Tetrachloroethane	(ug/l)	<0.5	<2.5	<1	<1
1,1,1-Trichloroethane	(ug/l)	<0.5	<2.5	<1	<1
1,1,2,2-Tetrachloroethane	(ug/l)	<0.5	<2.5	<1	<1
1,1,2-Trichloroethane	(ug/l)	<0.5	<2.5	<1	<1
1,1-Dichloroethane	(ug/l)	<0.5	<2.5	<1	<1
1,1-Dichloroethylene	(ug/l)	<0.5	<2.5	<1	<1
1,1-Dichloropropene	(ug/l)	<0.5	<2.5	<1	<1
1,2,3-Trichlorobenzene	(ug/l)	<2	<10	<4	<4
1,2,3-Trichloropropane	(ug/l)	<0.5	<2.5	<1	<1
1,2,4-Trichlorobenzene	(ug/l)	<2	<10	<4	<4
1,2-Dichloroethane	(ug/l)	<0.5	<2.5	<1	<1
1,2-Dichloropropane	(ug/l)	<0.5	<2.5	<2.5	<2.4
1,3-Dichloropropane	(ug/l)	<0.5	<2.5	<1	<1
2-Hexanone	(ug/l)	<20	<100	<40	<40
2-Methylnaphthalene	(ug/l)	<0.02	17	0.33	0.21
Acenaphthene	(ug/l)	0.032	0.64	1.5	1.4
Acenaphthylene	(ug/l)	<0.02	0.17	<0.02	0.085
Acetone	(ug/l)	<20	<100	<40	<40
Anthracene	(ug/l)	<0.02	0.12	0.11	0.11
Arsenic	(ug/l)	<0.5	18.8	32.4	31
Benzene	(ug/l)	2.3	<2.5	140	140
Benzene, (1-methylethyl)-	(ug/l)	15	75	24	24
Benzene, 1,2,4-trimethyl	(ug/l)	<2	220	<4	<4
Benzene, 1,3,5-trimethyl-	(ug/l)	<2	100	6.9	7
Benzo(a)anthracene	(ug/l)	<0.02	0.021	<0.02	<0.02
Benzo(a)pyrene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Benzo(ghi)perylene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Benzo(k)fluoranthene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Benzo[b]fluoranthene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Bromobenzene	(ug/l)	<2	<10	<4	<4

Analyses by Columbia Analytical Services (Kelso, WA)

- -=Not analyzed

Table A-2
Summary of Analytical Chemistry Results for Groundwater
Unvalidated Data - March 2002

25694284

PERIOD: From 03/14/2002 thru 03/15/2002 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE DATE	MW-07 03/14/2002	MW-08 03/15/2002	MW-09 03/15/2002	MW-09 03/15/2002
Bromodichloromethane	(ug/l)	<0.5	<2.5	<1	<1
Bromoform	(ug/l)	<0.5	<2.5	<1	<1
Carbon disulfide	(ug/l)	<0.5	<2.5	<1	<1
Carbon tetrachloride	(ug/l)	<0.5	<2.5	<1	<1
Chlorobenzene	(ug/l)	<0.5	<2.5	<1	<1
Chlorobromomethane	(ug/l)	<0.5	<2.5	<1	<1
Chloroethane	(ug/l)	<0.5	<2.5	<1	<1
Chloroform	(ug/l)	<0.5	<2.5	<1	<1
Chromium	(ug/l)	0.4	0.6	1.5	1.2
Chrysene	(ug/l)	<0.02	0.02	<0.02	<0.02
cis-1,2-Dichloroethylene	(ug/l)	<0.5	43	2	2.1
cis-1,3-Dichloropropene	(ug/l)	<0.5	<2.5	<1	<1
Copper	(ug/l)	0.8	0.4	2.1	2.1
DBCP	(ug/l)	<2	<10	<4	<4
Dibenzo(a,h)anthracene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Dibenzofuran	(ug/l)	<0.02	0.21	0.51	0.48
Dibromochloromethane	(ug/l)	<0.5	<2.5	<1	<1
Dichlorodifluoromethane	(ug/l)	<0.5	<2.5	<1	<1
EDB	(ug/l)	<2	<10	<4	<4
Ethylbenzene	(ug/l)	<0.5	360	33	33
Fluoranthene	(ug/l)	<0.02	0.41	0.095	0.096
Fluorene	(ug/l)	<0.02	0.65	2.1	2.4
Hexachlorobutadiene	(ug/l)	<2	<10	<4	<4
Indeno(1,2,3-cd)pyrene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Iron	(ug/l)	372	63600	74000	70600
Lead	(ug/l)	0.69	0.71	2.35	2.3
m/p-xylene	(ug/l)	1.5	550	53	52
Manganese	(ug/l)	<5	5900	4030	3830
m-Dichlorobenzene	(ug/l)	<0.5	<2.5	<1	<1
Methyl bromide	(ug/l)	<0.5	<2.5	<1	<1

Analyses by Columbia Analytical Services
(Kelso, WA)

- -=Not analyzed

Table A-2
Summary of Analytical Chemistry Results for Groundwater
Unvalidated Data - March 2002

25694284

PERIOD: From 03/14/2002 thru 03/15/2002 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE DATE	MW-07 03/14/2002	MW-08 03/15/2002	MW-09 03/15/2002	MW-09 03/15/2002
Methyl chloride	(ug/l)	<0.5	<2.5	<1	<1
Methyl ethyl ketone	(ug/l)	<20	<100	<40	<40
Methyl isobutyl ketone (MIBK)	(ug/l)	<20	<100	<40	<40
Methylene bromide	(ug/l)	<0.5	<2.5	<1	<1
Methylene chloride	(ug/l)	<2	<10	<4	<4
Naphthalene	(ug/l)	0.022	63	0.81	0.7
n-Butylbenzene	(ug/l)	<2	23	5.9	5.8
Nickel	(ug/l)	2.5	2	3.7	3.6
n-Propylbenzene	(ug/l)	29	170	27	26
o-Chlorotoluene	(ug/l)	<2	<10	<4	<4
o-Dichlorobenzene	(ug/l)	<0.5	<2.5	<1	<1
o-Xylene	(ug/l)	<0.5	5	18	18
p-Chlorotoluene	(ug/l)	<2	<10	<4	<4
p-Cymene	(ug/l)	<2	<10	5.1	5.3
p-Dichlorobenzene	(ug/l)	<0.5	<2.5	<1	<1
Phenanthrene	(ug/l)	<0.02	0.28	0.62	0.33
Pyrene	(ug/l)	<0.02	0.54	0.13	0.12
sec-Butylbenzene	(ug/l)	<2	15	<4	<4
sec-Dichloropropane	(ug/l)	<0.5	<2.5	<1	<1
Silver	(ug/l)	<0.02	<0.02	<0.02	<0.02
Styrene	(ug/l)	<0.5	<2.5	<1	<1
tert-Butylbenzene	(ug/l)	<2	<10	<4	<4
Tetrachloroethylene	(ug/l)	<0.5	<2.5	<1	<1
Toluene	(ug/l)	1.1	<2.5	40	40
trans-1,2-dichloroethene	(ug/l)	<0.5	<2.5	<1	<1
trans-1,3-Dichloropropene	(ug/l)	<0.5	<2.5	<1	<1
Trichloroethylene	(ug/l)	<0.5	3.4	<1	<1
Trichlorofluoromethane	(ug/l)	<0.5	<2.5	<1	<1
Vinyl chloride	(ug/l)	<0.5	8.4	<1	<1
Zinc	(ug/l)	3.5	0.7	0.8	0.8

Analyses by Columbia Analytical Services (Kelso, WA)

- -=Not analyzed

Table A-2
Summary of Analytical Chemistry Results for Groundwater
Unvalidated Data - March 2002

25694284

PERIOD: From 03/14/2002 thru 03/15/2002 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE DATE	MW-10 03/15/2002	MW-12 03/15/2002	MW-13 03/15/2002	MW-14 03/14/2002
1,1,1,2-Tetrachloroethane	(ug/l)	<1	<1	<1	<0.5
1,1,1-Trichloroethane	(ug/l)	<1	<1	<1	<0.5
1,1,2,2-Tetrachloroethane	(ug/l)	<1	<1	<1	<0.5
1,1,2-Trichloroethane	(ug/l)	<1	<1	<1	<0.5
1,1-Dichloroethane	(ug/l)	<1	<1	<1	<0.5
1,1-Dichloroethylene	(ug/l)	<1	<1	<1	<0.5
1,1-Dichloropropene	(ug/l)	<1	<1	<1	<0.5
1,2,3-Trichlorobenzene	(ug/l)	<4	<4	<4	<2
1,2,3-Trichloropropane	(ug/l)	<1	<1	<1	<0.5
1,2,4-Trichlorobenzene	(ug/l)	<4	<4	<4	<2
1,2-Dichloroethane	(ug/l)	<1	<1	<1	<0.5
1,2-Dichloropropane	(ug/l)	<2.9	<2	<3.3	<0.5
1,3-Dichloropropane	(ug/l)	<1	<1	<1	<0.5
2-Hexanone	(ug/l)	<40	<40	<40	<20
2-Methylnaphthalene	(ug/l)	0.036	0.39	0.88	<0.02
Acenaphthene	(ug/l)	0.27	1.7	1.5	<0.02
Acenaphthylene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Acetone	(ug/l)	<40	<40	<40	<20
Anthracene	(ug/l)	<0.02	0.089	0.068	<0.02
Arsenic	(ug/l)	16.5	23.4	28.2	1.4
Benzene	(ug/l)	5.2	82	43	<0.5
Benzene, (1-methylethyl)-	(ug/l)	78	26	46	<2
Benzene, 1,2,4-trimethyl	(ug/l)	<4	<4	<4	<2
Benzene, 1,3,5-trimethyl-	(ug/l)	<4	<4	16	<2
Benzo(a)anthracene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Benzo(a)pyrene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Benzo(ghi)perylene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Benzo(k)fluoranthene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Benzo[b]fluoranthene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Bromobenzene	(ug/l)	<4	<4	<4	<2

Analyses by Columbia Analytical Services (Kelso, WA)

--=Not analyzed

Table A-2
Summary of Analytical Chemistry Results for Groundwater
Unvalidated Data - March 2002

25694284

PERIOD: From 03/14/2002 thru 03/15/2002 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE / DATE	MW-10 03/15/2002	MW-12 03/15/2002	MW-13 03/15/2002	MW-14 03/14/2002
Bromodichloromethane	(ug/l)	<1	<1	<1	<0.5
Bromoform	(ug/l)	<1	<1	<1	<0.5
Carbon disulfide	(ug/l)	<1	<1	<1	<0.5
Carbon tetrachloride	(ug/l)	<1	<1	<1	<0.5
Chlorobenzene	(ug/l)	<1	<1	<1	<0.5
Chlorobromomethane	(ug/l)	<1	<1	<1	<0.5
Chloroethane	(ug/l)	1.1	<1	<1	<0.5
Chloroform	(ug/l)	<1	<1	<1	<0.5
Chromium	(ug/l)	<1	1.4	1.3	0.7
Chrysene	(ug/l)	<0.02	<0.02	<0.02	<0.02
cis-1,2-Dichloroethylene	(ug/l)	21	<1	<1	<0.5
cis-1,3-Dichloropropene	(ug/l)	<1	<1	<1	<0.5
Copper	(ug/l)	<0.5	0.5	0.7	0.8
DBCP	(ug/l)	<4	<4	<4	<2
Dibenzo(a,h)anthracene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Dibenzofuran	(ug/l)	0.055	0.63	0.65	<0.02
Dibromochloromethane	(ug/l)	<1	<1	<1	<0.5
Dichlorodifluoromethane	(ug/l)	<1	<1	<1	<0.5
EDB	(ug/l)	<4	<4	<4	<2
Ethylbenzene	(ug/l)	39	4.8	16	<0.5
Fluoranthene	(ug/l)	<0.02	0.036	0.029	<0.02
Fluorene	(ug/l)	0.29	2.9	2.7	<0.02
Hexachlorobutadiene	(ug/l)	<4	<4	<4	<2
Indeno(1,2,3-cd)pyrene	(ug/l)	<0.02	<0.02	<0.02	<0.02
Iron	(ug/l)	25400	90500	68300	2680
Lead	(ug/l)	0.19	0.82	0.55	0.05
m/p-xylene	(ug/l)	7.1	25	71	<0.5
Manganese	(ug/l)	2600	4570	2760	116
m-Dichlorobenzene	(ug/l)	<1	<1	<1	<0.5
Methyl bromide	(ug/l)	<1	<1	<1	<0.5

Analyses by Columbia Analytical Services (Kelso, WA)

- -=Not analyzed

Table A-2
Summary of Analytical Chemistry Results for Groundwater
Unvalidated Data - March 2002

25694284

PERIOD: From 03/14/2002 thru 03/15/2002 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE DATE	MW-10 03/15/2002	MW-12 03/15/2002	MW-13 03/15/2002	MW-14 03/14/2002
Methyl chloride	(ug/l)	<1	<1	<1	<0.5
Methyl ethyl ketone	(ug/l)	<40	<40	<40	<20
Methyl isobutyl ketone (MIBK)	(ug/l)	<40	<40	<40	<20
Methylene bromide	(ug/l)	<1	<1	<1	<0.5
Methylene chloride	(ug/l)	<4	<4	<4	<2
Naphthalene	(ug/l)	0.34	0.68	0.77	<2
n-Butylbenzene	(ug/l)	14	6.3	9.8	<2
Nickel	(ug/l)	2.6	3.3	3.9	1.8
n-Propylbenzene	(ug/l)	160	32	50	<2
o-Chlorotoluene	(ug/l)	<4	<4	<4	<2
o-Dichlorobenzene	(ug/l)	<1	<1	<1	<0.5
o-Xylene	(ug/l)	<1	6.1	12	<0.5
p-Chlorotoluene	(ug/l)	<4	<4	<4	<2
p-Cymene	(ug/l)	<4	<4	12	<2
p-Dichlorobenzene	(ug/l)	<1	<1	<1	<0.5
Phenanthrene	(ug/l)	0.023	1.7	1.6	<0.02
Pyrene	(ug/l)	<0.02	0.056	0.038	<0.02
sec-Butylbenzene	(ug/l)	13	4.6	6.9	<2
sec-Dichloropropane	(ug/l)	<1	<1	<1	<0.5
Silver	(ug/l)	<0.1	<0.02	<0.1	<0.02
Styrene	(ug/l)	<1	<1	<1	<0.5
tert-Butylbenzene	(ug/l)	<4	<4	<4	<2
Tetrachloroethylene	(ug/l)	<1	<1	<1	<0.5
Toluene	(ug/l)	1.5	16	26	<0.5
trans-1,2-dichloroethene	(ug/l)	<1	<1	<1	<0.5
trans-1,3-Dichloropropene	(ug/l)	<1	<1	<1	<0.5
Trichloroethylene	(ug/l)	<1	<1	<1	<0.5
Trichlorofluoromethane	(ug/l)	<1	<1	<1	2
Vinyl chloride	(ug/l)	20	<1	<1	<0.5
Zinc	(ug/l)	<2.5	1.4	<2.5	3.3

Analyses by Columbia Analytical Services (Kelso, WA)

- -=Not analyzed

Table A-2
Summary of Analytical Chemistry Results for Groundwater
Unvalidated Data - March 2002

25694284

PERIOD: From 03/14/2002 thru 03/15/2002 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE DATE	MW-15 03/14/2002	MW-16 03/14/2002	MW-17 03/14/2002
1,1,1,2-Tetrachloroethane	(ug/l)	<0.5	<0.5	<0.5
1,1,1-Trichloroethane	(ug/l)	<0.5	<0.5	<0.5
1,1,2,2-Tetrachloroethane	(ug/l)	<0.5	<0.5	<0.5
1,1,2-Trichloroethane	(ug/l)	<0.5	<0.5	<0.5
1,1-Dichloroethane	(ug/l)	<0.5	<0.5	<0.5
1,1-Dichloroethylene	(ug/l)	<0.5	<0.5	<0.5
1,1-Dichloropropene	(ug/l)	<0.5	<0.5	<0.5
1,2,3-Trichlorobenzene	(ug/l)	<2	<2	<2
1,2,3-Trichloropropane	(ug/l)	<0.5	<0.5	<0.5
1,2,4-Trichlorobenzene	(ug/l)	<2	<2	<2
1,2-Dichloroethane	(ug/l)	<0.5	<0.5	<0.5
1,2-Dichloropropane	(ug/l)	<0.5	<0.5	<0.5
1,3-Dichloropropane	(ug/l)	<0.5	<0.5	<0.5
2-Hexanone	(ug/l)	<20	<20	<20
2-Methylnaphthalene	(ug/l)	<0.02	<0.02	<0.02
Acenaphthene	(ug/l)	<0.02	<0.02	<0.02
Acenaphthylene	(ug/l)	<0.02	<0.02	<0.02
Acetone	(ug/l)	<20	<20	<20
Anthracene	(ug/l)	<0.02	<0.02	<0.02
Arsenic	(ug/l)	1.9	11	2.2
Benzene	(ug/l)	<0.5	<0.5	<0.5
Benzene, (1-methylethyl)-	(ug/l)	<2	<2	<2
Benzene, 1,2,4-trimethyl	(ug/l)	<2	<2	<2
Benzene, 1,3,5-trimethyl-	(ug/l)	<2	<2	<2
Benzo(a)anthracene	(ug/l)	<0.02	<0.02	<0.02
Benzo(a)pyrene	(ug/l)	<0.02	<0.02	<0.02
Benzo(ghi)perylene	(ug/l)	<0.02	<0.02	<0.02
Benzo(k)fluoranthene	(ug/l)	<0.02	<0.02	<0.02
Benzo[b]fluoranthene	(ug/l)	<0.02	<0.02	<0.02
Bromobenzene	(ug/l)	<2	<2	<2

Analyses by Columbia Analytical Services (Kelso, WA)

- -=Not analyzed

Table A-2
Summary of Analytical Chemistry Results for Groundwater
Unvalidated Data - March 2002

25694284

PERIOD: From 03/14/2002 thru 03/15/2002 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE DATE	MW-15 03/14/2002	MW-16 03/14/2002	MW-17 03/14/2002
Bromodichloromethane	(ug/l)	<0.5	<0.5	<0.5
Bromoform	(ug/l)	<0.5	<0.5	<0.5
Carbon disulfide	(ug/l)	<0.5	<0.5	<0.5
Carbon tetrachloride	(ug/l)	<0.5	<0.5	<0.5
Chlorobenzene	(ug/l)	<0.5	<0.5	<0.5
Chlorobromomethane	(ug/l)	<0.5	<0.5	<0.5
Chloroethane	(ug/l)	<0.5	<0.5	<0.5
Chloroform	(ug/l)	<0.5	<0.5	<0.5
Chromium	(ug/l)	0.4	0.8	0.2
Chrysene	(ug/l)	<0.02	<0.02	<0.02
cis-1,2-Dichloroethylene	(ug/l)	<0.5	<0.5	<0.5
cis-1,3-Dichloropropene	(ug/l)	<0.5	<0.5	<0.5
Copper	(ug/l)	1	0.4	0.6
DBCP	(ug/l)	<2	<2	<2
Dibenzo(a,h)anthracene	(ug/l)	<0.02	<0.02	<0.02
Dibenzofuran	(ug/l)	<0.02	<0.02	<0.02
Dibromochloromethane	(ug/l)	<0.5	<0.5	<0.5
Dichlorodifluoromethane	(ug/l)	<0.5	<0.5	<0.5
EDB	(ug/l)	<2	<2	<2
Ethylbenzene	(ug/l)	<0.5	<0.5	<0.5
Fluoranthene	(ug/l)	<0.02	<0.02	<0.02
Fluorene	(ug/l)	<0.02	<0.02	<0.02
Hexachlorobutadiene	(ug/l)	<2	<2	<2
Indeno(1,2,3-cd)pyrene	(ug/l)	<0.02	<0.02	<0.02
Iron	(ug/l)	1210	14700	1060
Lead	(ug/l)	0.5	0.15	0.6
m/p-xylene	(ug/l)	<0.5	<0.5	<0.5
Manganese	(ug/l)	1990	2040	540
m-Dichlorobenzene	(ug/l)	<0.5	<0.5	<0.5
Methyl bromide	(ug/l)	<0.5	<0.5	<0.5

Analyses by Columbia Analytical Services
(Kelso, WA)

- -=Not analyzed

Table A-2
Summary of Analytical Chemistry Results for Groundwater
Unvalidated Data - March 2002

25694284

PERIOD: From 03/14/2002 thru 03/15/2002 - Inclusive
SAMPLE TYPE: Water

CONSTITUENT	SITE / DATE	MW-15 03/14/2002	MW-16 03/14/2002	MW-17 03/14/2002
Methyl chloride	(ug/l)	<0.5	<0.5	<0.5
Methyl ethyl ketone	(ug/l)	<20	<20	<20
Methyl isobutyl ketone (MIBK)	(ug/l)	<20	<20	<20
Methylene bromide	(ug/l)	<0.5	<0.5	<0.5
Methylene chloride	(ug/l)	<2	<2	<2
Naphthalene	(ug/l)	<2	0.021	<2
n-Butylbenzene	(ug/l)	<2	<2	<2
Nickel	(ug/l)	2.7	1.9	2.4
n-Propylbenzene	(ug/l)	<2	<2	<2
o-Chlorotoluene	(ug/l)	<2	<2	<2
o-Dichlorobenzene	(ug/l)	<0.5	<0.5	<0.5
o-Xylene	(ug/l)	<0.5	<0.5	<0.5
p-Chlorotoluene	(ug/l)	<2	<2	<2
p-Cymene	(ug/l)	<2	<2	<2
p-Dichlorobenzene	(ug/l)	<0.5	<0.5	<0.5
Phenanthrene	(ug/l)	<0.02	<0.02	<0.02
Pyrene	(ug/l)	<0.02	0.033	<0.02
sec-Butylbenzene	(ug/l)	<2	<2	<2
sec-Dichloropropane	(ug/l)	<0.5	<0.5	<0.5
Silver	(ug/l)	<0.02	<0.02	<0.02
Styrene	(ug/l)	<0.5	<0.5	<0.5
tert-Butylbenzene	(ug/l)	<2	<2	<2
Tetrachloroethylene	(ug/l)	<0.5	<0.5	<0.5
Toluene	(ug/l)	<0.5	<0.5	<0.5
trans-1,2-dichloroethene	(ug/l)	<0.5	<0.5	<0.5
trans-1,3-Dichloropropene	(ug/l)	<0.5	<0.5	<0.5
Trichloroethylene	(ug/l)	<0.5	<0.5	<0.5
Trichlorofluoromethane	(ug/l)	<0.5	<0.5	<0.5
Vinyl chloride	(ug/l)	<0.5	<0.5	<0.5
Zinc	(ug/l)	5	2.2	4.2

Analyses by Columbia Analytical Services (Kelso, WA)

- -=Not analyzed

Well Development

SCHN00261058

CH2MHILL **MEMORANDUM**

To: Bill Cobb/Bridgewater (OFFICE)

(OFFICE)

(OFFICE)

(OFFICE)

(OFFICE)

Confidential Attorney Work Product Prepared Under the Direction of Counsel (OFFICE)

(OFFICE)

From: Mark Wirganowicz (OFFICE)

Date: 6/10/98 Project No. 130341.E0.01

Re: monitoring well development by Mike Abbott & Barry Collom

Premier Edible Oils

monitoring wells MW-1 through MW-5 developed 6/8 & 6/9/98 using surge block and peristaltic pump

MW-1

total gallons purged = 98

final parameters: specific conductance = 133 µmhos/cm
temp. = 14.1 °C
pH = 6.41
turbidity = 4.4 NTUs
description = clear, colorless

MW-2

total gallons purged = 55

final parameters = spec. cond. = 522 µmhos/cm
temp. = 17.1
pH = 6.22
turbidity = 6 NTUs
description = hint of yellow color, clear, very light sheen, light odor

CH2MHILL **MEMORANDUM**

To: _____ (OFFICE)

From: _____ (OFFICE)

Date: _____ Project No. 138341.E0.01

Re: _____

Confidential Attorney Work Product Prepared Under the Direction of Counsel.

MW-3

total gallons purged = 69

final parameters: spec. cond. = 361 µmhos/cm
temp. = 15.4 °C
pH = 6.44
turbidity = 4.7
description = almost clear, colorless, no sheen

MW-4

total gallons purged = 55

final parameters: spec. cond. = 378 µmhos/cm
temp = 13.3 °C
pH = 6.70
turbidity = 2.9 NTUs
description = clear, colorless, no sheen, gasoline odor

MW-5

total gallons purged = 55

final parameters: spec. cond. = 353 µmhos/cm
temp. = 14.5 °C
pH = 6.35
turbidity = 5 NTUs
description = clear, colorless, no sheen, gasoline odor

SCHN00261060

3/3

CH2MHILL **MEMORANDUM**

To: _____ (OFFICE)

From: _____ (OFFICE)

Date: _____ Project No. 130341.E0.01

Re: _____

Confidential Attorney Work Product Prepared Under the Direction of Counsel.

OBSERVATIONS DURING DEVELOPMENT

MW-1 : no sheens, no odor during development

MW-2 : thin layer of product on water column (~ 1/16") prior to development, strong diesel/kerosene odor, sheens especially on sand

MW-3: oil sheen as small dots and streaks of irridescence, diesel/kerosene(?) odor

MW-4: sheen observed with small globules ~ 1/16 - 1/8" diameter, gasoline odor

MW-5: sheen, gasoline odor

DRUM INVENTORY

drums labeled with well IDs, as development water, date, and number of gallons; drums left on-site near their respective wells; 3 empty drums left on site, one has large crease near bottom, recommend not for liquids

MW-1 : 2 drums (1 full, 1 with ~ 46 gallons)
MW-2 : 1 drum, full
MW-3 : 2 drums (1 full, 1 with ~ 15 gallons)
MW-4 : 1 drum, full
MW-5 : 1 drum, full

TOTAL = 7 drums, ~ 336 gallons

MEMO

REV 7/84 FORM 3

SCHN00261061

Confidential Attorney Work Product Pr...

CH2M HILL WELL DEVELOPMENT FIELD LOG

Schnitzer — Well I.D.: MW 1

Client: Premier Edible Oils	Well Dia:(in.): 2
Project #:	Sand Pack Dia (in.): 10"
Developed By: MDA; BEC	Bore Hole Dia (in.): 10"
	Total Gallons Removed: 98
Standing Well Volume (gallons @ 30% porosity): 27 - 12.79 x .17 = 2.4 gallons Casing	
15' x 3.92 x .3 = 17.6 gallons - Sand Pack	17.6 + 2.4 = 20 gal
Start: Date 6/18/98 Time: 1048	DTW (ft. from TOC): 12.79 Total Depth(ft. from TOC):
Stop: Date / / Time:	DTW (ft. from TOC): Total Depth(ft. from TOC): ~27
Development Method / Comments: Peristaltic Pump w/ 1/2" Poly tubing & surge block on bottom of tubing	

Time	DTW ft. from TOC	Volume Removed (gallons)	Spec. Cond. (micromohs/cm)	Temp. (oC)	Ph	Turbidity NTU's	Purge Rate (gal/min)	Surging (Y/N)	Near Continuous Surging of All 15' of Screen Clarity/ Color/Remarks
1048	12.79	0						Y	Initial Surging
1054	Pump on								Yellow-Brown, Very Cloudy Bottom
1057		2	121	15.0	6.19	—	.66	Y	↑ 100% Pump Speed settleable solids in
1105	12.98	10	117	13.4	6.30	—	1.0	Y	Yellow-Brown Cloudy Bottom of Bucket
1114	12.97	20	116	14.1	6.35	900	1.1	Y	100% Yellow-Brown very fine Sand Cloudy
1122	12.93	30	124	13.6	6.36	470	1.25	Y	100% " " " Cloudy
1130 ~~1139~~	12.97	40	122	13.7	6.41	330	1.25	Y	100% Yellow Brown very fine Sand cloudy
1139	12.90	50	128	13.7	6.41	795	1.1	Y	100% Pump Speed " less Sand, Cloudy
1149	12.92	60	126	13.9	6.43	475	1.0	Y	" Yellow-Brown very little Sand, Cloudy
1159	12.93	70	121	14.0	6.43	500	1.0	Y	" " "
1204	end	Surging						N	
1208	12.92	80	122	14.4	6.40	600	1.0	N	50% Pump speed " " Pump Suction Top 1' of Water Column
1208				/	reduce	Pump Speed			
1221	12.89	90	131	14.3	6.42	37	.8	N	" Slightly Cloudy, No Sand
1224	Turned Pump (92) down to 40%								40%
1234	12.83	98	133	14.1	6.41	4.4	*.8	N	40% Pump speed Clear Colorless "
END									

* measured @ .5 gpm ??

SCHN00261062

Confidential Attorney
Work Product
Protection of Counsel

CH2M HILL WELL DEVELOPMENT FIELD LOG

Schnitzer — Well I.D.: MW2

Client: Premier Edible Oils	Well Dia:(in.): 2
Project #:	Sand Pack Dia (in.): 10" X 15'
Developed By: mDa, BEC	Bore Hole Dia (in.): 10"
	Total Gallons Removed: 55
Standing Well Volume (gallons @ 30% porosity): (27 - 15.43) X .17 = 2 in well casing	
15 X 3.92 X .3 = 17.6 gal. in Sand Pack	17.6 + 2 = 19.6
Start: Date 6/19/98 Time:	DTW (ft. from TOC): 15.43 Total Depth(ft. from TOC):
Stop: Date / / Time:	DTW (ft. from TOC): Total Depth(ft. from TOC):
Development Method / Comments: Peristaltic Pump w/ 1/2" Poly Tubing And Surge block 6" from end of Tubing.	

Time	DTW ft. from TOC	Volume Removed (gallons)	Spec. Cond. (micromohs/cm)	Temp. (oC)	Ph	Turbidity NTUs	Purge Rate (gal/min)	Surging (Y/N)	Almost Continuous Surging of Screen Area during surging / Clarity/ Color/Remarks
1400	15.43	0						Y	STRONG Kerosene Odor
1403	—	<1	561	19.3	6.04	—		Y	Olive-Grey - Very Cloudy / lots of black specks 100% Pump Speed NO Sheen
1416	15.45	10	550	16.8	6.03	—	.8	Y	very little Sheen on top of water Heavy Sheen in SAND in bottom of Cup / Bucket
1430	15.25	20	545	16.8	6.07	—	.7	Y	very little Sheen on top of water - Heavy in Black Sand in bottom of Bucket - Olive brown
1443	15.20	30	542	16.8	6.15	500	.8	Y	less SAND, Same Other wise less turbid
1451	—	35				32		N	~~Slightly~~ Cloudy, Sheen & Colorless
1458	15.21	40	535	17.0	6.16	14	.7	N	Slightly Cloud, Sheen & Colorless no Sand
1305	—	45	527	17.0	6.25	11	.7	N	VERY Slightly Cloudy, Colorless Sheen
1313	15.15	50	527	17.0	6.24	9	.7	N	" " "
~~1319~~ 1313		~~55~~						N	70% Pump Speed
~~1325~~ 1325	14.95	55	522	17.1	6.22	6	.4	N	" Hint of Yellow in WATER
End.									

Checked for floating product w/ BAiler ~~and~~ before developing well 1/32 - 1/16" layer of Product on top of well. Strong Diesel / Kerosene

Confidential Attorney Work Product Prepared Under the Direction of Counsel

Confidential Attorney Work Product File

CH2M HILL WELL DEVELOPMENT FIELD LOG

Breeze from 70°F, clear, West

Schnitzer

Well I.D.: MW3

Client: Premier Edible Oils	Well Dia:(in.): 2
Project #:	Sand Pack Dia (in.): 10 x 15
Developed By: mdg, BEC	Bore Hole Dia (in.): 10
	Total Gallons Removed: 69
Standing Well Volume (gallons @ 30% porosity): (26 - 14.19) X .17 = 2.0 gal - Casing	
15 X 3.92 X .3 = 17.6 gal / Sand Pack 17.6 + 2 = 19.6 per vol.	
Start: Date 6/18/98 Time: 0739	DTW (ft. from TOC): 14.19 Total Depth(ft. from TOC):
Stop: Date / / Time:	DTW (ft. from TOC): Total Depth(ft. from TOC): ~26
Development Method / Comments: Peristaltic Pump w/ ½" Poly tubing. Attached Surge Block 6' from bottom of tubing.	

Time	DTW ft. from TOC	Volume Removed (gallons)	Spec. Cond. (micromohs/cm)	Temp. (oC)	Ph	Eh (~Turbidity)	Purge Rate (gal/min)	Surging (Y/N)	Clarity/ Color/Remarks (Surged Almost Continuously entire Screen length)
14:00	14.19	0				—		Y	
14:05	Pump ON					—	—	Y	50% Pump Speed Brown, Very Cloudy
14:07	14.32	~1.5	393	16.2	6.40	—	—	Y	50%, Very Cloudy, Brown Sheen / very fine
14:09		—						Y	100% Pump Speed lots of ~~Silt~~ Sand w/ Silt
14:13		5						Y	100% olive-Brown very fine
—		10	372	14.9	6.46	—	—	Y	Pump, Cloudy, Sheen sand w/ silt
14:28	14.45	15					.66	Y	lots of very Fine Sand still
14:35	14.42	20	368	14.7	6.45	—	.66	Y	" " " " " " Sheen
1447	14.45	30	364	14.7	6.43	—	.8	Y	Sheen, lots of Fine Sand, Olive-Brown
1458	14.43	40	364	14.7	6.44		.8	Y	less Sheen, less Sand, Olive-Brown
1510	14.45	50	357	14.6	6.46	600	.8	Y	Sheen, very little Sand, Olive-Brown
1511	and Surge							N	Suction in top 1' of water Column.
1520	—	58	360	14.6	6.41	122		N	Sheen?, No Sand, TAN
1520		58					0.4	N	slowed pump to ~~40~~ 30%
1537	14.32	65	355	15.3	6.42	11.5	00.4	N	No Sheen, Almost clear Colorless
1550	14.31	69	361	15.4	6.44	4.7	0.4	N	
END					6.				
									Oder - Diesel / Kerosene?

Note: Oil/Sheen evident in Purge cup as small dots or streak of irridescences. May be coming in with the Sand.

Sand is Black.

Confidential Work Product Prepared Under the Direction of Counsel.

CH2M HILL WELL DEVELOPMENT FIELD LOG

Schnitzer — Well I.D.: MW4

Client: Premier Edible Oils	Well Dia:(in.): 2
Project #:	Sand Pack Dia (in.): 10" x 15'
Developed By:	Bore Hole Dia (in.): 10"
	Total Gallons Removed: 55
Standing Well Volume (gallons @ 30% porosity): (27 - 13.76) X .17 = 2.3 gal. CASING	
~~15~~ X 3.92 X .3 = 17.6 Sand Pack + 2.3 = 19.9 gallons	
Start: Date 6/19/98 Time: 0830	DTW (ft. from TOC): 13.76 Total Depth(ft. from TOC): —
Stop: Date / / Time:	DTW (ft. from TOC): Total Depth(ft. from TOC): ~27
Development Method / Comments: Peristaltic Pump w/ 1/2" Poly Tubing & Surge Block Attached to Bottom of Tubing.	

Time	DTW ft. from TOC	Volume Removed (gallons)	Spec. Cond. (micromohs/cm)	Temp. (oC)	Ph	Turbidity NTUs ~~Ph~~	Purge Rate (gal/min)	Surging (Y/N)	Almost Continuous Surging of Entire Screen during Surging periods Clarity/ Color/Remarks
0847	13.76							Y	Olive-Grey
0853	Pump on							Y	50% pump Speed Very Cloudy,
0854								Y	100% pump Speed, " " "
0857	13.91	~4	277	13.4	6.54	—		Y	Black Sheen, Very Fine Sand, Cloudy
0906	13.78	12	276	13.2	6.66	—	.9	Y	Sheen, Sand, Cloudy, Gasoline odor?
0922	13.81	20	430	13.1	6.69	—	.5	Y	SAme
0928		25						Y	100% SAme No Sand
0934	13.78	30	398	13.4	6.75	20	.8	NO	Slightly Cloudy, Colorless No Sheen
~~0937~~ 0941	13.78	40	381	13.4	6.73	5.9	~~.9~~ .8	N	~~100% pump Speed~~ No Sheen No Sand Gasoline Odor Clear, Colorless
0956	13.80	50	378	13.3	6.70	2.9	1.0	N	SAme
1061	13.79	55	end						

Note: Sheen is seen in purge cup as small dots about 1/16 - 1/8" dia.

Confidential Attorney Work
Product Prepared Under the
Direction of Counsel.

CH2M HILL WELL DEVELOPMENT FIELD LOG

Schnitzer — Well I.D.: MW5

Client: Premier Edible Oils	Well Dia:(in.): 2
Project #:	Sand Pack Dia (in.): 10" X 15'
Developed By: mda, BEC	Bore Hole Dia (in.): 10"
	Total Gallons Removed: 55
Standing Well Volume (gallons @ 30% porosity): (26-14) X .17 = 2	
SAND PACK = 15 X 3.92 X .3 = 17.6	17.6 + 2 = (19.6)
Start: Date 6/19/98 Time: 10:21	DTW (ft. from TOC): 14.00 Total Depth(ft. from TOC): —
Stop: Date / / Time:	DTW (ft. from TOC): Total Depth(ft. from TOC): ~26
Development Method / Comments: Peristaltic Pump w/ ½" Poly tubing & Surge block Attached 6" From Bottom of Tubing T.D.	

Time	DTW ft. from TOC	Volume Removed (gallons)	Spec. Cond. (micromohs/cm)	Temp. (oC)	Ph	Turbidity NTU's / ~~Eh~~	Purge Rate (gal/min)	Surging (Y/N)	Almost Continuous Surging of entire Screen. Clarity/ Color/Remarks
1033								Y	
1038	Pump on					—		Y	~~100~~% Pump Speed. Olive Grey
↓						—		Y Y	SAND,
1041	—	~3	343	14.6	6.32	—	~1	Y	Sheen, Olive-Grey, Lots of Fine Black SAND Gasoline odor, Cloudy
1047	14.12	10	366	14.2	6.40	—	~1	Y	SAME
1058	14.15	20	367	14.0	6.37	—	~1	Y	SAME less SAND
1111	14.11	30	375	14.1	6.36	~~Eh~~ SAME	.8	Y	SAME less SAND
1118	14.14	35	end Surging			SAME	.8	Y	" " "
1123	14.13	40	372	14.2	6.39	150	~1	N	less Sheen, less Cloudy NO SAND less Color Gasoline odor
Bucket OUT 16 → 11:23	Pump to 50% speed		356	14.5	6.37	15	0.6	N	Very Slightly Cloudy Gasoline
11:31	14:18	45							No Sheen, Colorless, odor
1141	14.09	50	351	14.6	6.35	7.5	.5	N	Almost clear No Sheen Colorless Gasoline odor
1151	14.09	55	353	14.5		5	.5	N	Clear, Colorless No Sheen, Gasoline odor
End									

Note: Checked well with Bailer before starting
No Visible Floating Product.

Survey Information

SCHN00261067

Premier Edible Oils

Adjusted Elevations of Monitor Wells

Well ID	Location	Previous Assumed Elevation	NGVD 29 Elevation
MW-1	Casing	95.15	30.97
	PVC	94.80	30.62
MW-2	Casing	96.11	31.93
	PVC	95.76	31.58
MW-3	Casing	96.48	32.30
	PVC	96.24	32.06
MW-4	Casing	96.24	32.06
	PVC	95.94	31.76
MW-5	Casing	96.21	32.03
	PVC	95.85	31.67

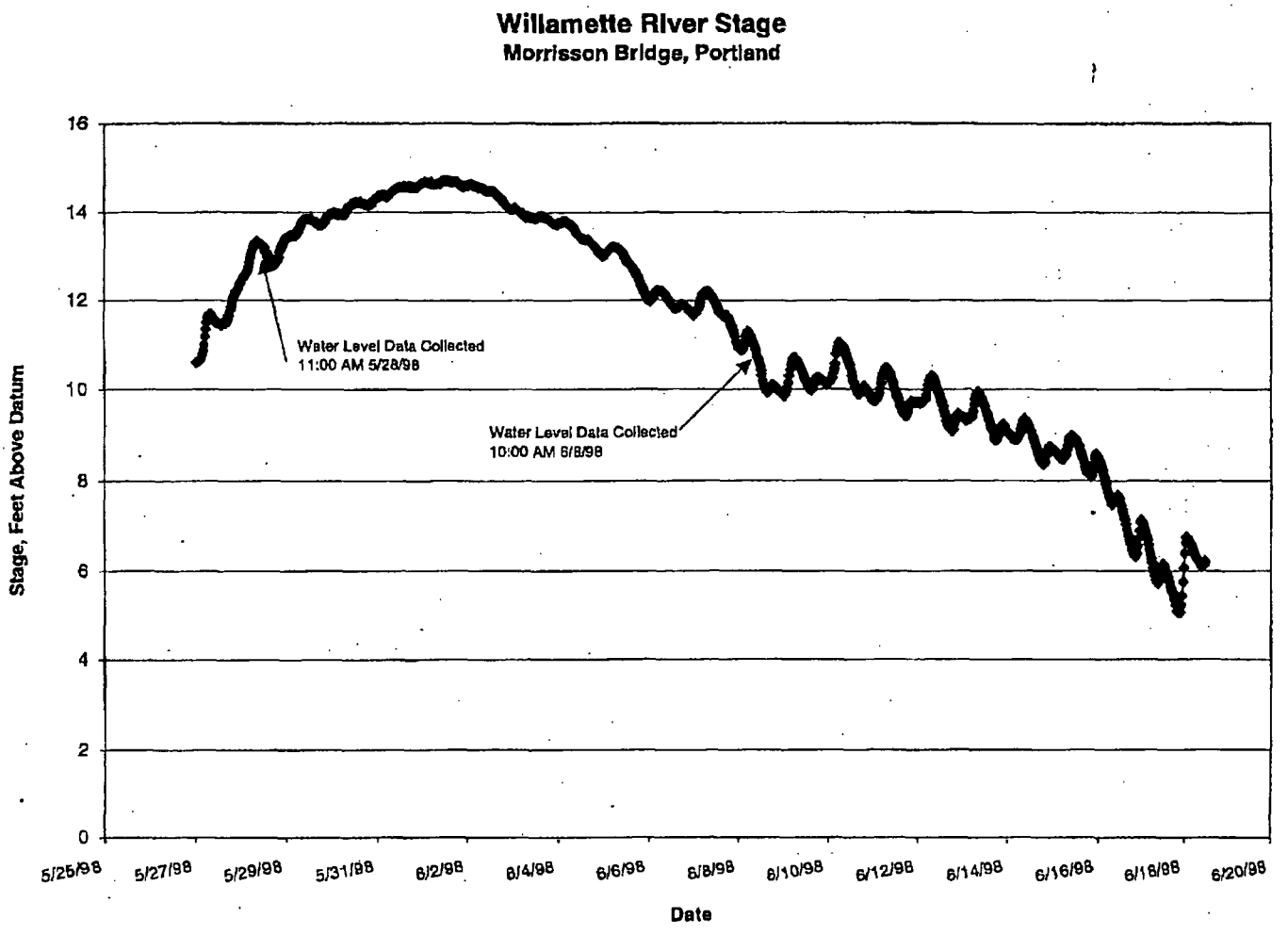
BM	Assumed	NGVD 29	Difference
HLM - 61	96.36	32.18	64.18

Fax # 973-6069

To: Bill Cobb
Bridgewater Group

From Bruce Brody-Heine
12/13/99

SCHN00261068



06/22/98 17:00 P.002/002

MEMORANDUM

To: Bruce B-H (OFFICE)

From: M.W. (OFFICE)

Date: 5/28/98 Project No. 13634.E0.01

Re: monitoring well water levels

Confidential Attorney Work Product Prepared Under the Direction of Counsel.

10:20 MW-5 DTW = 15.33 ft BTOC
no odor, no sheen, PVC shavings

10:25 MW-1 DTW = 14.12 ft BTOC
no odor, no sheen, PVC shavings

10:35 MW-3 DTW = 15.71 ft BTOC
no odor, no sheen, PVC shavings

10:45 MW-4 DTW = 14.75 ft BTOC
odor, no sheen, PVC shavings

10:55 MW-2 DTW = 14.47 ft BTOC
product on probe, slimy appearance, strong odor
no sheen, ~1" product on water

1110 dock DTW = 14.40 ft below top of curb on N side of dock

Confidential Attorney Work Product Prepared Under the Direction of Counsel.

Premier Edible Oils
130341.EO.01

Top of PVC casing elevations (feet, site assumed)

MW-1	94.80
MW-2	95.76
MW-3	96.24
MW-4	95.94
MW-5	95.85

Depth to Groundwater in Monitoring Wells (feet BTOC)

Date	MW-1	MW-2	MW-3	MW-4	MW-5
05/28/98	14.12	14.47	15.71	14.75	15.33

Groundwater Elevations (feet)

MW-1	MW-2	MW-3	MW-4	MW-5
80.68	81.29	80.53	81.19	80.52

GW-16 GW-19 GW-5 GW-3 GW-10

SCHN00261071

Well Completion Diagrams

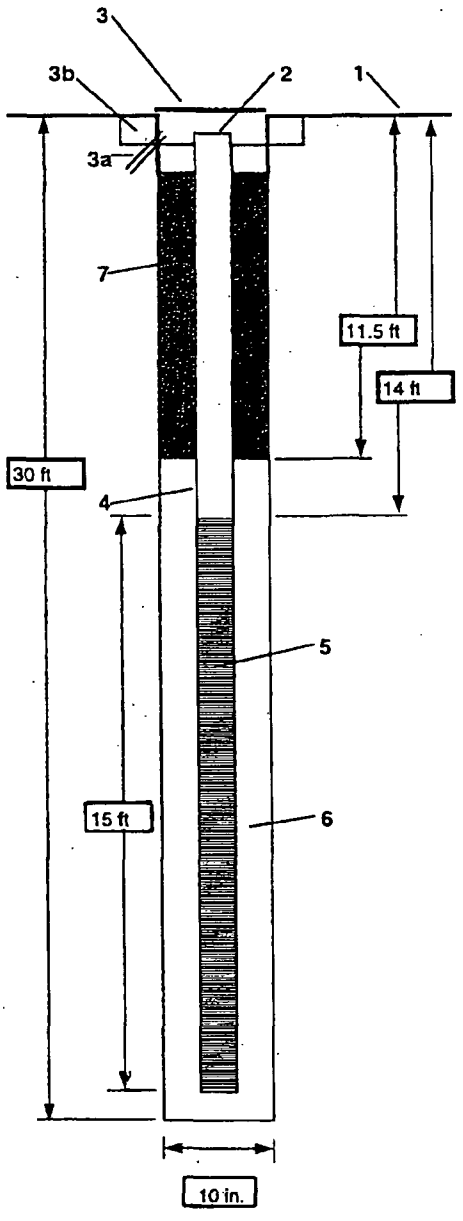
SCHN00261072

CH2MHILL

PROJECT NUMBER	BORING NUMBER	
130341.EO.01	MW01	SHEET 1 OF 1

WELL COMPLETION DIAGRAM

PROJECT : Premier Edible Oils		LOCATION : ESE of hydrogen plant (location 16)	
ELEVATION : 95.15 ft		DRILLING CONTRACTOR : Geo-Tech Explorations	
DRILLING METHOD AND EQUIPMENT USED : HSA			
WATER LEVEL 14.12 ft BTOC 5/28/98	START : 5/26/98	END : 5/26/98	LOGGER B. Brody-Heine



1- Ground elevation at well 95.15 ft

2- Top of casing elevation 94.80 ft

3- Wellhead protection cover type Sherwood monument
   a) drain tube? no
   b) concrete pad dimensions 1.5 ft

4- Diameter/type of well casing 2-inch Sch. 40 PVC flush threaded

5- Type/slot size of screen Sch. 40 PVC/0.010-inch slot

6- Type screen filter 10-20 Colorado Silica
   a) Quantity used 13 - 50# sacks

7- Type of seal 3/4-inch Bentonite chips
   a) Quantity used 7 - 50# sacks
   b) Top of seal 1.5 ft bgs

Development method

Development time

Estimated purge volume

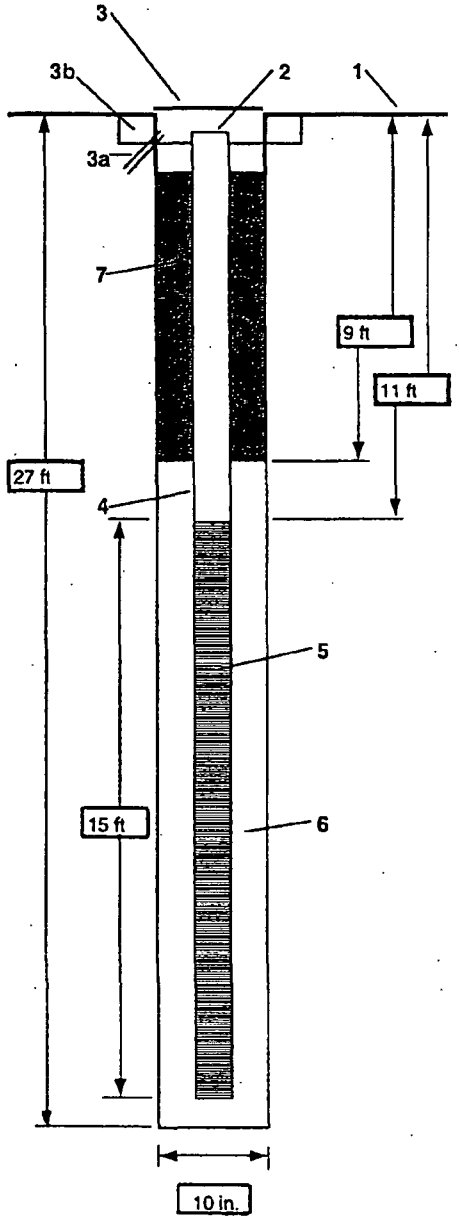
Comments 4-inch end cap below screen

CH2MHILL

PROJECT NUMBER	BORING NUMBER	
130341.EO.01	MW02	SHEET 1 OF 1

WELL COMPLETION DIAGRAM

PROJECT : Premier Edible Oils		LOCATION : W of warehouse (location 19)	
ELEVATION : 96.11 ft		DRILLING CONTRACTOR : Geo-Tech Explorations	
DRILLING METHOD AND EQUIPMENT USED : HSA			
WATER LEVEL 14.47 ft BTOC 5/28/98	START : 5/26/98	END : 5/26/98	LOGGER B. Brody-Heine



1- Ground elevation at well 96.11 ft

2- Top of casing elevation 95.76 ft

3- Wellhead protection cover type Sherwood monument
   a) drain tube? no
   b) concrete pad dimensions 1.5 ft

4- Diameter/type of well casing 2-inch Sch. 40 PVC flush threaded

5- Type/slot size of screen Sch. 40 PVC/0.010-inch slot

6- Type screen filter 10-20 Colorado Silica
   a) Quantity used 14 - 50# sacks

7- Type of seal 3/4-inch Bentonite chips
   a) Quantity used 5 - 50# sacks
   b) Top of seal 1.5 ft bgs

Development method

Development time

Estimated purge volume

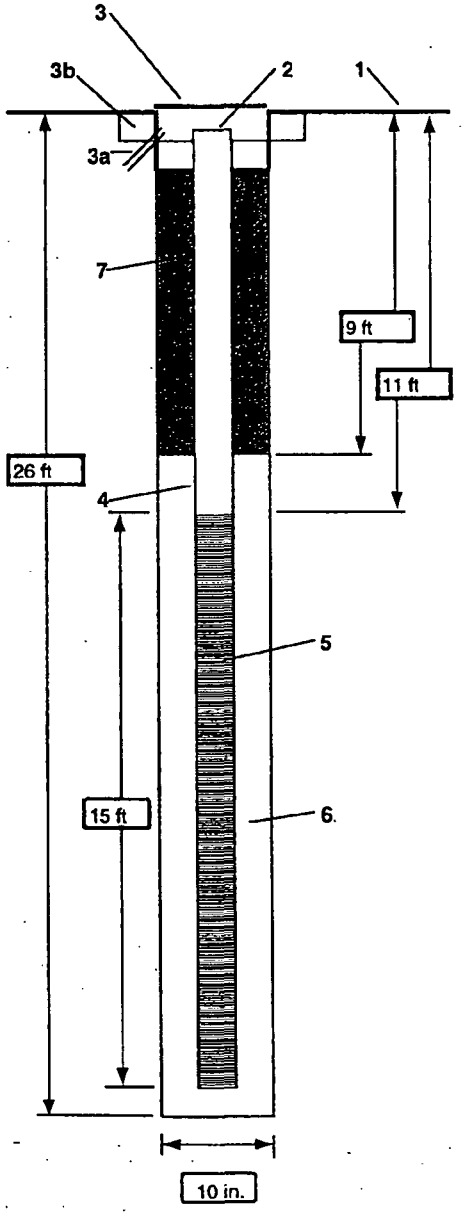
Comments 4-inch end cap below screen

CH2MHILL

PROJECT NUMBER	BORING NUMBER	
130341.EO.01	MW03	SHEET 1 OF 1

WELL COMPLETION DIAGRAM

PROJECT : Premier Edible Oils		LOCATION :	E of railcar loading racks (location 5)
ELEVATION : 96.48 ft		DRILLING CONTRACTOR :	Geo-Tech Explorations
DRILLING METHOD AND EQUIPMENT USED : HSA			
WATER LEVEL 15.71 ft BTOC 5/28/98	START : 5/26/98	END : 5/26/98	LOGGER B. Brody-Heine



1- Ground elevation at well 96.48 ft

2- Top of casing elevation 96.24 ft

3- Wellhead protection cover type Sherwood monument
   a) drain tube? no
   b) concrete pad dimensions 1.5 ft

4- Diameter/type of well casing 2-inch Sch. 40 PVC flush threaded

5- Type/slot size of screen Sch. 40 PVC/0.010-inch slot

6- Type screen filter 10-20 Colorado Silica
   a) Quantity used 15 - 50# sacks

7- Type of seal 3/4-inch Bentonite chips
   a) Quantity used 5 - 50# sacks
   b) Top of seal 1.5 ft bgs

Development method

Development time

Estimated purge volume

Comments 4-inch end cap below screen

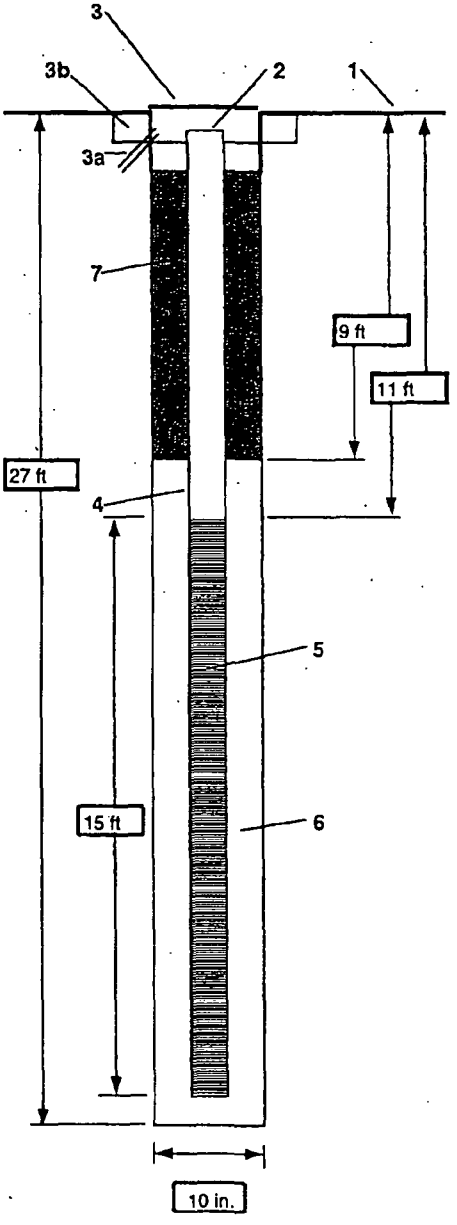
SCHN00261075

CH2MHILL

PROJECT NUMBER	BORING NUMBER	
130341.EO.01	MW04	SHEET 1 OF 1

WELL COMPLETION DIAGRAM

PROJECT : Premier Edible Oils		LOCATION : N of maintenance shop (location 3)	
ELEVATION : 96.24 ft		DRILLING CONTRACTOR : Geo-Tech Explorations	
DRILLING METHOD AND EQUIPMENT USED : HSA			
WATER LEVEL 14.75 ft BTOC 5/28/98	START : 5/27/98	END : 5/27/98	LOGGER B. Brody-Heine



1- Ground elevation at well 96.24 ft

2- Top of casing elevation 95.94 ft

3- Wellhead protection cover type Sherwood monument
   a) drain tube? no
   b) concrete pad dimensions 1.5 ft

4- Diameter/type of well casing 2-inch Sch. 40 PVC flush threaded

5- Type/slot size of screen Sch. 40 PVC/0.010-inch slot

6- Type screen filter 10-20 Colorado Silica
   a) Quantity used 14 - 50# sacks

7- Type of seal 3/4-inch Bentonite chips
   a) Quantity used 6 - 50# sacks
   b) Top of seal 1.5 ft bgs

Development method

Development time

Estimated purge volume

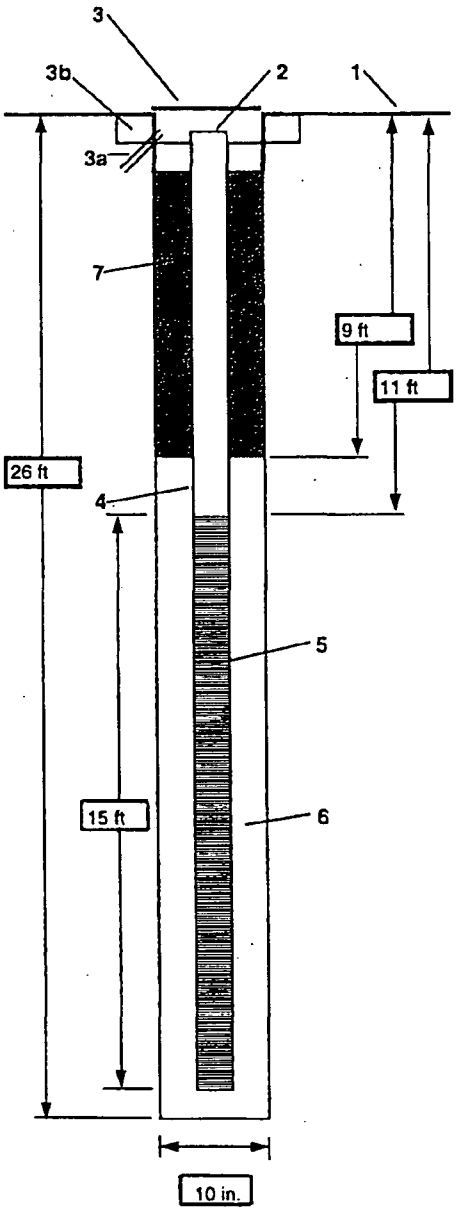
Comments 4-inch end cap below screen

CH2MHILL

PROJECT NUMBER	BORING NUMBER	
130341.EO.01	MW05	SHEET 1 OF 1

WELL COMPLETION DIAGRAM

PROJECT : Premier Edible Oils		LOCATION :	just N of process bldg (location 10)
ELEVATION : 96.21 ft		DRILLING CONTRACTOR :	Geo-Tech Explorations
DRILLING METHOD AND EQUIPMENT USED : HSA			
WATER LEVEL 15.33 ft BTOC 5/28/98	START : 5/27/98	END : 5/27/98	LOGGER B. Brody-Heine



1- Ground elevation at well 96.21 ft

2- Top of casing elevation 95.85 ft

3- Wellhead protection cover type Sherwood monument
a) drain tube? no
b) concrete pad dimensions 1.5 ft

4- Diameter/type of well casing 2-inch Sch. 40 PVC flush threaded

5- Type/slot size of screen Sch. 40 PVC/0.010-inch slot

6- Type screen filter 10-20 Colorado Silica
a) Quantity used 13 - 50# sacks

7- Type of seal 3/4-inch Bentonite chips
a) Quantity used 6 - 50# sacks
b) Top of seal 1.5 ft bgs

Development method

Development time

Estimated purge volume

Comments 4-inch end cap below screen

SCHN00261077

Soil Boring Logs

SCHN00261078

MHILL SUBJECT Summary of Drilling program observations SHEET NO. ____ of ____ DATE ____ PROJECT NO. ____

Geoprobe location	ODOR	Sheen	Air Monitoring Reading Downhole	Stained soil at depth below 10	Comments
1	--	--	0		
2	--	--	0		
3 (MW-4)	Yes	Yes heavy	3.2	15 to 26' strong odor & stain	(Solvent?)
4	--	yes	0.45		recharging slowly
5 (MW-3)	--	--	0	15 to 26 slight staining	
6	--	--	0		
7	Yes light	Yes	60		
8	— NO	ACCESS			
9	Yes	Yes heavy	30		
10 (MW-5)	YES strong	Yes balls of Product	jar head space 385	16-26'	solvent LEVEL C
11	--	--	0		
12	--	--	0.5		
13	--	--	0		
14	--	--	0		
15	— NO	ACCESS	TO LOCATION		
16 (MW-1)	--	--	0	No staining seen	clean looking
17	--	--	0		
18	--	--	0		
19 (MW-2)	YES STRONG	YES Heavy	300 inside well	10' to 26'	VERY STRONG LEVEL C
~~20~~	~~No~~	~~sample~~	~~Plant~~		
50	--	--	0		behind my building
60	--	Yes	160		between #3 & #4
46	--	--	1.0		between 3 & 2 slow rec
47	--	--	0.5		betwe 2 & 1 dee
48	--	--	0.0		between 1 & fence
49	--	--	0.5		nearest gate

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REV 10/96 FORM 18

SCHN00261079

this is a capital "O" letter.

CH2M HILL

PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	1	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION on berm, along east side of tankfarm

ELEVATION _____ DRILLING CONTRACTOR GeoTech Explorations Inc., Tualatin, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS: _____ START 5/21/98 FINISH 5/21/98 LOGGER Bruce Body-Heinz

DEPTH BELOW SURFACE (FT)	SAMPLE: INTERVAL	SAMPLE: NUMBER AND TYPE	SAMPLE: RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
5						Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch poly tubing w/ ball valve to collect groundwater samples No soil samples collected from this boring.
15						Depth to water inside rods: 14.8' bgs
	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected. OVM reading inside rods = 0.0 ppm
20	22.0					
25						

REV 11/89 FORM D1586

SCHN00261080

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PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	2	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION on berm, east side of tank farm

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/21/98 FINISH 5/21/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE: INTERVAL	SAMPLE: NUMBER AND TYPE	SAMPLE: RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
5						Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch poly tubing w/ ball valve to collect groundwater samples
15						Depth to water inside rods: 15.8' bgs
	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected.
20						OVM reading inside rods = 0.0ppm
	22.0					
25						

REV 11/89 FORM D1586

SCHN00261081

CH2MHILL

this is a capital "O" letter.

PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	3	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION east of small tank farm, containing diesel fuel

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/21/98 FINISH 5/21/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE: INTERVAL	SAMPLE: NUMBER AND TYPE	SAMPLE: RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
5						Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch poly tubing w/ ball valve to collect groundwater samples No soil samples collected from this boring.
15						
	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected. OVM reading inside rods = 3.2 ppm Heavy sheen observed on water samples.
20	22.0					
25						

REV 11/89 FORM D1586

SCHN00261082

this is a capital "O" letter.

CH2MHILL

PROJECT NUMBER	BORING NUMBER	SHEET
130341.E0.01	4	1 OF 1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION east of maintenance shop.

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/21/98 FINISH 5/21/98 LOGGER Bruce Brody-Heinz

DEPTH BELOW SURFACE (FT)	SAMPLE INTERVAL	SAMPLE NUMBER AND TYPE	SAMPLE RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
5						Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch polytubing w/ ball valve to collect groundwater samples No soil samples collect from this boring.
15						18.0', b.g.s. Depth to water inside rods: ~~18.00~~
	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected. • OVM reading inside rods = 0.4 ppm • Light sheen observed ~~present~~ on water samples. • Location ~~produced water~~ recharging slowly.
20	22.0					
25						

REV 11/89 FORM D1586

SCHN00261083

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CRA/HILL

PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	S	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION east of railcar loading rack

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/21/98 FINISH 5/21/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE INTERVAL	SAMPLE NUMBER AND TYPE	SAMPLE RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
	1.0	SS0.5	1.0		0.0 to 0.3' Asphalt 0.3 to 0.6' Fill sandy aggregate	Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch polytubing w/ ball valve to collect groundwater samples
	2.0	SS1.5	1.0		0.6 to 2.0 Sand (SW) with fine gravel, gray, moist. gravel 1"-mins.	Wet or oily stain observed at approximately 0.6'
5						
15						
	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected.
20						OVM reading inside rod = 0.0ppm
	22.0					
25						

REV 11/89 FORM D1586

SCHN00261084

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CH2MHILL

PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	6	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION south of waste treatment plant

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/21/98 FINISH 5/21/98 LOGGER Bruce Body-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE INTERVAL	SAMPLE NUMBER AND TYPE	SAMPLE RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" • (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
	1.0	SS05	1.0		0.0 to 0.3 Asphalt fill	Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch poly tubing w/ ball valve to collect groundwater samples
	2.0	SS1.5	1.0		0.3 to 2.0 Sand (SW) brown, moist loose, with fine gravel present.	
5						No visual signs of staining observed.
15						
	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected.
20						OVM reading inside rods = 0.0 ppm
	22.0					
25						

REV 11/89 FORM D1586

SCHN00261085

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CH2MHILL

PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	7	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION northeast corner of process building

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/22/98 FINISH 5/22/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE INTERVAL	SAMPLE NUMBER AND TYPE	SAMPLE RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
	1.0	SS0.5	1.0		0.0 to @3" Asphalt	Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch polytubing w/ ball valve to collect groundwater samples
	2.0	SS1.5	1.0		0.3 to 1.0' Fill, Sand (SW), with gravel, brown, moist, loose.	
	4.0	SS3	2.0		1.0' to 4.0 Sand (SP), brown moist, loose, occassional gravel encountered.	
5						
15	16.0				16.0 to 18.0 Sand (SP), gray, wet loose	stained soil present, strong odor observed.
	18.0	SS17	2.0		Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected. OVM reading inside rod = 60ppm Heavy sheens present on water sample Depth to water inside rods = 17.8' bgs
20	22.0					
25						

REV 11/89 FORM D1586

SCHN00261086

CH2MHILL **MEMORANDUM**

To: _____ (OFFICE)

_____ (OFFICE)

_____ (OFFICE)

From: _____ _____ (OFFICE) _____ (OFFICE)

Date: _____ Project No: _____ _____ (OFFICE)

Re: _____ _____ (OFFICE)

8

No access to location

this is a capital "O" letter.

PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	9	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION inside containment wall - small tank farm

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/22/98 FINISH 5/22/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE INTERVAL	SAMPLE NUMBER AND TYPE	SAMPLE RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
0	1.0	SS0.5	1.0		Linda Same as # 10 here	Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch poly tubing w/ ball valve to collect groundwater samples
	2.0	SS1.5	1.0			
	4.0	SS3	2.0			
5						
15	16.0				16.0 to 18.0' Sand (SP), brown, moist to wet, loose, med to fine sand.	Odor present, grey staining present 16.5 to 18.0' bgs.
	18.0	SS17	2.0		Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	~~Depth~~ GROUNDWATER sample collected. OVM reading inside rods = 30 ppm Depth to water in rods = 16.6 bgs
20	22.0					
25						

(8.30) REV 11/89 FORM D1586

SCHN00261088

CH2MHILL

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PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	10	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION in road between process building & tank

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/22/98 FINISH 5/22/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE: INTERVAL	SAMPLE: NUMBER AND TYPE	SAMPLE: RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
	1.0	SS05	1.0		0.0 to 0.3' Asphalt 0.3' to 1.0' Fill sand (SW) with gravel black, moist, loose.	Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch polytubing w/ ball valve to collect groundwater samples
	2.0	SS1.5	1.0		1.0 to 4.0 Sand (SP) fine to med brown, moist, loose	
	4.0	SS3	2.0			
5						
15	16.0				16.0 to 18.0 Sand (SP) fine to med, brown, moist to wet, loose.	Strong odor, grey stained soil from 17 to 18' bgs.
	18.0	SS17	2.0		Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected. • OVM reading inside jar headspace = 385 ppm • Strong sheen present on samples • Driller noted possible globuals of product in samples
20	22.0					
25						

REV 11/89 FORM D1586

SCHN00261089

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CRA/HILL

PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	11	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION east end of office building parking

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS - _____ START 5/21/98 FINISH 5/21/98 LOGGER Bruce Body-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE INTERVAL	SAMPLE NUMBER AND TYPE	SAMPLE RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
	1.0	SS0.5	1.0		0.0 to 0.3' Asphalt 0.3 to 1.0' Sand (SW), brown, moist loose with fine gravel present.	Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch poly tubing w/ ball valve to collect groundwater samples
	2.0	SS1.5	1.0		1.0 to 2.0 Sand (SP), brown, moist loose, fine sand.	Stained soil present between 0.3' and 0.8' b.g.s.
5						
15						Depth to water inside rods = 16.5' bgs
	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected.
20						OVM reading inside rods = 0.0 ppm
	22.0					
25						

REV 11/89 FORM D1586

SCHN00261090

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CH2M HILL

PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	12	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION in roadway between office & tanks

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/22/98 FINISH 5/22/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE INTERVAL	SAMPLE NUMBER AND TYPE	SAMPLE RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION	COMMENTS
					SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
	1.0	SS0.5	1.0		0.0 to 0.3' Asphalt 0.3' to 1.0' Fill, sand (SW) with gravel, black/gray, moist, loose	Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch poly tubing w/ ball valve to collect groundwater samples
	2.0	SS1.5	1.0			
	4.0	SS3	2.0		1.0 to 4.0' Sand (SP) fine to med, brown, moist, loose, wet zone from 3.0' to 3.4' bgs	• Stained soil was observed approximately 0.5' bgs
5						~~collect~~
15						Depth to water inside rods = 16.6 bgs
	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected.
20	22.0					OVM reading inside rods = 0.5 ppm
25						

REV 11/89 FORM D1586

SCHN00261091

CH2MHILL

PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01 (this is a capital "O" letter.)	13	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION at southwest corner of office building

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/21/98 FINISH 5/21/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE: INTERVAL	SAMPLE: NUMBER AND TYPE	SAMPLE: RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
5						Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch poly tubing w/ ball valve to collect groundwater samples No soil samples collected from this boring
15						Depth to water inside rods = 15.45' bgs
	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected. OVM reading inside rods = 20 ppm
20	22.0					
25						

REV 11/89 FORM D1586

SCHN00261092

this is a capital "O" letter.

CH2MHILL

Work Performed Under the Direction of Counsel.

PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	14	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION southwest corner of large tank farm

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS - _____ START 5/21/98 FINISH 5/21/98 LOGGER Bruce Body-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE INTERVAL	SAMPLE NUMBER AND TYPE	SAMPLE RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
0	1.0	SS 0.5	1.0		0.0 to 2.0 Sand (SP), fine to med, brown, moist loose, minor gravel ½" minus present	Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch poly tubing w/ ball valve to collect groundwater samples
	2.0	SS 1.5	1.0			No visual signs of staining observed.
5						
15						
	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected. OVM reading inside rods = 0.0ppm
20	22.0					
25						

REV 11/89 FORM D1586

SCHN00261093

CH2MHILL **MEMORANDUM**

To: _____ (OFFICE)

_____ (OFFICE)

_____ (OFFICE)

_____ (OFFICE)

_____ (OFFICE)

_____ (OFFICE)

From: _____ _____ (OFFICE)

Date: _____ Project No: _____

Re: _____

[illegible] Work [illegible] Under the [illegible]

#15
No access to location

SCHN00261094

CH2M HILL

PROJECT NUMBER (this is a capital "O" letter)	BORING NUMBER	SHEET	OF
130341.E0.01	16	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION east of containment berm, in open area of large tank farm

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS -- START 5/21/98 FINISH 5/21/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE INTERVAL	SAMPLE NUMBER AND TYPE	SAMPLE RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
0	1.0	SS 0.5	1.0		0.0 to 2.0' Sand (SP), fine to med, brown, (loose, moist) with minor amount of small gravel 1"-minus	Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch polytubing w/ ball valve to collect groundwater samples
	2.0	SS 1.5	1.0			
5						No visual signs of staining observed
15						
	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected.
20	22.0					
25						

(8 30)

REV 11/89 FORM D1586

SCHN00261095

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CH2MHILL

PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	17	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION on barge, north of tank farm

ELEVATION _____ DRILLING CONTRACTOR GeoTech Explorations Inc., Tualatin, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/21/96 FINISH 5/21/96 LOGGER Bruce Body-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE: INTERVAL	SAMPLE: NUMBER AND TYPE	SAMPLE: RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
5						Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch polytubing w/ ball valve to collect groundwater samples No soil sample collected from this boring.
15						Depth to water inside rods: 18.5'
	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected. Driller noted septic odor to water
20	22.0					
25						

REV 11/89 FORM D1586

SCHN00261096

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CH2MHILL

PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	18	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION on berm, north of tank farm

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS - _____ START 5/21/98 FINISH 5/21/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE: INTERVAL	SAMPLE: NUMBER AND TYPE	SAMPLE: RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
5						Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch poly tubing w/ ball valve to collect groundwater samples No soil samples collected from this boring
15						Depth to water inside rods: 18.7' b.g.s.
20	18-0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected. Drillers noted septic odor to water.
25	22-0					

REV 11/89 FORM D1586

SCHN00261097

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PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	19	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION southwest of warehouse building

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/21/98 FINISH 5/21/98 LOGGER Bruce Body-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE INTERVAL	SAMPLE NUMBER AND TYPE	SAMPLE RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
5						Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch poly tubing w/ ball valve to collect groundwater samples No soil samples collected from this boring
15						Depth to water inside rods: 17.0' bgs.
	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected. · OVM reading inside rods = 38ppm · Strong odors noted from groundwater sample · Heavy sheen observed on sample.
20	22.0					
25						

(8.20)

REV 11/89 FORM D1566

SCHN00261098

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CH2MHILL

PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	46	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION between #2 & #3/east berm

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/22/98 FINISH 5/22/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE INTERVAL	SAMPLE NUMBER AND TYPE	SAMPLE RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
5						Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch poly tubing w/ ball valve to collect groundwater samples No soil samples collected from this boring
15						This location recharging very slowly. Need 45 minutes to collect enough water for a sample.
	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected.
20						OVM reading inside rods = 1.0 ppm
	22.0					
25						

REV 11/89 FORM D1586

SCHN00261099

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CH2M HILL

PROJECT NUMBER	BORING NUMBER	SHEET	OF
130341.E0.01	47	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION between #1 & #2, on east berm

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/22/98 FINISH 5/22/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE INTERVAL	SAMPLE NUMBER AND TYPE	SAMPLE RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
						Used 4-foot geoprobe groundwater sampling screen, vacuum pump and 1/4-inch poly tubing w/ ball valve to collect groundwater samples
5						No soil samples collected from this boring
15						Depth to water in rods = 22.5' b.g.s
	18.0				Probe driven to 26 feet below ground surface, pulled back to 22 to expose the screen from 22 to 26 b.g.s. for groundwater sample collection	GROUNDWATER sample collected. OVM reading inside rods = 0.5 ppm
20	22.0					
25	26					

(8-30)

REV 11/89 FORM D1586

SCHN00261100

CH2M HILL

PROJECT NUMBER (this is a capital O letter)	BORING NUMBER	SHEET	OF
130341.E0.01	48	1	1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION in Northeast corner of property

ELEVATION _____ DRILLING CONTRACTOR GeoTech Explorations Inc., Tualatin, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/22/98 FINISH 5/22/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE INTERVAL	SAMPLE NUMBER AND TYPE	SAMPLE RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
5						Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch poly tubing w/ ball valve to collect groundwater samples No soil samples collected from this boring
10						
15						Depth to water in rods = 17.8' bgs
20	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected. OVM reading inside rods = 0.0 ppm
25	22.0					

(8.30)

REV 11/89 FORM D1586

SCHN00261101

this is a capital O letter.

CRA/HILL

PROJECT NUMBER	BORING NUMBER	SHEET
130341.E0.01	49	1 OF 1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION along entrance roadway, north edge of

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/22/98 FINISH 5/22/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE: INTERVAL	SAMPLE: NUMBER AND TYPE	SAMPLE: RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
5						Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch polytubing w/ ball valve to collect groundwater samples No soil samples collected from this boring
10						
15						
20	18.0				Probe driven to 26 (22) feet below ground surface, pulled back to 22 (18) to expose the screen from 22 (18) to 26 (22) b.g.s. for groundwater sample collection.	GROUNDWATER sample collected. OVM reading inside rods=0.5 ppm
25	22.0					
	22.0					

(8.30)

REV 11/89 FORM D1586

SCHN00261102

this is a capital "O" letter.

PROJECT NUMBER	BORING NUMBER	SHEET
130341.E0.01	SO	1 OF 1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION east of hydrogen plant

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS- _____ START 5/21/98 FINISH 5/21/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE: INTERVAL	SAMPLE: NUMBER AND TYPE	SAMPLE: RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
5						Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch poly tubing w/ ball valve to collect groundwater samples No soil samples collect from this boring.
15						
	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection	GROUNDWATER sample collected. OVM reading inside rods = 0.0 ppm
20	22.0					
25						

(8.30) REV 11/89 FORM D1586

SCHN00261103

this is a capital "O" letter.

CH2M HILL

PROJECT NUMBER	BORING NUMBER	SHEET
130341.E0.01	60	1 OF 1

SOIL BORING LOG

PROJECT Premier Edible Oil Site LOCATION Eastern property boundary

ELEVATION _____ DRILLING CONTRACTOR GEOTECH EXPLORATIONS INC., TUALATIN, OR.

DRILLING METHOD AND EQUIPMENT Geoprobe Direct Push Rig and 4' macro soil sampler, and 4' groundwater screen

WATER LEVELS _____ START 5/22/98. FINISH 5/22/98 LOGGER Bruce Brody-Heine

DEPTH BELOW SURFACE (FT)	SAMPLE: INTERVAL	SAMPLE: NUMBER AND TYPE	SAMPLE: RECOVERY (FT)	STANDARD PENETRATION TEST RESULTS 6"-6"-6" (N)	SOIL DESCRIPTION: SOIL NAME, USCS GROUP SYMBOL, COLOR, MOISTURE CONTENT, RELATIVE DENSITY OR CONSISTENCY, SOIL STRUCTURE, MINERALOGY	COMMENTS: DEPTH OF CASING, DRILLING RATE, DRILLING FLUID LOSS, TESTS AND INSTRUMENTATION
5						Used 4-foot geoprobe groundwater sampling screen, vacuum pump and ¼-inch poly tubing w/ ball valve to collect groundwater samples No soil samples collected from this boring.
15						
20	18.0				Probe driven to 22 feet below ground surface, pulled back to 18' to expose the screen from 18 to 22' b.g.s. for groundwater sample collection.	GROUNDWATER sample collected. OVM reading inside rods = 115 ppm Heavy sheen present on water samples
25	22.0					

(8.30)

REV 11/89 FORM D1586

SCHN00261104

URS

111 SW Columbia, Suite 900
Portland, Oregon 97201-5814
Phone: 503-222-7200 Fax: 503-222-4292

TRANSMITTAL

To: Jim Jakubiak
Environmental Administrator
Schnitzer Steel Industries, Inc.
3200 NW Yeon Ave
Portland, OR 97210

Project No.
52-00180063

We are sending you: **Attached via:** Mail

Under separate cover via:

Number	Item
1 Set	Schnitzer – PEO Boring Logs

Transmittal is as noted below:

☐	For approval	☐	Approved as submitted	☐	Resubmit ___ copies for approval
☒	For your use	☐	Approved as noted	☐	Submit ___ copies for distribution
☐	As requested	☐	Returned for corrections	☐	Return ___ corrected prints
☐	For review & comment	☐	Other		

Remarks:
Please call me if you have any questions.

From: James Peale
Direct: 503.948.7215

Date: March 13, 2002

URS

Site Id: FPL-27

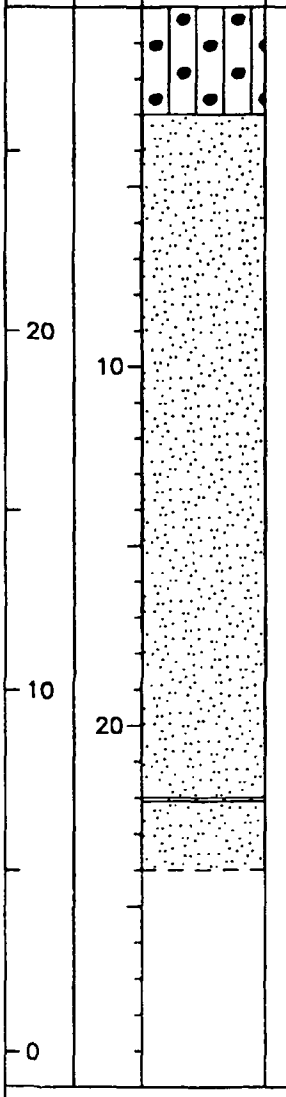
Location: Former Pipeline	Elevation: 29.03'
Logged By: Don Coberley	Datum: COP
Date(s): 05/04/01 - 05/04/01	State Plane North: 718019.62
Drilling Method: Direct Push	State Plane East: 7617711.64
Contractor: GeoTech	Static Water Level: 20.00'

Project Name: Premier Edible Oils

Project Number: 52-00180063

Total Depth: 24.00' | Borehole Dia.: 2.00in

Remarks:



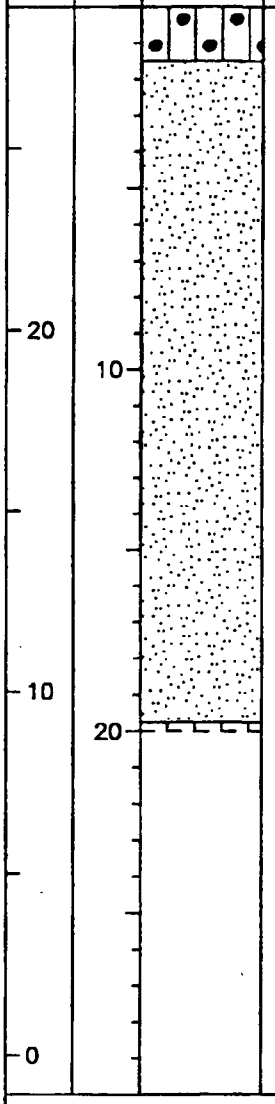
USCS Code	Material Description	PID
GM	BROWN SILTY SANDY GRAVEL, loose to medium dense, [moist].	
SP	BROWN POORLY GRADED SAND, fine to medium grained, [moist].	
	Root zone.	
	Becomes yellowish-brown [wet].	
ML	Becomes gray.	
SP	1" thick SILT lense.	
	Becomes brown.	
	Boring terminated at 24 feet bgs. Water sample collected, screened interval 20-24 feet bgs.	

SCHN00261106

URS

Site Id: GP-BLT-56	
Location: Bell Terminal	Elevation: 28.91'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 10/09/01 – 10/09/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 20.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	State Plane North: 718067.48
	State Plane East: 7618210.51
	Static Water Level: 15.65'

Remarks: BG = Background (varies)



USCS Code	Material Description	PID
GM	BROWN SILTY GRAVEL.	
SP	BROWN SAND, medium dense, fine to medium grained, trace fines [moist].	11 ppm
		10 ppm
		4 ppm
		5 ppm
	Becomes gray colored. Hydrocarbon odor.	2 ppm
	Trace SILT.	17 ppm
	Becomes saturated.	20 ppm
	Slight hydrocarbon odor.	81 ppm
	DARK GRAY POORLY GRADED SAND, fine to medium grained, trace fines [wet].	9.5 ppm
	Very slight hydrocarbon odor.	
ML	DARK GRAY SILT, soft [wet].	
	Boring terminated at 20 feet bgs. Water sample collected, screened interval 16–20 feet bgs.	

URS

Site Id: GP-BLT-57

Location: Bell Terminal		Elevation: 28.68'	
Logged By: Don Coberley		Datum: COP	
Project Name: Premier Edible Oils		Date(s): 10/09/01 - 10/09/01	State Plane North: 718026.31
Project Number: 52-00180063		Drilling Method: Direct Push	State Plane East: 7618209.05
Total Depth: 20.00'	Borehole Dia.: 2.00in	Contractor: GeoTech	Static Water Level: 15.55'

Remarks: BG = Background (varies)

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM	SILTY GRAVEL	
				SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, no odor, [moist].	
						BG ppm
20						BG ppm
	10					BG ppm
					Becomes gray colored, with hydrocarbon odor.	14.3 ppm
					Returns to brownish-yellow color, possible slough.	
					Returns to gray color, with hydrocarbon odor.	5.5 ppm
			▼		Trace fines, becomes [wet], slight hydrocarbon odor.	12.9 ppm 29.5 ppm 2.9 ppm
10				ML	GRAY SILT, trace clay, slight hydrocarbon odor [moist].	2.7 ppm
	20					
					Boring terminated at 20 feet bgs. Water sample collected, screened interval 16-20 feet bgs.	
0						

URS

Site Id: GP-BLT-58	
Location: Bell Terminal	Elevation: 29.86'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 10/09/01 - 10/09/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 20.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	State Plane North: 718059.83
	State Plane East: 7618139.31
	Static Water Level:

Remarks: BG = Background (varies)

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM	BROWN SILTY GRAVEL	
				SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, trace fines, no odor [moist].	BG ppm
20	10					BG ppm
						BG ppm
					Becomes orange colored (oxidized).	
					Becomes gray colored, no hydrocarbon odor, some wood fragments.	BG ppm
				ML	Gray SILT, medium stiff [moist-dry].	BG ppm
10	20				Terminate boring at 20 feet bgs. Insufficient water in boring for water sample.	
0						

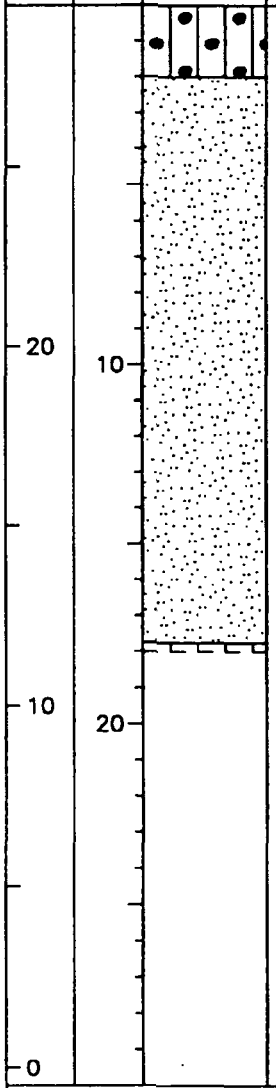
SCHN00261109

URS

Site Id: GP-BLT-59

Location: Bell Terminal	Elevation: 29.50'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 10/09/01 - 10/09/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 18.00'	Borehole Dia.: 2.00in
	Contractor: GeoTech
	State Plane North: 718004.18
	State Plane East: 7618161.81
	Static Water Level: 16.00'

Remarks: BG = Background (varies)



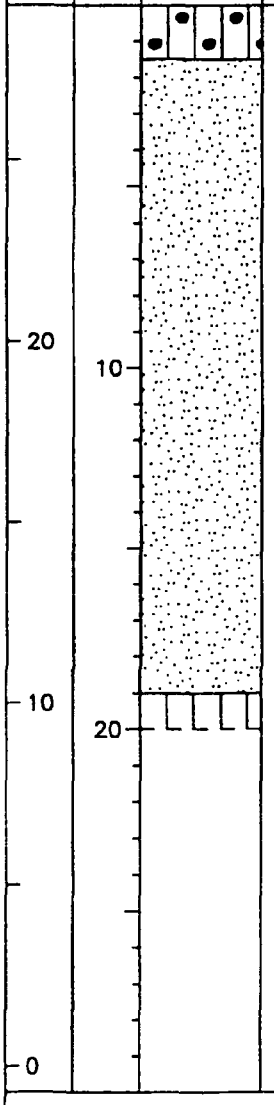
USCS Code	Material Description	PID
GM	BROWN SILTY GRAVEL	BG ppm
SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, no stain or odor [moist].	BG ppm
		BG ppm
		BG ppm
	Becomes gray colored, with hydrocarbon odor.	4.4 ppm
		10.3 ppm
		6 ppm
		35 ppm
	Becomes [wet], sheen to water, with hydrocarbon odor	39.6 ppm
		16.3 ppm
ML	GRAY SILT, soft-medium stiff.	28.4 ppm
	Terminate boring at 18 feet bgs. Water sample collected, screened interval 14-18 feet bgs.	

URS

Site Id: GP-BLT-60

Project Name: Premier Edible Oils		Location: Bell Terminal	Elevation: 29.28'
		Logged By: Don Coberley	Datum: COP
Project Number: 52-00180063		Date(s): 10/09/01 - 10/09/01	State Plane North: 718112.05
Total Depth: 20.00'	Borehole Dia.: 2.00in	Drilling Method: Direct Push	State Plane East: 7618211.62
		Contractor: GeoTech	Static Water Level: 16.50'

Remarks: BG = Background (varies)



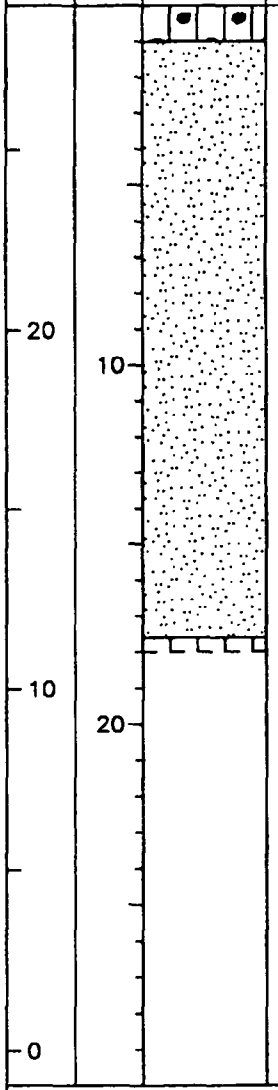
USCS Code	Material Description	PID
GM	BROWN SILTY GRAVEL	BG ppm
SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, trace fines [moist].	
		BG ppm
	Laminations.	BG ppm
		BG ppm
	Dark gray-brown colored zone.	
	Becomes gray colored, no hydrocarbon odor [wet].	
ML	GRAY SILT, soft-medium stiff, no odor, with black wood fragments [moist].	BG ppm
	Boring terminated at 20 feet bgs. Water sample collected, screened interval 16-20 feet bgs.	

URS

Site Id: GP-BLT-61

Location: Bell Terminal	Elevation: 29.04'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 10/09/01 - 10/09/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 18.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	Static Water Level: 15.84'

Remarks: BG = Background (varies)



USCS Code	Material Description	PID
GM	BROWN SILTY GRAVEL, medium dense [moist].	BG ppm
SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, trace fines [moist].	
		BG ppm
	Laminations.	BG ppm
		BG ppm
		BG ppm
	Becomes gray colored, with hydrocarbon odor.	108 ppm
	Grains slightly shiny, with hydrocarbon odor.	
ML	GRAY SILT, soft-slightly stiff, slight hydrocarbon odor [moist].	
	Boring terminated at 18 feet bgs. Water sample collected, screened interval 14-18 feet bgs.	

URS

Site Id: GP-BLT-62

		Location: Bell Terminal	Elevation: 29.53'
		Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils		Date(s): 10/09/01 - 10/09/01	State Plane North: 717933.42
Project Number: 52-00180063		Drilling Method: Direct Push	State Plane East: 7618206.57
Total Depth: 20.00'	Borehole Dia.: 2.00in	Contractor: GeoTech	Static Water Level: 17.31'

Remarks: BG = Background (varies)

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM	BROWN SILTY GRAVEL	BG ppm
				SP	BROWN TO BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, trace fines [moist].	
						BG ppm
						BG ppm
20	10					BG ppm
						BG ppm
					Becomes orange colored, possible oxidation.	BG ppm
			▼		Becomes gray colored, no odor [wet].	
10	20			ML	GRAY SILT, soft-medium stiff, no odor [moist-wet].	BG ppm
					Boring terminated at 20 feet bgs. Water sample collected, screened interval 16-20 feet bgs.	
0						

SCHN00261113

URS

Site Id: GP-BLT-63

		Location: Bell Terminal	Elevation: 29.43'
		Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils		Date(s): 10/09/01 - 10/10/01	State Plane North: 718039.75
Project Number: 52-00180063		Drilling Method: Direct Push	State Plane East: 7618162.71
Total Depth: 18.00'	Borehole Dia.: 2.00in	Contractor: GeoTech	Static Water Level: 16.29'

Remarks: BG = Background (varies)
Rig malfunction at about 16ft bgs during drilling on 10/9/01. Remainder of boring completed about 3ft south of initial boring on 10/10/01.

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM	BROWN SILTY GRAVEL, medium dense [moist].	BG ppm
				SP	BROWN TO BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, trace fines [moist].	
						BG ppm
						BG ppm
20	10					
						BG ppm
						BG ppm
					Becomes gray colored, with hydrocarbon odor.	43 ppm
			▼		DARK GRAY POORLY GRADED SAND, medium dense, fine to medium grained, strong hydrocarbon odor, slight sheen on water [wet].	4 ppm
				ML	GRAY SILT, soft-slightly stiff, wood chip at contact [moist-wet].	
10	20				Boring terminated at 18 feet bgs. Water sample collected, screened interval 14-18 feet bgs.	
0						

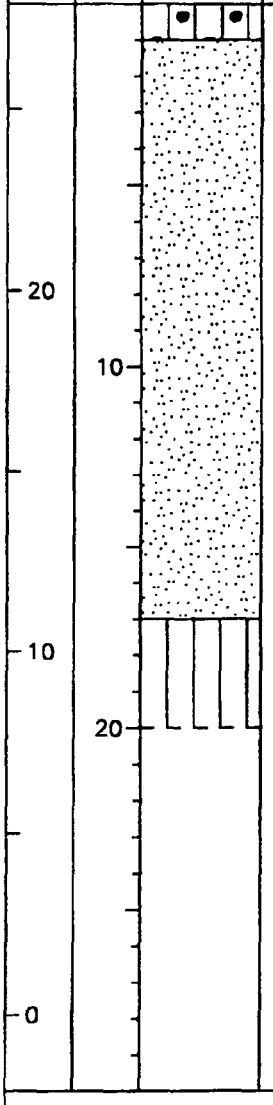
SCHN00261114

URS

Site Id: GP-FPL-64

Project Name: Premier Edible Oils		Location: Bell Terminal	Elevation: 27.90'
		Logged By: Don Coberley	Datum: COP
Project Number: 52-00180063		Date(s): 10/10/01 - 10/10/01	State Plane North: 718060.58
		Drilling Method: Direct Push	State Plane East: 7618075.69
Total Depth: 20.00'	Borehole Dia.: 2.00in	Contractor: GeoTech	Static Water Level:

Remarks:



USCS Code	Material Description	PID
GM	BROWN SILTY GRAVEL WITH SAND, medium dense, contains concrete fragments, no stain or odor [moist].	
SP	BROWNISH-YELLOW TO BROWN SAND, medium dense, fine to medium grained, some fines, no stain or odor [moist].	
	Gray colored zone, indistinct over 2" thick.	
	Scattered laminations.	
	Slightly more brownish-yellow color.	
	Wood fragments.	
	Becomes gray colored, no hydrocarbon odor.	
ML	Gray SILT, soft-slightly stiff, charred branch in sample, no hydrocarbon odor [wet].	
	Becomes [moist].	
	With SAND interbeds, fine grained, no odor, [dry-moist].	
	Boring terminated at 20 feet bgs. Insufficient water for sample.	

URS

Well Completion Diagram URS	Site Id: MW-06
Location: Treatment Plant	
Logged By: Don Coberley	Elevation: 29.36'
Contractor: GeoTech	Datum: COP
Drilling Method: HSA	State Plane North: 717804.80
Borehole Dia.: 10.00in	State Plane East: 7618020.68
Completed Depth: 27.31'	Total Depth: 27.50'

Project Name: Premier Edible Oils

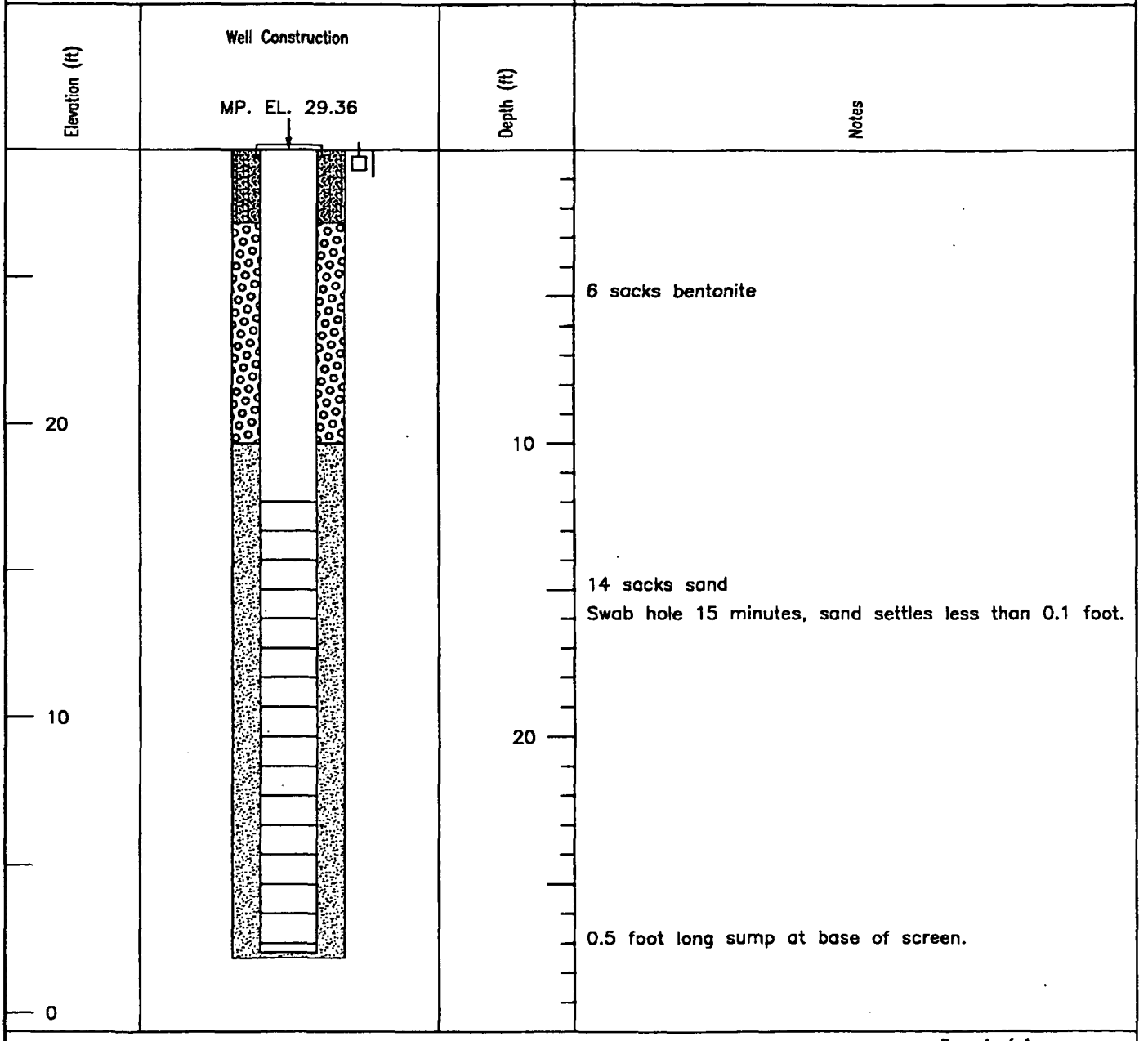
Project Number: 52-00180063 | Date(s): 05/21/01 - 05/21/01

Annular Fill:
type: Concrete fm: 0.00' to: 2.50'
type: Bentonite fm: 2.50' to: 10.00'
type: Sand Pack (generic) fm: 10.00' to: 27.50'

Blank Casing:
type: pvc dia: 2.00in fm: 0.0' to: 12.00'

Remarks:

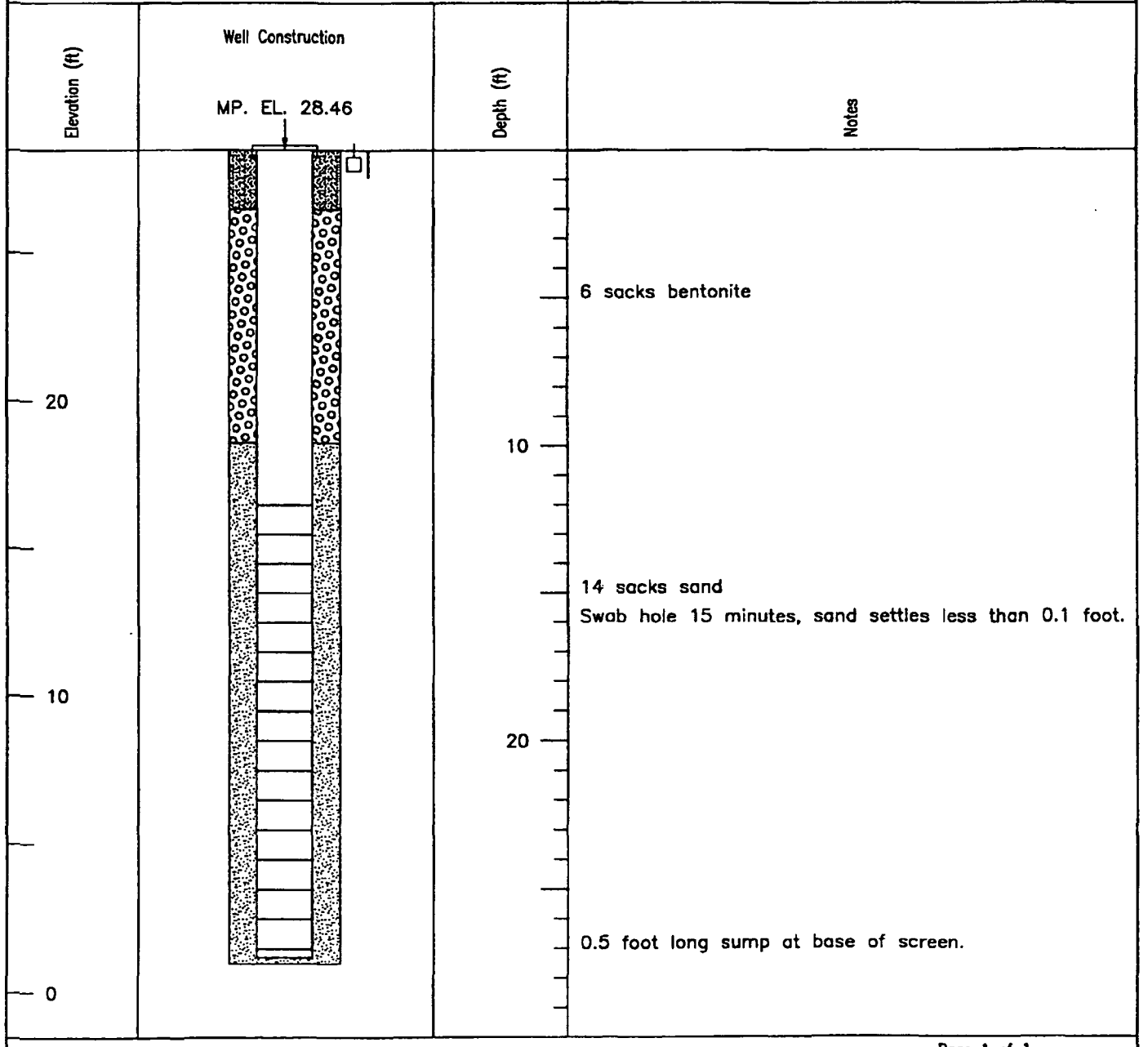
Screens:
type: Slotted size: 0.010in dia: 2.00in
type: size: dia:
fm: 12.00' to: 27.00'
fm: to:



SCHN00261116

URS

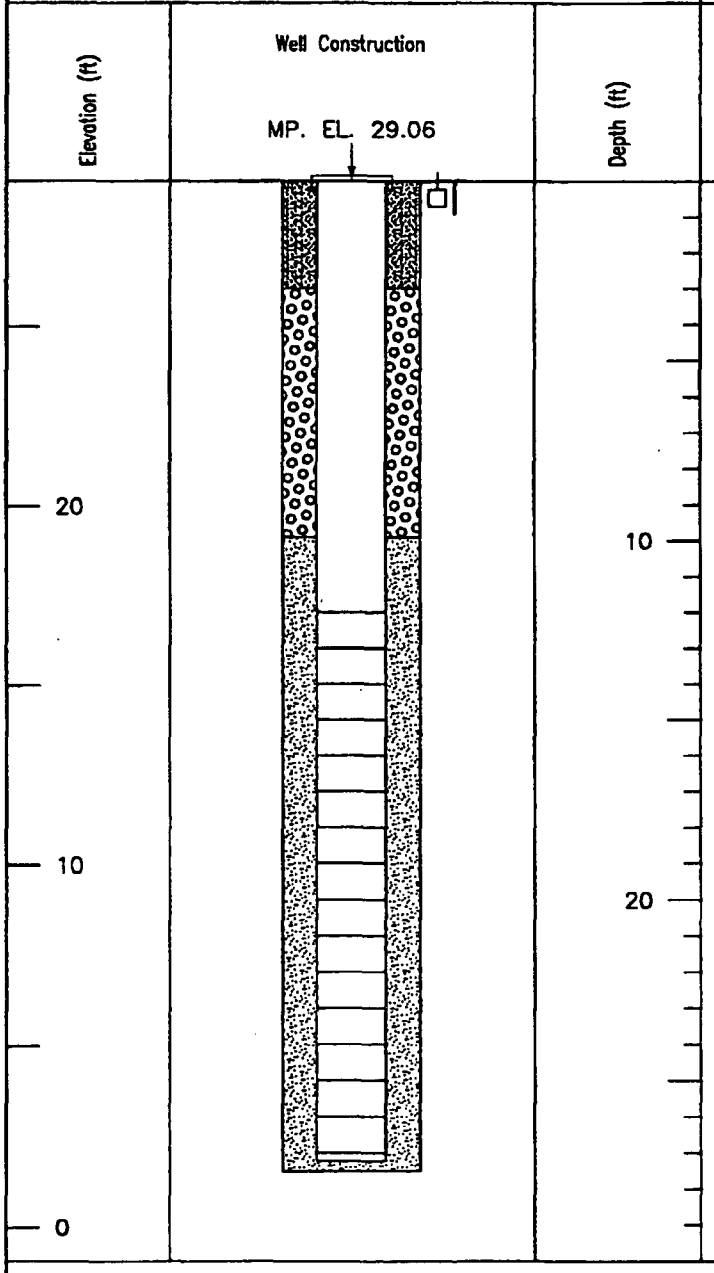
		Well Completion Diagram URS	Site Id: MW-07
		Location: Shoreline	
		Logged By: Don Coberley	Elevation: 28.46'
		Contractor: GeoTech	Datum: COP
Project Name: Premier Edible Oils		Drilling Method: HSA	State Plane North: 717802.50
Project Number: 52-00180063	Date(s): 05/21/01 - 05/21/01	Borehole Dia.: 10.00in	State Plane East: 7617772.11
Annular Fill: type: Concrete fm: 0.00' to: 2.00' type: Bentonite fm: 2.00' to: 9.90' type: Sand Pack (generic) fm: 9.90' to: 27.50'		Completed Depth: 27.30'	Total Depth: 27.50'
		Blank Casing: type: pvc dia: 2.00in fm: 0.0' to: 12.00'	
Remarks:		Screens: type: Slotted size: 0.010in dia: 2.00in fm: 12.00' to: 27.00' type: size: dia: fm: to:	



SCHN00261117

URS

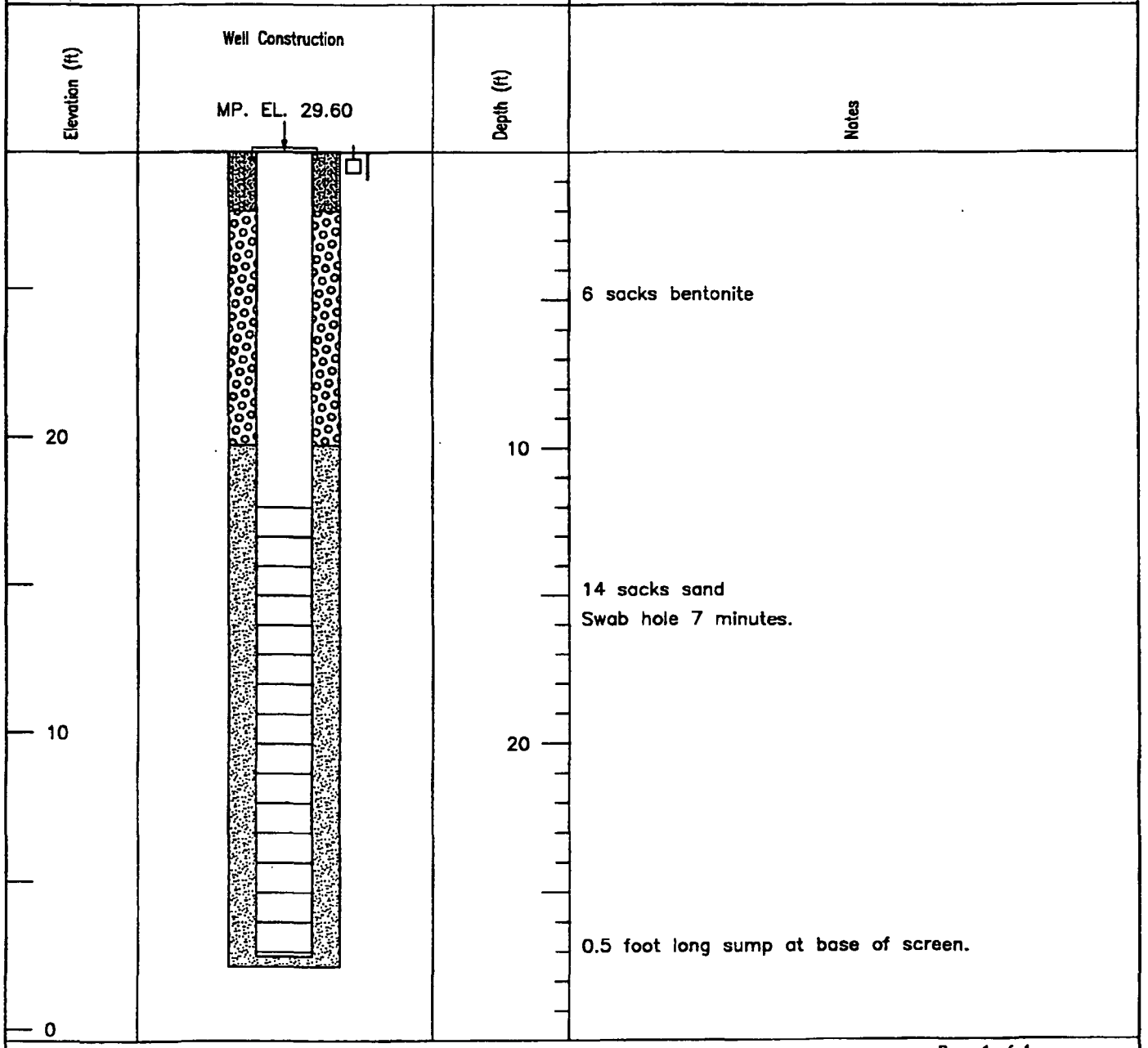
Well Completion Diagram URS	Site Id: MW-08
Location: S. Tank Farm	
Logged By: Don Coberley	Elevation: 29.06'
Contractor: GeoTech	Datum: COP
Project Name: Premier Edible Oils	Drilling Method: HSA / State Plane North: 717696.99
Project Number: 52-00180063 / Date(s): 05/21/01 - 05/21/01	Borehole Dia.: 10.00in / State Plane East: 7617945.61
Annular Fill:	Completed Depth: 27.22' / Total Depth: 27.50'
type: Concrete fm: 0.00' to: 3.00'	Blank Casing:
type: Bentonite fm: 3.00' to: 9.90'	type: pvc dia: 2.00in fm: 0.0' to: 12.00'
type: Sand Pack (generic) fm: 9.90' to: 27.50'	
Remarks:	Screens:
	type: Slotted size: 0.010in dia: 2.00in
	type: size: dia:
	fm: 12.00' to: 27.00'
	fm: to:



SCHN00261118

URS

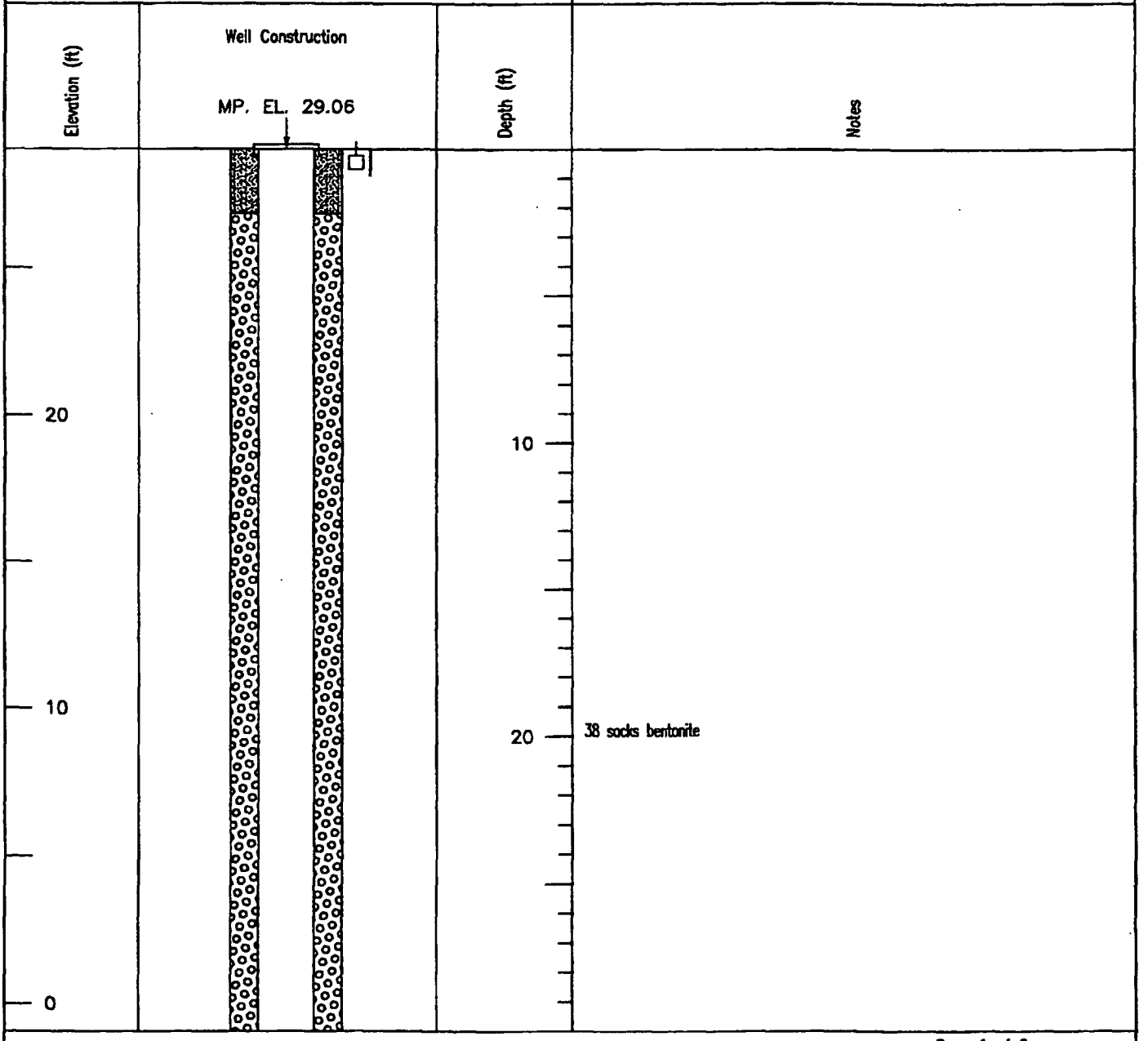
Well Completion Diagram URS	Site Id: MW-09
Location: Shoreline	
Logged By: Don Coberley	Elevation: 29.61'
Contractor: GeoTech	Datum: COP
Project Name: Premier Edible Oils	Drilling Method: HSA / State Plane North: 717475.19
Project Number: 52-00180063 / Date(s): 05/21/01 - 05/21/01	Borehole Dia.: 10.00in / State Plane East: 7617952.15
Annular Fill:	Completed Depth: 27.15' / Total Depth: 27.50'
type: Concrete fm: 0.00' to: 2.00'	Blank Casing:
type: Bentonite fm: 2.00' to: 9.90'	type: pvc dia: 2.00in fm: 0.0' to: 12.00'
type: Sand Pack (generic) fm: 9.90' to: 27.50'	
Remarks:	Screens:
	type: Slotted size: 0.010in dia: 2.00in
	type: size: dia:
	fm: 12.00' to: 27.00'
	fm: to:



SCHN00261119

URS

Well Completion Diagram URS	Site Id: MW-10
Location: Shoreline	
Logged By: Dan Coberley	Elevation: 29.06'
Contractor: GeoTech	Datum: COP
Project Name: Premier Edible Oils	Drilling Method: HSA — State Plane North: 717548.46
Project Number: 52-00180083 — Date(s): 05/22/01 - 05/22/01	Borehole Dia.: 14.00in — State Plane East: 7617916.86
Annular Fill:	Completed Depth: 52.80' — Total Depth: 55.00'
type: Concrete fm: 0.00' to: 2.20'	Blank Casing:
type: Bentonite fm: 2.20' to: 39.60'	type: pvc dia: 2.00in fm: 0.0' to: 41.70'
type: Sand Pack (generic) fm: 39.60' to: 55.00'	
Remarks: 14"-diameter boring to 35'; 8"-diameter boring to total depth. Screen consists of (2) 5-ft pre-pack screen sections.	Screens: type: Slotted size: 0.010in dia: 3.63in fm: 41.70' to: 46.70'; type: Slotted size: 0.010in dia: 3.63in fm: 47.40' to: 52.40'



SCHN00261120

URS

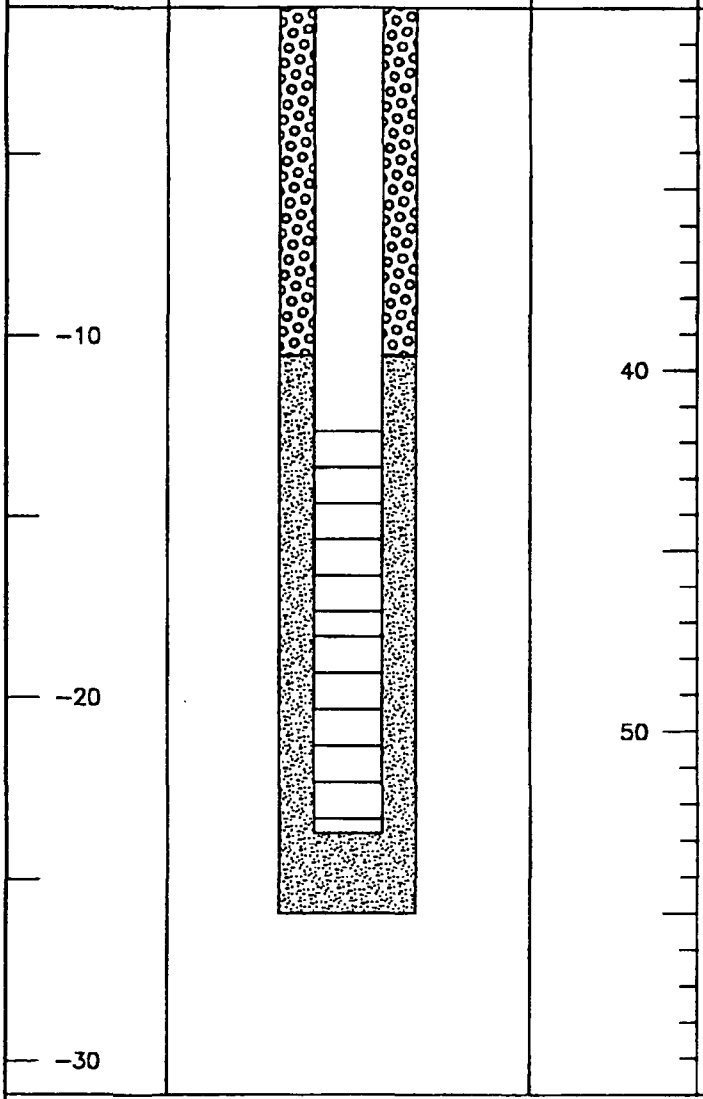
Well Completion Diagram URS	Site Id: MW-10
Location: Shoreline	
Logged By: Don Coberley	Elevation: 29.06'
Contractor: GeoTech	Datum: COP
Project Name: Premier Edible Oils	Drilling Method: HSA / State Plane North: 717548.46
Project Number: 52-00180063 / Date(s): 05/22/01 - 05/22/01	Borehole Dia.: 14.00in / State Plane East: 7617916.86
Annular Fill:	Completed Depth: 52.80' / Total Depth: 55.00'

Annular Fill:
type: Concrete fm: 0.00' to: 2.20'
type: Bentonite fm: 2.20' to: 39.60'
type: Sand Pack (generic) fm: 39.60' to: 55.00'

Blank Casing:
type: pvc dia: 2.00in fm: 0.0' to: 41.70'

Remarks: 14"-diameter boring to 35'; 8"-diameter boring to total depth.
Screen consists of (2) 5-ft pre-pack screen sections.

Screens:
type: Slotted size: 0.010in dia: 3.63in fm: 41.70' to: 46.70'
type: Slotted size: 0.010in dia: 3.63in fm: 47.40' to: 52.40'



Notes

3 sacks sand

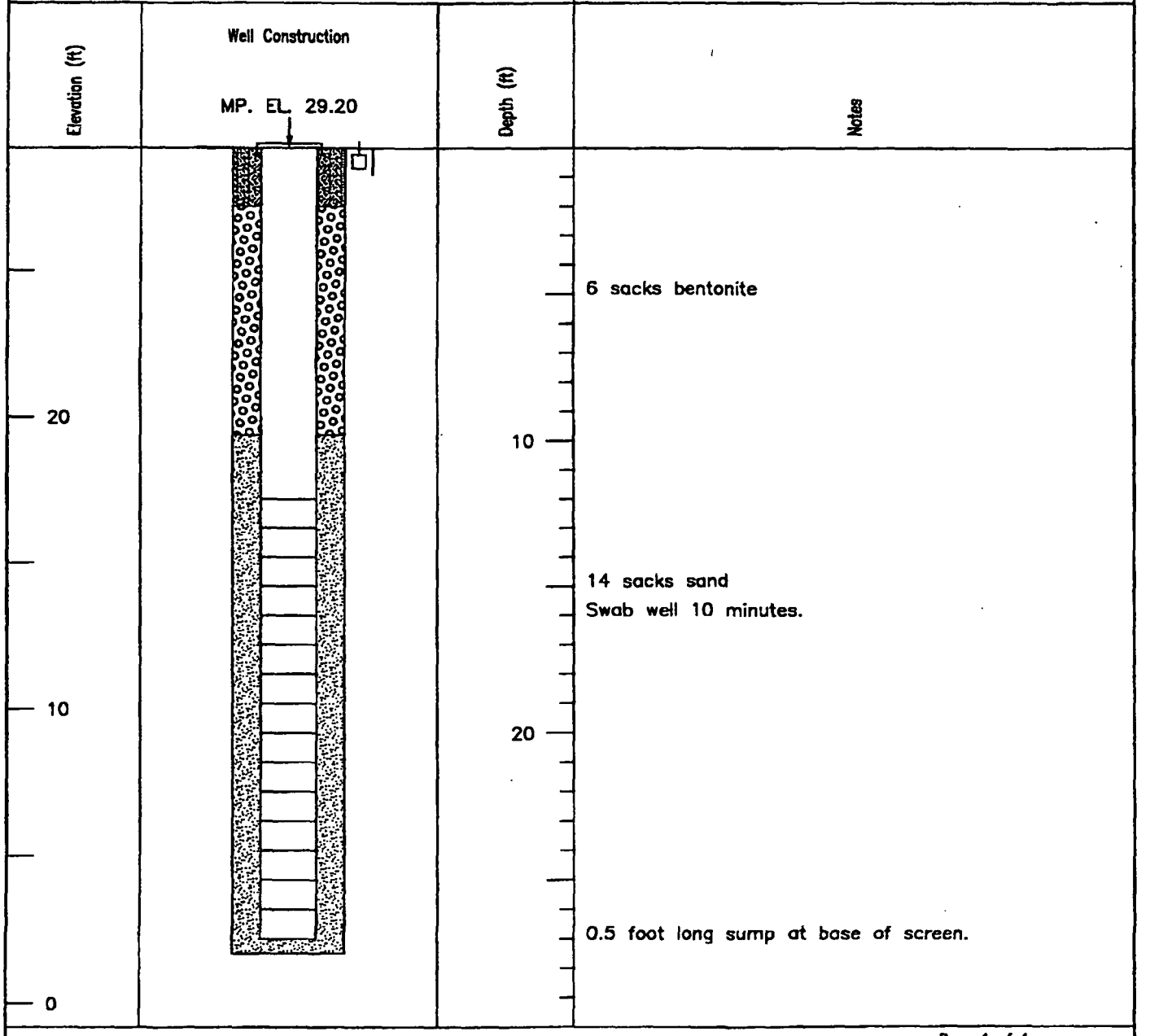
0.7 foot long coupler between pre-pack screen sections located at 46.7-47.4 feet bgs.

0.5 foot long sump at base of screen.

SCHN00261121

URS

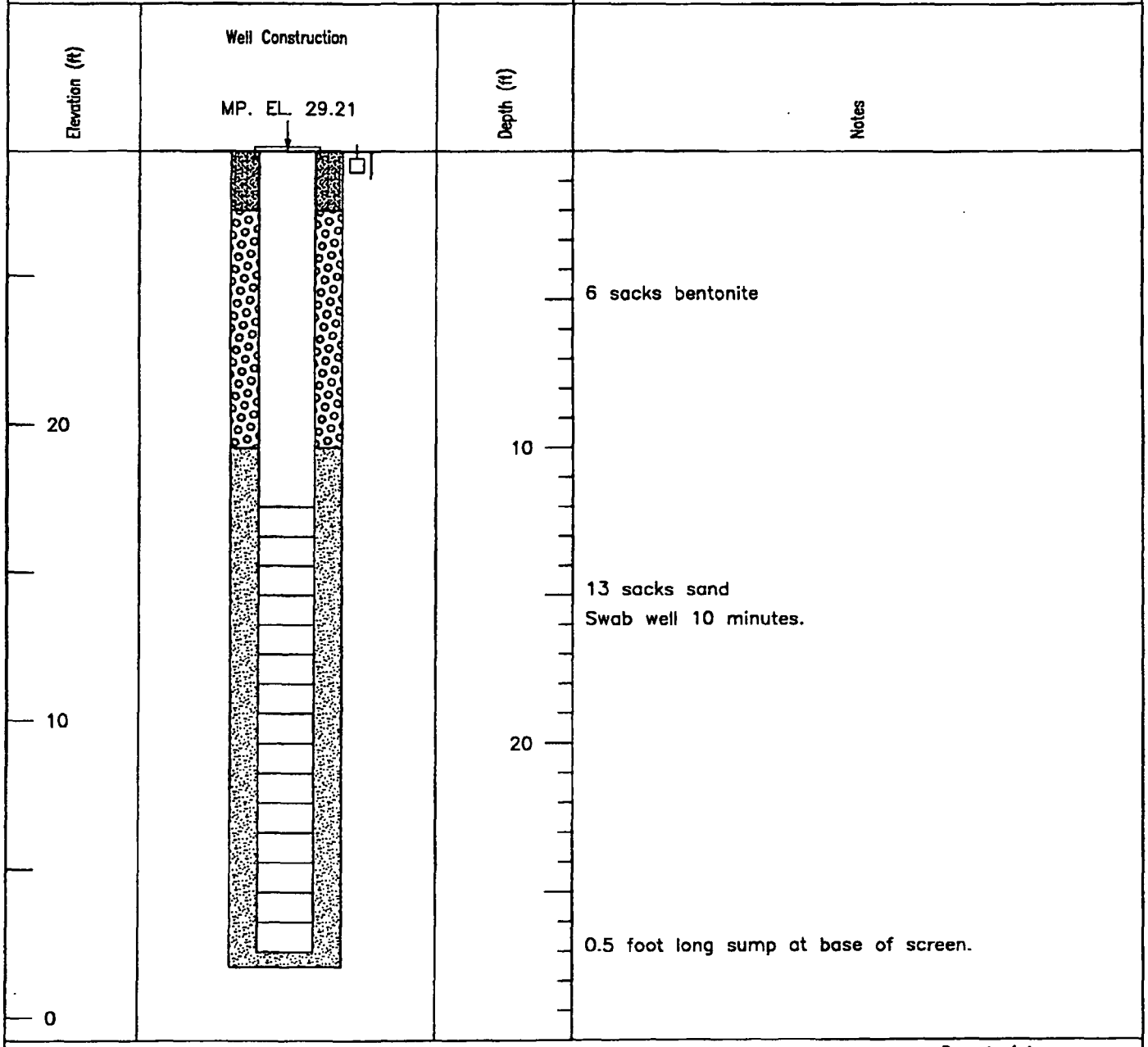
Well Completion Diagram URS	Site Id: MW-11
Location: NW Tanks	
Logged By: Don Coberley	Elevation: 29.20'
Contractor: GeoTech	Datum: COP
Project Name: Premier Edible Oils	Drilling Method: HSA / State Plane North: 717536.00
Project Number: 52-00180063 / Date(s): 05/23/01 – 05/23/01	Borehole Dia.: 10.00in / State Plane East: 7618014.71
Annular Fill:	Completed Depth: 27.00' / Total Depth: 27.50'
type: Concrete fm: 0.00' to: 2.00'	Blank Casing:
type: Bentonite fm: 2.00' to: 9.80'	type: pvc dia: 2.00in fm: 0.0' to: 12.00'
type: Sand Pack (generic) fm: 9.80' to: 27.50'	
Remarks:	Screens:
	type: Slotted size: 0.010in dia: 2.00in
	type: size: dia:
	fm: 12.00' to: 27.00'
	fm: to:



SCHN00261122

URS

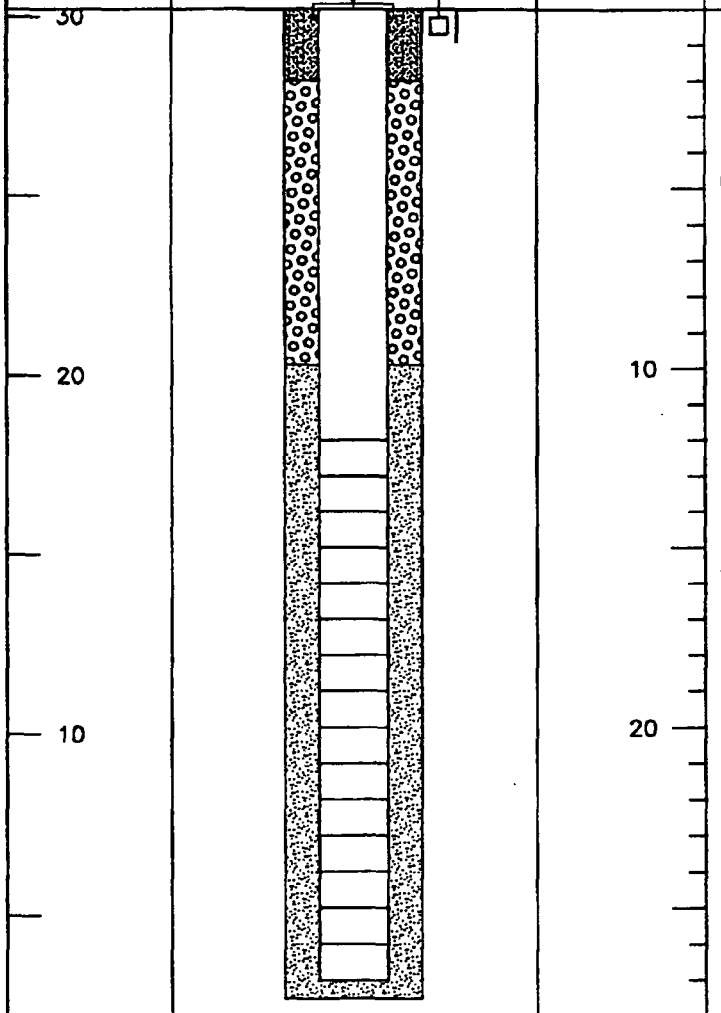
Well Completion Diagram URS	Site Id: MW-12
Location: Shoreline	
Logged By: Don Coberley	Elevation: 29.21'
Contractor: GeoTech	Datum: COP
Project Name: Premier Edible Oils	Drilling Method: HSA / State Plane North: 717544.21
Project Number: 52-00180063 / Date(s): 05/23/01 - 05/23/01	Borehole Dia.: 10.00in / State Plane East: 7617919.98
Annular Fill:	Completed Depth: 27.00' / Total Depth: 27.50'
type: Concrete fm: 0.00' to: 2.00'	Blank Casing:
type: Bentonite fm: 2.00' to: 10.00'	type: pvc dia: 2.00in fm: 0.0' to: 12.00'
type: Sand Pack (generic) fm: 10.00' to: 27.50'	
Remarks:	Screens:
	type: Slotted size: 0.010in dia: 2.00in
	type: size: dia:
	fm: 12.00' to: 27.00'
	fm: to:



SCHN00261123

URS

Well Completion Diagram URS	Site Id: MW-13
Location: Shoreline	
Logged By: Don Coberley	Elevation: 30.21'
Contractor: GeoTech	Datum: COP
Project Name: Premier Edible Oils	Drilling Method: HSA / State Plane North: 717446.67
Project Number: 52-00180063 / Date(s): 05/24/01 - 05/24/01	Borehole Dia.: 10.00in / State Plane East: 7618091.05
Annular Fill:	Completed Depth: 27.00' / Total Depth: 27.50'
type: Concrete fm: 0.00' to: 2.00'	Blank Casing:
type: Bentonite fm: 2.00' to: 9.90'	type: pvc dia: 2.00in fm: 0.0' to: 12.00'
type: Sand Pack (generic) fm: 9.90' to: 27.50'	
Remarks:	Screens:
	type: Slotted size: 0.010in dia: 2.00in
	type: size: dia:
	fm: 12.00' to: 27.00'
	fm: to:



SCHN00261124

URS

Well Completion Diagram URS	Site Id: MW-14
Location: N. Prop'y Boundary	
Logged By: Don Coberley	Elevation: 30.72'
Contractor: GeoTech	Datum: COP
Drilling Method: HSA	State Plane North: 718273.50
Project Name: Premier Edible Oils	Borehole Dia.: 10.00in — State Plane East: 7617954.46
Project Number: 52-00180063 — Date(s): 05/24/01 - 05/24/01	Completed Depth: 18.50' — Total Depth: 21.50'

Annular Fill:
type: Concrete fm: 0.00' to: 2.00'
type: Bentonite fm: 2.00' to: 6.60'
type: Sand Pack (generic) fm: 6.60' to: 19.00'

Blank Casing:
type: pvc dia: 2.00in fm: 0.0' to: 8.50'

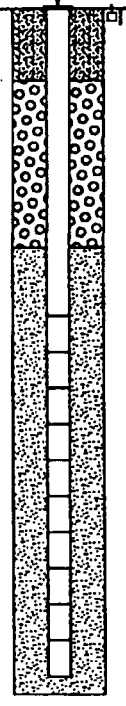
Screens:
type: Slotted size: 0.010in dia: 2.00in fm: 8.50' to: 18.50'
type: size: dia: fm: to:

Static Water Level:

Remarks: Boring chipped and hydrated from 19' to total depth.

Elevation (ft)	Depth (ft)	Graphic Log	USCS Code	Material Description
30			GM/GP	BROWN SANDY GRAVEL WITH SILT
			SP	BROWN SAND, loose, fine to medium grained, [moist].
20	10			Becomes slightly more dense, with trace fines.
				With some SILT 13.5-14 feet bgs.
				Sand becomes gray, wet.
			ML/CL	DARK GRAY SILT, medium stiff, some CLAY, [moist].
10	20		SP/SM	DARK GRAY SAND, medium dense, fine grained, some SILT, slight burned odor, [dry-moist].
			ML	Boring terminated at 20 feet bgs (augers drilled to 20 feet bgs, split spoon driven to 21.5 feet bgs).
				Annular fill 10 sacks sand, 4 1/2 sacks bentonite. 0.5 foot long sump at base of screen.

Well Construction
MP. EL. 30.72



PID

SCHN00261125

URS

Well Completion Diagram URS	Site Id: MW-15
Location: N. Prop'y Boundary	
Logged By: Don Coberley	Elevation: 30.48'
Contractor: GeoTech	Datum: COP
Drilling Method: HSA	State Plane North: 718273.69
Borehole Dia.: 10.00in	State Plane East: 7617960.88
Completed Depth: 37.50'	Total Depth: 38.50'

Project Name: Premier Edible Oils

Project Number: 52-00180063 | Date(s): 05/24/01 - 05/25/01

Annular Fill:
type: Concrete fm: 0.00' to: 2.00'
type: Bentonite fm: 2.00' to: 25.40'
type: Sand Pack (generic) fm: 25.40' to: 38.50'

Remarks: 10"-diameter boring to 19.5'; 8.25" boring to total depth.

Blank Casing:
type: pvc dia: 2.00in fm: 0.0' to: 27.00'

Screens:
type: Slotted size: 0.010in dia: 2.00in fm: 27.00' to: 37.00'
type: size: dia: fm: to:

Static Water Level:

Elevation (ft)	Depth (ft)	Graphic Log	USCS Code	Material Description
30			GM/GP	BROWN SANDY GRAVEL WITH SILT
			SP	BROWN SAND, loose, fine to medium grained, [moist].
20	10			Becomes slightly more dense, with trace fines.
				With some SILT 13.5-14 feet bgs.
				Sand becomes gray, wet.
			ML/CL	DARK GRAY SILT, medium stiff, some CLAY, [moist].
10	20		SP/SM	DARK GRAY SAND, loose-medium dense, fine grained, some SILT,[dry-moist].
				Becomes wet.
				GRAY AND BROWN MOTTLED SILT AND SILTY SAND lense.
			ML/SM	
			SP/SM	DARK GRAY SAND, loose-medium dense, fine grained, some SILT,[dry-moist].
			ML/SM	GRAY AND BROWN MOTTLED SILT,soft-medium stiff, [moist-wet].
			SP/SM	GRAY AND BROWN SAND, fine grained, with SILT, [wet].
				Some medium grained sand.
				Sand becomes brown colored, dense, silt decreases to trace.

Well Construction
MP. EL. 30.48

PID

SCHN00261126

URS

Well Completion Diagram URS	Site Id: MW-15
Location: N. Prop'y Boundary	
Logged By: Don Coberley	Elevation: 30.48'
Contractor: GeoTech	Datum: COP
Drilling Method: HSA	State Plane North: 718273.69
Project Name: Premier Edible Oils	Borehole Dia.: 10.00in — State Plane East: 7617960.88
Project Number: 52-00180063	Completed Depth: 37.50' — Total Depth: 38.50'

Annular Fill:
type: Concrete fm: 0.00' to: 2.00'
type: Bentonite fm: 2.00' to: 25.40'
type: Sand Pack (generic) fm: 25.40' to: 38.50'

Blank Casing:
type: pvc dia: 2.00in fm: 0.0' to: 27.00'

Screens:
type: Slotted size: 0.010in dia: 2.00in fm: 27.00' to: 37.00'
type: size: dia: fm: to:

Static Water Level:

Remarks: 10"-diameter boring to 19.5'; 8.25" boring to total depth.

Elevation (ft)	Depth (ft)	Graphic Log	USCS Code	Material Description	Well Construction	PID
0			ML/SM	GRAY SILT WITH SAND, medium stiff, sand fine grained.		
			SP	GRAY SAND, medium dense to dense, fine to medium grained, no fines, no odor, [wet].		
			ML	3" thick SILT lense, 2" thick SILT lense.		
			SP			
			ML			
			SP			
			SP/SM	GRAY SAND, medium dense, fine to medium grained, with SILT, no odor, [wet].		
				Becomes siltier, dense.		
				Terminate boring at 38.5 feet bgs.		
				Annular fill material 5 1/2 sacks sand, 28 sacks bentonite. 0.5 foot long sump at base of screen.		
-10	40					
-20	50					

SCHN00261127

URS

Well Completion Diagram URS	Site Id: MW-16
Location: N. Prop'y Boundary	
Logged By: Don Coberley	Elevation: 30.03'
Contractor: GeoTech	Datum: COP
Drilling Method: HSA	State Plane North: 718278.69
Project Name: Premier Edible Oils	Borehole Dia.: 10.00in — State Plane East: 7617730.07
Project Number: 52-00180063 — Date(s): 05/25/01 - 05/25/01	Completed Depth: 37.00' — Total Depth: 37.50'

Annular Fill:
type: Concrete fm: 0.00' to: 2.00'
type: Bentonite fm: 2.00' to: 24.90'
type: Sand Pack (generic) fm: 24.90' to: 37.50'

Remarks:

Blank Casing:
type: pvc dia: 2.00in fm: 0.0' to: 27.00'

Screens:
type: Slotted size: 0.010in dia: 2.00in fm: 27.00' to: 37.00'
type: size: dia: fm: to:

Static Water Level:

Elevation (ft)	Depth (ft)	Graphic Log	USCS Code	Material Description	Well Construction (MP. EL. 30.03)	PID
			GM	BROWN SILTY GRAVEL WITH SAND, loose-medium dense, [dry-moist].		
			SP	BROWN SAND, loose-medium dense, fine to medium grained, [dry-moist].		
				BROWN TO BROWNISH-YELLOW SAND, loose-medium dense, fine to medium grained, trace fines, no odor, [moist].		
20	10					
			ML	1 1/2" thick SILT lense.		
				With more medium, some coarse sand. No odor.		
10	20			Becomes more moist.		
			ML/SP	3" thick GRAY SILT lense, medium stiff, [moist].		
				DARK GRAY SAND, medium dense, fine to medium grained, trace fines, no odor, [moist].		
				Becomes wet.		
				Interbedded SILT and SAND		
			ML	DARK GRAY SILT, soft-medium stiff, no odor.		
			SP/SM	DARK GRAY SAND, medium dense to dense, fine grained, with SILT stringers, no odor.		
			ML	DARK GRAY SILT, medium stiff, [moist]		

SCHN00261128

URS

Well Completion Diagram URS	Site Id: MW-16
Location: N. Prop'y Boundary	
Logged By: Don Coberley	Elevation: 30.03'
Contractor: GeoTech	Datum: COP
Drilling Method: HSA	State Plane North: 718278.69
Project Name: Premier Edible Oils	Borehole Dia.: 10.00in — State Plane East: 7617730.07
Project Number: 52-00180063	Completed Depth: 37.00' — Total Depth: 37.50'

Annular Fill:
type: Concrete fm: 0.00' to: 2.00'
type: Bentonite fm: 2.00' to: 24.90'
type: Sand Pack (generic) fm: 24.90' to: 37.50'

Remarks:

Blank Casing:
type: pvc dia: 2.00in fm: 0.0' to: 27.00'

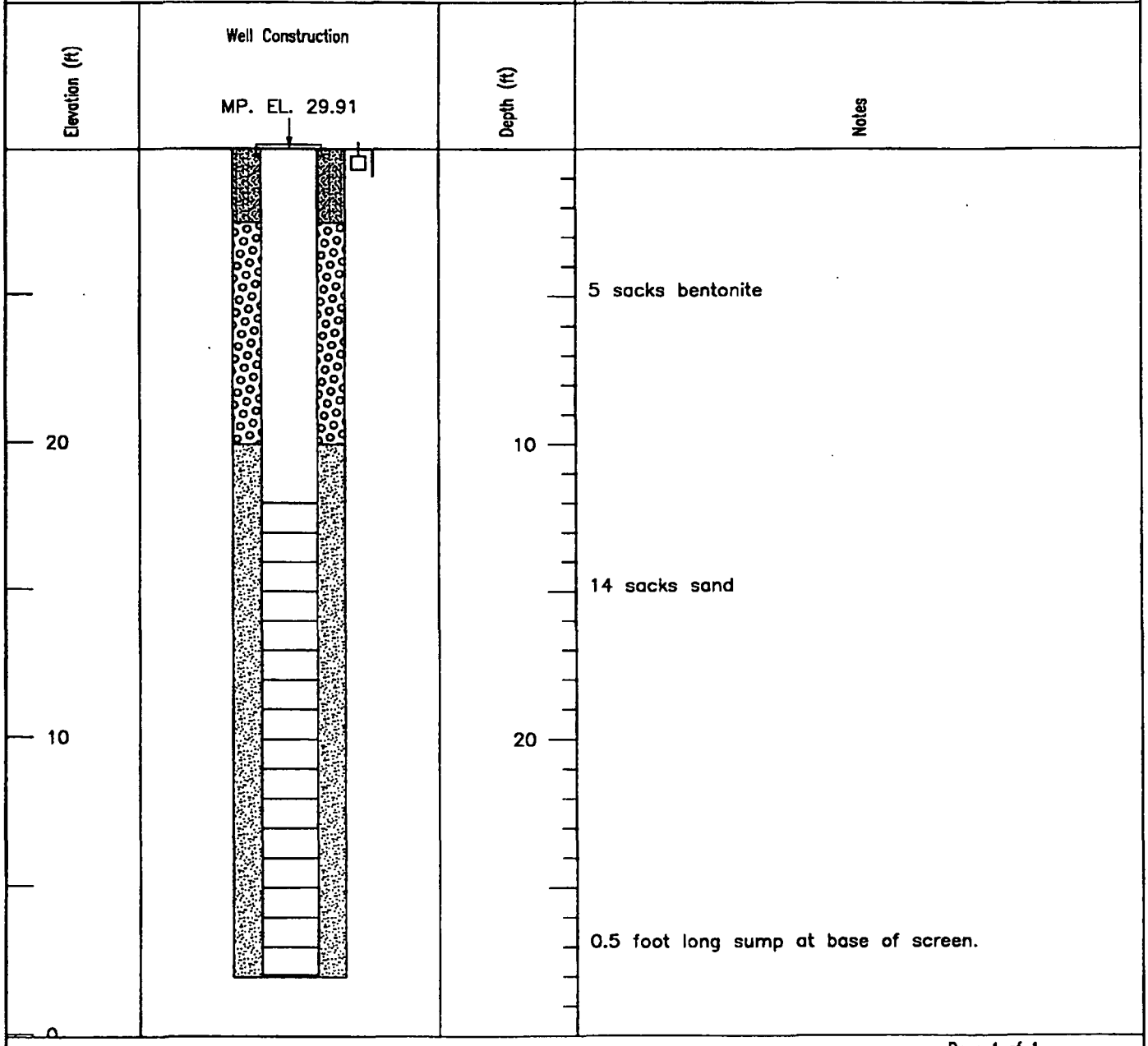
Screens:
type: Slotted size: 0.010in dia: 2.00in fm: 27.00' to: 37.00'
type: size: dia: fm: to:

Static Water Level:

Elevation (ft)	Depth (ft)	Graphic Log	USCS Code	Material Description	Well Construction	PID
0			SP/SM	DARK GRAY SAND, dense, fine grained, trace fines, no odor.		
			ML	4" thick SILT lense.		
			SP/SM	DARK GRAY TO GRAY SILT, stiff, decomposing organic odor, [moist].		
			ML	DARK GRAY SAND, medium dense, fine grained, trace fines.		
			SP/SM	3" thick SILT lense		
-10	40		ML	Grades to SILT.		
			SP/SM	Boring terminated at 37.5 feet bgs.		
				Annular fill material 9 sacks sand, 17 sacks bentonite. 0.5 foot long sump at base of screen.		
-20	50					

URS

Well Completion Diagram URS	Site Id: MW-17
Location: N. Prop'y Boundary	
Logged By: Don Coberley	Elevation: 29.91'
Contractor: GeoTech	Datum: COP
Project Name: Premier Edible Oils	Drilling Method: HSA — State Plane North: 718278.81
Project Number: 52-00180063 — Date(s): 05/25/01 - 05/25/01	Borehole Dia.: 10.00in — State Plane East: 7617733.52
Annular Fill:	Completed Depth: 27.93' — Total Depth: 28.00'
type: Concrete fm: 0.00' to: 2.50'	Blank Casing:
type: Bentonite fm: 2.50' to: 10.00'	type: pvc dia: 2.00in fm: 0.0' to: 12.00'
type: Sand Pack (generic) fm: 10.00' to: 28.00'	
Remarks:	Screens:
	type: Slotted size: 0.010in dia: 2.00in
	type: size: dia:
	fm: 12.00' to: 27.00'
	fm: to:



SCHN00261130

URS

Site Id: NTF-01

Location: N. Tank Farm		Elevation: 27.64'	
Logged By: Don Coberley		Datum: COP	
Project Name: Premier Edible Oils		Date(s): 04/30/01 - 04/30/01	State Plane North: 717970.76
Project Number: 52-00180063		Drilling Method: Direct Push	State Plane East: 7618063.42
Total Depth: 24.00'	Borehole Dia.: 2.00in	Contractor: GeoTech	Static Water Level: 21.70'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				SP	BROWNISH-YELLOW SAND, medium dense, fine to medium grained, trace fines [moist].	
					Gray colored, very slight hydrocarbon odor.	
					Asphalt fragment or hydrocarbon-cemented zone	
					BROWNISH-YELLOW SAND, medium dense, fine to medium grained, trace fines [moist].	
20					Becomes gray colored, slight hydrocarbon odor.	
	10				Hydrocarbon odor stronger.	
10				ML/CL	1" thick LEAN CLAY stringer.	
				SP	Becomes wet.	
	20			SM	2" thick BROWNISH-YELLOW SILTY SAND lense.	
			▼	SP	Sheen to water.	
					Boring terminated at 24 feet bgs. Water sample collected, screened interval 20-24 feet bgs.	
0						

SCHN00261131

URS

Site Id: NTF-02

Location: N. Tank Farm	Elevation: 28.52'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 04/30/01 - 04/30/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 24.00'	Borehole Dia.: 2.00in
	Contractor: GeoTech
	Static Water Level:

Remarks: Static Water Level not recorded.

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
20	0			SP	BROWN POORLY GRADED SAND, loose to medium dense, fine to medium grained, no odor [moist].	
	10				Becomes gray colored, with slight hydrocarbon odor.	
					No staining 13.5-14 feet bgs.	
10					Slightly more coarse grained 18-19.3 feet bgs. Wood fragment at 19.5 feet bgs.	
	20				Strong hydrocarbon odor and sheen 21.5-22.5 feet bgs.	
0					Boring terminated at 24 feet bgs. Collect water sample, screened interval 20-24 feet bgs.	

SCHN00261132

URS

Site Id: NTF-03

Location: N. Tank Farm	Elevation: 28.08'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 04/30/01 - 04/30/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 44.00'	Borehole Dia.: 2.00in
	Contractor: GeoTech
	Static Water Level: 24.00'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, no stain or odor, [moist].	
20	10				Becomes gray colored, no hydrocarbon odor.	
10	20				Becomes dark gray.	
				SM	DARK GRAY SILTY SAND, strong hydrocarbon odor.	
			▼	SP	DARK GRAY POORLY GRADED SAND, fine to medium grained, strong hydrocarbon odor, sheen to water.	
				SM	DARK GRAY SILTY SAND, medium dense, no odor, contains wood fragments.	
0				SP	DARK GRAY POORLY GRADED SAND, decomposing organic material odor, no hydrocarbon odor, [wet].	

SCHN00261133

URS

Site Id: NTF-03

		Location: N. Tank Farm	Elevation: 28.08'
		Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils		Date(s): 04/30/01 - 04/30/01	State Plane North: 717969.03
Project Number: 52-00180063		Drilling Method: Direct Push	State Plane East: 7618022.13
Total Depth: 44.00'	Borehole Dia.: 2.00in	Contractor: GeoTech	Static Water Level: 24.00'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
					Contains thin, silty stringers.	
					Becomes more fine-grained.	
-10	40					
					Boring terminated at 44 feet bgs. Water sample collected, screened interval 40-44 feet bgs.	
-20	50					
-30						

SCHN00261134

URS

Site Id: NTF-26

Location: N. Tank Farm	Elevation: 26.37'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/04/01 - 05/04/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 24.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	Static Water Level: 20.00'
	State Plane North: 718176.43
	State Plane East: 7617944.35

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
20	10			SP	BROWNISH-YELLOW TO BROWN POORLY GRADED SAND, fine to medium grained, [moist]. Gravel stringers. Sand, light cementation.	
10	20		▼	ML SP ML SP ML SP	2" thick GRAY SILT lense, 2" thick saturated zone perched on silt. GRAY POORLY GRADED SAND, fine grained, [wet]. 3" thick SILT lense. GRAY POORLY GRADED SAND, fine grained, [moist]. 1" thick SILT lense. GRAY POORLY GRADED SAND, fine grained, [moist]. Sand [wet] at 20 feet bgs.	
0				ML SP	GRAY SILT, soft, [moist]. BROWN SAND, fine grained, [moist]. Boring terminated at 24 feet bgs. Water sample collected, screened interval 20-24 feet bgs.	

SCHN00261135

URS

Site Id: NWT-09

		Location: NW Tanks	Elevation: 29.91'
		Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils		Date(s): 05/01/01 - 05/01/01	State Plane North: 717606.43
Project Number: 52-00180063		Drilling Method: Direct Push	State Plane East: 7617979.67
Total Depth: 28.00'	Borehole Dia.: 2.00in	Contractor: GeoTech	Static Water Level: 24.50'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				SM SP	DARK BROWN SILTY SAND, medium dense, trace gravel. BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, [moist].	
					Becomes gray colored.	60 ppm
20	10					66 ppm
						175 ppm
					Strong hydrocarbon odor.	205 ppm
						228 ppm
						160 ppm
						270 ppm
						54 ppm
10	20					146 ppm
				ML SP	3" thick SILT lense.	103 ppm
						125 ppm
						240 ppm
						165 ppm
			▼			251 ppm
				ML SP	DARK GRAY SILT, soft, wood fragments at base.	22 ppm
					DARK GRAY POORLY GRADED SAND, fine to medium grained, strong hydrocarbon odor, sheen to water.	20 ppm
						5 ppm
					Boring terminated at 28 feet bgs. Collect water sample, screened interval 24-28 feet bgs.	3 ppm
0						

SCHN00261136

URS

Site Id: NWT-10

Location: NW Tanks	Elevation: 29.60'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/01/01 - 05/01/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 24.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	State Plane North: 717533.50
	State Plane East: 7618133.48
	Static Water Level: 20.50'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM SP	LIGHT BROWN TO DARK BROWN SILTY GRAVEL BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, [moist]. Becomes slightly lighter color.	
20	10				Becomes gray colored, with faint hydrocarbon odor.	2 ppm 0 ppm
						22 ppm 49 ppm 30 ppm 44 ppm 33 ppm
10	20		▼			60 ppm 138 ppm 79 ppm 58 ppm
					Becomes dark gray colored, [wet]. Possible edible oil sheen to water.	10 ppm
				ML SP	6" thick DARK GRAY SILT lense	50 ppm
				ML SP	DARK GRAY POORLY GRADED SAND, fine to medium grained, [moist]. 3" thick SILT lense.	13 ppm 8 ppm
0					Boring terminated at 24 feet bgs. Water sample collected, screened interval 20-24.	

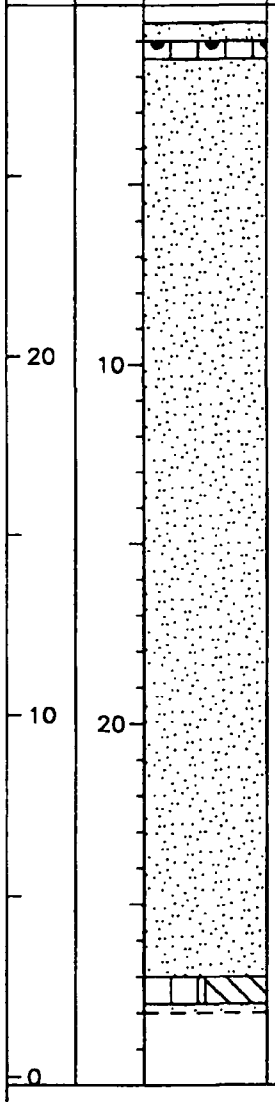
SCHN00261137

URS

Site Id: NWT-17

Location: NW Tanks	Elevation: 29.77'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/02/01 - 05/02/01
Project Number: 52-00180063	State Plane North: 717697.06
Drilling Method: Direct Push	State Plane East: 7618053.23
Total Depth: 28.00'	Borehole Dia.: 2.00in
Contractor: GeoTech	Static Water Level: 23.50'

Remarks:



Elevation (ft)	Depth (ft)	USCS Code	Material Description	PID
		AS	Asphalt.	
		SP GM SP	BROWN SILTY GRAVEL, dense, [moist].	
			BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, [moist].	
20	10		Becomes gray colored, with hydrocarbon odor.	1 ppm
				51 ppm
				79 ppm
				115 ppm
				115 ppm
				77 ppm
			Sand grains shiny.	235 ppm
				276 ppm
10	20		Sand [moist].	251 ppm
				206 ppm
				109 ppm
			Sand [wet].	111 ppm
				275 ppm
				120 ppm
			Sand [moist].	131 ppm
				129 ppm
		ML/CL SP	DARK GRAY CLAYEY SILT, slight hydrocarbon odor, [moist].	62 ppm
			Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	4 ppm
0				2 ppm

SCHN00261138

URS

Site Id: NWT-24

Location: NW Tanks	Elevation: 29.77'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/04/01 - 05/04/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	State Plane North: 717747.14
	State Plane East: 7618166.70
	Static Water Level: 24.00'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				AS	Asphalt.	
				SP	BROWNISH-YELLOW TO BROWN POORLY GRADED SAND, medium dense, fine to medium grained, [moist].	
20	10					
				ML	3" thick BROWN SILT lense.	
				SP	Sand slightly more dense.	
10	20					
				ML	GRAY SILT, soft to medium stiff, [moist], interbedded with GRAY SAND, fine grained, [moist].	
			▼		GRAY SILT, soft to medium stiff, decomposing organic material odor, [wet].	
					Silt becomes [moist].	
				SP	GRAY SAND, fine grained, [moist].	
0					Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	

SCHN00261139

URS

Site Id: NWT-30

Location: NW Tanks		Elevation: 29.98'	
Logged By: Don Coberley		Datum: COP	
Project Name: Premier Edible Oils		Date(s): 05/07/01 - 05/07/01	State Plane North: 717606.65
Project Number: 52-00180063		Drilling Method: Direct Push	State Plane East: 7618021.58
Total Depth: 28.00'	Borehole Dia.: 2.00in	Contractor: GeoTech	Static Water Level: 23.80'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM	DARK GRAY SILTY GRAVEL, loose, gravel to 2" size, [dry].	
				SP	BROWN SAND, medium dense, fine to medium grained, trace fines, [moist].	
20	10				Becomes gray colored, with hydrocarbon odor.	12 ppm
					Grains become shiny, no visible free hydrocarbon.	123 ppm
						35 ppm
						376 ppm
						261 ppm
						100 ppm
10	20				Sand [moist-wet], trace yellowish free hydrocarbon.	67 ppm
				CL/ML	DARK GRAY LEAN CLAY, hydrocarbon odor, [moist].	117 ppm
				SP	DARK GRAY SAND, fine grained, hydrocarbon odor, [moist].	50 ppm
			▼			181 ppm
				ML/SP	4" thick SILT lense.	312 ppm
					Slight sheen to water.	
				ML/CL/SP	3" thick CLAYEY SILT lense.	
				ML/SP	1" thick SILT lense	
				ML/CL	DARK GRAY CLAYEY SILT, slight hydrocarbon odor.	
0					Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	

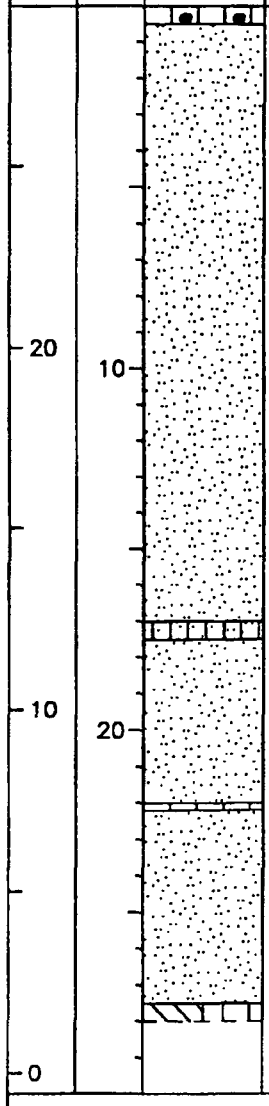
SCHN00261140

URS

Site Id: NWT-33

Location: NW Tanks	Elevation: 29.42'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/07/01 - 05/07/01
Project Number: 52-00180063	State Plane North: 717535.33
Total Depth: 28.00'	Drilling Method: Direct Push
Borehole Dia.: 2.00in	Contractor: GeoTech
	Static Water Level: 24.00'

Remarks:



Elevation (ft)	Depth (ft)	USCS Code	Material Description	PID
		GM	LIGHT BROWN SILTY GRAVEL, loose, [dry].	
		SP	BROWNISH-YELLOW SAND, medium dense, fine to medium grained, [moist].	
			Becomes gray, with hydrocarbon odor.	
20	10			61 ppm
				61 ppm
				171 ppm
			Becomes dark gray.	339 ppm
				117 ppm
				101 ppm
				67 ppm
				93 ppm
		SM		38 ppm
		SP	BROWNISH-YELLOW SILTY SAND, with gray laminations.	133 ppm
10			DARK GRAY SAND, fine grained, strong hydrocarbon odor, [moist].	263 ppm
	20			963 ppm
			Grains shiny.	150 ppm
		ML	Trace yellowish colored free hydrocarbon.	325 ppm
		SP	2" thick SILT lense.	291 ppm
			Sand [wet], sheen to water.	237 ppm
				358 ppm
				317 ppm
				164 ppm
		CL/ML	DARK GRAY LEAN CLAY, soft to medium stiff, hydrocarbon odor, [moist].	26 ppm
0			Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	

SCHN00261141

URS

Site Id: NWT-34

Location: NW Tanks	Elevation: 30.19'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/07/01 - 05/07/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00'	Borehole Dia.: 2.00in
	Contractor: GeoTech
	State Plane North: 717666.07
	State Plane East: 7618149.63
	Static Water Level: 24.50'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
30				GM/GP	BROWN AND GRAY SILTY GRAVEL	
				SP	BROWNISH-YELLOW SAND, *medium dense, fine to medium grained, [moist].*	
					Medium sand absent.	
					Becomes gray colored, with hydrocarbon odor.	37 ppm
20	10					97 ppm
						163 ppm
						96 ppm
						91 ppm
						50 ppm
						69 ppm
					Grains shiny 15.5 to 16 feet bgs.	271 ppm
						284 ppm
						192 ppm
						152 ppm
10	20			ML		180 ppm
				SP	2" thick SILT lense.	476 ppm
					Sand *fine to medium grained.*	235 ppm
				ML	Medium sand absent, sand slightly lighter colored, grains shiny.	276 ppm
				SP	2" thick SILT lense.	531 ppm
			▼		Sand [wet], sheen to water.	691 ppm
						944 ppm
						80 ppm
						56 ppm
					Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet.	

SCHN00261142

URS

Site Id: NWT-35	
Location: NW Tanks	Elevation: 29.77'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/07/01 - 05/07/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00' / Borehole Dia.: 2.00in	Contractor: GeoTech

State Plane North: 717591.93	Static Water Level: 23.70'
State Plane East: 7618305.84	

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM SP	DARK BROWN TO BLACK SILTY GRAVEL, loose to medium dense, partially asphalt cemented. BROWNISH-YELLOW SAND, medium dense, fine grained, [moist].	
					Becomes brown colored.	
					Becomes brownish-yellow colored.	
20	10					
					Becomes brown colored. Becomes brownish-yellow colored.	
				ML SP	3" thick SILT lense.	
				ML/CL SP	DARK GRAY CLAYEY SILT, grading to SILT DARK GRAY SAND, fine grained, decomposing organic material odor, [moist].	
10	20					
				ML SP	1" thick SILT lense	
			▼	ML/CL SP	DARK GRAY SILT WITH SAND, sand fine grained, [moist]. BROWN AND GRAY SAND, fine grained, [moist].	
				ML	GRAY AND BROWN MOTTLED SILT, [wet] at top, becomes [moist].	
				SP	GRAY AND BROWN MOTTLED SAND, fine grained, [moist].	
					Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	
0						

SCHN00261143

URS

Site Id: SHL-07	
Location: Shoreline	Elevation: 28.61'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/01/01 - 05/01/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00'	Borehole Dia.: 2.00in
	Contractor: GeoTech
	State Plane North: 717915.90
	State Plane East: 7617746.80
	Static Water Level: 23.70'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				SC/SM/SP	BLACK SILTY SAND, *with roots and wood chips.* LIGHT BROWN SAND AND SANDY GRAVEL, with silt, rock frogments. BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, scattered gravel to 1.5" size, [moist]. Gravel absent.	
20	10					
10	20		▼	ML/SP	1" thick GRAY SILT lense. GRAY POORLY GRADED SAND, medium dense, fine to medium grained, no odor, [wet]. Thin, discontinuous SILT lenses (0.25" thick).	
0					Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	

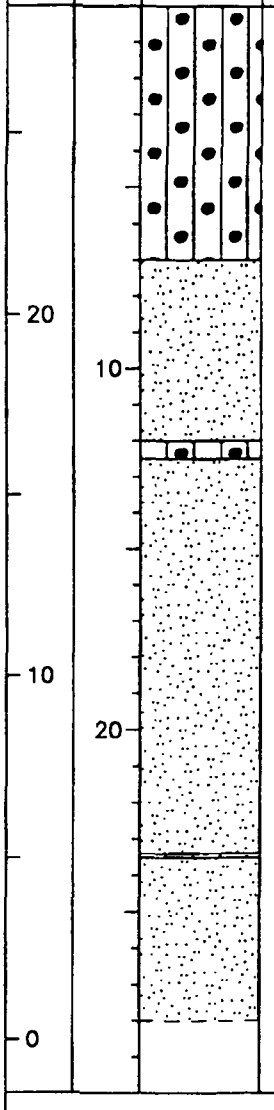
SCHN00261144

URS

Site Id: SHL-08

Location: Shoreline	Elevation: 28.52'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/01/01 - 05/01/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00'	Borehole Dia.: 2.00in
	Contractor: GeoTech
	State Plane North: 717810.04
	State Plane East: 7617767.47
	Static Water Level: 23.20'

Remarks:



USCS Code	Material Description	PID
GM	BROWN TO DARK BROWN TO BLACK SILTY GRAVEL, dense, some sand, rock fragments to 1" size, [moist]. Thin granule/pebble layer, slightly cemented with asphalt.	
SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, no odor, [moist].	
GM	DARK BROWN SILTY GRAVEL, dense, slightly cemented.	
SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, no odor, [moist].	
	Becomes gray colored, [wet].	
	1" thick GRAY SILT lense.	
ML SP	GRAY POORLY GRADED SAND, medium dense, fine to medium grained.	
	Slight hydrocarbon odor.	
	Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	

URS

Site Id: SHL-12

Location: Shoreline	Elevation: 30.24'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/01/01 - 05/01/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00'	Borehole Dia.: 2.00in
	Contractor: GeoTech
	State Plane North: 717446.41
	State Plane East: 7618093.03
	Static Water Level: 24.00'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
30				GM	LIGHT BROWN TO GRAY GRAVEL, rock fragments angular, 1" to 1.5" size, some fines.	
				SP	BROWNISH-YELLOW SAND, medium dense, fine to medium grained, trace fines, [moist].	
20	10				Becomes gray colored.	12 ppm
					Becomes brownish-yellow colored.	95 ppm
					Becomes gray colored.	156 ppm
						15 ppm
						27 ppm
						111 ppm
						87 ppm
						26 ppm
10	20				BROWN SAND, dense, fine to medium grained, trace fines, trace gravel, angular, to 1" size, [moist].	143 ppm
					GRAY SAND, medium dense, fine to medium grained, [moist].	52 ppm 145 ppm
				ML SP	1" thick GRAY SILT lense.	204 ppm
						67 ppm
						62 ppm
						16 ppm
				ML SP	GRAY SILT, with sand stringers.	5 ppm
					GRAY SAND, medium dense, fine to medium grained, [moist].	2 ppm
					Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	

SCHN00261146

URS

Site Id: SHL-13

Location: Shoreline	Elevation: 29.29'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/02/01 – 05/02/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00'	Borehole Dia.: 2.00in
	Contractor: GeoTech
	State Plane North: 717594.29
	State Plane East: 7617885.82
	Static Water Level: 23.60'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				SP GM	BROWNISH-YELLOW POORLY GRADED SAND, fine to medium grained, [moist]. BROWN TO DARK BROWN SILTY GRAVEL, medium dense, some sand, gravel to 1" size, [dry to moist].	
				SP	BROWN POORLY GRADED SAND, fine to medium grained, trace fines, scattered gravel, [moist]. Gravel absent.	
20	10					
					Becomes slightly more dense, light cementation.	
10	20				Becomes gray colored, with strong hydrocarbon odor.	117 ppm 20 ppm 85 ppm
				ML SP	1" thick SILT lense. Sand [wet], sheen to water.	218 ppm 120 ppm
					Becomes more fine grained.	146 ppm 133 ppm 25 ppm
0				ML SP	DARK GRAY SILT, with wood fragments. DARK GRAY POORLY GRADED SAND, medium dense, fine to medium grained, trace fines. Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	15 ppm 5 ppm

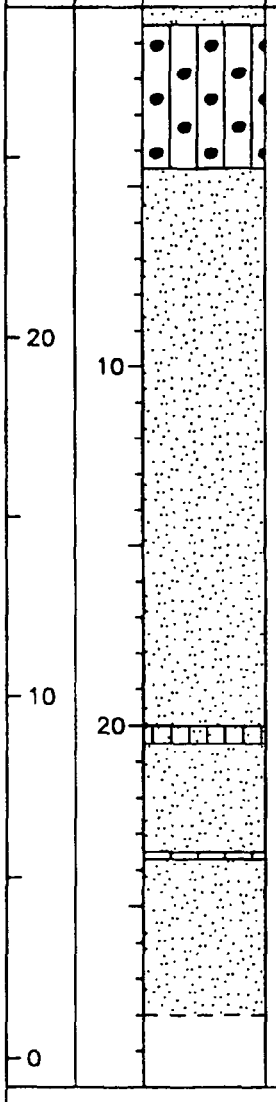
SCHN00261147

URS

Site Id: SHL-14

Location: Shoreline	Elevation: 29.21'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/02/01 - 05/02/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	State Plane North: 717543.07
	State Plane East: 7617915.49
	Static Water Level: 23.10'

Remarks:



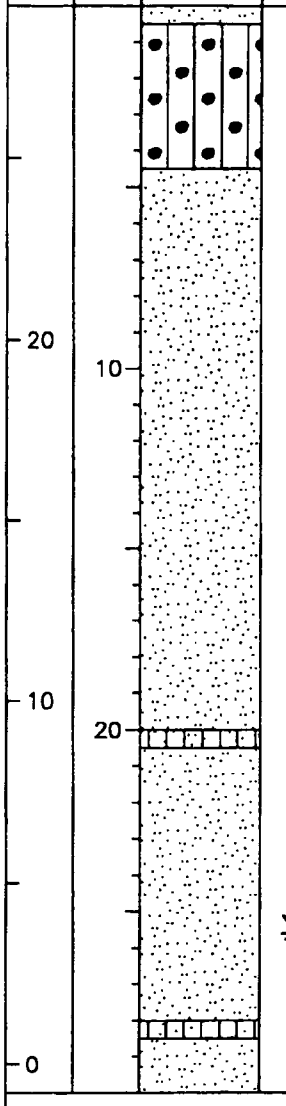
USCS Code	Material Description	PID
SP GM	BROWN SAND, medium dense, fine to medium grained, [moist]. DARK BROWN SILTY GRAVEL, loose, fragments to 3/4" size, angular, [dry].	
SP	BROWN SAND, medium dense, fine to medium grained, [moist].	
	Becomes gray colored, with hydrocarbon odor.	10 ppm 8 ppm 16 ppm 39 ppm
SM SP	DARK GRAY SILTY SAND, soft to medium dense, hydrocarbon odor, [moist]. DARK GRAY SAND, fine to medium grained, hydrocarbon odor, [moist].	144 ppm 70 ppm 165 ppm 179 ppm
ML SP	2' thick SILT lense. Sand [wet], sheen to water.	183 ppm 163 ppm 35 ppm 10 ppm
	Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	1 ppm

URS

Site Id: SHL-15

Location: Shoreline	Elevation: 29.21'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/02/01 - 05/02/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 48.00'	Borehole Dia.: 2.00in
	Contractor: GeoTech
	State Plane North: 717543.99
	State Plane East: 7617915.99
	Static Water Level: 25.60'

Remarks:



USCS Code	Material Description	PID
SP GM	RUN CLOSED SAMPLER TO 28 FEET BGS. Graphic log 0-28 from adjacent boring SHL-14.	
SP		
SM SP		
SM SP	DARK GRAY SILTY SAND, sand fine grained, no hydrocarbon odor, [wet].	

URS

Site Id: SHL-15

Location: Shoreline	Elevation: 29.21'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/02/01 - 05/02/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 48.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	Static Water Level: 25.60'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				ML SP	DARK GRAY POORLY GRADED SAND, fine to medium grained, very slight hydrocarbon odor, [wet].	
					2" thick SILT lense.	
				ML SP		
				ML/CL SP	2" thick SILT lense. Slight hydrocarbon odor.	
					DARK GRAY CLAYEY SILT, slight hydrocarbon odor.	
-10	40				DARK GRAY POORLY GRADED SAND, fine to medium grained, slight hydrocarbon odor.	1 ppm
				ML/CL SP		
					DARK GRAY CLAYEY SILT, soft, with wood fragments, slight hydrocarbon odor, [wet].	76 ppm
					DARK GRAY SAND, fine grained, slight hydrocarbon odor.	
						5 ppm
-20	50				Boring terminated at 48 feet bgs. Water sample collected, screened interval 44-48 feet bgs.	
-30						

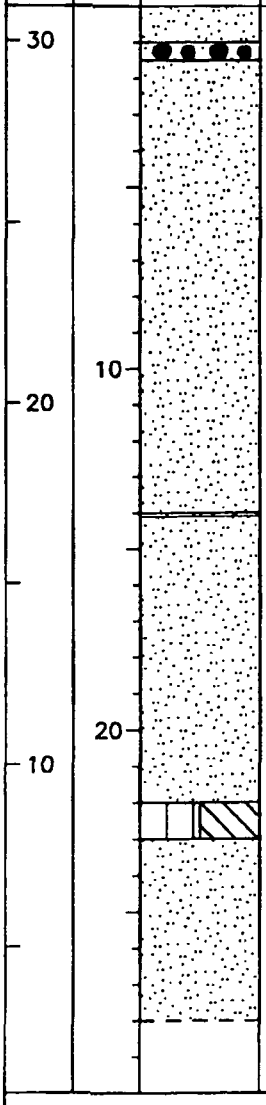
SCHN00261150

URS

Site Id: SHL-21

Location: Shoreline	Elevation: 30.96'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/03/01 - 05/03/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	Static Water Level: 24.00'

Remarks:



USCS Code	Material Description	PID
SP	BROWN SAND, fine grained, some silt, [moist].	
GP	GRAY GRAVEL, to 1" size, angular, some fine sand, [dry].	
SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, trace silt, no odor, [moist].	
ML/CL	1" thick GRAY CLAYEY SILT	
SP	3" thick GRAY SAND lense	
	1" thick GRAVEL lense (angular).	
	GRAY POORLY GRADED SAND, *medium dense, fine to medium grained, some silt, hydrocarbon odor, [moist].*	71 ppm
	Fines absent, [wet].	230 ppm
ML/CL	GRAY CLAYEY SILT, hydrocarbon odor, [wet].	15 ppm
SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, no fines, slight hydrocarbon odor, [moist].	5 ppm
	GRAY POORLY GRADED SAND, medium dense, no fines.	3 ppm
	Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	

SCHN00261151

URS

Site Id: SHL-22

Location: Shoreline	Elevation: 30.00'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/03/01 - 05/03/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00'	Borehole Dia.: 2.00in
	Contractor: GeoTech
	State Plane North: 717409.72
	State Plane East: 7618316.67
	Static Water Level: 23.50'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				SW	BROWN WELL GRADED SAND, fine to medium grained, gravel to 1/2" size, rounded, no odor, [moist].	
				SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, no fines, no odor, [moist].	
20	10					
10	20				GRAY POORLY GRADED SAND, medium dense, fine grained, trace silt, no odor, [moist].	
				ML/CL	GRAY CLAYEY SILT, no odor, [wet].	
				SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, no fines, no odor, [moist].	
			▼		GRAY POORLY GRADED SAND, medium dense, fine grained, no fines, no odor, [moist].	
				ML/CL	GRAY CLAYEY SILT, no odor, [wet].	
				SP	3" thick, 1 1/2" thick SAND lenses.	
				ML/CL		
				SP	GRAY POORLY GRADED SAND, medium dense, fine grained, no fines, no odor, [moist].	
					Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	

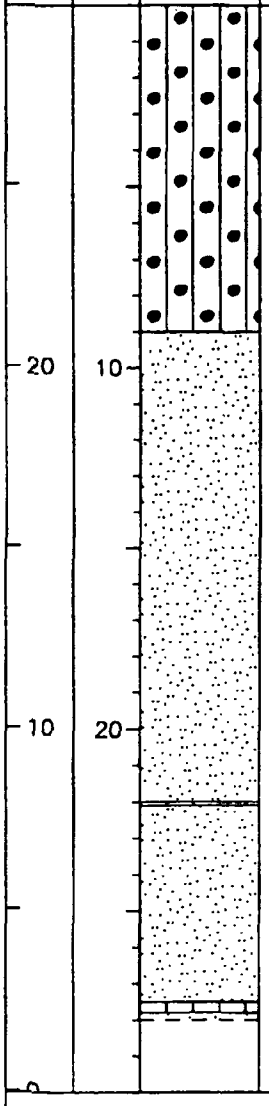
SCHN00261152

URS

Site Id: SHL-32

Location: Shoreline	Elevation: 29.94'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/07/01 - 05/07/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	Static Water Level: 23.80'

Remarks:



Elevation (ft)	Depth (ft)	USCS Code	Material Description	PID
		GM	BROWNISH-YELLOW TO BROWN TO GRAY SILTY GRAVEL, loose, gravel to 1/2" size, some slag, [dry].	
20	10	SP	BROWNISH-YELLOW SAND, medium dense, fine to medium grained, trace fines, no odor, [moist].	
			Light brown colored laminations.	
			Becomes gray, with hydrocarbon odor.	50 ppm
10	20			225 ppm
			Becomes dark gray.	80 ppm
		ML SP	1 1/2" thick SILT lense.	88 ppm
			2 thin (less than 1" thick) SILT lenses.	294 ppm
			Sand [wet], sheen to water, hydrocarbon odor decreases with depth.	223 ppm
				163 ppm
				20 ppm
		ML SP		12 ppm
			4" thick SILT lense.	
0			Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	

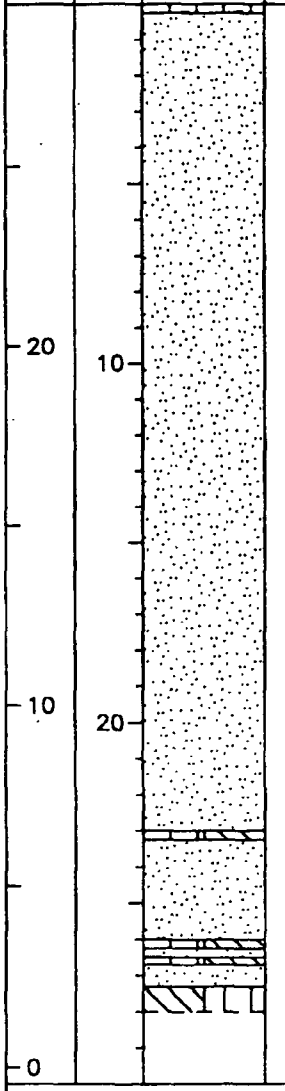
SCHN00261153

URS

Site Id: STF-16

Location: S. Tank Farm	Elevation: 29.53'
Logged By: Dan Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/02/01 - 05/02/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	State Plane North: 717699.02
	State Plane East: 7617947.83
	Static Water Level: 23.70'

Remarks:



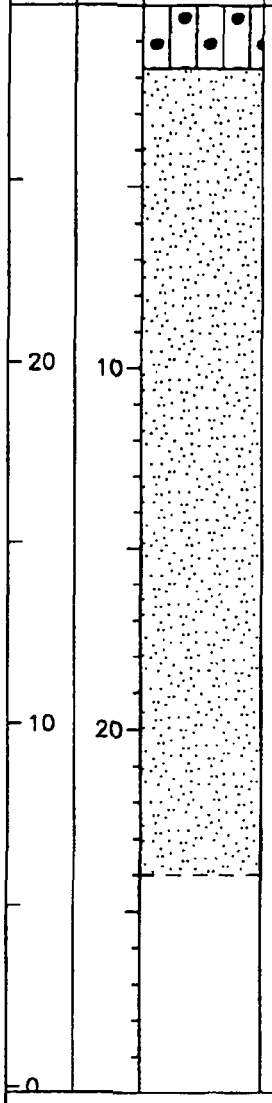
USCS Code	Material Description	PID
GM SP	BROWNISH-YELLOW TO DARK BROWN POORLY GRADED SAND, slightly cemented 0.5 to 2.0 feet bgs.	1 ppm
	Becomes gray colored.	32 ppm
	Hydrocarbon odor.	59 ppm
		32 ppm
		30 ppm
		39 ppm
		96 ppm
		121 ppm
	Sand [moist].	63 ppm
		45 ppm
		44 ppm
		7 ppm
ML/CL SP	3" thick CLAYEY SILT lense.	1 ppm
	Sand [wet], with slight hydrocarbon odor.	
ML/CL SP		
ML/CL SP	3" thick CLAYEY SILT lense.	
CL/ML	2" thick CLAYEY SILT lense.	
	8" thick CLAYEY SILT lense.	
	Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	

SCHN00261154

URS

Site Id: WWP-04	
Location: Treatment Plant	Elevation: 29.84'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 04/30/01 - 04/30/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 24.00'	Borehole Dia.: 2.00in
	Contractor: GeoTech
	State Plane North: 717867.82
	State Plane East: 7618106.57
	Static Water Level: 22.00'

Remarks:



USCS Code	Material Description	PID
GM	GRAYISH-BROWN SILTY GRAVEL, medium dense.	
SP	BROWN POORLY GRADED SAND, fine to medium grained, some fines, scattered gravel to 1"+ size, [moist].	
	Becomes gray stained at 19.5 feet bgs.	16.5 ppm 81 ppm
	Strong hydrocarbon odor, sheen to water.	110 ppm 13 ppm
	Boring terminated at 24 feet bgs. Water sample collected, screened interval 20-24 feet bgs.	3 ppm

URS

Site Id: WWP-05

Location: Treatment Plant	Elevation: 29.93'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 04/30/01 - 04/30/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 44.00'	Borehole Dia.: 2.00in
	Contractor: GeoTech
	State Plane North: 717839.41
	State Plane East: 7618076.01
	Static Water Level: 25.00'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM	LIGHT BROWN SILTY GRAVEL, medium dense.	1 ppm
				SP	BROWN POORLY GRADED SAND, medium dense, fine to medium grained.	1 ppm
					Mottled to rust brown colored.	
20	10					
10	20				Sand [moist].	
					Becomes gray stained.	
					Strong hydrocarbon odor.	45 ppm
			▼		Thin wet zone 25-26 feet bgs. Strong hydrocarbon odor, sheen to water.	250 ppm
						166 ppm
						140 ppm
				SM		10 ppm
0				SP	GRAY SILTY SAND, *medium dense, sand fine grained, some clay, with wood fragments.*	
					DARK GRAY POORLY SORTED SAND medium dense fine to medium grained [moist]	

SCHN00261156

URS

Site Id: WWP-05	
Location: Treatment Plant	Elevation: 29.93'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 04/30/01 - 04/30/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 44.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	State Plane North: 717839.41
	State Plane East: 7618076.01
	Static Water Level: 25.00'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				CL/ML	LEAN CLAY, soft, [moist].	
				SP/SM	SILTY SAND, sand fine grained, [wet].	
				CL/ML	LEAN CLAY, [moist].	
-10	40			SP	Thin sand stringer, fine grained, [wet].	
					DARK GRAY TO BLACK POORLY GRADED SAND, sand fine to medium grained, some silt, slight hydrocarbon odor, [moist].	
					Boring terminated at 44 feet bgs. Water sample collected, screened interval 40-44 feet bgs.	
-20	50					
-30						

SCHN00261157

URS

Site Id: WWP-06

Location: Treatment Plant	Elevation: 29.64'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 04/30/01 - 04/30/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	State Plane North: 717815.68
	State Plane East: 7618021.65
	Static Water Level: 23.70'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM	LIGHT BROWN TO BROWN SILTY SANDY GRAVEL, dense, with rock fragments, [moist].	
				SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, [moist].	
20	10					
10	20				Becomes gray colored.	1 ppm
			▼		Strong odor, mixed hydrocarbon and possible solvent.	4 ppm 166 ppm 645 ppm
						5 ppm 19 ppm 1 ppm
					Hydrocarbon odor.	4 ppm
0					Boring terminated at 28 feet bgs. Collect water sample, screened interval 24-28 feet bgs.	

SCHN00261158

URS

Site Id: WWP-18

Location: Treatment Plant	Elevation: 30.69'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/03/01 - 05/03/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00' / Borehole Dia.: 2.00in	Contractor: GeoTech

State Plane North: 717904.58
State Plane East: 7617973.97
Static Water Level: 24.00'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
30				CR SP	BROWNISH-YELLOW POORLY GRADED SAND, medium dense, fine to medium grained, no fines, no odor, [moist].	
20	10					
10	20		▼	ML SP	1" thick GRAY SILT lense. BROWNISH-YELLOW SAND, medium dense, fine to medium grained, no fines, [moist]. GRAY SAND, *medium dense, fine to medium grained, trace fines, [wet].* Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	

SCHN00261159

URS

Site Id: WWP-20

Location: Treatment Plant	Elevation: 30.51'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/03/01 - 05/03/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	State Plane North: 717839.52
	State Plane East: 7617898.54
	Static Water Level: 24.00'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
30				CR	CONCRETE	
				GP	GRAY GRAVEL WITH BROWNISH YELLOW SAND, sand fine to medium grained, no odor, [moist].	
				SP	BROWNISH YELLOW POORLY GRADED SAND, *medium dense, fine to medium grained, trace fines, no odor, [moist].*	
					With scattered gravel to 1" size, angular.	
20	10				Gravel absent.	
10	20		▼		Sand becomes gray, slight odor (not hydrocarbon), [wet].	
				ML	GRAY SILT, slight odor (not hydrocarbon), [wet].	
					Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	

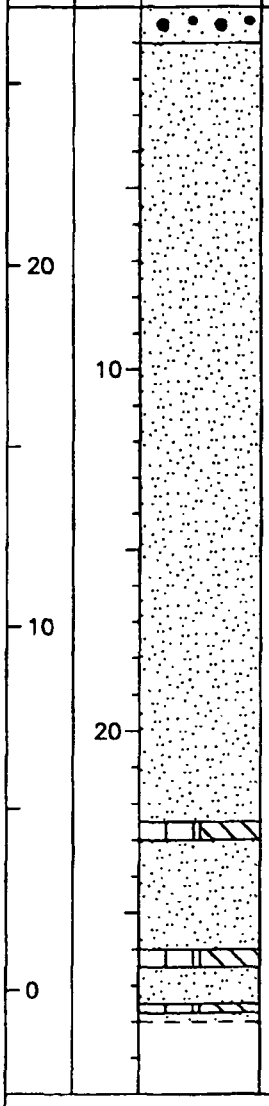
SCHN00261160

URS

Site Id: WWP-23

Location: Treatment Plant	Elevation: 27.13'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/03/01 - 05/03/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	State Plane North: 717756.45
	State Plane East: 7617962.11
	Static Water Level: 24.00'

Remarks:



Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GP SP	WHITISH GRAY GRAVEL, crushed concrete. BROWN TO DARK BROWN POORLY GRADED SAND, fine to medium grained, trace fines, [moist].	
					BROWN TO BROWNISH-YELLOW POORLY GRADED SAND, fine to medium grained, [moist].	
				ML/CL SP	GRAY CLAYEY SILT, medium stiff, [moist]. GRAY POORLY GRADED SAND, fine to medium grained, [moist].	1 ppm
				ML/CL SP ML/CL SP	GRAY CLAYEY SILT, soft to medium stiff, [moist]. GRAY POORLY GRADED SAND, fine to medium grained, [moist]. 3" thick CLAYEY SILT lense, slight hydrocarbon odor.	
					Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	

SCHN00261161

URS

Site Id: WWP-28

Location: Treatment Plant	Elevation: 29.83'
Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils	Date(s): 05/04/01 - 05/04/01
Project Number: 52-00180063	Drilling Method: Direct Push
Total Depth: 28.00' / Borehole Dia.: 2.00in	Contractor: GeoTech
	Static Water Level: 24.00'

Remarks:

Elevation (ft)	Depth (ft)	Graphic Log	Water Level	USCS Code	Material Description	PID
				GM	BROWN TO GRAY SILTY GRAVEL, loose to medium dense, [dry-moist].	
				SP	BROWN POORLY GRADED SAND, fine to medium grained, trace fines, [moist].	
					With dark brown laminations.	
20	10				Becomes gray.	
					Becomes brown, slightly silty.	
					Becomes gray, silt absent.	
10	20				Sand fine grained.	
						2 ppm
						35 ppm
			▼		Indistinct gasoline/solvent odor.	615 ppm
					Sheen to water.	39 ppm
						82 ppm
					2" thick SILT lense.	
				ML SP	Boring terminated at 28 feet bgs. Water sample collected, screened interval 24-28 feet bgs.	
0						

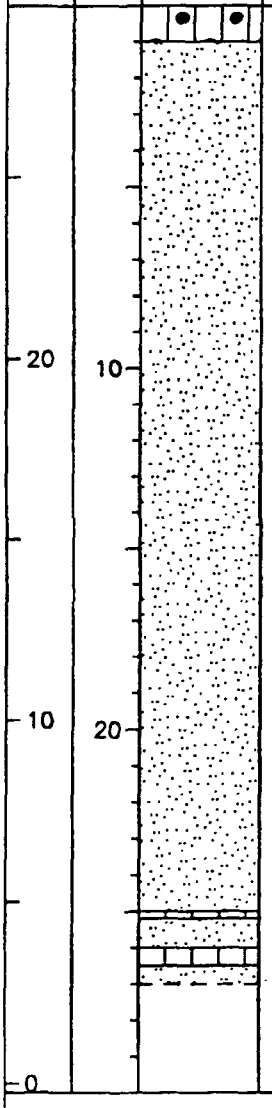
SCHN00261162

URS

Site Id: WWP-29

		Location: Treatment Plant	Elevation: 29.74'
		Logged By: Don Coberley	Datum: COP
Project Name: Premier Edible Oils		Date(s): 05/04/01 - 05/04/01	State Plane North: 717841.66
Project Number: 52-00180063		Drilling Method: Direct Push	State Plane East: 7618055.34
Total Depth: 27.00'	Borehole Dia.: 2.00in	Contractor: GeoTech	Static Water Level: 23.50'

Remarks:



USCS Code	Material Description	PID
GM	LIGHT GRAY TO GRAY SILTY GRAVEL (crushed concrete), [moist].	
SP	BROWNISH-YELLOW TO BROWN SAND, fine to medium grained, trace fines, [moist].	
	Sand fine grained [damp].	
	Becomes gray.	16 ppm
	Indistinct gasoline/solvent odor.	32 ppm
		189 ppm
		220 ppm
ML	2" thick SILT lense.	
SP		
ML	6" thick SILT lense.	
SP		
	Refusal at 27 feet bgs. Remove 3" wood from nose cone.	
	Boring terminated at 27 feet bgs. Water sample collected, screened interval 23-27 feet bgs. Strong sheen to sampled water.	

NORTHWEST DEMOLITION & DISMANTLING

Date: 5/10/99

To: Schnitzer Steel Industries, Inc.
James Jakubiak
Phone: 503-286-6976
Fax: 503-286-6948

From: Northwest Demolition & Dismantling
Richard Wayper
Phone: 503-598-9706
Fax: 503-620-1708

Pages: 1

Subject: concrete crushing

Jim,

Good to talk with you today. Northwest Demolition crushed a total of 4,105 tons at your property with 2,709 tons and 1,396 tons from the North and South sides respectively.

Please call if you need any additional information.

AFE AND ASSET ADDITION FORM

99006

Date AFE: (Authorization for Expenditures) Prepared: 01/27/99 AFE Asset No.:
CIP Expenditure :
Proposed Project Start Date: 02/01/99
Proposed Project Completion Date (if CIP): 03/15/99
Capital Expenditure/Expense: Capital _ Expense X
Company: *SIC* Division: Real Estate Location: *10400 North Burgard Way (Old Palmco Site)*

Asset Description	Proposed Cost	Actual Cost
Northwest Demolition	*$64,700*	
Demolition of tank foundations and concrete slabs		
Project Total	*$64,700*	

Business Purpose: Obey Law _ Maintain Business X Reduce Costs ___ Expand Business __
Included in Capital Budget: Yes
Purpose/Benefits:
All tanks have now been removed. Concrete foundations and slabs must be removed to prepare the site for future leasing and/or construction.

AFE (INITIAL) Division Approval		AFE (INITIAL) Executive Approval		AFE (INITIAL) Corporate Review		ADDS (INITIAL) Accounting Review	
Proj. Mgr.:		RMM:	RMM	Legal:		(to be initialed only when ADDS form is submitted)	
Dept. Head:		BAR:		Risk Mgmt.:		Div. Acct.:	
Purch. Mgr:		KMN:		Tax:			
Div. Cont.:		LES:					
Div. VP/Pres.:							

Corp. CA Acct.
Corp. CA Sup.

52201000.6081.12

Cost Center: _____
General Ledger Account No.: _____
Person with asset custody (OPT.): _____
New or Used Asset: _____
Model No.: _____ Serial No.: _____
Expenditure Date (if CIP)/
Entered Service Date (if not CIP): _____
Asset (still) in CIP (_ ONE): Yes____ No ____

Property Ref.:				
Real/Personal/ Non-assessable:	R	P	N	
Real Type:	B	YI	ME	
		C	O	
Personal Type:	V	LB	O	
Non-assessable Type:	LV	IN	RM	O
Property Tax Lot:				

SHADED AREAS TO BE COMPLETED BY CAPITAL ASSET ACCOUNTING
ACTUAL COST COLUMN TO BE COMPLETED AFTER AFE HAS BEEN APPROVED

Rev. 1/97

SCHN00261255

P.O. Box 930
Wilsonville, Oregon 97070
Tel. 503/638-6900
Fax 503/638-1019

Northwest
DEMOLITION & DISMANTLING

CONSTRUCTION CONTRACT

THIS AGREEMENT is made this 28th day of January, 1999, between Brian H. Smith Demolition & Excavating Inc., d.b.a. Northwest Demolition & Dismantling (hereinafter "Contractor") and Schnitzer Investment Corp. (hereinafter "Owner"). Owner desires Contractor to perform the demolition and concrete handling of the tank pad bases secondary containment and portions of the truck loading area at the former Premier Edible Oils tank farm facility in Portland, Oregon, ("Project") and Contractor shall perform all work required for the Project on the following terms and conditions:

1. Contractor agrees to furnish all materials, equipment and labor for the work on the Project.

2. **Time of Performance.** Contractor shall use his best efforts to commence the work within 7 days after execution of this agreement and complete the work within 30 days after commencement. Extensions shall be granted for delays caused by conditions beyond the contractor's control such as labor disputes, accidents, weather conditions, and unavailability of materials or equipment. Contractor shall not be held accountable in damages or otherwise for any breach of this term due to conditions beyond its control.

3. **Contract Sum.** Owner shall pay Contractor the sum of $64,700.00, subject to additions and deductions provided for in the Contract.

4. **Progress Payments.**

4.1 Payments due and unpaid under the Contract (including the final payment) shall bear interest at 1-1/2% interest per month from the date payment is due.

5. **Final Payment.** The final payment, constituting the entire unpaid balance of the contract, shall be paid within 30 days after the completion of the work on the Project.

6. **Changes.** All changes or modifications of this Contract shall be in writing signed by Owner and Contractor, and shall state with particularity the change(s) and any additional charge(s) or credit(s) resulting therefrom. If any change requires the extension of time for completion of work, such extension of time shall also be in writing. All additional work shall be performed and charged pursuant to the attached Exhibit A, Schedule of Charges.

SCHN00261256

7. Notwithstanding any other terms of this Contract, Owner shall pay any and all additional charges occasioned by changes requested in writing by Owner, including but not limited to additional permit and inspection fees, plan and design alteration and/or additional services, cost allowance item overages, materials and labor. All such items shall be charged to Owner as they occur and accounted for in Contractor's progress payments or in the final payment.

8. **Labor, Materials and Equipment.**

8.1 Contractor agrees to use good and sufficient construction materials or equipment of the type commonly used for the particular kind of construction in the community where the improvement is located.

8.2 Contractor is solely responsible for securing all labor and equipment included in this Contract, and Owner is prohibited from securing labor or materials that substitute or supplant those included herein, except by written changes or modifications agreed upon by Contractor and Owner in the manner set out in the change provisions of this Contract.

8.3 All work shall be performed in a good and workmanlike manner and in conformance with all local, state and federal regulations. Any deficiencies in workmanship shall be corrected in accordance with local industry standards.

9. **Changed Conditions.** The price set out in Section 3 above is based upon all conditions of the land, including but not limited to rock, ground and underground water, trees and roots, and other buried obstructions, as they appear to the eye, and with no probing, at the time of the making of this contract. Where hazardous materials or asbestos are discovered in land or in existing structures, work on the Project shall stop for whatever evaluation, determination, or correction process shall be required by building, environmental, or other regulatory authorities without penalty to Contractor for any delays occasioned thereby. Owner shall bear all cost connected with any undiscovered condition. Contractor makes no warranties as to the condition of the real property or the structures herein. Subsequently discovered conditions which may increase the price herein are the Owner's risk and responsibility. Contractor agrees to disclose any such discovered conditions to Owner immediately upon discovery. Owner shall have not more than five days after such disclosure by Contractor to cancel this Contract in the event that such subsequently discovered conditions materially impair the course of construction, or affect the course of construction to the extent that the price set out in Section 3 above is materially increased. In the event that Owner elects to cancel this Contract due to undiscovered conditions, or for any other reason, Owner shall pay Contractor's final billing statement, which shall account for all of Contractor's charges up to and through the time

of cancellation, and for any further reasonable charges associated with or arising from the cancellation, including but not limited to restoration of the Project to its original condition.

10. **Access to Project.** Contractor shall permit Owner, or Owner's representatives, to have access to, and to inspect the work during its progress. Owner shall provide Contractor complete and continuous access to the premises, and shall not interfere with Contractor's activities on the premises.

11. **Contractor Insurance.** See attached SIC insurance requirements. "Must Meet" these rquirements.

12. **Subrogation.** Owner and Contractor waive all rights against each other for losses or damages covered by the insurance obtained under Sections 11 and 12, above, or any other property insurance applicable to the work, but only to the extent each loss is covered by and actually paid for by such insurance, except such rights as they may have to the proceeds of such insurance. The parties retain all other rights against each other regarding any such loss in excess of amounts paid by all policies that cover the loss.

13. **Compliance with Laws.** Contractor shall comply with federal, state and local laws, social security laws, unemployment compensation and workers' compensation laws applicable to the performance of this contract. Contractor shall comply with all statutory, regulatory and/or contractual safety and environmental requirements applicable to its work. It is understood the Contractor is responsible for the safety of its own workers and activities.

14. **Indemnity.**

14.1 Except to the extent that the negligence of Contractor contributes to the claim, loss, damage, injury or liability, Owner, to the fullest extent permitted by law, agrees to indemnify, defend and hold Contractor harmless from and against all liability, cost, expense, including attorney fees, and any and all claims, demands, judgments, loss or damages on account of injuries, disease or death to any person, including subcontractor's employees, or damage to or contamination of property or the environment, or any type of loss or damage whatsoever resulting from the existence of hazardous materials and asbestos on, about, or within the storage tanks and/or pipes, demolition debris, or on the Project site, specifically including any claims under the federal Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA), as amended, the Federal Resource Conservation and Recovery Act (RCRA), as amended, and any other applicable, similar, federal, state or local law.

14.2. Except to the extent that the negligence of Owner contributes to the claim

loss, damages, injury or liability, and except as provided in paragraph 15.1 above, Contractor, to the fullest extent permitted by law, agrees to indemnify, defend and hold Owner harmless from and against all liability, cost, expense, including attorney fees, and any and all claims, demands, judgments, loss or damages on account of injuries, disease or death to any person, or damage to property arising from Contractor's work on the Project.

15. **Assignment.** This contract is personal to the parties hereto. Neither Owner nor Contractor shall assign this Contract without the written consent of the other, and such consent shall not be unreasonably withheld.

16. **Termination.**

16.1 If Owner fails to pay Contractor for a period of 45 days through no fault of Contractor, Contractor may, on 5 days additional written notice to Owner, terminate the Contract and recover from Owner payment for the work performed and for proven loss with respect to the labor, materials and equipment, reasonable overhead, profit and damages applicable to the Project.

16.2 If Contractor commits any material breach, or persistently fails or neglects to carry out the work in accordance with this Contract, after 7 days' written notice to Contractor and without prejudice to any other remedy the Owner may make good the deficiencies and may deduct the cost thereof from any sums which are or may become due to Contractor under this Contract. Alternatively, at Owner's option, the Owner may terminate this Contract and finish the Work as Owner deems appropriate. If the unpaid balance of the Contract price hereunder exceeds the expense of finishing the Work, such excess shall be paid to Contractor; but if such expense exceeds such unpaid balance, Contractor shall pay the difference to Owner.

17. **Disputes.**

17.1 **Mediation.** In the event of a dispute between the parties arising out of or relating to this Contract, the parties agree to submit such dispute to a mediator agreed to by the parties as soon as practicable after the dispute arises, and preferably before commencement of litigation or arbitration. The parties agree to exercise their best efforts in good faith resolve all disputes in mediation, including without limitation disputes involving other participants in the Project in a combined mediation.

17.2 **Arbitration.** Any dispute arising out of, or in any way relating to this Contract, shall be referred to arbitration. The Arbitration shall occur in Portland, Oregon. The parties shall mutually select an arbitrator. If the parties cannot agree on an arbitrator, then each

party shall select one competent person, and those two individuals will then select a third neutral person to act as arbitrator. The arbitrator should have experience in commercial construction. The award of the arbitrator shall be binding and may not be appealed. Owner and Contractor shall have all rights arising under Oregon law regarding any arbitration award under this Contract.

18. **Attorney Fees and Costs.** If an action or a suit is instituted to enforce any of the terms of this Contract, or if any dispute is referred to arbitration hereunder, the party not prevailing agrees to pay all of the prevailing party's actual court or arbitration expenses, costs, and disbursements, expert witness fees in addition to such sum as the court or arbitrator(s) may adjudge reasonable as attorney's fees at arbitration, trial or on appeal of such arbitration, suit, or action, in addition to all other sums provided by law.

19. **Entire Agreement.** This Contract, including the plans, specifications, and cost allowances, contains all the terms and conditions agreed upon by the parties hereto (the "Contract Documents"), and no other prior agreement shall be deemed to exist or to bind any of the parties hereto.

20. **Contract Documents.** The Contract Documents consist of this Contract and the following Exhibits attached:

1. Exhibit A - Schedule of Charges
2. Exhibit B – Proposal of January 25, 1999
3. Exhibit C – Proposal Attachment #1 dated January 27, 1999

21. **Other Provisions:**

All salvaged steel shall be reserved for Schnitzer Steel Products Company.

IN WITNESS WHEREOF, the parties hereto have signed this Contract as of the date and year first written above.

Northwest Demolition & Dismantling

By: _____
Brian H. Smith
Title: President

Schnitzer Investment Corp.

By: James J Gabrielak

Title: Environmental Administrator

TO: Northwest Demolition & Dismantling

PROJECT/SERVICE: Schnitzer Investment Corp.- former Premier Edible Oils facility.

Please provide evidence of the following insurance before the subject project or service begins.

General Liability Insurance

- Comprehensive or commercial general liability, including:
  1. Premises/operations
  2. Products/completed operations
  3. Contractual liability
  4. Independent contractors
  5. Broad form property damage
  6. Personal injury

- Limits of no less than $1,000,000 combined single limit.

- [Schnitzer division] to be named as additional insured.

Automobile Liability Insurance

- Comprehensive automobile liability form
- Coverage to include all owned, non-owned and hired automobiles.
- Limits of no less than $1,000,000 combined single limit.
- [Schnitzer division] to be named as additional insured.

Workers' Compensation Insurance

- Coverage to provide for all of contractors' or sub-contractors' employees.
- Workers' compensation for statutory benefits.
- Employers Liability for no less than $100,000.

Each certificate of insurance to provide for a 30 day written notice of cancellation. Please send certificates to:

[Division Name]
ATTN: *[Name of Person Requesting Certificate]*
[Division Address]
[Phone Number]

COISAMPL.DOC\rev. 4/18/97

P.O. Box 930
Wilsonville, Oregon 97070
Tel. 503/638-6900
Fax 503/638-1019

Northwest DEMOLITION & DISMANTLING

July 31, 1998

SCHEDULE OF CHARGES

Labor (includes overhead and profit)

Job Supervisor	$ 75.00/hour
Foreman	$ 60.00/hour
Operators, drivers	$ 45.00/hour
Laborers	$ 42.00/hour

Equipment (includes fuel, maintenance, operator, overhead and profit)

	Komatsu PC400 with bucket and thumb	$225.00/hour
	Komatsu PC400 with hammer	$250.00/hour
(2)	Komatsu PC400 with LaBounty Universal Processor	$350.00/hour
	Komatsu 220 with bucket and thumb	$175.00/hour
	Komatsu 220 with hammer	$225.00/hour
	Cat 966D rubber-tired loader	$175.00/hour
(2)	Cat 977 track loader with demolition bucket and winch	$150.00/hour
	Eagle portable concrete crushing plant w/magnet, scale, & conveyor	$250.00/hour
	CEC Screen with conveyors	$100.00/hour
	Whiphammer (price includes operator & supervisor (2 hour min.)	$350.00/hour
	Peterbilt & Clement end dump or 3 axle LoadKing lowboy	$ 85.00/hour
(4)	Peterbilt and Kenworth drop box truck and boxes	$ 85.00/hour
	Drop box trailer and box	$ 25.00/hour
(4)	753 Bobcat with bucket, grapple and foam-filled tires	$ 75.00/hour
	753 Bobcat with concrete breaker	$ 90.00/hour
(1)	853 Bobcat with shear and hard tires	$ 90.00/hour
(1)	Construction fork-lift	$ 75.00/hour
(4)	Ford F250 Diesel Pick-ups	$ 50.00/day

Four hour minimum on all excavators and crushing plant.

Applicable state and local taxes are in addition to the above prices.

No provision in above prices for move-in and move-out. Above rates are based on equipment owned by Northwest Demolition & Dismantling. Overtime costs based on operator only.

EXHIBIT A

Demolition, Dismantling, Salvage and Excavation

OR CCB #48263 *WA #NORTHDD137JM*

EXHIBIT B
PAGE 1 of 3

P.O. Box 930
Wilsonville, Oregon 97070
Tel. 503/638-6900
Fax 503/638-1019

January 25, 1999

Jim Goodrich
James Jakubiak
Schnitzer Steel Industries, Inc.
3200 NW Yeon Avenue
Portland, Oregon 97296-0047

RE: REMOVAL OF CONCRETE TANK BASES, SCHNITZER TANK FARM, PORTLAND OREGON – BID #2

Dear Sirs:

Northwest Demolition and Dismantling (NWD) is pleased to submit this revised proposal for the removal of the concrete secondary containment walls and the concrete tank bases from the NW Portland tank farm location. This revision includes a greater volume of concrete than previously considered. This increased scope was outlined to NWD during a second walk-through given by Jim Jakubiak. Thank you for the opportunity to offer our services.

In addition, NWD has also provided pricing for off-site removal of concrete rubble versus on-site processing of this material to a 3-inch structural fill.

Scope of Work:

1. Mobilize and demobilize the necessary crew and equipment to and from the site.
2. Perform the demolition of the concrete secondary containment walls and concrete tank slabs. This removal includes the concrete tank slabs found on both sides of the yellow building. The slabs occur in three distinct areas. One of the areas to be demolished lies between the building and the railroad tracks. NWD has included 300 lineal feet of saw-cutting to cleanly separate the demolished slab in this area. Schnitzer will ~~pressure~~ wash and remove loose debris from the concrete surface prior to demolition. (as shown in attached Figure)
3. NWD will reduce the concrete material to a size that can be effectively hauled off-site or NWD will mobilize a concrete recycling unit and downsize the concrete rubble to three inch minus. The concrete recycling system has magnets to remove the steel from within the

EXHIBIT B
PAGE 2 of 3

concrete. Schnitzer will provide direction to NWD on how to handle stained or contaminated concrete that may be encountered.

Proposal Pricing:

- Mob./Demob. of demolition equipment. Demolition of concrete structures. Stockpiling of concrete into piles. $51,720
- Trucking & disposal of uncontaminated concrete at recycling facility. $18.30/ton
(or $359 per end dump load if recycling facility does not have scales)
- Trucking & disposal of contaminated concrete at disposal facility. $89.75/ton
- On-site recycling of concrete with NWD's concrete recycling unit. $7.25/ton
(includes mob./demob. of recycling unit and operation)

Proposal Assumptions:

A. Others will provide analytical analysis as required for disposal or characterization purposes.

B. Transportation and disposal pricing is contingent on the acceptance of the material by the recycling and disposal facilities. Pricing excludes any state or local city taxes.

C. Work will proceed without interruption.

D. Schnitzer will sign the waste profiles and manifests (as appropriate) for any contaminated material that is hauled off-site.

E. Site improvements including electrical disconnects will be provided by others.

F. The cost for removal, relocation or disposal of debris left within the work area is not included.

G. Stand-by time. If NWD is forced into stand-by by issue(s) not caused by NWD, NWD will charge such stand-by at half the standard NWD rate sheet for the applicable equipment utilized on the project.

H. NWD has assumed one mobilization and demobilization for this project.

I. The Scope of Work covered within this proposal is a little vague. Prior to the commencement of demolition, NWD and Schnitzer personnel will agree on what is included within the project scope.

EXHIBIT B
PAGE 3 of 3

Once again, thank you for this opportunity to provide the service outlined above. Please do not hesitate to call for additional information.

Sincerely,

Richard Wayper
Program Manager

CC: NWD – Brian Smith

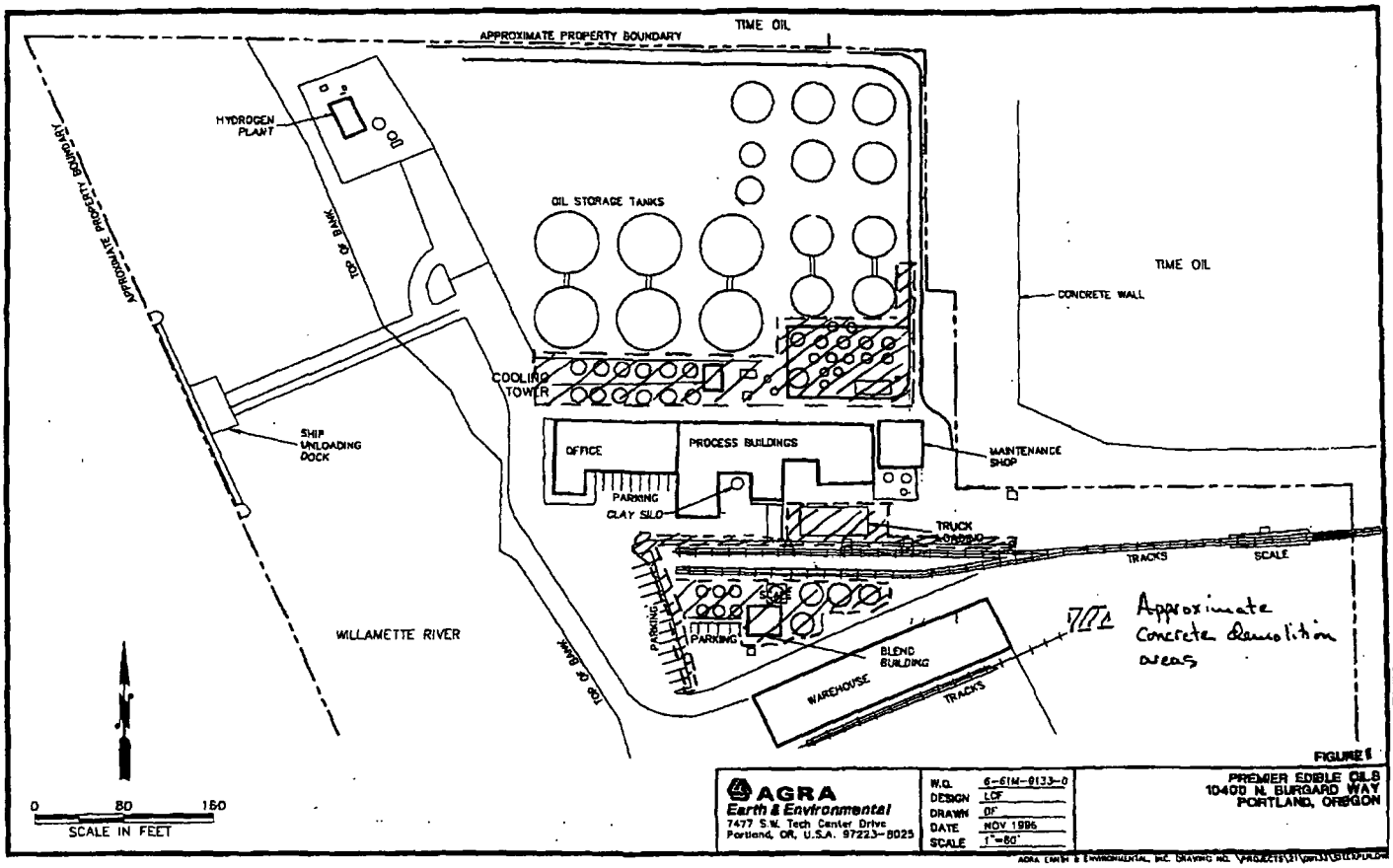


FIGURE 1

02/04/99 15:41 ☎503 288 8948 SCHNITZER STEEL 013/014

SCHN00261267

EXHIBIT C

Northwest
DEMOLITION & DISMANTLING

P.O. Box 930
Wilsonville, Oregon 97070
Tel. 503/638-6900
Fax 503/638-1019

January 27, 1999

Jim Goodrich
James Jakubiak
Schnitzer Steel Industries, Inc.
3200 NW Yeon Avenue
Portland, Oregon 97298-0047

RE: ATTACHMENT #1 TO PROPOSAL DATED JANUARY 25, 1999

Dear Sirs:

This letter is Attachment #1 to the proposal provided on January 25, 1999 for the demolition and concrete handling of the tank pad bases at the Portland Schnitzer tank farm facility.

This attachment alters the proposal pricing from a mixture of lump sum and unit pricing to solely lump sum pricing.

The January 25, 1999 proposal provided various options for the handling of concrete rubble. The pricing in this document assumes that all demolished concrete rubble will be processed with the Northwest Demolition and Dismantling (NWD) concrete recycling unit. The recycling unit will produce a 3-inch minus material.

The lump sum price to perform the scope of work is $64,700.

Once again, thank you for this opportunity to provide the service outlined above. Please do not hesitate to call for additional information.

Sincerely,

Richard Wayper
Program Manager

CC: NWD – Brian Smith

NORTHWEST DEMOLITION & DISMANTLING

Date: 2/5/99

To: SchnitzerInvestment Corp.
James Jakubiak
Phone: 503-286-6976
Fax: 503-286-6948

From: Northwest Demolition & Dismantling
Richard Wayper
Phone: 503-598-9706
Fax: 503-620-1708

Pages: 1

Subject: Contractual issues

Jim,
Thanks for your help with these contractual issues. Hopefully the following will rectify the concerns you have. Northwest Demolition is OK with all the changes except two.

1. Locates. Insert the following language, " Contractor and Owner will jointly arrange for locating of utilities. Prior to commencement of work, Contractor and Owner will discuss the results of the utility locates. Contractor will take reasonable care in the execution of the work to protect utilities.
2. Environmental Permits. Please delete the added sentence which states that Contractor will acquire all environmental permits. Section 8.4 (Labor, Equipment and Equipment) states that all work will be performed according to local, state, and federal regulations. Also under Section 14, Compliance of laws, it states that Contractor shall comply with all federal, state and local laws applicable to the performance of the contract. Hence, Northwest Demolition feels it is unnecessary to add any additional language to the contract document. We acknowledge that we must abide by applicable laws and regulations and as per the contract take responsibility for issues created through our fault.

EXHIBIT B
PAGE 1 of 3

P.O. Box 930
Wilsonville, Oregon 97070
Tel. 503/638-6900
Fax 503/638-1019

January 25, 1999

Jim Goodrich
James Jakubiak
Schnitzer Steel Industries, Inc.
3200 NW Yeon Avenue
Portland, Oregon 97296-0047

RE: REMOVAL OF CONCRETE TANK BASES, SCHNITZER TANK FARM, PORTLAND OREGON – BID #2

Dear Sirs:

Northwest Demolition and Dismantling (NWD) is pleased to submit this revised proposal for the removal of the concrete secondary containment walls and the concrete tank bases from the NW Portland tank farm location. This revision includes a greater volume of concrete than previously considered. This increased scope was outlined to NWD during a second walk-through given by Jim Jakubiak. Thank you for the opportunity to offer our services.

In addition, NWD has also provided pricing for off-site removal of concrete rubble versus on-site processing of this material to a 3-inch structural fill.

Scope of Work:

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3. NWD will reduce the concrete material to a size that can be effectively hauled off-site or NWD will mobilize a concrete recycling unit and downsize the concrete rubble to three inch minus. The concrete recycling system has magnets to remove the steel from within the

EXHIBIT B
PAGE 2 of 3

concrete. Schnitzer will provide direction to NWD on how to handle stained or contaminated concrete that may be encountered.

Proposal Pricing:

• Mob./Demob. of demolition equipment. Demolition of concrete structures. Stockpiling of concrete into piles.	$51,720
• Trucking & disposal of uncontaminated concrete at recycling facility. (or $359 per end dump load if recycling facility does not have scales)	$16.30/ton
• Trucking & disposal of contaminated concrete at disposal facility.	$89.75/ton
• On-site recycling of concrete with NWD's concrete recycling unit. (includes mob./demob. of recycling unit and operation)	$7.25/ton

Proposal Assumptions:

A. Others will provide analytical analysis as required for disposal or characterization purposes.

B. Transportation and disposal pricing is contingent on the acceptance of the material by the recycling and disposal facilities. Pricing excludes any state or local city taxes.

C. Work will proceed without interruption.

D. Schnitzer will sign the waste profiles and manifests (as appropriate) for any contaminated material that is hauled off-site.

E. Site improvements including electrical disconnects will be provided by others.

F. The cost for removal, relocation or disposal of debris left within the work area is not included.

G. Stand-by time. If NWD is forced into stand-by by issue(s) not caused by NWD, NWD will charge such stand-by at half the standard NWD rate sheet for the applicable equipment utilized on the project.

H. NWD has assumed one mobilization and demobilization for this project.

I. The Scope of Work covered within this proposal is a little vague. Prior to the commencement of demolition, NWD and Schnitzer personnel will agree on what is included within the project scope.

EXHIBIT B
PAGE 3 of 3

Once again, thank you for this opportunity to provide the service outlined above. Please do not hesitate to call for additional information.

Sincerely,

Richard Wayper
Program Manager

CC: NWD – Brian Smith

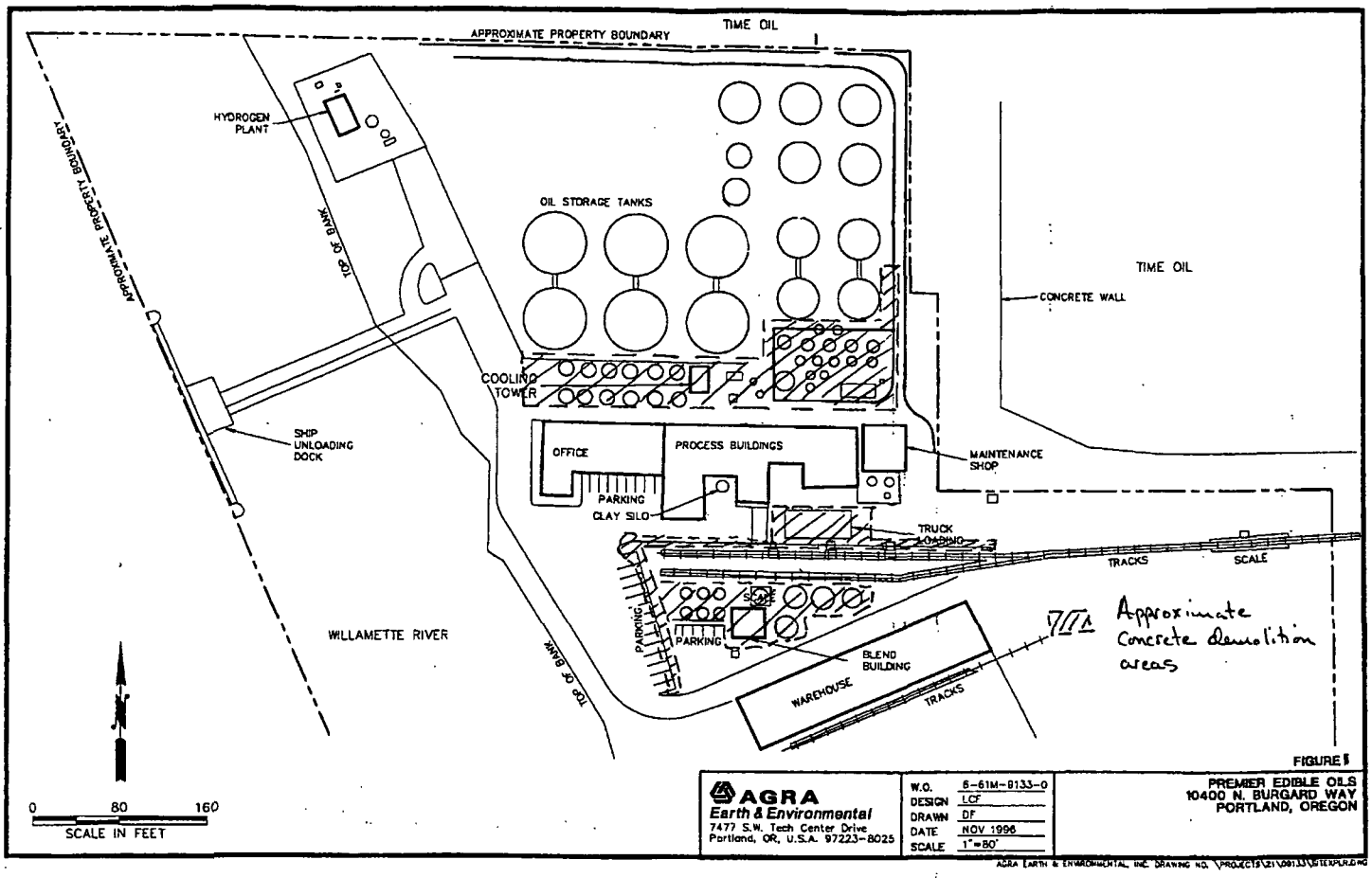

FIGURE 1

AGRA Earth & Environmental
7477 S.W. Tech Center Drive
Portland, OR, U.S.A. 97223-8025

W.O.	6-61M-8133-0
DESIGN	LCF
DRAWN	DF
DATE	NOV 1996
SCALE	1"=80'

PREMIER EDIBLE OILS
10400 N. BURGARD WAY
PORTLAND, OREGON

AGRA EARTH & ENVIRONMENTAL, INC. DRAWING NO. \PROJECTS\21\00133\SITEXPLR.DWG

SCHN00261285

EXHIBIT C

P.O. Box 930
Wilsonville, Oregon 97070
Tel. 503/638-6900
Fax 503/638-1019

January 27, 1999

Jim Goodrich
James Jakubiak
Schnitzer Steel Industries, Inc.
3200 NW Yeon Avenue
Portland, Oregon 97296-0047

RE: ATTACHMENT #1 TO PROPOSAL DATED JANUARY 25, 1999

Dear Sirs:

This letter is Attachment #1 to the proposal provided on January 25, 1999 for the demolition and concrete handling of the tank pad bases at the Portland Schnitzer tank farm facility.

This attachment alters the proposal pricing from a mixture of lump sum and unit pricing to solely lump sum pricing.

The January 25, 1999 proposal provided various options for the handling of concrete rubble. The pricing in this document assumes that all demolished concrete rubble will be processed with the Northwest Demolition and Dismantling (NWD) concrete recycling unit. The recycling unit will produce a 3-inch minus material.

The lump sum price to perform the scope of work is $64,700.

Once again, thank you for this opportunity to provide the service outlined above. Please do not hesitate to call for additional information.

Sincerely,

Richard Wayper
Program Manager

CC: NWD – Brian Smith

P.O. Box 930
Wilsonville, Oregon 97070
Tel. 503/638-6900
Fax 503/638-1019

January 12, 1999

~ 1000 tons

Jim Goodrich
Schnitzer Steel Industries, Inc.
3200 NW Yeon Avenue
Portland, Oregon 97296-0047

RE: REMOVAL OF CONCRETE TANK BASES, SCHNITZER TANK FARM, PORTLAND OREGON

Dear Mr. Goodrich:

Northwest Demolition and Dismantling (NWD) is pleased to submit this confidential proposal for the removal of the concrete secondary containment walls and the concrete tank bases from the NW Portland tank farm location. Thank you for the opportunity to offer our services.

The following proposal is based on our site visit and the information supplied to NWD by James Jakubiak (Schnitzer Steel – Environmental Administrator) during our on-site meeting.

Scope of Work:

1. Mobilize and demobilize the necessary crew and equipment to and from the site.
2. Perform the demolition of the concrete secondary containment walls and concrete tank slabs. This removal includes the concrete tank slabs found on both sides of the yellow building. NWD will reduce the concrete material to a size that can be effectively hauled off-site. The concrete slabs are contaminated in places with hydrocarbons. This contaminated concrete will be separately stockpiled. This material will be placed on and covered by plastic sheeting awaiting disposal.
3. The clean concrete will be hauled to a concrete recycling facility. Where, who Do they have acceptance criteria
4. The contaminated concrete will be hauled to a disposal facility permitted to accept materials of this type. What facility

Proposal Pricing:

Mob/Demob, concrete removal & downsizing/stockpiling (Scope Items#1&2):	$43,650
Transport & recycle clean concrete is (Scope Item #3): How many end dumps?	$16.30/ton
(or $359 per end dump load if recycling facility does not have scales)	
Transport & dispose of hydrocarbon contaminated concrete is (Scope Item #4):	$89.75/ton

How many end dumps

Demolition, Dismantling, Salvage and Excavation

SCHN00261299

Proposal Assumptions:

A. Others will provide analytical analysis as required for disposal or characterization purposes.

B. Transportation and disposal pricing is contingent on the acceptance of the material by the recycling and disposal facilities. Pricing excludes any state or local city taxes.

C. Work will proceed without interruption. Equipment breakdown will not be responsibility of property owner

D. Site improvements including electrical disconnects will be provided by others. done

E. The cost for removal, relocation or disposal of debris left within the work area is not included. will be done and agreed upon prior to initiating work.

F. Stand-by time. If NWD is forced into stand-by by issue(s) not caused by NWD, NWD will charge such stand-by at half the standard NWD rate sheet for the applicable equipment utilized on the project.

~~G. NWD has assumed one mobilization and demobilization for this project.~~

H. The Scope of Work covered within this proposal is a little vague. NWD requests and on-site meeting with Schnitzer Steel personnel to field verify what is and what is not included within the proposal.

I. NWD has not included the possibility of on-site concrete recycling within this proposal. If requested, NWD would be able to provide pricing for this service.

Once again, thank you for this opportunity to provide the service outlined above. Please do not hesitate to call for additional information.

Sincerely,

Richard Wayper
Program Manager

CC: NWD – Brian Smith

Post-it® Fax Note 7671	Date 1/28/99	# of pages ▶ 1
To Linda Wakefield	From Jim Jakubiak	
Co./Dept.	Co.	
Phone #	Phone #	
Fax # (503) 223-2804	Fax #	

503 603 0213 Jan. 26 1999 01:04PM P1

P.O. Box 930
Wilsonville, Oregon 97070
Tel. 503/638-6900
Fax 503/638-1019

NORTHWEST DEMOLITION & DISMANTLING

January 27, 1999

Jim Goodrich
James Jakubiak
Schnitzer Steel Industries, Inc.
3200 NW Yeon Avenue
Portland, Oregon 97296-0047

RE: ATTACHMENT #1 TO PROPOSAL DATED JANUARY 25, 1999

Dear Sirs:

This letter is Attachment #1 to the proposal provided on January 25, 1999 for the demolition and concrete handling of the tank pad bases at the Portland Schnitzer tank farm facility.

This attachment alters the proposal pricing from a mixture of lump sum and unit pricing to solely lump sum pricing.

The January 25, 1999 proposal provided various options for the handling of concrete rubble. The pricing in this document assumes that all demolished concrete rubble will be processed with the Northwest Demolition and Dismantling (NWD) concrete recycling unit. The recycling unit will produce a 3-inch minus material.

The lump sum price to perform the scope of work is $64,700.

Once again, thank you for this opportunity to provide the service outlined above. Please do not hesitate to call for additional information.

Sincerely,

Richard Wayper
Program Manager

CC: NWD – Brian Smith

NORTHWEST DEMOLITION & DISMANTLING

Date: 1/25/99

To: Schnitzer Steel Industries, Inc
James Jakubiak/Jim Goodrich
Phone: 503-286-6976
Fax: 503-286-6948

From: Northwest Demolition & Dismantling
Richard Wayper
Phone: 503-598-9706
Fax: 503-620-1708

Pages: 4

Subject: Revised proposal for demo of concrete bases

Assumes
1,000 tons

P.O. Box 930
Wilsonville, Oregon 97070
Tel. 503/638-6900
Fax 503/638-1019

January 25, 1999

Jim Goodrich
James Jakubiak
Schnitzer Steel Industries, Inc.
3200 NW Yeon Avenue
Portland, Oregon 97296-0047

RE: REMOVAL OF CONCRETE TANK BASES, SCHNITZER TANK FARM, PORTLAND OREGON – BID #2

Dear Sirs:

Northwest Demolition and Dismantling (NWD) is pleased to submit this revised proposal for the removal of the concrete secondary containment walls and the concrete tank bases from the NW Portland tank farm location. This revision includes a greater volume of concrete than previously considered. This increased scope was outlined to NWD during a second walk-through given by Jim Jakubiak. Thank you for the opportunity to offer our services.

In addition, NWD has also provided pricing for off-site removal of concrete rubble versus on-site processing of this material to a 3-inch structural fill.

Scope of Work:

1. Mobilize and demobilize the necessary crew and equipment to and from the site.

2. Perform the demolition of the concrete secondary containment walls and concrete tank slabs. This removal includes the concrete tank slabs found on both sides of the yellow building. The slabs occur in three distinct areas. One of the areas to be demolished lies between the building and the railroad tracks. NWD has included 300 lineal feet of saw-cutting to cleanly separate the demolished slab in this area. Schnitzer will pressure wash and remove loose debris from the concrete prior to demolition.

3. NWD will reduce the concrete material to a size that can be effectively hauled off-site or NWD will mobilize a concrete recycling unit and downsize the concrete rubble to three inch minus. The concrete recycling system has magnets to remove the steel from within the

$51,720
7,250
$58,970
Backfill $7,500
$66,470

concrete. Schnitzer will provide direction to NWD on how to handle stained or contaminated concrete that may be encountered.

Proposal Pricing:

- Mob./Demob. of demolition equipment. Demolition of concrete structures. Stockpiling of concrete into piles. **$51,720**

- Trucking & disposal of uncontaminated concrete at recycling facility. (or $359 per end dump load if recycling facility does not have scales) **$16.30/ton** 16,300

- Trucking & disposal of contaminated concrete at disposal facility. **$89.75/ton**

- On-site recycling of concrete with NWD's concrete recycling unit. (includes mob./demob. of recycling unit and operation) **$7.25/ton** $7,250

Need to add Backfill

Proposal Assumptions:

A. Others will provide analytical analysis as required for disposal or characterization purposes.

B. Transportation and disposal pricing is contingent on the acceptance of the material by the recycling and disposal facilities. Pricing excludes any state or local city taxes.

C. Work will proceed without interruption.

D. Schnitzer will sign the waste profiles and manifests (as appropriate) for any contaminated material that is hauled off-site.

E. Site improvements including electrical disconnects will be provided by others.

F. The cost for removal, relocation or disposal of debris left within the work area is not included.

G. Stand-by time. If NWD is forced into stand-by by issue(s) not caused by NWD, NWD will charge such stand-by at half the standard NWD rate sheet for the applicable equipment utilized on the project.

H. NWD has assumed one mobilization and demobilization for this project.

I. The Scope of Work covered within this proposal is a little vague. Prior to the commencement of demolition, NWD and Schnitzer personnel will agree on what is included within the project scope.

Once again, thank you for this opportunity to provide the service outlined above. Please do not hesitate to call for additional information.

Sincerely,

Richard Wayper
Program Manager

CC: NWD – Brian Smith

SCHN00261308

NORTHWEST DEMOLITION & DISMANTLING

Date: 1/25/99

To: Schnitzer Steel Industries, Inc
James Jakubiak/Jim Goodrich
Phone: 503-286-6976
Fax: 503-286-6948

From: Northwest Demolition & Dismantling
Richard Wayper Cell Phone (510)(8214)
Phone: 503-598-9706
Fax: 503-620-1708

Pages: 4

Subject: Revised proposal for demo of concrete bases

Northwest
DEMOLITION & DISMANTLING

P.O. Box 930
Wilsonville, Oregon 97070
Tel. 503/638-6900
Fax 503/638-1019

January 25, 1999

Jim Goodrich
James Jakubiak
Schnitzer Steel Industries, Inc.
3200 NW Yeon Avenue
Portland, Oregon 97296-0047

RE: REMOVAL OF CONCRETE TANK BASES, SCHNITZER TANK FARM, PORTLAND OREGON – BID #2

Dear Sirs:

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concrete. Schnitzer will provide direction to NWD on how to handle stained or contaminated concrete that may be encountered.

Proposal Pricing:

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(or $359 per end dump load if recycling facility does not have scales)

- Trucking & disposal of contaminated concrete at disposal facility. $89.75/ton

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(includes mob./demob. of recycling unit and operation)

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I. The Scope of Work covered within this proposal is a little vague. Prior to the commencement of demolition, NWD and Schnitzer personnel will agree on what is included within the project scope.

P.O. Box 930
Wilsonville, Oregon 97070
Tel. 503/638-6900
Fax 503/638-1019

Northwest
DEMOLITION & DISMANTLING

January 27, 1999

Schnitzer Steel Industries, Inc.
3200 N.W. Yeon Avenue
Portland, Oregon 97296-0047

Attn: Jim Goodrich
James Jakubiak

Re: Demolition and Concrete Handling of Tank Pad Bases, Portland, Oregon

Gentlemen:

Enclosed please find two copies of the contract for work to be performed by Northwest Demolition & Dismantling at the Schnitzer tank farm in Portland, Oregon.

Please sign and return both copies of the contract to our office. One copy will be signed by Northwest Demolition & Dismantling and returned to you.

We are looking forward to working with you on this project. Thank you.

Sincerely,

Mavis Smith
Secretary-Treasurer

ms

Please Print or Type
(Form designed for use on elite (12-pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 97580
2. Page 1 of 1

3. Generator's Name and Mailing Address
~~QUALITY EDIBLE OILS~~ PREMIER EDIBLE OIL'S
2500 NORTH BURGARD
PORTLAND, OR 97210

4. Generator's Phone (503) 286-6944 ATTN: TIM ~~TODD/J~~ JAKUBI

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
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. (OILY SOIL) RQ	004	DM	00220	G
b. MATERIAL NOT REGULATED BY D.O.T. (SOAP) RQ	001	DM	00017	G
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A. CRL#550151, ESI#00-1450-10-01
B. CRL#550147, ESI#00-143-13

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

MAIL ORIGINAL TO: ATTN: TIM TODD/J JAKUBIAK
SCHNITZER STEEL
P.O. BOX 10047
PORTLAND, OR 97296

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 Jakubiak
Signature: [signature]
Month 09 Day 14 Year 00

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: SCOTT R. LINDSAY
Signature: [signature]
Month 09 Day 14 Year 00

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: Julie Valdez
Signature: Julie Valdez
Month 10 Day 12 Year 00

GENERATOR
TRANSPORTER
FACILITY

Printed by: JAKEOFF & ASSOCIATES, INC.
Neenah, WI 54957-0300

ORIGINAL - RETURN TO GENERATOR
[signature] 9/26/00

12-BLC-M5

SCHN00261318

Please print or type
(Form designed for use on elite (2-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 975XU
2. Page 1 of 1

3. Generator's Name and Mailing Address: TREMIER EDIBLE OILS
QUALITY EDIBLE OILS
2500 NORTH BURGARD
PORTLAND, OR 97210

4. Generator's Phone (503) 286-6944 ATTN: TIM TODD/J 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:
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. (OILY SOIL) RQ	004	DM	00220	G
b. MATERIAL NOT REGULATED BY D.O.T. (SOAP) RQ	001	DM	00017	G
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A. CRL#550151, ESI#00-1450-10-01
B. CRL#550147, ESI#00-143-13

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.
MAIL ORIGINAL TO ATTN: TIM TODD/J JAKUBIAK
SCHNITZER STEEL
P.O. BOX 10047
PORTLAND, OR 97296

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: Tim Jakubiak
Signature: [signature]
Month 09 Day 14 Year 00

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: SCOTT R. LINDSAY
Signature: [signature]
Month 09 Day 14 Year 00

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

SCHN00261319

ENVIROTECH SYSTEMS, INC.
18820 AURORA AVENUE NORTH, SUITE 201
SEATTLE, WA 98133
TELEPHONE: (206) 363-9000 FAX: (206) 546-1920

WASTE PRODUCT QUESTIONNAIRE

PROFILE ESI WPQ 00-143-13

GENERATOR NAME: ~~QUALITY~~ EDIBLE OILS PREMIER
SITE ADDRESS: 2500 NORTH BURGARD, PORTLAND, OR 97210
INVOICE TO: QUALITY EDIBLE OILS
ADDRESS: 2500 NORTH BURGARD, PORTLAND, OR 97210
DATE: 5/22/00
SIC CODE:
GEN EPA ID: EXEMPT
CONTACT: JIM JAKUBIAK
PHONE: 503-286-6976

WASTE PRODUCT DESCRIPTION AND CHARACTERISTICS

WASTE PRODUCT NAME: MIXED SOAPS
SOURCE:
PROCESS GENERATING WASTE: CONSOLIDATION OF UNWANTED PRODUCT AT PLANT CLOSURE
FORM:

ODOR
◯ NONE ◉ MILD ◯ STRONG
DESCRIBE: SOAP

COLOR AND CLARITY
COLOR: WHITE
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

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)

	%
LAUNDRY SOAP	85-90
TOP HAND CLEANER	5-10
PERFECTION HAIR SHAMPOO	1-2
EYESALINE EYE WASH SOLUTION	2-3
BORAXO HAND CLEANER	2-3
PERFECTION HAIR SHAMPOO	2-3

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:
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: , MATERIAL NOT REGULATED BY D.O.T.
ADDITIONAL DESCRIPTION: (SOAP)
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. Johnson TITLE Environmental Administrator DATE 9/14/00

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: MIXED SOAPS
SOURCE OF MATERIAL SAMPLED:
DATE: 5/17/00

SCHN00261320

ENVIROTECH SYSTEMS, INC.
16820 AURORA AVENUE NORTH, SUITE 201
SEATTLE, WA 98133
TELEPHONE: (206) 363-9000 FAX: (206) 546-1920

WASTE PRODUCT QUESTIONNAIRE

PROFILE ESI WPQ 00-145-10-01

GENERATOR NAME: ~~QUALITY EDIBLE OILS~~ PREMIER
SITE ADDRESS: 2500 NORTH BURGARD, PORTLAND, OR 97210
INVOICE TO: SCHNITZER STEEL
ADDRESS: P.O. BOX 10047, PORTLAND, OR 97296
DATE: 6/7/00
SIC CODE:
GEN EPA ID: EXEMPT
CONTACT: TIM TODD/J JAKUBIAK
PHONE: 503 286-6944

WASTE PRODUCT DESCRIPTION AND CHARACTERISTICS

WASTE PRODUCT NAME: SOIL ~~CUTTINGS~~/SEDIMENT
PROCESS GENERATING WASTE: ~~MONITORING WELL DEVELOPMENT~~ Catch basin Cleaning
SOURCE:
FORM:

ODOR
○ NONE ◉ MILD ○ STRONG
DESCRIBE: OILY

COLOR AND CLARITY
COLOR: CLEAR
CLARITY: TRANSPARANT

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

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)

	%
SOIL,SAND,DIRT,GRAVEL	99-100
OIL	0-1

CHEMICAL NATURE
○ I ○ O ◉ I/O

METALS (PPM)
○ TOTAL ◉ EPA TCLP ○ GEN KNOWLEDGE

ARSENIC (As)	ND
BARIUM (Ba)	ND
CADMIUM (Cd)	0.042
CHROMIUM (Cr)	ND
COPPER (Cu)	NS
LEAD (Pb)	0.38
MERCURY (Hg)	ND
NICKEL (Ni)	NS
SELENIUM (Se)	ND
SILVER (Ag)	ND
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: 1A2-55
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: , MATERIAL NOT REGULATED BY D.O.T.
ADDITIONAL DESCRIPTION: (OILY SOIL)
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 [signature] TITLE Environmental Administrator DATE 9/14/00

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: SCOOP SAMPLE QUANTITY: 16 oz NAME: SOIL CUTTINGS
SOURCE OF MATERIAL SAMPLED: DRUMS-COMPOSITE DATE: 5/16/00

SCHN00261321

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

TCLP Metals
EPA 1311/6010B/7470A

Date Extracted: 5-26-00
Date Digested: 5-30-00
Date Analyzed: 5-30,31&6-1-00

Matrix: TCLP Extract
Units: mg/L (ppm)

Lab ID: 05-158-01
Client ID: PE 13-16 COMP

Analyte	Method	Result	PQL
Arsenic	6010B	**ND**	.40
Barium	6010B	**ND**	2.0
Cadmium	6010B	**0.042**	.020
Chromium	6010B	**ND**	.020
Lead	6010B	**0.38**	.20
Mercury	7470A	**ND**	.010
Selenium	6010B	**ND**	.40
Silver	6010B	**ND**	.020

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

TCLP Metals
EPA 1311/6010B/7470A
METHOD BLANK QUALITY CONTROL

Date Extracted:	5-26-00
Date Digested:	5-30-00
Date Analyzed:	5-30,31&6-1-00
Matrix:	TCLP Extract
Units:	mg/L (ppm)
Lab ID:	MB0530T2&MB0530T3

Analyte	Method	Result	PQL
Arsenic	6010B	**ND**	.40
Barium	6010B	**ND**	2.0
Cadmium	6010B	**ND**	.020
Chromium	6010B	**ND**	.020
Lead	6010B	**ND**	.20
Mercury	7470A	**ND**	.010
Selenium	6010B	**ND**	.40
Silver	6010B	**ND**	.020

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

TCLP Metals
EPA 1311/6010B/7470A
DUPLICATE QUALITY CONTROL

Date Extracted: 5-26-00
Date Digested: 5-30-00
Date Analyzed: 5-30,31&6-1-00

Matrix: TCLP Extract
Units: mg/L (ppm)

Lab ID: 05-158-01

Analyte	Sample Result	Duplicate Result	RPD	PQL	Flags
Arsenic	ND	ND	NA	.40	
Barium	ND	ND	NA	2.0	
Cadmium	0.0415	0.04	2.8	.020	
Chromium	ND	0.0210	NA	.020	
Lead	0.378	ND	NA	.20	
Mercury	ND	ND	NA	.010	
Selenium	ND	ND	NA	.40	
Silver	ND	ND	NA	.020	

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

TCLP Metals
EPA 1311/6010B/7470A
MS/MSD QUALITY CONTROL

Date Extracted: 5-26-00
Date Digested: 5-30-00
Date Analyzed: 5-30,31&6-1-00

Matrix: TCLP Extract
Units: mg/L (ppm)

Lab ID: 05-158-01

Analyte	Spike Level	MS	Percent Recovery	MSD	Percent Recovery	RPD	Flags
Arsenic	4.0	**4.82**	121	**4.38**	109	9.7	
Barium	4.0	**4.66**	116	**4.33**	108	7.3	
Cadmium	2.0	**2.06**	101	**1.95**	95	5.7	
Chromium	4.0	**4.14**	103	**3.28**	82	23	
Lead	10	**9.90**	95	**9.33**	90	5.9	
Mercury	0.10	**0.095**	95	**0.1**	97	1.3	
Selenium	4.0	**4.30**	107	**4.50**	112	4.5	
Silver	2.0	**2.01**	101	**1.88**	94	6.6	

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

NWTPH-HCID

Date Extracted:	5-25-00
Date Analyzed:	5-25-00
Matrix:	Soil
Units:	mg/Kg (ppm)
Client ID:	PE 13-16 COMP
Lab ID:	05-158-01
Gasoline:	ND
PQL:	28
Diesel Fuel:	ND
PQL:	57
Heavy Oil:	Heavy Oil
PQL:	110
Surrogate Recovery:	
o-Terphenyl	116%
Flags:	

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

NWTPH-HCID
METHOD BLANK QUALITY CONTROL

Date Extracted:	5-25-00
Date Analyzed:	5-25-00
Matrix:	Soil
Units:	mg/Kg (ppm)
Lab ID:	MB0525S1
Gasoline:	ND
PQL:	25
Diesel Fuel:	ND
PQL:	50
Heavy Oil:	ND
PQL:	100
Surrogate Recovery:	
o-Terphenyl	106%

Flags

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

TOTAL METALS
EPA 6010B/7471A

Date Extracted: 5-26-00
Date Digested: 5-26&6-5-00
Date Analyzed: 5-26&6-5-00

Matrix: Water
Units: mg/L (ppm)

Lab ID: 05-158-02
Client ID: PE01-12 COMP

Analyte	Method	Result	PQL
Arsenic	6010B	**ND**	.22
Barium	6010B	**0.018**	.011
Cadmium	6010B	**ND**	.011
Chromium	6010B	**0.012**	.011
Lead	6010B	**ND**	.11
Mercury	7470A	**ND**	.00050
Selenium	6010B	**ND**	.22
Silver	6010B	**ND**	.011

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

TOTAL METALS
EPA 6010B/7471A
METHOD BLANK QUALITY CONTROL

Date Extracted:	5-26-00
Date Digested:	5-26&6-5-00
Date Analyzed:	5-26&6-5-00
Matrix:	Water
Units:	mg/L (ppm)
Lab ID:	MB0526W1&MB0605W1

Analyte	Method	Result	PQL
Arsenic	6010B	ND	.22
Barium	6010B	ND	.011
Cadmium	6010B	ND	.011
Chromium	6010B	ND	.11
Lead	7470A	ND	.00050
Mercury	6010B	ND	.22
Selenium	6010B	ND	.011
Silver			

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: *Quality Edible Oils*

TOTAL METALS
EPA 6010B/7471A
DUPLICATE QUALITY CONTROL

Date Extracted: 5-26-00
Date Digested: 5-26&6-5-00
Date Analyzed: 5-26&6-5-00

Matrix: Water
Units: mg/L (ppm)

Lab ID: 05-066-01

Analyte	Sample Result	Duplicate Result	RPD	PQL	Flags
Arsenic	**ND**	**ND**	NA	.22	
Barium	**0.0562**	**0.057**	2.0	.011	
Cadmium	**ND**	**ND**	NA	.011	
Chromium	**ND**	**ND**	NA	.011	
Lead	**ND**	**ND**	NA	.11	
Mercury	**ND**	**ND**	NA	.00050	
Selenium	**ND**	**ND**	NA	.22	
Silver	**ND**	**ND**	NA	.011	

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

TOTAL METALS
EPA 6010B/7471A
MS/MSD QUALITY CONTROL

Date Extracted: 5-26-00
Date Digested: 5-26&6-5-00
Date Analyzed: 5-26&6-5-00

Matrix: Water
Units: mg/L (ppm)

Lab ID: 05-066-01

Analyte	Spike Level	MS	Percent Recovery	MSD	Percent Recovery	RPD	Flags
Arsenic	2.2	**2.34**	106	**2.32**	105	1.1	
Barium	2.2	**2.22**	98	**2.27**	101	2.6	
Cadmium	1.1	**0.943**	86	**0.93**	85	1.3	
Chromium	2.2	**2.14**	97	**2.17**	99	1.7	
Lead	5.5	**4.93**	90	**5.71**	104	15	
Mercury	0.01	**0.005**	98	**0**	99	1.0	
Selenium	2.2	**2.17**	99	**2.17**	99	0	
Silver	1.1	**1.09**	99	**1.07**	97	2.0	

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

BTEX EPA 8021B

Date Extracted: 5-25-00
Date Analyzed: 5-25-00

Matrix: Water
Units: ug/L (ppb)

Client ID: **PE 01-12 COMP**
Lab ID: 05-158-02

	Result	Flags	PQL
Benzene	**ND**		1.0
Toluene	**ND**		1.0
Ethyl Benzene	**ND**		1.0
m,p-Xylene	**ND**		1.0
o-Xylene	**ND**		1.0

Surrogate Recovery:
Fluorobenzene 115%

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

BTEX EPA 8021B
METHOD BLANK QUALITY CONTROL

Date Extracted: 5-25-00
Date Analyzed: 5-25-00

Matrix: Water
Units: ug/L (ppb)

Lab ID: MB0525W1

	Result	Flags	PQL
Benzene	**ND**		1.0
Toluene	**ND**		1.0
Ethyl Benzene	**ND**		1.0
m,p-Xylene	**ND**		1.0
o-Xylene	**ND**		1.0

Surrogate Recovery:
Fluorobenzene 113%

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

BTEX EPA 8021B
DUPLICATE QUALITY CONTROL

Date Extracted: 5-25-00
Date Analyzed: 5-25-00

Matrix: Water
Units: ug/L (ppb)

Lab ID:	05-159-01 Original	05-159-01 Duplicate	RPD	Flags
Benzene	ND	ND	NA	
Toluene	ND	ND	NA	
Ethyl Benzene	ND	ND	NA	
m,p-Xylene	ND	ND	NA	
o-Xylene	ND	ND	NA	
Surrogate Recovery:				
Fluorobenzene	114%	107%		

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

BTEX EPA 8021B
MS/MSD QUALITY CONTROL

Date Extracted: 5-25-00
Date Analyzed: 5-25-00

Matrix: Water
Units: ug/L (ppb)
Spike Level: 50.0 ppb

Lab ID:	05-159-01 MS	Percent Recovery	05-159-01 MSD	Percent Recovery	RPD	Flags
Benzene	55.9	112	56.5	113	1.0	
Toluene	54.9	110	55.4	111	0.87	
Ethyl Benzene	54.8	110	55.3	111	0.91	
m,p-Xylene	54.8	110	55.3	111	0.95	
o-Xylene	53.9	108	54.2	108	0.57	
Surrogate Recovery:						
Fluorobenzene	115%		117%			

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

NWTPH-Dx

Date Extracted:	5-31-00
Date Analyzed:	5-31-00
Matrix:	Soil
Units:	mg/Kg (ppm)
Client ID:	PE 13-16 COMP
Lab ID:	05-158-01
Diesel Fuel:	ND
PQL:	140
Heavy Oil:	1400
PQL:	110
Surrogate Recovery:	
o-Terphenyl	---
Flags:	S,X

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

NWTPH-Dx
METHOD BLANK QUALITY CONTROL

Date Extracted:	5-31-00
Date Analyzed:	5-31-00
Matrix:	Soil
Units:	mg/Kg (ppm)
Lab ID:	MB0531S1
Diesel Fuel:	ND
PQL:	25
Heavy Oil:	ND
PQL:	50
Surrogate Recovery:	
o-Terphenyl	101%
Flags:	X

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

NWTPH-Dx
DUPLICATE QUALITY CONTROL

Date Extracted: 5-31-00
Date Analyzed: 5-31-00

Matrix: Soil
Units: mg/Kg (ppm)

Lab ID:	05-188-06 MS	05-188-06 MSD
Diesel Fuel:	156	158
PQL:	130	130
RPD:	1.5	
Surrogate Recovery:		
o-Terphenyl	---	---
Flags:	S,X	S,X

Date of Report: June 6, 2000
Samples Submitted: May 25, 2000
Lab Traveler: 05-158
Project: Quality Edible Oils

Date Analyzed: 5-25-00

% MOISTURE

Client ID	Lab ID	% Moisture
PE 13-16 COMP	05-158-01	12

CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST
A WASTE MANAGEMENT COMPANY

17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2643
(541) 454-3227 Fax

September 9, 1999

SCHNITZER INVESTMENT CORP
10400 N BURGARD WAY
PORTLAND, OR 97203-6422

RE: CONFIRMATION PERMIT

ATTENTION: JIM JAKUBIAK

We are pleased to confirm Waste Management's approval of your waste material as described below. Waste Management based upon the information provided by you prepared the attached profile for the waste material. It is important that no changes be made to the profile without Waste Management's consent. If the profile meets with your approval, then you are ready to schedule shipment of your waste.

Profile Number: 545575
Approved Management Facility: ***COLUMBIA RIDGE LANDFILL***
Disposal Method: CO-MINGLE

The newly formed Waste Management is working hard to provide an increased level of service to our customers. We are asking that when you ship your material, a copy of the attached form; titled "PERMIT" is sent with your Manifest or Bill of Lading. This shows that you have preapproval and pricing-contracting is in place. This will help us in processing your load in the most efficient manner.

All waste coming to Oregon Waste systems or Chemical Waste Management ***must*** *be scheduled, twenty-four hours in advance, with Greg Marrett. If you are unable to reach Greg you can contact our customer service representative Linda Wimmer. Unscheduled loads could be delayed several hours or even rejected.*

If you have any questions we have listed contact people you may use in addition to your Sales Representative

Greg Marrett: Scheduling & Transportation 541-454-3220
Linda Wimmer: Customer Service Pricing 800-843-3604
Leah Shannon: Customer Service & Approvals 541-454-3289
Gary Fisher: Operational Assistance 541-454-3234

Thank you,

Leah Shannon

Leah Shannon
Waste Management

PERMIT

COLUMBIA RIDGE LANDFILL & RECYCLE CENTER
18177 CEDAR SPRINGS LANE
ARLINGTON, OR 97812 *PHONE: 541-454-2030*

PERMIT TO DISPOSE OF NONHAZARDOUS MATERIALS

GENERATOR: SCHNITZER INVESTMENT CORP

DESCRIPTION: CONCRETE DEBRIS & SOIL

QUANTITY: 60 CUBIC YARDS – ONE TIME

PROFILE: 545575

EXPIRES: 11-30-99

LOCATION: 10400 N BURGARD WAY
PORTLAND, OR 97203-6422
CONTACT: JIM JAKUBIAK

DATE: 8-31-99

TYPE OF DISPOSAL: CO-MINGLE

SPECIAL HANDLING:

BILLING: SCHNITZER INVESTMENT CORP
PO BOX 10047
PORTLAND, OR 97296-0047

APPROVED: LEAH SHANNON

DATE: 8-31-99

WASTE MANAGEMENT

EACH DRIVER MUST Show (A COPY OF THIS PERMIT).

SCHN00261356

Waste Management, Inc.

Date Printed 09/08/99

GENERATOR'S WASTE PROFILE SHEET

Profile # CRL 545575

(_) Check here if this is a Recertification LOCATION OF ORIGINAL Columbia Ridge Landfill

GENERAL INFORMATION

1. Generator Name: SCHNITZER INVESTMENT CORP Generator USEPA ID: EXEMPT

2. Generator Address: 10400 N BURGARD WAY
   PORTLAND OR 97203-6422

   Billing Address: (_) Same
   SCHNITZER INVESTMENT CORP
   PO BOX 10047
   PORTLAND OR 97296-0047

3. Technical Contact/Phone: JIM JAKUBIAK 503/286-6976

4. Alternate Contact/Phone:

   Billing Contact/Phone: JIM JAKUBIAK 503/286-6976

PROPERTIES AND COMPOSITION

5. Process Generating Waste: THE FACILITY FORMERLY PRODUCED PALM (EDIBLE) OILS FOR USE IN COOKING

6. Waste Name: CONCRETE DEBRIS & SOIL

7A. Is this a USEPA hazardous waste (40 CFR Part 261)? Yes (_) No (X)
B. Identify ALL USEPA listed and characteristic waste code numbers (D,F,K,P,U):

State Waste Codes:

8. Physical State @ 70F: A. Solid(X) Liquid(_) Both(_) Gas(_) B. Single Layer (X) Multilayer (_) C. Free liq. range 0 to 0%

9A. pH: Range _____ or Not applicable (X) B. Strong Odor (_);describe

10. Liquid Flash Point: < 73F (_) 73-99F (_) 100-139F (_) 140-199F (_) >= 200F (_) N.A. (X) Closed Cup (X) Open Cup (_)

11. CHEMICAL COMPOSITION: List ALL constituents (incl. halogenated organics) present in any concentration and forward analysis

Constituents	Range	Unit Description
ORGANICS	0 to 128000	MG/KG
OIL	to	
GREASE	to	
TRICHLOROETHYLENE	0 to 13.7	MG/KG
NON-TRI CHEMICALS	0 to 1	MG/KG
CHLORINATED PETROLEUM AROMATIC HYDROCARBONS	to	See attach2
TOTAL COMPOSITION (MUST EQUAL OR EXCEED 100%):	100.000000	

12. OTHER: PCBs if yes, concentration _ _____ ppm, PCBs regulated by 40 CFR 761 (_). Pyrophoric (_) Explosive (_) Radioactive (_) Benzene if yes, concentration _ _____ ppm. NESHAP (_) Shock Sensitive (_) Oxidizer (_) Carcinogen (_) Infectious (_) Other

13. If waste subject to the land ban & meets treatment standards, check here: _ & supply analytical results where applicable.

SHIPPING INFORMATION

14. PACKAGING: Bulk Solid (X) Bulk Liquid (_) Drum (_) Type/Size: CUBIC YARDS Other

15. ANTICIPATED ANNUAL VOLUME: 60 Units: CUBIC YARDS Shipping Frequency: ONE TIME

SAMPLING INFORMATION Sample Tracking Number: 4935142

16a. Sample source (drum, lagoon, pond, tank, vat, etc.):

Date Sampled: _____ Sampler's Name/Company:

16b. Generator's Agent Supervising Sampling: 17. (X) No sample required (See instructions.)

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize WMI to obtain a sample from any waste shipment for purposes of recertification.

Signature on original profile 545575	JIM JAKUBIAK	ENVIRONMENTAL ADMINISTRATOR	8/18/99
Signature	Name and Title		Date

SCHN00261357

Date Printed 09/08/99

Profile # CRL 545575

18. This is a Nonwastewater.

19. If this waste is subject to any California list restrictions enter the letter from below (either A, B.1 or B.2) next to each restriction that is applicable:

___ HOCs, ___ PCBs, ___ Acid, ___ Metals, ___ Cyanides

20. Identify ALL Characteristic and Listed USEPA hazardous waste numbers that apply (as defined by 40 CFR 261). For each waste number, identify the subcategory (as applicable, check none, or write in the description from 40 CFR 268.41, 268.42, and 268.43).

REF #	A. US EPA HAZARDOUS WASTE CODE(S)	B. SUBCATEGORY Enter the subcategory description. If not applicable, simply check none		C. APPLICABLE TREATMENT STANDARDS			D. HOW MUST THE WASTE BE MANAGED?
				PERFORMANCE-BASED: Check as applicable		SPECIFIED TECHNOLOGY: If applicable enter the 40 CFR 268.42 table 1 treatment code(s)	
		DESCRIPTION	NONE	268.41(a)	268.43(a)	268.42	Enter letter from below
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

Management under the land disposal restrictions:

A. RESTRICTED WASTE REQUIRES TREATMENT

B.1 RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

B.2 RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)

B.3 GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS

C. RESTRICTED WASTE SUBJECT TO A VARIANCE

D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT

E. NOT CURRENTLY SUBJECT TO LAND DISPOSAL RESTRICTIONS

21. Is this waste a soil or debris? No: _ Yes, Soil: X Yes, Debris: _

22. Specific Gravity Range: _____ to _____

23. Indicate the range of each: Units

Cyanides: _ None _____ to _____ _____ Type (free, total, amenable, etc.) _____

Cyanides: _ None _____ to _____ _____ Type (free, total, amenable, etc.) _____

Sulfides: _ None _____ to _____ _____ Type _____

Optional Phenolics: _ None _____ to _____ _____

24. Identify the waste color VARIES _____, DOT physical state Solid _____,

and physical appearance SOLID _____

SCHN00261358

Date Printed 09/08/99

Profile #
CRL 545575

25. COMPLETE ONLY FOR WASTES INTENDED FOR FUELS OR INCINERATION		26. RECLAMATION, FUELS or INCINERATION PARAMETERS (Provide if information is available)
	TOTAL	RANGE
Beryllium as Be	ppm	A. Heat Value (Btu/lb): _____-_____
Potassium as K	ppm	B. Water: _____
Sodium as Na	ppm	C. Viscosity (cps): _____@_____F _ 100 F _ 150 F
Bromine as Br	%	D. Ash: _____ %
Chlorine as Cl	%	E. Settleable solids: _____ %
Fluorine as F	%	F. Vapor Pressure @ STP (mm/Hg): ____
Sulfur as S	%	G. Is this waste a pumpable liquid? Yes _ No _
		H. Can this waste be heated to improve flow? Yes _ No _
		I. Is this waste soluble in water? Yes _ No _
		J. Particle size: Will the solid portion of this waste pass through a 1/8 inch screen? Yes _ No _

27. TRANSPORTATION INFORMATION

A. Is this a DOT Hazardous Material? Yes _ No X

B. Proper Shipping Name. . . . . : NON-REGULATED MATERIAL

and Additional Description if required: _____

C. DOT Regulations: _____ Hazard Class: ____ _____ I.D. _____ Packing Group: ___

D. CERCLA Reportable Quantity (RQ) and units (Lb, Kg): _____

E. Non-Bulk code ___ Bulk code ___

F. Special Provisions ___ ___ ___ ___ ___ ___

G. Labels Required _____ _____ _____

28. SPECIAL HANDLING INFORMATION

_ Material Safety Data Sheets Attached

29. OTHER INFORMATION

THE FACILITY FORMERLY PRODUCED PALM (EDIBLE) OILS FOR USE IN COOKING. THE SOIL WAS GENERATED DURING A PROPERTY INVESTIGATION. THE CONCRETE WAS GENERATED WHEN THE DRAINS & SUMPS WERE REMOVED FROM OUTDOOR LOCATIONS.

30. WASTE MANAGEMENT CERTIFICATION

Waste Management, Inc. has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile.

SCHN00261359

Date Printed 09/08/99

Profile # CRL 545575

31. OTHER HAZARDOUS CONSTITUENTS Indicate if the waste contains any of the following.

METALS	TCLP Information: Check only ONE for each constituent Use units: ppm, mg/l				TCLP Data	TCA or TOTAL Use units: ppm, mg/l, mg/kg or percent			
						California List			
	Less Than	TC Regulated Level	Equal or More	Waste No.	TCLP Actual	Less Than	Regulated Level	Equal or More	Actual
Arsenic as As	X	5.0 mg/l		D004			500 mg/l		
Barium as Ba	X	100.0 mg/l		D005					
Cadmium as Cd	X	1.0 mg/l		D006			100 mg/l		
Chromium tot Cr	X	5.0 mg/l		D007					
Lead as Pb	X	5.0 mg/l		D008			500 mg/l		
Mercury as Hg	X	.2 mg/l		D009			20 mg/l		
Selenium as Se	X	1.0 mg/l		D010			100 mg/l		
Silver as Ag	X	5.0 mg/l		D011					
Nickel as Ni							134 mg/l		
Thallium as Tl							130 mg/l		
Chromium Hex							500 mg/l		
Antimony									
Beryllium									
Copper									
Vanadium									
Zinc									

SCHN00261360

Date Printed 09/08/99

Profile #
CRL 545575

32. OTHER HAZARDOUS CONSTITUENTS Indicate if the waste contains any of the following.

ORGANICS	TCLP Information: Check only ONE for each constituent				TCLP Data	TCA or TOTAL Use units: ppm, mg/l or %
	Less Than	Regulated Level	Equal or More	Waste No.	TCLP Analytical Test Results Use units: ppm or mg/l	
Benzene	X	0.5 mg/l		D018		
Carbon Tetrachloride	X	0.5 mg/l		D019		
Chlordane	X	0.03 mg/l		D020		
Chlorobenzene	X	100.0 mg/l		D021		
Chloroform	X	6.0 mg/l		D022		
m-Cresol	X	200 mg/l		D024		
o-Cresol	X	200.0 mg/l		D023		
p-Cresol	X	200.0 mg/l		D025		
Cresol	X	200.0 mg/l		D026		
2,4-D	X	10.0 mg/l		D016		
1,4 Dichlorobenzene	X	7.5 mg/l		D027		
1,2-Dichloroethane	X	0.5 mg/l		D028		
1,1-Dichloroethylene	X	0.7 mg/l		D029		
2,4-Dinitrotoluene	X	0.13 mg/l		D030		
Endrin	X	.02 mg/l		D012		
Heptachlor, & Hydroxide	X	0.008 mg/l		D031		
Hexachloro-1,3 Butadiene	X	0.5 mg/l		D033		
Hexachlorobenzene	X	0.13 mg/l		D032		
Hexachloroethane	X	3.0 mg/l		D034		
Lindane	X	0.4 mg/l		D013		
Methoxychlor	X	10.0 mg/l		D014		
Methyl Ethyl Ketone	X	200.0 mg/l		D035		
Nitrobenzene	X	2.0 mg/l		D036		
Pentachlorophenol	X	100.0 mg/l		D037		
Pyridine	X	5.0 mg/l		D038		
Tetrachloroethylene	X	0.7 mg/l		D039		
Toxaphene	X	0.5 mg/l		D015		
2,4,5-TP Silvex	X	1.0 mg/l		D017		
Trichloroethylene	X	0.5 mg/l		D040		
2,4,5-Trichlorophenol	X	400.0 mg/l		D041		
2,4,6-Trichlorophenol	X	2.0 mg/l		D042		
Vinyl Chloride	X	0.2 mg/l		D043		

SCHN00261361

Date Printed 09/08/99

Profile # CRL 545575

ATTACHMENT 2

CHEMICAL COMPOSITION: Additional constituents NOT included on page 1 of the Waste Profile

Constituents	Range	Unit Description
GASOLINE	0 to 4380	MG/KG
ORGANICS	0 to 1000	MG/KG
DIESEL	to	
OIL	to	
ORGANICS	100000 to 500000	MG/KG
OIL	to	
GREASE	to	
INERTS	100 to 100	%
SOIL, CONCRETE	to	
COMMENTS	to	
** EXP DATE 11/30/99 **	to	
CO-MINGLE	to	

Date Printed 09/08/99

Profile #
CRL 545575

MISCELLANEOUS PROFILE FIELDS

Selling Region Lab: CWL
Master Profile No.: _____
Sales Office. . . : PDX
Location Orig. . .: CRL
Profile Expires . : 11/30/99
Approved. . . . . : 8/31/99
Signed Profile Present: Y Change Pending: _ Waste Status: A
Site (DCS) Status: 1 _____
Prof. Tracking No: 4935142

Fuels Approval.: _
Pumpable Liquid Exact: ___ % OR Range: ___ - ___ %
Type of Pump. .: _____
Additional Anticipated Vol: _____ Per: _ Unit Code/Des: ___ _____

Handling Codes: __ _____ __ _____
__ _____ __ _____
__ _____ __ _____

EPA Data: Status Code: U Tax Code. .: _
Permit No: _____ Expr. Date.: _____ Volume. . .: _____
Certificate of Destruction or Disposal Required ? _ Project # : _____
DOT Properties: Inhalation: _ Dermal: _ Oral: _ Flammable: _ Health: _

Percent Taxable: _____ No. of Labels. . .: __
Tranship Dest .: ___ Download Generator: 1426411
Material Class.: _ DCS Generator #...: 9999999999
Treatment Codes: D80 ___ ___ ___ ___ ___
Process Codes .: 3P CRL ___ ___ ___ ___ ___ ___ ___ ___
Schedule Category : ____
Schedule Interval : _____
Listed Solvent Waste: _ Hal. Org. Compounds.: _ RCRA Reactive. . . .: _
Etiologic. . . . . .: _ Water Reactive . . .: _ Pesticide Mfg. Waste: _
Ignition Screen : ___ Gas Evolution : ___ Wet Zone . . . . . .: _
Self-heating cube sz ____ Vapor Concentration _____ Boiling Point F ___
Is Gas Ignitable? _ Corrosive to Steel or Aluminum _ Organic Peroxide _
Chemical Family Name _____

GENERATOR FROM PAGE 1

Business Name	USEPA ID	Rltn	Contract in Place	at	Expires on	Evergreen Contract
SCHNITZER INVESTMENT CORP	EXEMPT	G	_	___	_____	_

ADDITIONAL BUSINESSES

Business Name	USEPA ID	Rltn	Contract in Place	at	Expires on	Evergreen Contract
SCHNITZER INVESTMENT CORP	N/A	I	_	___	_____	_

ADDITIONAL PROFILE COMMENTS

Cat	Comment	Cat	Comment

SUPPLEMENTAL FIELDS

Field	Value

Date Printed 9/08/99

Profile Change History

Profile # CRL 545575

This section lists comments describing changes made to the profile.

Profile Change Comments	Date	User
CWL/545575 Entire profile copied to CRL/545575	9/01/99	WM0225BMS

SCHNITZER INVESTMENT CORP.

P.O. Box 10047, Portland, Oregon 97296-0047
(503) 224-9900 FAX (503) 286-6948

September 17, 2002

DEQ – HWPPD-TU/WRAP
811 SW 6th Avenue
Portland, Oregon 97204

RE: Submission – Notice of Plan Completion (NPC) Form

Schnitzer Investment Corp. received a letter from the Department of Environmental Quality dated September 10, 2002 indicating SIC is required to submit a NPC form. The form submission is a requirement of Oregon's Toxic Use Reduction and Hazardous Waste Reduction Act. The form has been completed and is attached.

Based on our understanding of this requirement, SIC is not obligated to complete a Reduction Plan, because the waste removal activities were conducted as a one time event as part of a remedial action completed at the site. At this time, SIC believes designated hazardous waste has been removed from the site and the SIC/Premier Edible Oils site will once again be a "Conditionally-Exempt Generator" for the year 2002. You should also know the former edible oil refinery operator is no longer in business at this location.

If you have questions or comments, please call me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Cc: Tom Zelenka

Reason for Not Preparing Plan

This form is for reporting year 2001. Refer to the fact sheet "Oregon's Toxics Use Reduction and Hazardous Waste Reduction Act" and to the Act and regulations for clarification on when the following reasons for not preparing a Plan may apply.

Name of Company: Schnitzer Investment Corp. (Formerly) Premier Edible Oils Site SIC code(s): 2079

Physical Address: 10400 North Burgard Road · Portland, OR. 97203-6422

Mailing Address: P.O. Box 10047 · Portland, OR 97296-0047

Contact Person: Jim Jakubiak Title: Environmental Administrator

Phone number: (503) 286-6976 E-mail address: jjakubiak@schn.com

TRI ID #: Not Applicable DEQ ID #: ORD987180189

State of Oregon Department of Environmental Quality

Toxics Use/Waste Reduction Assistance Program
811 SW 6th Avenue
Portland, OR 97204
Phone: (503) 229-6015
Fax: (503) 229-6977
Contact: Elaine Glendening
www.deq.state.or.us/wmc/tuwrap.html

I have not prepared a Reduction Plan under the Toxics Use Reduction and Hazardous Waste Reduction Act for the following reason (check one box):

I am not subject to these requirements, because:

- ☐ I manufactured the toxic substance as a product.
- ☒ I generated the hazardous waste solely as a result of remedial activities.
- ☐ I was a Conditionally-Exempt Generator and not a Large User.

or

I am claiming or applying for an exemption from these requirements:

- ☒ I certify that I generated the hazardous waste as a result of a one-time cleanout event and that I was previously a Conditionally-Exempt Generator.
- ☐ I certify that I have an Environmental Management System that meets the conditions for this exemption.
- ☐ I am applying for an exemption from these requirements because I have a consumer education program that meets the conditions for this exemption.

or

One of these special situations applies to me:

- ☐ A prior owner of my facility prepared a Reduction Plan that is still valid and that is retained at the facility. (Please note that you may need to prepare a Pounds Report, depending on your status.)
- ☐ My facility has moved out of state or gone out of business.

My signature below certifies that the information above is correct.

Name of ~~Senior Manager or Business Owner~~ Property Owner Representative: James F Jakubiak

Signature: James F Jakubiak Date: September 15, 2002

Send this form by October 15, 2002 to:

DEQ – HWPPD-TU/WRAP
811 SW Sixth Avenue
Portland, OR 97204

Last Updated: 6/19/02
By: Elaine Glendening

SCHN00261501

Notice of Plan Completion

NPCNew 77

This form is for reporting year 2001. Refer to the fact sheet "Oregon's Toxics Use Reduction and Hazardous Waste Reduction Act" and to the Act and regulations for information on planning requirements.

Name of Company: SCHNITZER INV PREMIER EDIBLE OILS SITE

SIC Code(s): 2079: SHORTENING AND COOKING OILS

Physical Address: 10400 N BURGARD WAY, PORTLAND, OR 97203-6422

Mailing Address: PO BOX 10047, PORTLAND, OR 97296-0047

Contact Person: Unknown

Title: Unknown

Phone Number: Unknown

E-Mail Address: Unknown

TRI ID#: 97203PLMCN12005

DEQ ID#: ORD987180189

State of Oregon
Department of Environmental Quality

Toxics Use/Waste Reduction Assistance Program
811 SW 6th Avenue
Portland, OR 97204
Phone: (503)229-5316
Fax: (503)229-6977
Contact: Mark Ralston
www.deq.state.or.us/wmc/tuwrap

I certify that the business identified on this form has completed a Reduction Plan, as required under Oregon's Toxics Use Reduction and Hazardous Waste Reduction Act, and that this Plan is kept on site.

Name of Senior Manager or Business Owner: _____

Signature: _____ Date _____

Send this form by October 15, 2002 to: DEQ - HWPPD - TU/WRAP
811 SW Sixth Avenue
Portland, OR 97204

SCHNITZER INVESTMENT CORP.

P.O. Box 10047, Portland, Oregon 97296-0047
(503) 224-9900 FAX (503) 286-6948

September 17, 2002

DEQ – HWPPD-TU/WRAP
811 SW 6th Avenue
Portland, Oregon 97204

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If you have questions or comments, please call me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Cc: Tom Zelenka

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Physical Address: 10400 North Bergerd Road · Portland, OR. 97203-6422

Mailing Address: P.O. Box 10047 · Portland, OR. 97296-0047

Contact Person: Jim Jakubiak Title: Environmental Administrator

Phone number: (503) 286-6976 E-mail address: jjakubiak@schn.com

TRI ID #: Not Applicable DEQ ID #: ORD987180189

State of Oregon
Department of Environmental Quality

Toxics Use/Waste Reduction Assistance Program
811 SW 6th Avenue
Portland, OR 97204
Phone: (503) 229-6015
Fax: (503) 229-6977
Contact: Elaine Glendening
www.deq.state.or.us/wmc/tuwrap.html

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I am not subject to these requirements, because:

- ☐ I manufactured the toxic substance as a product.
- ☒ I generated the hazardous waste solely as a result of remedial activities.
- ☐ I was a Conditionally-Exempt Generator and not a Large User.

or

I am claiming or applying for an exemption from these requirements:

- ☒ I certify that I generated the hazardous waste as a result of a one-time cleanout event and that I was previously a Conditionally-Exempt Generator.
- ☐ I certify that I have an Environmental Management System that meets the conditions for this exemption.
- ☐ I am applying for an exemption from these requirements because I have a consumer education program that meets the conditions for this exemption.

or

One of these special situations applies to me:

- ☐ A prior owner of my facility prepared a Reduction Plan that is still valid and that is retained at the facility. (Please note that you may need to prepare a Pounds Report, depending on your status.)
- ☐ My facility has moved out of state or gone out of business.

My signature below certifies that the information above is correct.

Name of ~~Senior Manager or Business Owner~~ Property Owner Representative: James L Jakubiak

Signature: James L Jakubiak Date: September 15, 2002

Send this form by October 15, 2002 to: DEQ – HWPPD-TU/WRAP
811 SW Sixth Avenue
Portland, OR 97204

Last Updated: 6/19/02
By: Elaine Glendening

SCHN00261504

Notice of Plan Completion

NPCNew 77

This form is for reporting year 2001. Refer to the fact sheet "Oregon's Toxics Use Reduction and Hazardous Waste Reduction Act" and to the Act and regulations for information on planning requirements.

Name of Company: SCHNITZER INV PREMIER EDIBLE OILS SITE

SIC Code(s): 2079: SHORTENING AND COOKING OILS

Physical Address: 10400 N BURGARD WAY, PORTLAND, OR 97203-6422

Mailing Address: PO BOX 10047, PORTLAND, OR 97296-0047

Contact Person: Unknown

Title: Unknown

Phone Number: Unknown

E-Mail Address: Unknown

TRI ID#: 97203PLMCN12005

DEQ ID#: ORD987180189

State of Oregon
Department of Environmental Quality

Toxics Use/Waste Reduction Assistance Program
811 SW 6th Avenue
Portland, OR 97204
Phone: (503)229-5316
Fax: (503)229-6977
Contact: Mark Ralston
www.deq.state.or.us/wmc/tuwrap

I certify that the business identified on this form has completed a Reduction Plan, as required under Oregon's Toxics Use Reduction and Hazardous Waste Reduction Act, and that this Plan is kept on site.

Name of Senior Manager or Business Owner: _____

Signature: _____ Date _____

Send this form by October 15, 2002 to: DEQ - HWPPD - TU/WRAP
811 SW Sixth Avenue
Portland, OR 97204

Oregon
John A. Kitzhaber, M.D., Governor

NPCNew 77

Department of Environmental Quality
Headquarters
811 SW Sixth Avenue
Portland, OR 97204-1390
(503) 229-5696
FAX (503) 229-6124
TTY (503) 229-6993

September 10, 2002

LQ:TUR:FOR 200240
Hazardous Waste/TUR Coordinator
Schnitzer Investment Corporation
PO Box 10047
Portland, OR 97296-0047

RE: Requirement to Submit a Notice of Plan Completion by October 15, 2002

Oregon's 1989 Toxics Use Reduction and Hazardous Waste Reduction Act (TURHWRA) was one of the first State laws to promote pollution prevention through facility-wide planning. Since its passage, businesses throughout the State have successfully employed the law's planning requirements to reduce their use of toxic chemicals and to reduce generation of hazardous wastes.

We are writing to inform you that our records indicate your facility is subject to TURHWRA planning requirements and therefore must complete a Reduction Plan. The deadline for developing your Plan and notifying the DEQ of its completion this year is October 15, 2002.

The requirement to prepare a Reduction Plan applies to certain businesses, industrial facilities, government agencies and institutions, which are regulated as "toxics users" by falling into one or more of the following categories:

- **Small Quantity Generators** - persons who generate between 220 and 2,200 pounds of hazardous waste in a calendar month.

- **Large Quantity Generators** - persons who generate more than 2,200 pounds of hazardous waste or more than 2.2 pounds of acutely hazardous waste in a calendar month.

- **Large Users** - users of toxic chemicals who are required to report under the federal Toxics Release Inventory program (Section 313 of the Emergency Planning and Community Right-to-Know Act).

Please submit the enclosed "Notice of Plan Completion" (NPC) form to:

DEQ – HWPPD – TU/WRAP
811 SW Sixth Ave
Portland, OR 97204

Please keep a copy of your Plan and NPC form on site.

DEQ-DC1

Some facilities may not be subject to planning requirements or may be able to claim an exemption. To find out more, please see the enclosed fact sheet "Oregon's Toxics Use Reduction and Hazardous Waste Reduction Act." If you are not subject to Plan requirements or are claiming an exemption, please complete the form "Reason for Not Preparing Plan" that is on the reverse side of the NPC form. This information will help us avoid sending you unnecessary paperwork in the future.

Note: Please check the information on your mailing label. If it is incorrect, please make corrections on your form.

To obtain further information on TURHWRA requirements or to receive technical assistance, please see the enclosed fact sheet. You can obtain copies of forms and other information on our Web site: www.deq.state.or.us/wmc/tuwrap.html. If you believe that our records are incorrect or have questions about the requirements, please contact me at 503-229-6015 or at glendening.elaine@deq.state.or.us

Sincerely,

Elaine Glendening

Elaine Glendening
Toxics Use/Waste Reduction Assistance Coordinator

Enclosures:

- Form: Notice of Plan Completion
- Form: Reason for Not Preparing Plan
- Fact sheet: Oregon's Toxics Use Reduction and Hazardous Waste Reduction Act

DEQ-DC1

SCHN00261507

Don't Let the Moments Pass You By!

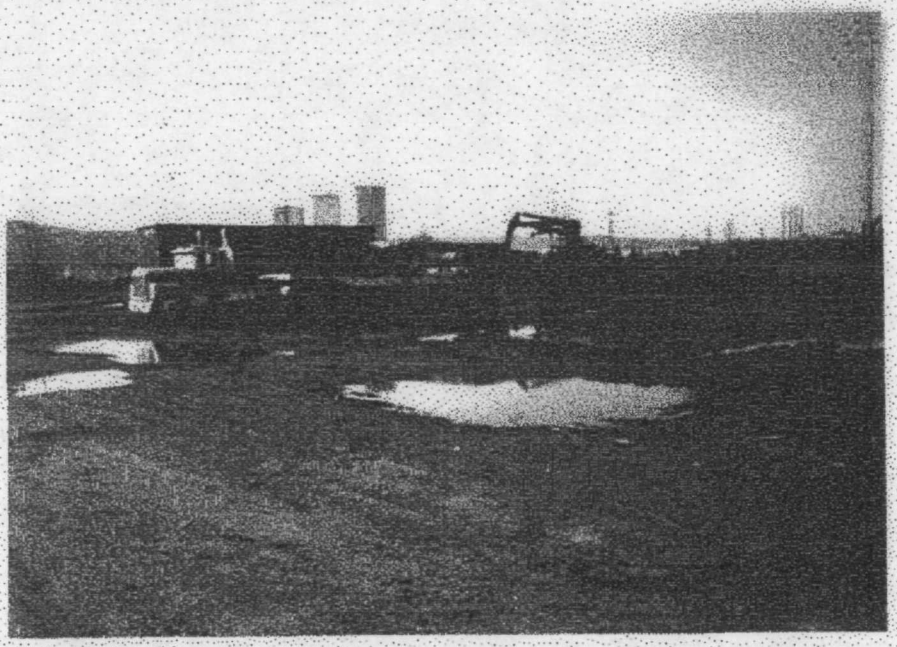
Date _____

Subject Time Oil - Oil Staining Claim

_____

SHARE YOUR MEMORIES WITH

PHOTOS



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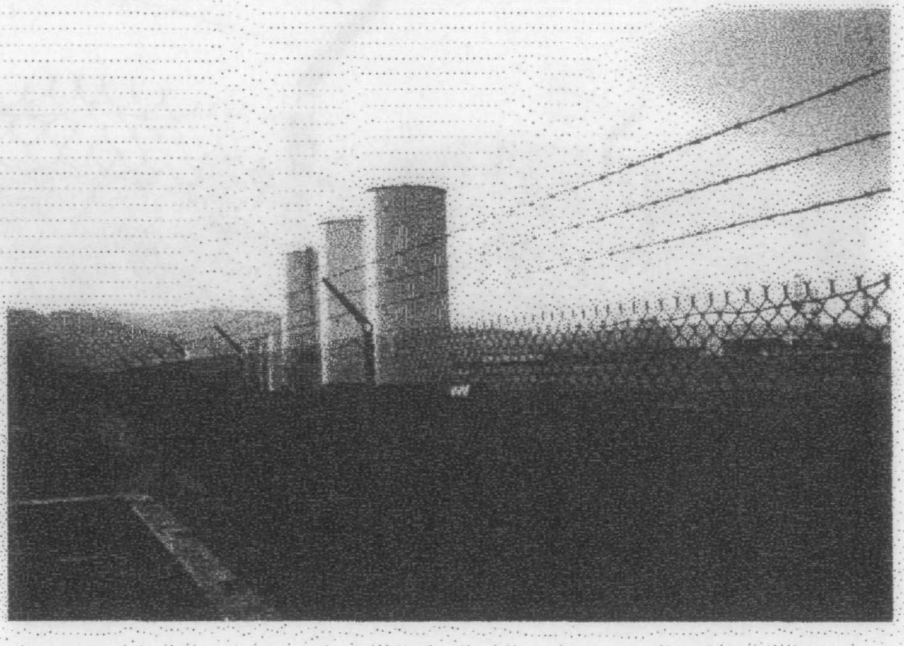

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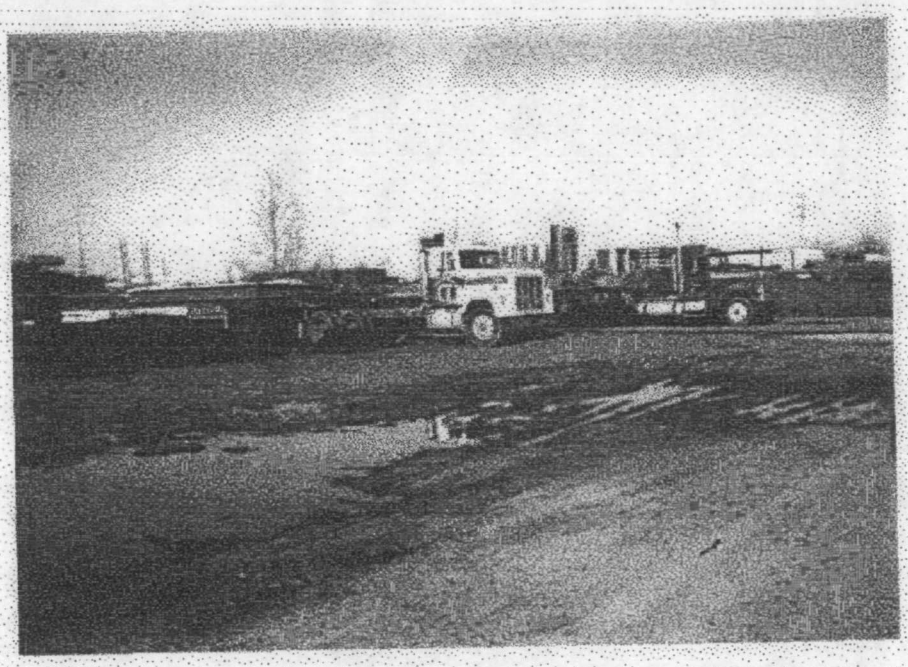

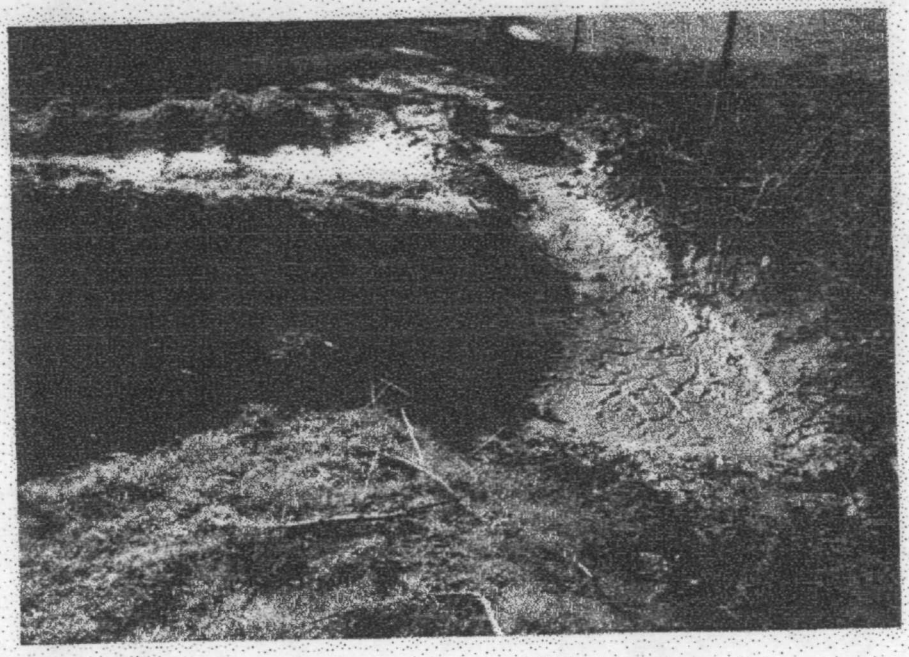

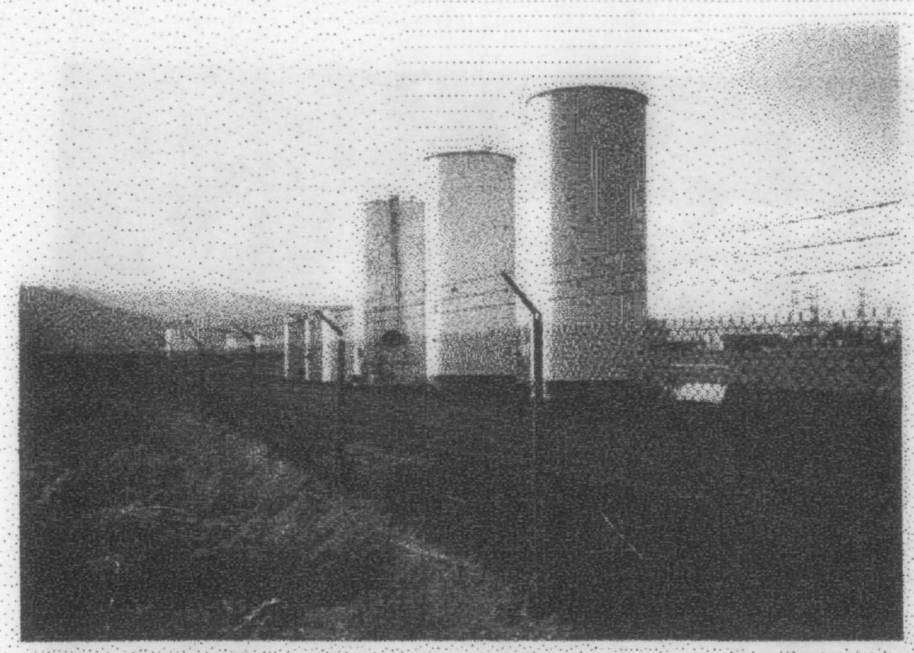

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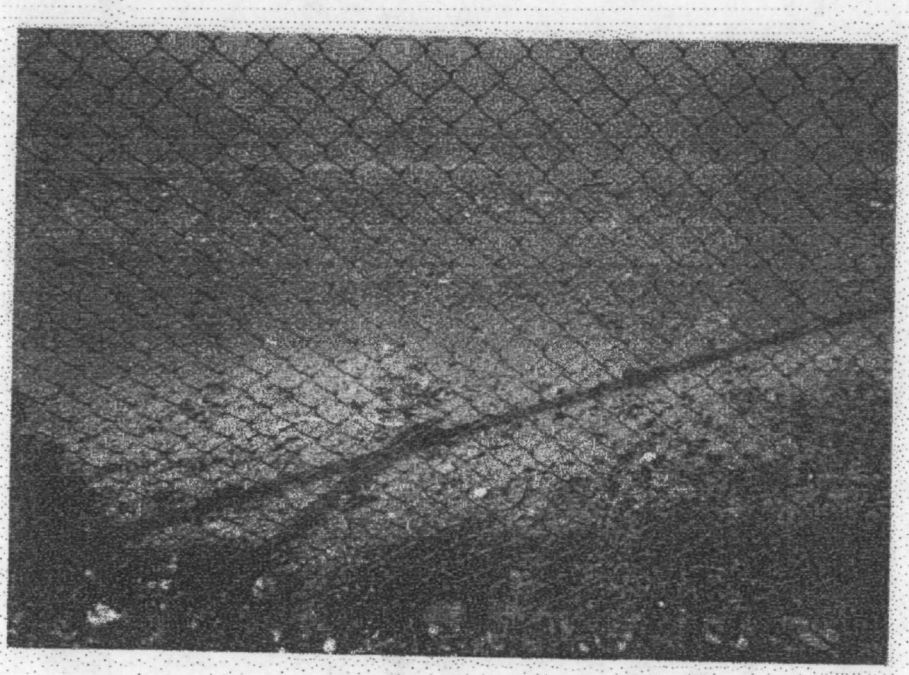

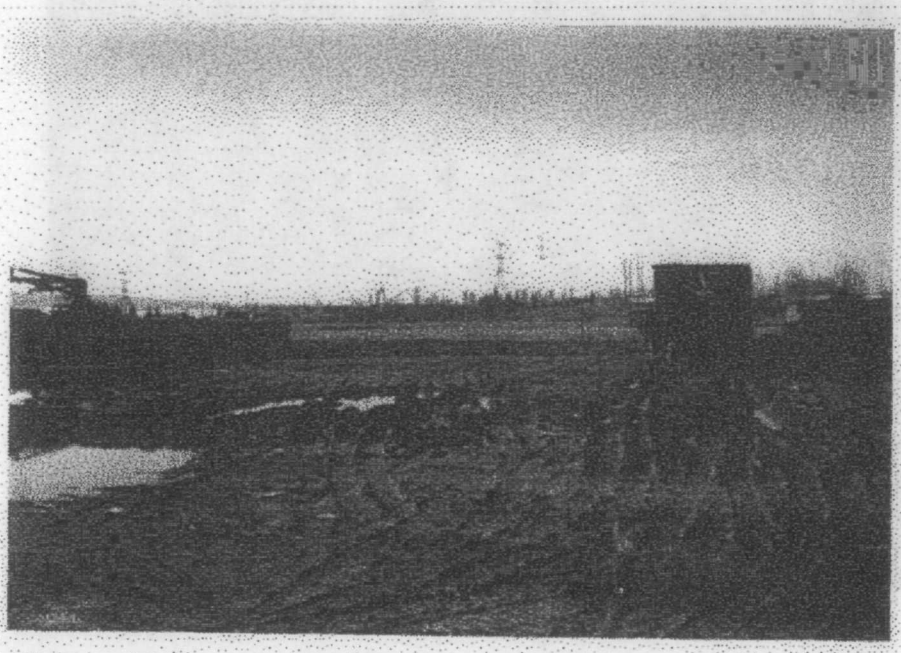

SCHN00261526

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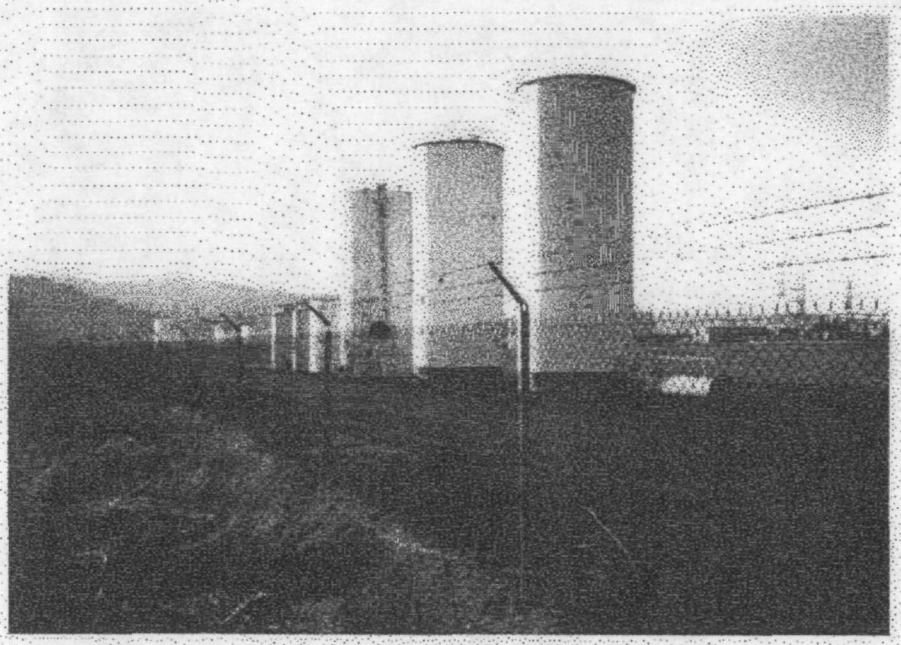

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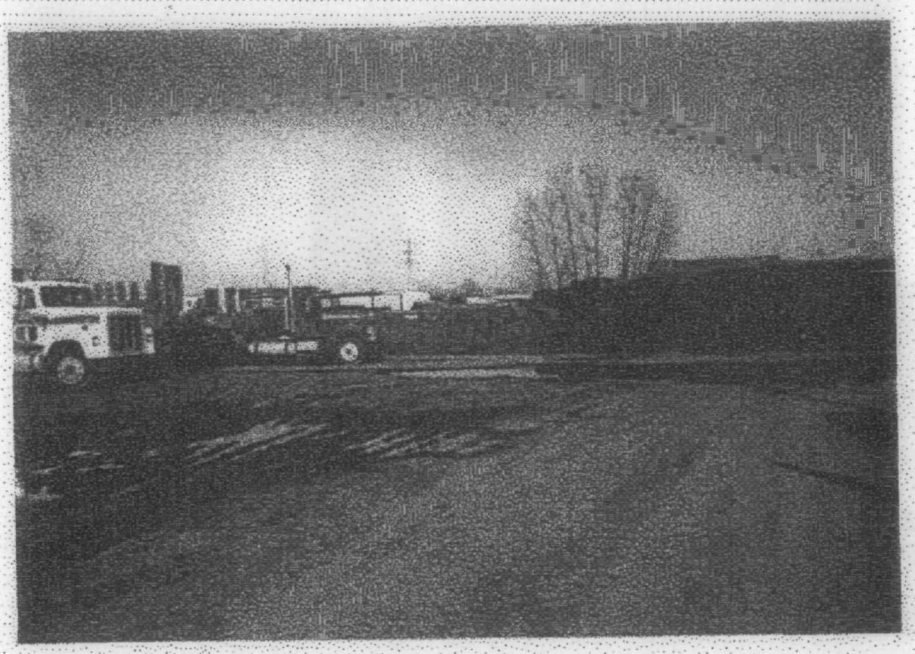

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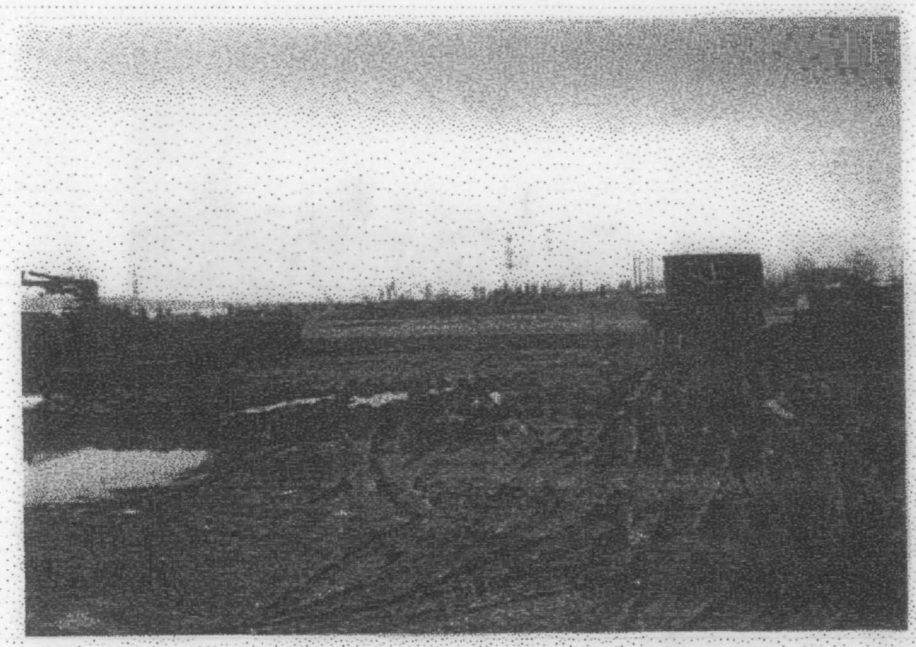

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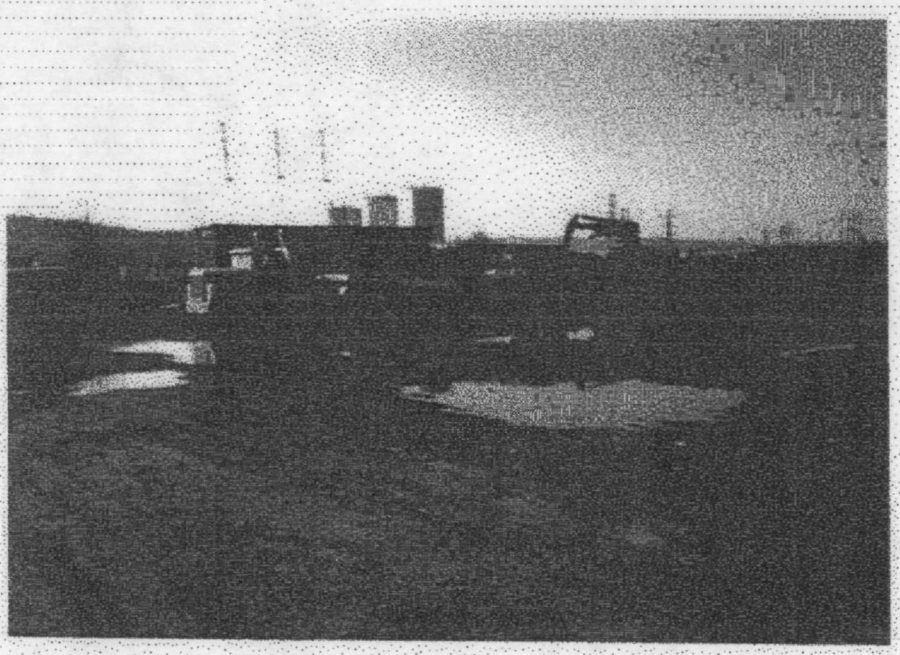

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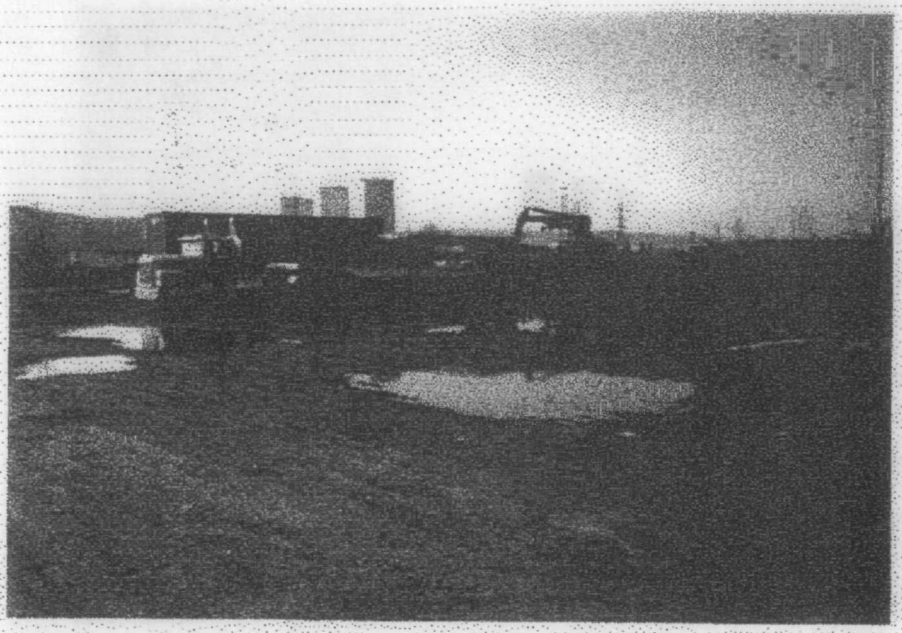

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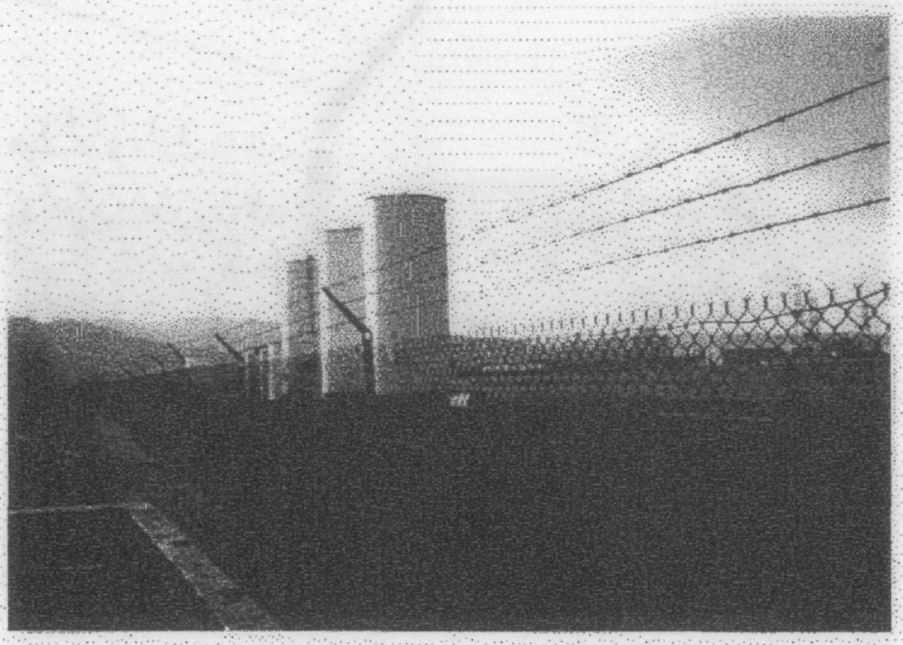
SCHN00261537

SCHN00261538



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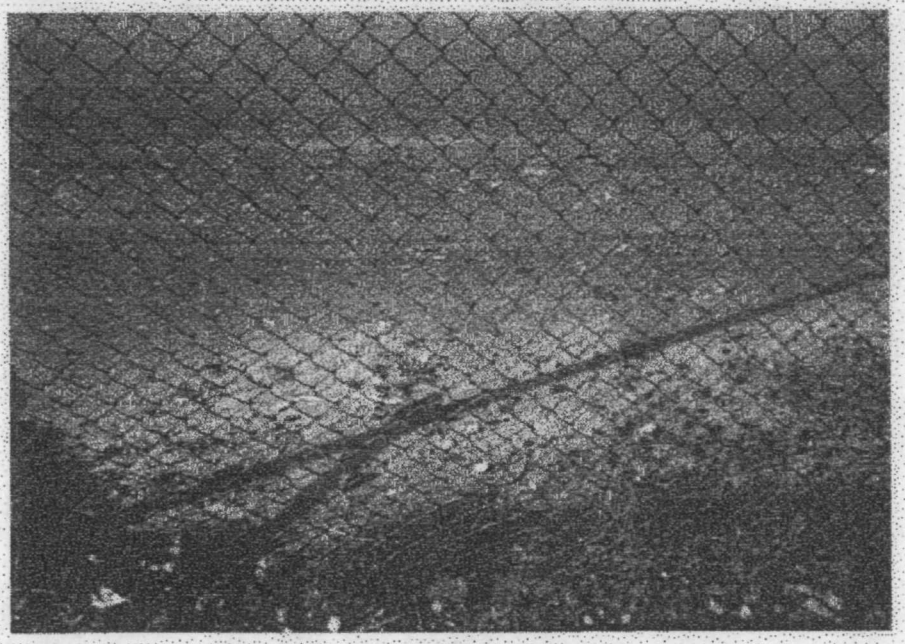


SCHWABE WILLIAMSON & WYATT P.C.
ATTORNEYS AT LAW

PACWEST CENTER, SUITES 1800-1800
1211 SOUTHWEST FIFTH AVENUE • PORTLAND, OREGON 97204-3795
TELEPHONE: 503 222-9981 • FAX: 503 796-2900 • TELEX: 650-686-1360

PATRICIA M. DOST
Admitted in Oregon and Washington
Direct Line: (503) 796-2449
E-Mail Address: pmd@schwabe.com

March 18, 1999

VIA FACSIMILE

Lori Iriah Bauman
Ater Wynne Hewitt Dodson & Skerritt, LLP
Suite 1800
222 SW Columbia Street
Portland, OR 97201

Re: Time Oil Co. v. Schnitzer Investment

Dear Lori:

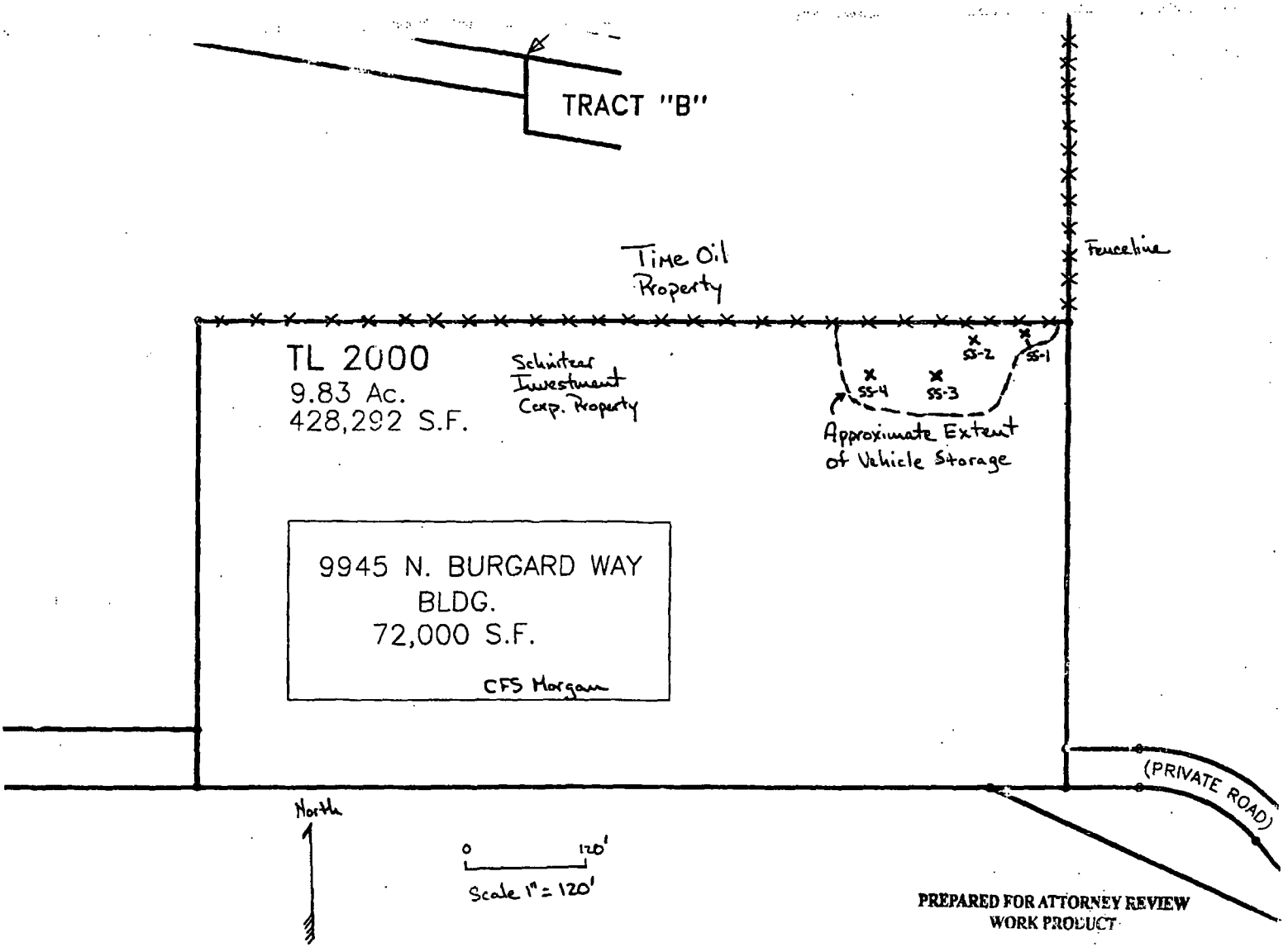
Last week, Kevin Murphy at Time Oil observed significant soil staining at the southeast corner of Time Oil's property, adjacent to Schnitzer's Burgard facility. For several weeks, Schnitzer has stored vehicles, automobile crushers and other equipment near the fence between the two properties, and oil and possibly other materials have obviously leaked from this equipment and drained onto Time Oil's property. In the last two weeks, Time Oil employees have observed crushed cars stored in this area, which are another likely source of the contamination. Time Oil is currently investigating the nature and extent of this contamination and will look to Schnitzer for reimbursement of its investigation costs and necessary remedial action costs.

In the meantime, Time Oil requests that Schnitzer remove all vehicles, equipment and crushed cars from this area or take other action to stop the ongoing release of oil and other materials to Time Oil's property.

Very truly yours,

Patricia M. Dost

PMD/csb
cc: Rick Gordon
Kevin Murphy
Claudia Powers, Esq.



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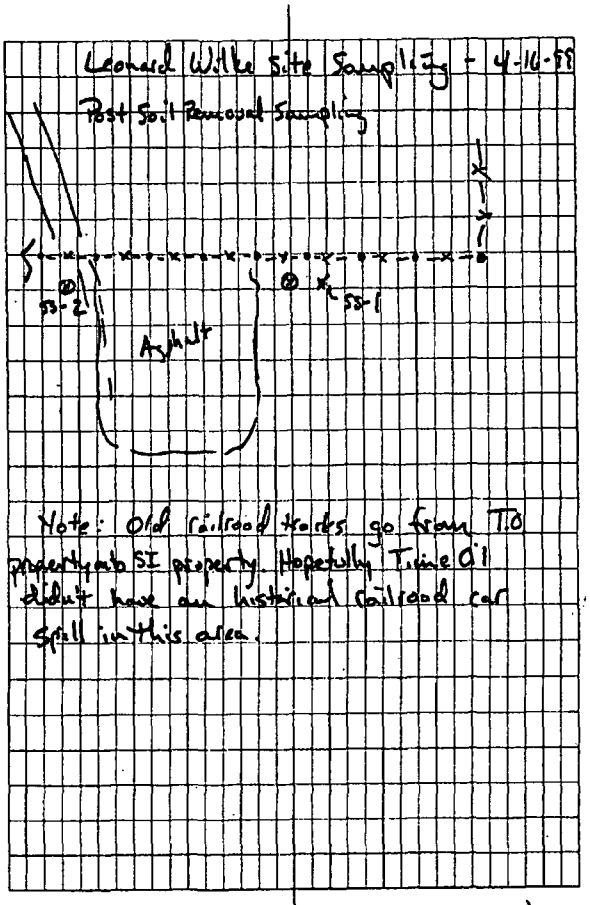

SS-4

SS-3

SCHN00261549

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

Faxed
~~6/26/99~~
7/26/99

SCRAP DIVISION
FAX TRANSMITTAL COVER SHEET

TO: Kristin DATE: ~~6/26/99~~ 7/26/99

NUMBER OF PAGES BEING SENT

FROM: Jim Jakubiak (INCLUDING COVER PAGE) ~~6~~

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: Wilke Site Waste Profile and analytical results submitted for review and approval.

SCHN00261568

WASTE MANAGEMENT, INC.

7227 N.E. 55th Avenue
Portland, OR 97218
Phone: 503-493-7825 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: June 10, 1999

Attention: Jim Jajubiak

Company: Snitzer Steel

Fax number: 286-6948

From: Tracy Breinlinger – Customer Service

No. of Pages (including cover sheet): 4

Comments: Please complete the waste profile sheet & fax w/ analytical or MSDS to Kristin at 503) 493-7822.

Any questions, please call.

Tracy

If you do not receive all of the pages or it is illegible, please call 503-493-7861.

WASTE MANAGEMENT

GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Service Agreement on File? ☒YES ☐NO

Profile Number: WMI 54553C

Renewal Date: / /

A. Waste Generator Information

1. Generator Name: Schnitzer Steel Products Co.
2. SIC Code: NA
3. Facility Street Address: 12005 North Burgard Road
4. Phone: (503) 286-6976
5. Facility City: Portland, Oregon
6. State/Province: Oregon
7. Zip/Postal Code:
8. Generator USEPA/Federal ID #: NA
9. County: Multnomah
10. State/Province ID #: NA
11. Customer Name: Schnitzer Steel Products Co.
12. Customer Phone: ( )
13. Customer Contact: Jim Jakubiak
14. Customer Fax:

B. Waste Stream Information

1. Name of Waste: Petroleum impacted Soil
2. State Waste Code:
3. Process Generating Waste: Drippage from vehicles
4. Estimated Annual Volume: One-time <15 ☒Tons ☐Yards ☐Other (specify)
5. Personal Protective Equipment Requirements: For hydrocarbons as necessary
6. Transporter/Transfer Station: Waste Transportation Services
7. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (If no, skip 8, 9, & 10)..... ☐YES ☒NO
8. Reportable Quantity (lbs.; kgs.): —
9. Hazard Class/ID #: —
10. USDOT Shipping Name: —

☐Check if additional information is attached. Indicate the number of attached pages:

C. Generator's Certification (Please check appropriate responses, sign, and date below.)

1. Is the waste represented by this waste profile sheet a "Hazardous Waste," as defined by USEPA, Canadian, Mexican and/or state/province regulation, in the location where generated or ultimately managed?..... ☐YES ☒NO
2. Does the waste represented by this waste profile sheet contain regulated radioactive material or regulated concentrations of Polychlorinated Biphenyls (PCBs)?..... ☐YES ☒NO
3. Does this waste profile sheet and all attachments contain true and accurate descriptions of the waste material?..... ☒YES ☐NO
4. Has all relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste been disclosed to the Contractor?..... ☒YES ☐NO
5. Is the analytical data attached hereto derived from testing a representative sample in accordance with 40 CFR 261.20 (c) or equivalent rules?..... ☐NA ☒YES ☐NO
6. Will all changes that occur in the character of the waste be identified by the Generator and disclosed to the Contractor prior to providing the waste to the Contractor?..... ☒YES ☐NO

Certification Signature: J. Jakubiak Title: Environmental Administrator

Name (Type or Print): Jim Jakubiak Company Name: Schnitzer Steel Products Co. Date: 6/26/99

D. WMI Management's Decision — FOR WMI USE ONLY

1. Management Method: ☒Landfill ☐Solidify ☐Bioremediation ☐Other (Specify)
2. Proposed Ultimate Management Facility:
3. Hours of acceptance: ☐NA
4. Supplemental Information:
5. Precautions, Special Handling Procedures, or Limitations on Approval:

Special Waste Decision..... ☐Approved ☐Disapproved

Salesperson's Signature: Date:

Division Approval Signature (Optional): Date:

Special Waste Approvals Person Signature: Date:

Form WMI-4152

SCHN00261570

GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Instructions

Information on this form is used to determine if the waste may be transported, treated, stored or disposed in a legal, safe, and environmentally sound manner. This information will be maintained in strict confidence. Answers must be provided for section A, B, and C and must be printed in ink or typed. A response of "None" or "NA" (not applicable) can be made if appropriate. If additional space is needed, indicate on the form that additional information is attached, and attach the information to the Generator's Waste Profile Sheet. If you have questions concerning this form, please contact the Contractor's sales representative.

A. Waste Generator Information

1. **Generator Name** - Enter the name of the facility where the waste is generated.
2. **SIC Code** - Enter the four digit Standard Industrial Classification Code for the facility where the waste is generated.
3. **Facility Street Address** - Enter the street address (not P.O. Box) of the facility where the waste is generated.
4. **Phone** - Enter Generator's area code and phone number.
5. **Facility City** - Enter the city where the waste is generated.
6. **State/Province** - Enter the state or province where the waste is generated.
7. **Zip/Postal Code** - Enter the generating facility's zip or postal code.
8. **Generator USEPA/Federal ID #** - Enter the identification number issued by the USEPA, Canadian, or Mexican Federal Agency to the facility generating the waste (if applicable).
9. **County** - Enter the county where the waste is generated.
10. **State/Province ID #** - Enter the identification number issued by the state or province to the facility generating the waste (if applicable).
11. **Customer Name** - Entity that the Contractor is directly working with regarding the represented waste stream. If the same as the Generator, mark "Same as Above".
12. **Customer Phone** - Enter technical contact's area code and telephone number.
13. **Customer Contact** - Enter the name of the person who can answer technical questions about the waste.
14. **Customer Fax** - Area code and facsimile number for the customer.

B. Waste Stream Information

1. **Name of Waste** - Enter a name generally descriptive of this waste (e.g., paint sludge, fluorescent bulbs).
2. **State Waste Code** - If applicable, the code assigned to the specific waste stream by the state regulatory agency.
3. **Process Generating Waste** - Describe the process generating the waste in detail. List the specific process/operation or source that generates the waste (e.g., incineration of municipal refuse, asbestos removal, wastewater treatment, building maintenance).
   At a minimum, the Generator should answer the following questions in determining the process generating the waste.
   - What chemicals are stored and/or used at the facility?
   - Is the waste generated from the production/manufacturing of any of the following industries: wood preservation; inorganic pigments; organic pigments; pesticides; explosives; petroleum refining; iron and steel, copper, lead or zinc production?
   - Is the waste a result from degreasing, solvent parts cleaning, recovery/reclaiming of solvents (bottoms), wastewater treatment (sludges), or electroplating?
4. **Estimated Annual Volume** - Approximate volume in tons, yards, or other (e.g., drums, gallons) that will be received by the ultimate management facility. This volume amount is not intended for use in complying with state and/or permit restrictions.
5. **Personal Protective Equipment Requirements** - All personal protective equipment that is necessary to safely manage the waste stream.
6. **Transporter/Transfer Station** - Transporter and/or transfer station name.
7. **Is this a U.S. Department of Transportation (USDOT) hazardous material?**-Choose the appropriate response: yes or no.
8. **Reportable Quantity (lbs.; kgs.)** - If the answer to 7 is yes, enter the Reportable Quantity (RQ) established by 40 CFR 302.4 or equivalent Canadian or Mexican regulation for this waste. Indicate the appropriate units for the RQ.
9. **Hazard Class/ID #** - If the answer to 7 is yes, indicate the proper USDOT hazard class and identification number.
10. **USDOT Shipping Name** - If the answer to 7 is yes, enter the proper USDOT shipping name for the waste.

C. Generator's Certification

Indicate the appropriate response to questions/statements 1, 2, 3, 4, 5, and 6. By signing this Generator's Waste Profile Sheet, the Generator certifies the responses are true and accurate with respect to the waste stream(s) listed.

Certification Signature - Signature of an authorized employee of the Generator or representative of the generator if authorized in writing by the generator.
Title - Enter Employee's title.
Name - Print or Type Employee's name.
Company Name - Company employing the person certifying the Generator's Waste Profile Sheet.
Date - Enter the date this Generator's Waste Profile Sheet is signed.

D. WMI Management's Decision — FOR WMI USE ONLY

To be completed by WMI

WPS #_____

BILLING ADDRESS:

Schnitzer Steel Products, Co.
COMPANY NAME

P.O. Box 10047
BILLING ADDRESS

Portland, Oregon 97296-0047
CITY, STATE, ZIP

Jim Jakubiak (503) 286-6976
CONTACT NAME PHONE NUMBER

CHEMICAL COMPOSITION:

CONSTITUENT	CONCENTRATION RANGE
Heavy Oil Range Hydrocarbons	50mg/kg – 354mg/kg

PLEASE ATTACH ANALYTICAL OR MSD SHEETS Attached 6/26/99 JJ

CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST
A WASTE MANAGEMENT COMPANY

17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2643
(541) 454-3227 Fax

August 4, 1999

SCHNITZER STEEL PRODUCTS INC
PO BOX 10047
PORTLAND, OR 97296-0047

RE: CONFIRMATION PERMIT

ATTENTION: JAMES JAKUBIAK

We are pleased to confirm Waste Management's approval of your waste material as described below. Waste Management based upon the information provided by you prepared the attached profile for the waste material. It is important that no changes be made to the profile without Waste Management's consent. If the profile meets with your approval, then you are ready to schedule shipment of your waste.

Profile Number: 545530
*Approved Management Facility: **COLUMBIA RIDGE LANDFILL***
Disposal Method: ADC

The newly formed Waste Management is working hard to provide an increased level of service to our customers. We are asking that when you ship your material, a copy of the attached form; titled "PERMIT" is sent with your Manifest or Bill of Lading. This shows that you have preapproval and pricing-contracting is in place. This will help us in processing your load in the most efficient manner.

All waste coming to Oregon Waste systems or Chemical Waste Management must be scheduled, twenty-four hours in advance, with Greg Marrett. If you are unable to reach Greg you can contact our customer service representative Linda Wimmer. Unscheduled loads could be delayed several hours or even rejected.

If you have any questions we have listed contact people you may use in addition to your Sales Representative

Greg Marrett: Scheduling & Transportation 541-454-3220
Linda Wimmer: Customer Service Pricing 800-843-3604
Leah Shannon: Customer Service & Approvals 541-454-3289
Gary Fisher: Operational Assistance 541-454-3234

Thank you,

Leah Shannon

Leah Shannon
Waste Management

PERMIT

COLUMBIA RIDGE LANDFILL & RECYCLE CENTER
18177 CEDAR SPRINGS LANE
ARLINGTON, OR 97812 PHONE: 541-454-2030

PERMIT TO DISPOSE OF NONHAZARDOUS MATERIALS

GENERATOR: SCHNITZER STEEL PRODUCTS INC

DESCRIPTION: PETROLEUM IMPACTED SOIL

QUANTITY: <15 TONS – ONE TIME

PROFILE: 545530

EXPIRES: 7-27-00

LOCATION: 12005 N BURGARD ST
PORTLAND, OR 97203-6422
CONTACT: JAMES JAKUBIAK

DATE: 7-27-99

TYPE OF DISPOSAL: ADC

SPECIAL HANDLING:

BILLING: SCHNITZER STEEL PRODUCTS INC
PO BOX 10047
PORTLAND, OR 97296-0047

APPROVED: LEAH SHANNON

DATE: 7-27-99

WASTE MANAGEMENT

EACH DRIVER MUST Show (A COPY OF THIS PERMIT).

WASTE MANAGEMENT, INC.

7227 N.E. 55th Avenue
Portland, OR 97218
Phone: 503-493-7825 Fax: 503-493-7822

FAX COVER PAGE

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Date: Aug. 4, 1999

Attention: Jim Jakubiak

Company: Schnitzer Steel

Fax number: 286-6948

From: Tracy Breinlinger – Customer Service

No. of Pages (including cover sheet): 3

Comments: Confirmation letter & permit for waste profile # 545530.

Please contact Julie Valdez to schedule loads into the facility 541-454-3310

Any other questions, please call.

Tracy

If you do not receive all of the pages or it is illegible, please call 503-493-7825.

SCHN00261575

Wilke Site – 1 Rolloff

CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST
A WASTE MANAGEMENT COMPANY

17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2643
(541) 454-3227 Fax

August 16, 1999

SCHNITZER STEEL PRODUCTS INC
12005 N BURGARD ST
PORTLAND, OR 97203-6422

RE: CONFIRMATION PERMIT

ATTENTION: JIM JAKUBIAK

We are pleased to confirm Waste Management's approval of your waste material as described below. Waste Management based upon the information provided by you prepared the attached profile for the waste material. It is important that no changes be made to the profile without Waste Management's consent. If the profile meets with your approval, then you are ready to schedule shipment of your waste.

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Approved Management Facility: ***COLUMBIA RIDGE LANDFILL***
Disposal Method: ADC

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Greg Marrett: Scheduling & Transportation 541-454-3220
Linda Wimmer: Customer Service Pricing 800-843-3604
Leah Shannon: Customer Service & Approvals 541-454-3289
Gary Fisher: Operational Assistance 541-454-3234

Thank you,

Leah Shannon

Leah Shannon
Waste Management

PERMIT

COLUMBIA RIDGE LANDFILL & RECYCLE CENTER
18177 CEDAR SPRINGS LANE
ARLINGTON, OR 97812 *PHONE: 541-454-2030*

PERMIT TO DISPOSE OF NONHAZARDOUS MATERIALS

GENERATOR: SCHNITZER STEEL PRODUCTS INC

DESCRIPTION: PETROLEUM IMPACTED SOIL ***QUANTITY: 15 TONS – ONE TIME***	***PROFILE: 545530*** ***EXPIRES: 7-27-00***
LOCATION: 12005 N BURGARD ST ***PORTLAND, OR 97203-6422*** ***CONTACT: JIM JAKUBIAK***	***DATE: 7-27-99***

TYPE OF DISPOSAL: ADC
SPECIAL HANDLING:
BILLING: SCHNITZER STEEL PRODUCTS CO ***PO BOX 10047*** ***PORTLAND, OR 97296-0047***

APPROVED: LEAH SHANNON	***DATE: 7-27-99***

WASTE MANAGEMENT

EACH DRIVER MUST Show (A COPY OF THIS PERMIT).

SCHN00261580

Waste Management, Inc.

Date Printed 08/16/99

GENERATOR'S WASTE PROFILE SHEET

Profile # CRL 545530

(_) Check here if this is a Recertification LOCATION OF ORIGINAL Columbia Ridge Landfill

GENERAL INFORMATION

1. Generator Name: SCHNITZER STEEL PRODUCTS INC Generator USEPA ID: ORD099155574

2. Generator Address: 12005 N BURGARD ST Billing Address: SCHNITZER STEEL PRODUCTS CO
(_) Same
PO BOX 10047
PORTLAND OR 97203-6422
PORTLAND OR 97296-0047

3. Technical Contact/Phone: JIM JAKUBIAK 503/286-6976

4. Alternate Contact/Phone: Billing Contact/Phone: JIM JAKUBIAK 503/286-6976

PROPERTIES AND COMPOSITION

5. Process Generating Waste: DRIPPAGE FROM VEHICLES

6. Waste Name: PETROLEUM IMPACTED SOIL

7A. Is this a USEPA hazardous waste (40 CFR Part 261)? Yes (_) No (X)
B. Identify ALL USEPA listed and characteristic waste code numbers (D,F,K,P,U):
State Waste Codes:

8. Physical State @ 70F: A. Solid(X) Liquid(_) Both(_) Gas(_) B. Single Layer (X) Multilayer (_) C. Free liq. range 0 to 0%

9A. pH: Range _____ or Not applicable (X) B. Strong Odor (_);describe

10. Liquid Flash Point: < 73F (_) 73-99F (_) 100-139F (_) 140-199F (_) >= 200F (_) N.A. (X) Closed Cup (X) Open Cup (_)

11. CHEMICAL COMPOSITION: List ALL constituents (incl. halogenated organics) present in any concentration and forward analysis

Constituents	Range	Unit Description
INERTS	50 to 354	MG/KG
HEAVY OIL RANGE HYDROCARBONS	to	
COMMENTS	to	
ADC	to	
** 7-27-00 **	to	
	to	
TOTAL COMPOSITION (MUST EQUAL OR EXCEED 100%):		

12. OTHER: PCBs if yes, concentration _ _____ ppm, PCBs regulated by 40 CFR 761 (_). Pyrophoric (_) Explosive (_) Radioactive (_) Benzene if yes, concentration _ _____ ppm. NESHAP (_) Shock Sensitive (_) Oxidizer (_) Carcinogen (_) Infectious (_) Other _____

13. If waste subject to the land ban & meets treatment standards, check here: _ & supply analytical results where applicable.

SHIPPING INFORMATION

14. PACKAGING: Bulk Solid (X) Bulk Liquid (_) Drum (_) Type/Size: TONS Other <15

15. ANTICIPATED ANNUAL VOLUME: 15 Units: TONS Shipping Frequency: ONE TIME

SAMPLING INFORMATION Sample Tracking Number: 4934381

16a. Sample source (drum, lagoon, pond, tank, vat, etc.):

Date Sampled: _____ Sampler's Name/Company:

16b. Generator's Agent Supervising Sampling: 17. (_) No sample required (See instructions.)

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize WMI to obtain a sample from any waste shipment for purposes of recertification.

Signature on original profile 545530	JIM JAKUBVIAK	ENV ADMN	6/26/99
Signature		Name and Title	Date

SCHN00261581

Date Printed 08/16/99

Profile #
CRL 545530

18. This is a Nonwastewater.

19. If this waste is subject to any California list restrictions enter the letter from below (either A, B.1 or B.2) next to each restriction that is applicable:

___ HOCs, ___ PCBs, ___ Acid, ___ Metals, ___ Cyanides

20. Identify ALL Characteristic and Listed USEPA hazardous waste numbers that apply (as defined by 40 CFR 261). For each waste number, identify the subcategory (as applicable, check none, or write in the description from 40 CFR 268.41, 268.42, and 268.43).

REF #	A. US EPA HAZARDOUS WASTE CODE(S)	B. SUBCATEGORY Enter the subcategory description. If not applicable, simply check none		C. APPLICABLE TREATMENT STANDARDS			D. HOW MUST THE WASTE BE MANAGED?
				PERFORMANCE-BASED: Check as applicable		SPECIFIED TECHNOLOGY: If applicable enter the 40 CFR 268.42 table 1 treatment code(s)	
		DESCRIPTION	NONE	268.41(a)	268.43(a)	268.42	Enter letter from below
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

Management under the land disposal restrictions:

A. RESTRICTED WASTE REQUIRES TREATMENT

B.1 RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

B.2 RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)

B.3 GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS

C. RESTRICTED WASTE SUBJECT TO A VARIANCE

D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT

E. NOT CURRENTLY SUBJECT TO LAND DISPOSAL RESTRICTIONS

21. Is this waste a soil or debris? No: _ Yes, Soil: X Yes, Debris: _

22. Specific Gravity Range: _____ to _____

23. Indicate the range of each: Units

Cyanides: _ None to _____ _____ Type (free, total, amenable, etc.) _____

Cyanides: _ None to _____ _____ Type (free, total, amenable, etc.) _____

Sulfides: _ None to _____ _____ Type _____

Optional
Phenolics: _ None to _____ _____

24. Identify the waste color VARIES , DOT physical state Solid .

and physical appearance SOLID

SCHN00261582

Date Printed 08/16/99

Profile #
CRL 545530

25. COMPLETE ONLY FOR WASTES INTENDED FOR FUELS OR INCINERATION			26. RECLAMATION, FUELS or INCINERATION PARAMETERS (Provide if information is available)
	TOTAL		RANGE
Beryllium as Be	_____	ppm	A. Heat Value (Btu/lb): _____-_____
Potassium as K	_____	ppm	B. Water: _____
Sodium as Na	_____	ppm	C. Viscosity (cps): _____@_____F _ 100 F _ 150 F
Bromine as Br	_____	%	D. Ash: _____ %
Chlorine as Cl	_____	%	E. Settleable solids: _____ %
Fluorine as F	_____	%	F. Vapor Pressure @ STP (mm/Hg): ____
Sulfur as S	_____	%	G. Is this waste a pumpable liquid? Yes _ No _
			H. Can this waste be heated to improve flow? Yes _ No _
			I. Is this waste soluble in water? Yes _ No _
			J. Particle size: Will the solid portion of this waste pass through a 1/8 inch screen? Yes _ No _

27. TRANSPORTATION INFORMATION

A. Is this a DOT Hazardous Material? Yes _ No X

B. Proper Shipping Name. . . . . : NON-REGULATED MATERIAL

and Additional Description if required: _____

C. DOT Regulations: _____ Hazard Class: ____ _____ I.D. _____ Packing Group: ___

D. CERCLA Reportable Quantity (RQ) and units (Lb, Kg): _____

E. Non-Bulk code ___ Bulk code ___

F. Special Provisions ___ ___ ___ ___ ___ ___

G. Labels Required _____ _____ _____

28. SPECIAL HANDLING INFORMATION

_____

_____

_____

_____

_ Material Safety Data Sheets Attached

29. OTHER INFORMATION

INCEDENTIAL DRIPPAGE FROM CARS; NO METALS ASSOC- IATED W/PROCESS OF CRUSHING.

_____

_____

_____

_____

30. WASTE MANAGEMENT CERTIFICATION

Waste Management, Inc. has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile.

SCHN00261583

Date Printed 08/16/99

Profile #
CRL 545530

31. OTHER HAZARDOUS CONSTITUENTS Indicate if the waste contains any of the following.

METALS	TCLP Information: Check only ONE for each constituent Use units: ppm, mg/l				TCLP Data	TCA or TOTAL Use units: ppm, mg/l, mg/kg or percent			
						California List			
	Less Than	TC Regulated Level	Equal or More	Waste No.	TCLP Actual	Less Than	Regulated Level	Equal or More	Actual
Arsenic as As	X	5.0 mg/l		D004			500 mg/l		
Barium as Ba	X	100.0 mg/l		D005					
Cadmium as Cd	X	1.0 mg/l		D006			100 mg/l		
Chromium tot Cr	X	5.0 mg/l		D007					
Lead as Pb	X	5.0 mg/l		D008			500 mg/l		
Mercury as Hg	X	.2 mg/l		D009			20 mg/l		
Selenium as Se	X	1.0 mg/l		D010			100 mg/l		
Silver as Ag	X	5.0 mg/l		D011					
Nickel as Ni							134 mg/l		
Thallium as Tl							130 mg/l		
Chromium Hex							500 mg/l		
Antimony									
Beryllium									
Copper									
Vanadium									
Zinc									

SCHN00261584

Date Printed 08/16/99

Profile #
CRL 545530

32. OTHER HAZARDOUS CONSTITUENTS Indicate if the waste contains any of the following.

ORGANICS	TCLP Information: Check only ONE for each constituent				TCLP Data	TCA or TOTAL Use units: ppm, mg/l or %
	Less Than	Regulated Level	Equal or More	Waste No.	TCLP Analytical Test Results Use units: ppm or mg/l	
Benzene	X	0.5 mg/l		D018		
Carbon Tetrachloride	X	0.5 mg/l		D019		
Chlordane	X	0.03 mg/l		D020		
Chlorobenzene	X	100.0 mg/l		D021		
Chloroform	X	6.0 mg/l		D022		
m-Cresol	X	200 mg/l		D024		
o-Cresol	X	200.0 mg/l		D023		
p-Cresol	X	200.0 mg/l		D025		
Cresol	X	200.0 mg/l		D026		
2,4-D	X	10.0 mg/l		D016		
1,4 Dichlorobenzene	X	7.5 mg/l		D027		
1,2-Dichloroethane	X	0.5 mg/l		D028		
1,1-Dichloroethylene	X	0.7 mg/l		D029		
2,4-Dinitrotoluene	X	0.13 mg/l		D030		
Endrin	X	.02 mg/l		D012		
Heptachlor, & Hydroxide	X	0.008 mg/l		D031		
Hexachloro-1,3 Butadiene	X	0.5 mg/l		D033		
Hexachlorobenzene	X	0.13 mg/l		D032		
Hexachloroethane	X	3.0 mg/l		D034		
Lindane	X	0.4 mg/l		D013		
Methoxychlor	X	10.0 mg/l		D014		
Methyl Ethyl Ketone	X	200.0 mg/l		D035		
Nitrobenzene	X	2.0 mg/l		D036		
Pentachlorophenol	X	100.0 mg/l		D037		
Pyridine	X	5.0 mg/l		D038		
Tetrachloroethylene	X	0.7 mg/l		D039		
Toxaphene	X	0.5 mg/l		D015		
2,4,5-TP Silvex	X	1.0 mg/l		D017		
Trichloroethylene	X	0.5 mg/l		D040		
2,4,5-Trichlorophenol	X	400.0 mg/l		D041		
2,4,6-Trichlorophenol	X	2.0 mg/l		D042		
Vinyl Chloride	X	0.2 mg/l		D043		

SCHN00261585

Date Printed 08/16/99

Profile #
CRL 545530

MISCELLANEOUS PROFILE FIELDS

Selling Region Lab: CWL
Master Profile No.: _____
Sales Office. . . : PDX
Location Orig. . .: CRL
Profile Expires . : 7/27/00
Approved. . . . . : 7/27/99
Signed Profile Present: Y Change Pending: _ Waste Status: A
Site (DCS) Status: I
Prof. Tracking No: 4934381

Fuels Approval.: _
Pumpable Liquid Exact: ___ % OR Range: ___ - ___ %
Type of Pump. .: _____
Additional Anticipated Vol: _____ Per: _ Unit Code/Des: ___ _____

Handling Codes: __ _____ __ _____
__ _____ __ _____
__ _____ __ _____

EPA Data: Status Code: U Tax Code. .: _
Permit No: _____ Expr. Date.: _____ Volume. . .: _____
Certificate of Destruction or Disposal Required ? _ Project # : _____
DOT Properties: Inhalation: _ Dermal: _ Oral: _ Flammable: _ Health: _

Percent Taxable: _____ No. of Labels. . .: __
Transhipp Dest .: ___ Download Generator: 1392675
Material Class.: _ DCS Generator #...: 9999999999
Treatment Codes: __ __ __ __ __ __
Process Codes .: 3P CRL ___ ___ ___ ___ ___ ___ ___ ___
Schedule Category : ____
Schedule Interval : _____
Listed Solvent Waste: _ Hal. Org. Compounds.: _ RCRA Reactive. . . .: _
Etiologic. . . . . .: _ Water Reactive . . .: _ Pesticide Mfg. Waste: _
Ignition Screen : ___ Gas Evolution : ___ Wet Zone . . . . . .: _
Self-heating cube sz ____ Vapor Concentration _____ Boiling Point F ___
Is Gas Ignitable? _ Corrosive to Steel or Aluminum _ Organic Peroxide _
Chemical Family Name _____

GENERATOR FROM PAGE 1

Business Name	USEPA ID	Rltn	Contract in Place	at	Expires on	Evergreen Contract
SCHNITZER STEEL PRODUCTS INC	ORD099155574	G	_	___	_____	_

ADDITIONAL BUSINESSES

Business Name	USEPA ID	Rltn	Contract in Place	at	Expires on	Evergreen Contract
SCHNITZER STEEL PRODUCTS CO	N/A	I	_	___	_____	_

ADDITIONAL PROFILE COMMENTS

Cat	Comment	Cat	Comment

SUPPLEMENTAL FIELDS

Field	Value

Date Printed 8/16/99

Profile Change History

Profile #
CRL 545530

This section lists comments describing changes made to the profile.

Profile Change Comments	Date	User
CWL/545530 Entire profile copied to CRL/545530	7/29/99	WM0225NMH

Columbia Ridge Landfill & Recycling Center
18177 Cedar Springs Lane
Arlington, Or 97812
Fax # : (541) 454 - 3343
Phone#: (541) 454 - 2030

Special Waste Technician Ext. 318 (Brenda Ogren)
Special Waste Billing Dpt. Ext. 310 (Julie Valdez)
CRLRC Scales Ext. 302 (Angela Timmerman)
Accounts Receivable Ext. 338 (Becky Hansford)

DATE: 2/21/01

TO: Jim Jakubiak (503)-286-0948

FROM: Julie Valdez

MESSAGE: copy of scale ticket and bill of lading.

PAGES: 3 (INCLUDING THIS ONE)

Oregon Waste Systems
A Waste Management Company
18177 Cedar Springs Lane
Arlington, Oregon 97812
(541) 454-2030

Nº 350628

DATE:/TIME: TIME 03:22 PM 16 AUG 99

LOAD DATE:

CUSTOMER NAME: WTS/Schnitzer

PROFILE NUMBER: 565530

TRUCK NUMBER: TRUCK NO K1

TRAILER/CONTAINER NUMBER: 026044

SEAL NUMBER:

CUSTOMER INVOICE NO.: 50621

GROSS WEIGHT: GROSS 63960 LB

TARE WEIGHT-TRACTOR:

TARE WGT.-TRAILER/CONTAINER: W TARE 41920 LB

NET WEIGHT: NET 22040 LB

GATEHOUSE: Greg

DRIVER:

TRAIN ID: ORIGIN:

WASTE TYPE: petrol impacted soil

DISPOSAL: CM (DC) BU GRID SEGREGATE

REMARKS:

HAULER: WTS

SCHN00261589

Oregon Waste Systems № 50621

Portland Office (800) 843-3604 Seattle Office (800) 421-9673

BILL OF LADING

Generator Name & Loading Address:
Schnitzer Steel
Wilki Site
Portland, OR

Contact Person: Jim

Telephone Number:

Waste Profile #: 545530

Waste Type: Soil

Estimated Volume: 15 (tons)

Special Handling Instructions:

Acknowledgement of Loading: (Customer, Consultant, On Site Contractor, or Contractors Representative)

Name (Please Print) Signature Date

Rail Facility Name & Address:

Telephone #:

Disposal Facility Name & Address:

Columbia Ridge Landfill & Recycling Facility
18177 Cedar Springs Lane
Arlington, OR 97812

Telephone #: (503) 454-2030

Transporter Name & Address:
Waste Transportation Services
PO Box 61778
Vancouver, WA 98666

Telephone #: 888-286-2130

Truck/Chassis # K-1 /

Container # CETU026044

Container Inspection (Upon pick-up)

- ☐ Tarp and tarp accessories are in good condition
- ☐ Door and door ratchets are secured tightly
- ☐ Container is empty and clean

Comments:

It is the transporters responsibility to install plastic liner (if required) and insure that tarps and tarp bows have been removed leaving the entire container/truck free of obstructions prior to loading. After loading, the transporter is to clean and remove all debris on the outside of the container/truck, replace the roof bows, and secure the tarp prior to leaving the job site.

Ron Lunceford [signature]

Driver Name (Please Print) Signature Date

Remarks:

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

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

DISCHARGE AUTHORIZATION

BATCH DISCHARGE

Company Name:	Schnitzer Investment
Site:	Premier Edible Oils Corporation
Facility Address:	10400 N Burgard Way Portland, Oregon 97203
SIC Code (primary):	2079
Industrial User Classification:	Not Applicable
Business Activity:	Edible Oils
Process Wastewater(s):	Tank farm stormwater acccumulation
Discharge Authorization Number:	DABD-0002
Expiration Date:	December 31, 2009

Authorized Discharge:

Effective with the date signed, Schnitzer Investment is authorized to discharge only domestic wastewater and the non-domestic wastewater(s) associated with the process wastewater(s) listed above to the City of Portland's sewer system, at the former Premier Edible Oil Corporation site. All other discharge is prohibited without prior authorization. This Discharge Authorization is issued based on information submitted to the City pursuant to a request for batch discharges, and other technical information.

Significant changes in discharge characteristics, discharge volume, or discharge frequency will result in a review of this authorization.

For the City of Portland:

Kelly D. Hendryx
Environmental Services Supervisor

2/28/00
Date

For the IU:

James L. Jakubiak
Representative's signature

James L. Jakubiak
Representative's name (print)

March 15, 2000
Date

\\ariel\grp102\customer\iu-p\premier edible oils\adcm\dabd_premier.doc

SCHN00261605

d. City Limits (Administrative Rules)

Pollutant of Concern	Limit
Oil & Grease non-polar	110 mg/liter

2. **Compliance Actions**

For purposes of complying with applicable discharge limitations, the authorized discharger shall minimize the discharge of Pollutants of Concern to the City of Portland's sewer system. This shall be accomplished by implementing specific and/or general Best Management Practices (BMPs). Compliance with the BMP(s) shall be considered as compliance with applicable discharge limitations.

SECTION B. General Conditions

1. ADMINISTRATIVE REQUIREMENTS

a. **Non-Transferability**
This Discharge Authorization is not transferable. In the event of sale of the facility, the new owners shall contact the City and request the issuance of a new Discharge Authorization

b. **Property Rights or Privileges**
The issuance of this authorization does not convey any property rights in either real or personal property, or any exclusive privileges; it does not authorize any injury to private property or any invasion of personal rights; and it does not authorize any infringements of federal, state, or local laws or regulations.

c. **Liability**
The City of Portland, its officers, agents or employees shall not sustain any liability due to the issuance of this permit or the construction or maintenance of facilities resulting from this discharge authorization.

d. **Severability**
The provisions of this discharge authorization are severable, and if any provision of this discharge authorization or the application of any provision of this discharge authorization to any circumstance is held invalid, the application of such provision to the other circumstances and the remainder of this discharge authorization shall not be affected.

e. **Records Retention**
The authorized discharger for a minimum of three years shall retain all records of activities to comply with this Discharge Authorization. This retention period shall be extended during the course of any unresolved litigation pertaining to the discharge of pollutants by the authorized discharger or whenever it is requested by the City.

f. **Chemical Storage**
Chemicals shall be stored in a manner that will prevent the entry of these substances into the sanitary, combined, or storm sewer system or waters of the state.

SCHN00261606

d. **Plant Closure**
In the event the authorized discharger plans to cease operations at the present business location, and not to relocate within the City of Portland's jurisdiction, the authorized discharger shall inform this office, in writing, 60 days prior to plant closure.

e. **Change of Ownership**
In case of a change in ownership, notify the City with the change together with the name, address and phone/fax numbers of the new owners.

f. **Certification**
Legible copies of all applications, reports, and information submitted to the City shall be signed and certified as follows:

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.

g. The City may be notified at 503-823-5320 (telephone), 503-823-5559 (facsimile), or write:

Alternative Discharge Control Program - Batches
Industrial Source Control Division
Bureau of Environmental Services
6543 N. Burlington Avenue
Portland, Oregon 97203-5452

DISCHARGE AUTHORIZATION – BATCH DISCHARGE REPORT

Due by January 31st of the following year.

Company: Scnitzer Investment
Site: Premier Edible Oils Corporation
Discharge Authoriztion #: DABD-0002

For the calendar year:

2000 ☒	2003 ☐	2006 ☐	2009 ☐
2001 ☐	2004 ☐	2007 ☐	____ ☐
2002 ☐	2005 ☐	2008 ☐	

Date	Type of discharge	Start time	End time	Volume (gallons)	Weather Wet/Dry	Discharged by	Best Management Practices Oil Sheen, Oil Absorbent Pillow

All discharges comply with the terms, conditions, and stipulations specified in the Discharge Authorization. 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 for knowing violations.

Signature: _____ **Date:** _____ **Page** ____ **of** ____

Mail to: Alternative Discharge Control Program – Batches; Industrial Source Control Division; Bureau of Environmental Services; 6543 N. Burlington Avenue; Portland, Oregon 97203-5452; or fax to: (503) 823-5559.

January 31, 2002

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Sanitary Sewer Discharge Report – Discharge Authorization DABD - 0002
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the discharge report for the above-referenced facility for the calendar year 2001. We did not discharge storm water to the sanitary sewer in 2001.

Please call me at (503) 286-6976 if you have questions or comments.

Sincerely,
Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Cc: Tom Zelenka, Schnitzer Group

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

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

January 2, 2001

Jim Jakubiak
Schnitzer Investment Corp
Premier Edible Oil Corp.
PO Box 10047
Portland, OR 97296-0047

RE: DABA 0002

Dear Mr. Jakubiak,

This is a reminder to you that your Discharge Authorization – Batch Discharge Log Report for January 1, 2001 through December 30, 2001, is due by January 30, 2002.

If you have questions regarding this report, please refer to your Discharge Authorization Batch Discharge contract, or contact me at (503) 823-7859.

Yours sincerely,

Victoria Cloudy Sears
Environmental Tech I

SCHNITZER INVESTMENT CORP.
2501 S.E. Columbia Way Vancouver, Washington 98661
Voice (360) 693-3644, (503) 224-9900 FAX (360) 693-1833

January 31, 2002

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Sanitary Sewer Discharge Report – Discharge Authorization DABD - 0002
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the discharge report for the above-referenced facility for the calendar year 2001. We did not discharge storm water to the sanitary sewer in 2001.

Please call me at (503) 286-6976 if you have questions or comments.

Sincerely,
Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Cc: Tom Zelenka, Schnitzer Group

Printed on recycled paper

DISCHARGE AUTHORIZATION – BATCH DISCHARGE REPORT

Due by January 31st of the following year.

Company: Scnitzer Investment
Site: Premier Edible Oils Corporation
Discharge Authoriztion #: DABD-0002

For the calendar year:

2000 ☐	2003 ☐	2006 ☐	2009 ☐
2001 ☒	2004 ☐	2007 ☐	___ ☐
2002 ☐	2005 ☐	2008 ☐	

Date	Type of discharge	Start time	End time	Volume (gallons)	Weather Wet/Dry	Discharged by	Best Management Practices Oil Sheen, Oil Absorbent Pillow

No Discharge for Calendar Year 2001

All discharges comply with the terms, conditions, and stipulations specified in the Discharge Authorization. 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 for knowing violations.

Signature: James L Schnitzer Date: January 31, 2002 Page 1 of 1

Mail to: Alternative Discharge Control Program – Batches; Industrial Source Control Division; Bureau of Environmental Services; 6543 N. Burlington Avenue; Portland, Oregon 97203-5452; or fax to: (503) 823-5559.

SCHN00261612

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

January 31, 2001

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Sanitary Sewer Discharge Report – Discharge Authorization DABD-0002
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the discharge report for the above-referenced facility for the calendar year 2000. We did not discharge storm water to the sanitary sewer in 2000.

Please call me at (503) 286-6976 if you have questions or comments.

Sincerely,
Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Cc: Tom Zelenka, Schnitzer Group

Printed on recycled paper

DISCHARGE AUTHORIZATION – BATCH DISCHARGE REPORT

Due by January 31st of the following year.

Company: Scnitzer Investment
Site: Premier Edible Oils Corporation
Discharge Authoriztion #: DABD-0002

For the calendar year:

2000 ☒	2003 ☐	2006 ☐	2009 ☐
2001 ☐	2004 ☐	2007 ☐	____ ☐
2002 ☐	2005 ☐	2008 ☐	

Date	Type of discharge	Start time	End time	Volume (gallons)	Weather Wet/Dry	Discharged by	Best Management Practices Oil Sheen, Oil Absorbent Pillow

No Discharge for calendar year 2000

All discharges comply with the terms, conditions, and stipulations specified in the Discharge Authorization. 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 for knowing violations.

Signature: James J Schmidt Date: 1-31-01 Page 1 of 1

Mail to: Alternative Discharge Control Program – Batches; Industrial Source Control Division; Bureau of Environmental Services; 6543 N. Burlington Avenue; Portland, Oregon 97203-5452; or fax to: (503) 823-5559.

SCHN00261614

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

March 15, 2000

Ms. Cloudy Sears
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Sewer Discharge Authorization – DB002
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached the signed Discharge Authorization form for the above-referenced facility. Please call me at (503) 286-6976 if you have questions or comments.

Sincerely,
Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Cc: Mr. David Ball, BES
Mr. Tom Zelenka, Schnitzer Investment Corp.

Printed on recycled paper

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

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

DISCHARGE AUTHORIZATION

BATCH DISCHARGE

Company Name:	Schnitzer Investment
Site:	Premier Edible Oils Corporation
Facility Address:	10400 N Burgard Way Portland, Oregon 97203
SIC Code (primary):	2079
Industrial User Classification:	Not Applicable
Business Activity:	Edible Oils
Process Wastewater(s):	Tank farm stormwater acccumulation
Discharge Authorization Number:	DABD-0002
Expiration Date:	December 31, 2009

Authorized Discharge:

Effective with the date signed, Schnitzer Investment is authorized to discharge only domestic wastewater and the non-domestic wastewater(s) associated with the process wastewater(s) listed above to the City of Portland's sewer system, at the former Premier Edible Oil Corporation site. All other discharge is prohibited without prior authorization. This Discharge Authorization is issued based on information submitted to the City pursuant to a request for batch discharges, and other technical information.

Significant changes in discharge characteristics, discharge volume, or discharge frequency will result in a review of this authorization.

For the City of Portland:

Kelly D. Hendryx
Environmental Services Supervisor

2/28/00
Date

For the IU:

James J. Jakubiak
Representative's signature

James C. Jakubiak
Representative's name (print)

March 15, 2000
Date

d. City Limits (Administrative Rules)

Pollutant of Concern	Limit
Oil & Grease non-polar	110 mg/liter

2. **Compliance Actions**

For purposes of complying with applicable discharge limitations, the authorized discharger shall minimize the discharge of Pollutants of Concern to the City of Portland's sewer system. This shall be accomplished by implementing specific and/or general Best Management Practices (BMPs). Compliance with the BMP(s) shall be considered as compliance with applicable discharge limitations.

SECTION B. General Conditions

1. ADMINISTRATIVE REQUIREMENTS

a. **Non-Transferability**
This Discharge Authorization is not transferable. In the event of sale of the facility, the new owners shall contact the City and request the issuance of a new Discharge Authorization

b. **Property Rights or Privileges**
The issuance of this authorization does not convey any property rights in either real or personal property, or any exclusive privileges; it does not authorize any injury to private property or any invasion of personal rights; and it does not authorize any infringements of federal, state, or local laws or regulations.

c. **Liability**
The City of Portland, its officers, agents or employees shall not sustain any liability due to the issuance of this permit or the construction or maintenance of facilities resulting from this discharge authorization.

d. **Severability**
The provisions of this discharge authorization are severable, and if any provision of this discharge authorization or the application of any provision of this discharge authorization to any circumstance is held invalid, the application of such provision to the other circumstances and the remainder of this discharge authorization shall not be affected.

e. **Records Retention**
The authorized discharger for a minimum of three years shall retain all records of activities to comply with this Discharge Authorization. This retention period shall be extended during the course of any unresolved litigation pertaining to the discharge of pollutants by the authorized discharger or whenever it is requested by the City.

f. **Chemical Storage**
Chemicals shall be stored in a manner that will prevent the entry of these substances into the sanitary, combined, or storm sewer system or waters of the state.

d. Plant Closure

In the event the authorized discharger plans to cease operations at the present business location, and not to relocate within the City of Portland's jurisdiction, the authorized discharger shall inform this office, in writing, 60 days prior to plant closure..

e. Change of Ownership

In case of a change in ownership, notify the City with the change together with the name, address and phone/fax numbers of the new owners.

f. Certification

Legible copies of all applications, reports, and information submitted to the City shall be signed and certified as follows:

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.

g. The City may be notified at 503-823-5320 (telephone), 503-823-5559 (facsimile), or write:

Alternative Discharge Control Program - Batches
Industrial Source Control Division
Bureau of Environmental Services
6543 N. Burlington Avenue
Portland, Oregon 97203-5452

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

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

February 22, 2000

Jim Jakubiak
Environmental Administrator
Schnitzer Investment Corporation
3200 N.W. Yeon Avenue
Portland, Oregon 97203

Subject: Industrial Wastewater Batch Discharges
Premier Edible Oils Corporation Site

Dear Mr. Jakubiak,

The Industrial Source Control Division has reviewed the laboratory analytical reports and discharge reports previously submitted by Schnitzer Investment, at the former Premier Edible Oils Corporation for Batch Discharges. We find the tank farm stormwater accumulation wastes have consistently met the City limits for discharge to the sanitary sewer system. Therefore, we are approving continuation of the Batch Discharges through a Discharge Authorization.

This authorization is for tank farm stormwater accumulation wastewater only. Any other wastewater will be discharged with provisions of the Batch Discharge Program.

Note that the Discharge Authorization for Batch Discharges is valid for an extended period. Discharge Reports are required annually by January 31st. Conditions of discharge will remain the same as before and comply with Chapter 17.34 of the Code of the City of Portland and the Bureau of Environmental Services' Administrative Rules (Division I). Laboratory analyses will no longer be required.

A Discharge Authorization – Batch Discharge Report is enclosed for your convenience. You may use this form, or one of your own that shows, at a minimum, the same information.

Please review and sign the document, acknowledging your agreement to the terms, and return it to this office prior to discharge. If you have any questions concerning these requirements, please contact the undersigned at (503) 823-7859, fax (503) 823-5559, or cloudys@bes.ci.portland.or.us.

Respectfully,

V. Cloudy Sears
Environmental Technician
Industrial Source Control Division

Called Cloudy Sears 3-15-2000
Only need to report yearly, Next report 2001.

S:\CUSTOMER\IU-P\PREMIER EDIBLE OILS\ADCM\DABD_COVER_PREMIER.DOC

SCHN00261619

CITY OF PORTLAND
BUREAU OF ENVIRONMENTAL SERVICES
Water Pollution Control Laboratory
Industrial Source Control Division
6543 N. Burlington Avenue
Portland, Oregon 97203-5452
503-823-5322
FAX 503-823-5559

FACSIMILE TRANSMISSION

To: Jim Jakubiak
Schnitzer Investment Corp.

From: David S. Ball
Phone: 503-823-7554
Date: 10 January, 2000

We are sending you a fax from 503-823-5559 to fax **503-323-2804**

# Sheets	Description
1	Authorization Letter
1	Total Sheets

Your company was issued a 6-month batch discharge authorization that expired on 31 December 1999. Until further notice, this facsimile extends your authorization to continue discharging previously identified process wastewater.

The Industrial Source Control Division is in the process of issuing you a Discharge Authorization – Batch Discharge. The advantages will be:

- No expiration unless the nature of the process wastewater discharged changes.
- Reporting requirements reduced to an annual report.
- Monitoring requirements reduced or eliminated.

The new authorization should be issued around 1 February 2000.

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

February 10, 2000

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1999-033 (January 2000)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of January 2000. We did not discharge storm water to the sanitary sewer in January 2000.

I have also attached a corrected version of the December 1999 sewer discharge report for your records. The cover letter was misdated at two locations.

Please call me at (503) 286-6976 if you have questions or comments.

Sincerely,
Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

CITY OF PORTLAND

BATCH DISCHARGE REPORT

Batch-1999-033

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- [X] ~~July 1999~~ January 2000
- [ ] August 1999
- [ ] September 1999
- [ ] October 1999
- [ ] November 1999
- [ ] December 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
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No Discharge

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 **Date:** 2/10/2000

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SCHN00261622

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

January 14, 2000

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1999-033 (December 1999)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of December 1999. We did not discharge storm water to the sanitary sewer during this month. Once again, we were unable to collect a discharge sample as required by a permit because we didn't discharge.

For your information, I received your facsimile transmission dated January 10, 2000, authorizing discharge for another six months. I appreciate your attention in updating the permit.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,
Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Printed on recycled paper

BATCH DISCHARGE REPORT

Batch-1999-033

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ July 1999
- ☐ August 1999
- ☐ September 1999
- ☐ October 1999
- ☐ November 1999
- ☒ December 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
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No Discharge

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

Signature: J. Jahnke **Date:** 1-14-2000

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SCHN00261624

CITY OF PORTLAND

BATCH DISCHARGE REPORT

Batch-1999-033

For City Use Only

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ ~~July 1999~~ January 2000
- ☐ August 1999
- ☐ September 1999
- ☐ October 1999
- ☐ November 1999
- ☐ December 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
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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: _____ Date: _____

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SCHN00261625

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

File

December 14, 1999

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1999-033 (November 1999)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of November 1999. We did not discharge storm water to the sanitary sewer in November 1999. Once again, we were unable to collect a discharge sample as required by the permit because we didn't discharge.

Please call me at (503) 286-6976 if you have questions or comments.

Sincerely,
Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Printed on recycled paper

CITY OF PORTLAND

BATCH DISCHARGE REPORT

For City Use Only

Batch-1999-033

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ July 1999
- ☐ August 1999
- ☐ September 1999
- ☐ October 1999
- ☑ November 1999
- ☐ December 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
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No Discharge

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 Johnlich Date: 12/14/99

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SCHN00261627

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

November 12, 1999

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1999-033 (October 1999)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of October 1999. We did not discharge storm water to the sanitary sewer in October 1999. Once again, we were unable to collect a discharge sample as required by the permit because we didn't discharge.

Please call me at (503) 286-6976 if you have questions or comments.

Sincerely,
Schnitzer Investment Corp.

J. Jakubiak

Jim Jakubiak
Environmental Administrator

Printed on recycled paper

CITY OF PORTLAND

BATCH DISCHARGE REPORT

For City Use Only

Batch-1999-033

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ July 1999
- ☐ August 1999
- ☐ September 1999
- ☐ October 1999
- ☐ November 1999
- ☐ December 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
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No discharge

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: _____ **Date:** November 12, 1999

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SCHN00261629

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

File

August 10, 1999

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1999-003 (July 1999)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of July 1999. We did not discharge storm water to the sanitary sewer in July 1999.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,
Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Printed on recycled paper

CITY OF PORTLAND

BATCH DISCHARGE REPORT

For City Use Only

Batch-1999-033

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- [x] July 1999
- [ ] August 1999
- [ ] September 1999
- [ ] October 1999
- [ ] November 1999
- [ ] December 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
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No discharge

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 Jahnke Date: 8/10/99

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SCHN00261631

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

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

16 June 1999

Mr. Jim Jakubiak
Environmental Administrator
Schnitzer Investment Corp.
3200 N.W. Yeon Avenue
P.O. Box 10047
Portland, Oregon 97296-0047

Subject: Industrial Wastewater Batch Discharge (Batch-1999-033)

Dear Mr. Jakubiak:

This letter responds to your 14 June 1999 request for frequent batch discharges from 10400 N. Burgard Way (formerly Premier Edible Oils Corp.).

The Industrial Source Control Division (ISCD) has reviewed the laboratory analytical reports provided for this type of wastewater and finds the waste meets the City's local limits for discharge to the sanitary sewer system. In order to verify that your discharges remain within the local discharge limits, the ISCD is requesting sampling and analysis of your wastewater.

This letter authorizes the periodic discharge of approximately 200 gallons of edible oil contaminated stormwater and is subject to the following stipulations:

- Parameters, listed on the attached *Monitoring and Reporting Requirements*, shall be analyzed each quarter.
- Discharge shall be to the sanitary sewer at either manhole #1 or manhole #2.
- The rate of discharge shall not exceed 50 gallons/minute.
- Discharge should occur during dry weather whenever possible. Dry weather is defined by the Oregon Department of Environmental Quality as a time it is not raining and it has not rained in the Portland metropolitan area during the previous eight (8) hours.
- This office must be notified of the dates and volumes of discharges by returning the enclosed *Batch Discharge Report* form on the schedule indicated on *Monitoring and Reporting Requirements*.

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This authorization is only for wastewater from secondary containment areas around the aboveground storage tanks for the period ending 31 December 1999. Future batch discharge authorization will be valid for six (6) months. A letter requesting a batch discharge reauthorization should be submitted before this authorization expires. The ISCD may modify or require increased monitoring and/or additional pollutants due to changes in Federal categorical or local discharge limits.

Please sign a copy of this letter acknowledging your agreement to the above-mentioned terms and return it to this office prior to the first discharge. If you have any questions concerning the above requirements, please contact the undersigned at 503-823-7554 or 503-823-5559 (facsimile).

Respectfully,

David S. Ball
Environmental Technician
Industrial Source Control Division
Bureau of Environmental Services

Agreement to above terms:

James F Jahnke
Name

Environmental Administrator
Title

6/26/99
D ate

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SCHN00261633

CITY OF PORTLAND
BUREAU OF ENVIRONMENTAL SERVICES
Water Pollution Control Laboratory
Industrial Source Control Division
6543 N. Burlington Avenue
Portland, Oregon 97203-5452
503-823-5322
FAX 503-823-5559

FACSIMILE TRANSMISSION

To: Jim Jakublak
Schnitzer Investment Corp.

From: David S. Ball
Phone: 503-823-7554
Date: 16 June, 1999

We are sending you a fax from 503-823-5559 to fax **503-323-2804**

# Sheets	Description
1	Cover Sheet
2	Authorization Letter (Batch-1999-033)
1	Monitoring and Reporting Requirements
1	Batch Discharge Report
5	Total Sheets

Hard copies of authorization letter and discharge report are being sent by U.S. Mail.

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

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

15 June 1999

Mr. Jim Jakubiak
Environmental Administrator
Schnitzer Investment Corp.
3200 N.W. Yeon Avenue
P.O. Box 10047
Portland, Oregon 97296-0047

Subject: Industrial Wastewater Batch Discharge (Batch-1999-033)

Dear Mr. Jakubiak:

This letter responds to your 14 June 1999 request for frequent batch discharges from 10400 N. Burgard Way (formerly Premier Edible Oils Corp.).

The Industrial Source Control Division (ISCD) has reviewed the laboratory analytical reports provided for this type of wastewater and finds the waste meets the City's local limits for discharge to the sanitary sewer system. In order to verify that your discharges remain within the local discharge limits, the ISCD is requesting sampling and analysis of your wastewater.

This letter authorizes the periodic discharge of approximately 200 gallons of edible oil contaminated stormwater and is subject to the following stipulations:

- Parameters, listed on the attached *Monitoring and Reporting Requirements*, shall be analyzed each quarter.
- Discharge shall be to the sanitary sewer at either manhole #1 or manhole #2.
- The rate of discharge shall not exceed 50 gallons/minute.
- Discharge should occur during dry weather whenever possible. Dry weather is defined by the Oregon Department of Environmental Quality as a time it is not raining and it has not rained in the Portland metropolitan area during the previous eight (8) hours.
- This office must be notified of the dates and volumes of discharges by returning the enclosed *Batch Discharge Report* form on the schedule indicated on *Monitoring and Reporting Requirements*.

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This authorization is only for wastewater from secondary containment areas around the aboveground storage tanks for the period ending 31 December 1999. Future batch discharge authorization will be valid for six (6) months. A letter requesting a batch discharge reauthorization should be submitted before this authorization expires. The ISCD may modify or require increased monitoring and/or additional pollutants due to changes in Federal categorical or local discharge limits.

Please sign a copy of this letter acknowledging your agreement to the above-mentioned terms and return it to this office prior to the first discharge. If you have any questions concerning the above requirements, please contact the undersigned at 503-823-7554 or 503-823-5559 (facsimile).

Respectfully,

David S. Ball

David S. Ball
Environmental Technician
Industrial Source Control Division
Bureau of Environmental Services

Agreement to above terms:

_____
Name

_____
Title

_____
Date

S:\PROJECTS\BATCHES\1999\99033LTR.DOC

CITY OF PORTLAND

MULTIPLE BATCH DISCHARGES

MONITORING AND REPORTING REQUIREMENTS

INDUSTRY NAME: **Premier Edible Oils Corporation** **Batch 1999-033**

DISCHARGE PERIOD: 1 July to 31 December 1999

Note: ✔ indicates the month(s) for monitoring, the parameters to be tested, and the sample types required. Shaded areas indicate the date(s) monitoring reports are due.

Parameters	Sample Type	1st Quarter			2nd Quarter			3rd Quarter			4th Quarter		
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Batch Discharge Report								✔	✔	✔	✔	✔	✔
Oil and Grease (note 1) (EPA Method 1664)	Grab								✔			✔	
Request for discharge renewal													✔
Report Due Date:								15 August	15 September	15 October	15 November	15 December	15 January

note 1: Total oil and grease may be reported if the concentration is less than or equal to 100 mg/liter. If the total oil and grease concentration exceeds 110 mg/liter, the non-polar oil and grease fraction shall be determined and reported.

SCHN00261637

CITY OF PORTLAND

BATCH DISCHARGE REPORT

For City Use Only

Batch-1999-033

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ July 1999
- ☐ August 1999
- ☐ September 1999
- ☐ October 1999
- ☐ November 1999
- ☐ December 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
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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: _____ Date: _____

s:\projects\batches\1999\99033sum.doc

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

September 11, 1999

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1999-003 (August 1999)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of August 1999. We did not discharge storm water to the sanitary sewer in August 1999. We were unable to collect a discharge sample as required by the permit because we didn't discharge.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,
Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

CITY OF PORTLAND

BATCH DISCHARGE REPORT

Batch-1999-033

For City Use Only

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ July 1999
- ☒ August 1999
- ☐ September 1999
- ☐ October 1999
- ☐ November 1999
- ☐ December 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
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No discharge

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 nsure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or ıose persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____ Date: 9/13/99

\projects\batches\1999\99033sum.doc

SCHN00261640

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

October 11, 1999

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1999-033 (Septmeber 1999)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of September 1999. We did not discharge storm water to the sanitary sewer in September 1999. Once again, we were unable to collect a discharge sample as required by the permit because we didn't discharge.

We would like to request permission to discharge approximately 550-gallons of drummed groundwater obtained from on-site monitoring wells in 1998. Groundwater analytical results collected from wells indicate the water may still contain low levels of TPH, PAHs, VOCs, and nickel. If you can approve this request or if you require further information please contact me at (503) 286-6976.

Sincerely,
Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Printed on recycled paper

CITY OF PORTLAND

BATCH DISCHARGE REPORT

For City Use Only

Batch-1999-033

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ July 1999
- ☐ August 1999
- ☒ September 1999
- ☐ October 1999
- ☐ November 1999
- ☐ December 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
1			
2			
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No discharge

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 Johnson Date: October 10, 1999

:\projects\batches\1999\99033sum.doc

SCHN00261642

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

Mailed - same day

July 13, 1999

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1999-002 (June 1999)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of June 1999. We discharged storm water to the sanitary sewer during this month on one occasion. All discharge was done in compliance with permit requirements.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

CITY OF PORTLAND

BATCH DISCHARGE REPORT

For City Use Only

Batch-1999-002

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ January 1999
- ☐ February 1999
- ☐ March 1999
- ☐ April 1999
- ☐ May 1999
- ☒ June 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
1			
2			
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26	~75	Dry	< 15gpm
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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 F Jakubiak Date: 7-13-99

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SCHN00261644

****
*** ACTIVITY REPORT ***
****

TRANSMISSION OK

TX/RX NO.	2416
CONNECTION TEL	98235559
CONNECTION ID	ENV. SERVICES
START TIME	07/13 10:13
USAGE TIME	00'49
PAGES	2
RESULT	OK

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

Post-it® Fax Note 7671	Date 7-13-99	# of pages ▶ 2
To Mr. David Ball	From Jim Jakubiak	
Co./Dept. BES	Co. SIC	
Phone #	Phone # (503) 286-6976	
Fax #	Fax #	

July 13, 1999

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1999-002 (June 1999)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of June 1999. We discharged storm water to the sanitary sewer during this month on one occasion. All discharge was done in compliance with permit requirements.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Draft
Changed
6/14/99

Columbia Analytical Services INC.
An Employee-Owned Company

June 8, 1999 Service Request No: K9903552

Jim Jakubiak
Schnitzer ~~Steel Products Company~~ Investment Corp.
P.O. Box 10047
Portland, OR 97296

Re: Premier Edible Oils

Dear Jim:

Enclosed are the results of the rush sample(s) submitted to our laboratory on June 4, 1999. For your reference, these analyses have been assigned our service request number K9903552.

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

Page 1 of 5

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.

SCHN00261648

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Schnitzer Steel Products Co.	**Service Request No.:**	K9903552
Project:	Premier Edible Oils	**Date Received:**	6/4/99
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.

No difficulties were experienced during analysis of this batch.

Approved by _____ **Date** 6/8/99

SCHN00261649

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9903552
Project:	Premier Edible Oils	**Date Collected:**	5/29/99
Sample Matrix:	Water	**Date Received:**	6/4/99
		Date Extracted:	6/7/99
		Date Analyzed:	6/7/99

Oil & Grease
~~Petroleum Hydrocarbons~~
EPA Method ~~418.1~~ 413.2
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
SW-1	K9903552-001	0.5	ND
SW-2	K9903552-002	0.5	35.3
Method Blank	K990607-MB	0.5	ND

Approved By: _____ Date: 6/8/99

1AMRL/102594
03552PHC.SJ1 - 1 6/7/99

SCHN00261650

Columbia Analytical Services INC.
An Employee-Owned Company

CHAIN OF CUSTODY

Sediment and Tissue Chemistry

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

SR#: 19903552

PAGE 1 OF 1 COC #

PROJECT NAME: Premier Edible Oils
PROJECT NUMBER:
PROJECT MANAGER: Tim Jakubiak
COMPANY/ADDRESS: P.O. Box 10047, Portland, Oregon
PHONE #: (503) 286-6976 FAX #: (503) 286-6948
SAMPLER'S SIGNATURE: [signature]

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Metals (list below)	☐ Total Volatile Solids ☐ Total Solids ☐ Lipids	TOC (ASTM D4129M)	Grain size - PSEP / ASTM D422	Sulfide ☐ Total (9030M) ☐ Water Soluble	AVS / SEM	Ammonia ☐ Total (350.1m) ☐ Pore water	Pesticides (8081)	PCBs (8082) ☐ Aroclors ☐ Congeners	Semivolatiles (GC/MS SIM) ☐ PAHs ☐ Phthalates ☐ Phenols ☐ PSEP	Organotin - Sediment ☐ Mono ☐ Di ☐ Tri ☐ Tetra	Organotin - Pore water ☐ Mono ☐ Di ☐ Tri ☐ Tetra	Volatiles (8260)	TRPH 8015 / 418.1	Oil & Grease 413.2					REMARKS
SW-1	5-29-99	1000		W	1															X					
SW-2	5-29-99	1005		W	1															X					

00005

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:

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:

SMS Metals: As Cd Cr Cu Pb Hg Ag Zn
CA Metals: Ag As Cd Cr Cu Hg Ni Pb Se Zn

SPECIAL INSTRUCTIONS/COMMENTS:
Oil & Grease 413.2

RELINQUISHED BY:	RELINQUISHED BY:	RELINQUISHED BY:	RELINQUISHED BY:
[signature] 6/4/99 1645	[signature] 6/4/99 4:40pm		
Signature / Date/Time	Signature / Date/Time	Signature / Date/Time	Signature / Date/Time
Tim Jakubiak STC	Andrea Jaynes CAS		
Printed Name / Firm	Printed Name / Firm	Printed Name / Firm	Printed Name / Firm

SCHN00261651

Columbia Analytical Services INC.
An Employee-Owned Company

June 14, 1999 Service Request No: K9903552

Jim Jakubiak
Schnitzer Investment Corp.
P.O. Box 10047
Portland, OR 97296

Re: Premier Edible Oils

Dear Jim:

Enclosed is the revised page(s) for the sample(s) submitted to our laboratory on June 4, 1999. For your reference, these analyses have been assigned our service request number K9903552.

We apologize for any inconvenience this may have created. Please call if you have any questions. My extension is 260.

Respectfully submitted,

Columbia Analytical Services, Inc.

Harvey Jacky
Project Chemist

HJ/ee

Page 1 of 5

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.

SCHN00261653

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Schnitzer Investment Corp.	**Service Request No.:**	K9903552
Project:	Premier Edible Oils	**Date Received:**	6/4/99
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.

No difficulties were experienced during analysis of this batch.

Approved by _____ **Date** 6/14/99

SCHN00261654

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Investment Corp.	**Service Request:**	K9903552
Project:	Premier Edible Oils	**Date Collected:**	5/29/99
Sample Matrix:	Water	**Date Received:**	6/4/99

Oil and Grease

Prep Method:	METHOD	Units:	mg/L (ppm)
Analysis Method:	413.2	Basis:	NA
Test Notes:			

Sample Name	Lab Code	MRL	Dilution Factor	Date Extracted	Date Analyzed	Result	Result Notes
SW-1	K9903552-001	0.5	1	6/7/99	6/7/99	ND	
SW-2	K9903552-002	0.5	1	6/7/99	6/7/99	35.3	
Method Blank	K970607-WB	0.5	1	6/7/99	6/7/99	ND	

Approved By: _____ Date: 6/14/99

1A/052595

SCHN00261655

Columbia Analytical Services, Inc.
An Employee-Owned Company

CHAIN OF CUSTODY

Sediment and Tissue Chemistry

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

SR#: 109903552

PAGE 1 OF 1 COC #

PROJECT NAME: Premier Edible Oils
PROJECT NUMBER:
PROJECT MANAGER: Tim Takibick
COMPANY/ADDRESS: P.O. Box 10047
Portland, Oregon
PHONE #: (503) 286-6976 FAX #: (503) 286-6148
SAMPLER'S SIGNATURE:

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Metals (list below)	☐ Total Volatile Solids ☐ Total Solids ☐ Lipids	TOC (ASTM D4129M)	Grain size - PSEP / ASTM D422	Sulfide ☐ Total (9030M) ☐ Water Soluble	AVS / SEM	Ammonia ☐ Total (350.1m) ☐ Pore water	Pesticides (8081)	PCBs (8082) ☐ Aroclors ☐ Congeners	Semivolatiles (GC/MS SIM) ☐ PAHs ☐ Phthalates ☐ Phenols ☐ PSEP	Organotin - Sediment ☐ Mono ☐ Di ☐ Tri ☐ Tetra	Organotin - Pore water ☐ Mono ☐ Di ☐ Tri ☐ Tetra	Volatiles (8260)	TRPH 8015 / 418.1	Oil & Grease 413.2					REMARKS
SW-1	5-25-99	1000		W	1															X					
SW-2	5-25-99	1005		W	1															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:

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:

SMS Metals: As Cd Cr Cu Pb Hg Ag Zn
CA Metals: Ag As Cd Cr Cu Hg Ni Pb Se Zn

SPECIAL INSTRUCTIONS/COMMENTS:
Oil & Grease 413.2

RELINQUISHED BY:	RELINQUISHED BY:	RELINQUISHED BY:	RELINQUISHED BY:
Signature: [signature] Date/Time: 6/4/99 1645	Signature: [signature] Date/Time: 6/4/99 4:49pm	Signature Date/Time	Signature Date/Time
Printed Name: Tim Takibick Firm: STC	Printed Name: [signature] Firm: CAS	Printed Name Firm	Printed Name Firm

SCHN00261656

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

June 14, 1999

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1999-002 (May 1999)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of May 1999. We discharged storm water to the sanitary sewer on two occasions in May 1999. In addition, monitoring samples were collected and analyzed as required by the permit.

The storm water sample (SW-2) was collected on May 29, 1999. A second field blank sample (SW-1) was also submitted and analyzed for quality control/quality assurance purposes. The analytical report is attached for your review. The total hydrocarbon concentration for sample SW-2 was reported at 35.3 mg/L, well below the discharge limit of 100 mg/L.

We would also like to request renewal of the permit for an additional six months. We hope this request meets with your approval.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Printed on recycled paper

CITY OF PORTLAND

BATCH DISCHARGE REPORT

For City Use Only

Batch-1999-002

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ January 1999
- ☐ February 1999
- ☐ March 1999
- ☐ April 1999
- ☒ May 1999
- ☐ June 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
1			
2			
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10	~50	Dry	Less than 15gpm
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29	~50	Dry	Less than 15gpm
30			
31			

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 J Johnbrich Date: 6/14/99

s:\projects\batches\1999\99002sum.doc

SCHN00261658

Columbia Analytical Services INC.
An Employee-Owned Company

June 14, 1999 Service Request No: K9903552

Jim Jakubiak
Schnitzer Investment Corp.
P.O. Box 10047
Portland, OR 97296

Re: Premier Edible Oils

Dear Jim:

Enclosed is the revised page(s) for the sample(s) submitted to our laboratory on June 4, 1999. For your reference, these analyses have been assigned our service request number K9903552.

We apologize for any inconvenience this may have created. Please call if you have any questions. My extension is 260.

Respectfully submitted,

Columbia Analytical Services, Inc.

Harvey Jacky
Project Chemist

HJ/ee

Page 1 of _____

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

002 CAS KELSO 06/14/99 MON 14:48 FAX

SCHN00261659

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.

003 CAS KELSO 06/14/99 MON 14:48 FAX
SCHN00261660

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Schnitzer Investment Corp.	**Service Request No.:**	K9903552
Project:	Premier Edible Oils	**Date Received:**	6/4/99
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.

No difficulties were experienced during analysis of this batch.

Approved by _____ **Date** 6/14/99

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Investment Corp.	**Service Request:**	K9903552
Project:	Premier Edible Oils	**Date Collected:**	5/29/99
Sample Matrix:	Water	**Date Received:**	6/4/99

Oil and Grease

Prep Method:	METHOD	**Units:**	mg/L (ppm)
Analysis Method:	413.2	**Basis:**	NA
Test Notes:			

Sample Name	Lab Code	MRL	Dilution Factor	Date Extracted	Date Analyzed	Result	Result Notes
SW-1	K9903552-001	0.5	1	6/7/99	6/7/99	ND	
SW-2	K9903552-002	0.5	1	6/7/99	6/7/99	35.3	
Method Blank	K970607-WB	0.5	1	6/7/99	6/7/99	ND	

Approved By: _____ Date: 6/14/99

1A052595

06/14/99 MON 14:48 FAX CAS KELSO 005

SCHN00261662

Columbia Analytical Services inc.
An Employee-Owned Company

CHAIN OF CUSTODY
Sediment and Tissue Chemistry

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

SR#: 19903552

PAGE 1 OF 1 COC #

PROJECT NAME: Premier Edible Oils
PROJECT NUMBER:
PROJECT MANAGER: Tim Jakubiak
COMPANY/ADDRESS: P.O. Box 10047, Portland, Oregon
PHONE #: (503) 286-6976 FAX #: (503) 286-6948
SAMPLER'S SIGNATURE: [signature]

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Metals (list below)	☐ Total Volatile Solids ☐ Total Solids ☐ Lipids	TOC (ASTM D4129M)	Grain size - PSEP / ASTM D422	Sulfide ☐ Total (9030M) ☐ Water Soluble	AVS / SEM	Ammonia ☐ Total (350.1m) ☐ Pore water	Pesticides (8081)	PCBs (8082) ☐ Aroclors ☐ Congeners	Semivolatiles (GC/MS SIM) ☐ PAHs ☐ Phthalates ☐ Phenols ☐ PSEP	Organotin - Sediment ☐ Mono ☐ Di ☐ Tri ☐ Tetra	Organotin - Pore water ☐ Mono ☐ Di ☐ Tri ☐ Tetra	Volatiles (8260)	TRPH 8015 / 418.1	Oil & Grease 413.2					REMARKS
SW-1	5-29-99	1000		W	1															X					
SW-2	5-29-99	1005		W	1															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:

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:
SMS Metals: As Cd Cr Cu Pb Hg Ag Zn
CA Metals: Ag As Cd Cr Cu Hg Ni Pb Se Zn

SPECIAL INSTRUCTIONS/COMMENTS:
Oil & Grease 413.2

RELINQUISHED BY:	RELINQUISHED BY:	RELINQUISHED BY:	RELINQUISHED BY:
[signature] 6/4/99 1645	[signature] 6/4/99 4:40pm		
Signature / Date/Time	Signature / Date/Time	Signature / Date/Time	Signature / Date/Time
Tim Jakubiak SIC	[signature] CAS		
Printed Name / Firm	Printed Name / Firm	Printed Name / Firm	Printed Name / Firm

SCHN00261663

06/14/99 MON 14:49 FAX CAS KELSO 006

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

Delivered
4/15/99

April 14, 1999

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1999-002 (March 1999)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of March 1999. We discharged storm water to the sanitary sewer during this month on two different occasions. All discharge was done in compliance with permit requirements.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Printed on recycled paper

CITY OF PORTLAND

BATCH DISCHARGE REPORT

For City Use Only

Batch-1999-002

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ January 1999
- ☐ February 1999
- ☒ March 1999
- ☐ April 1999
- ☐ May 1999
- ☐ June 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
1			
2	200	Dry	@ ~ 15gpm
3			
4			
5	75	Dry	@ ~ 15gpm
6			
7			
8			
9			
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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 Johnson **Date:** 4/14/99

s:\projects\batches\1999\99002sum.doc

SCHN00261668

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

File
Mailed 5-12-99

May 11, 1999

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1999-002 (April 1999)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of April 1999. We did not discharge storm water to the sanitary sewer during April 1999.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Printed on recycled paper

CITY OF PORTLAND

BATCH DISCHARGE REPORT

For City Use Only

Batch-1999-002

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ January 1999
- ☐ February 1999
- ☐ March 1999
- ☒ April 1999
- ☐ May 1999
- ☐ June 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
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No Discharge this month

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 F Jakubish **Date:** 5/12/99

s:\projects\batches\1999\99002sum.doc

SCHN00261670

SCHNITZER INVESTMENT CORP.

3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 323-2804

March 15, 1999

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1999-002 (February 1999)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of February 1999. We discharged storm water to the sanitary sewer during this month on eight different occasions. All discharge was done in compliance with permit requirements.

On February 8, 1999, two water samples were collected from secondary containment structures to verify water quality and to comply with permit requirements. Both samples were analyzed by North Creek Analytical. Results for both samples were reported as not detected at the respective reporting limits. The analytical report is attached for your review.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

CITY OF PORTLAND

BATCH DISCHARGE REPORT

For City Use Only

Batch-1999-002

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ January 1999
- ☒ February 1999
- ☐ March 1999
- ☐ April 1999
- ☐ May 1999
- ☐ June 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
1	~750	Dry	@ ~40gpm
2	~750	Dry	@ ~40gpm
3	~1000	Dry/Wet	@ ~40gpm
4	~1000	Dry/Wet	@ ~40gpm
5	~1000	Dry/Wet	@ ~40gpm
6	~1000	Dry/Wet	@ ~40gpm
7			
8	~1000	Dry/Wet	@ ~40gpm
9			
10			
11			
12			
13			
14			
15	~200	Dry	@ ~15gpm
16			
17			
18			
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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 F Johnson **Date:** 3/12/99

s:\projects\batches\1999\99002sum.doc

SCHN00261672

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ▪ (425) 420-9200 ▪ FAX 420-9210
SPOKANE ▪ (509) 924-9200 ▪ FAX 924-9290
PORTLAND ▪ (503) 906-9200 ▪ FAX 906-9210

Schnitzer Steel Products Company	Project:	Edible Oils Site	Sampled: 2/8/99
PO Box 10047	Project Number:	na	Received: 2/12/99
Portland, OR 97296	Project Manager:	Jim Jakubiak	Reported: 2/22/99 00:06

ANALYTICAL REPORT FOR SAMPLES:

Sample Description	Laboratory Sample Number	Sample Matrix	Date Sampled
SW-1	P902220-01	Water	2/8/99
SW-2	P902220-02	Water	2/8/99

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (425) 420-9200 ■ FAX 420-9210
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 906-9200 ■ FAX 906-9210

Schnitzer Steel Products Company	Project:	Edible Oils Site	Sampled: 2/8/99
PO Box 10047	Project Number:	na	Received: 2/12/99
Portland, OR 97296	Project Manager:	Jim Jakubiak	Reported: 2/22/99 00:06

Conventional Chemistry Parameters per APHA/EPA Methods
North Creek Analytical - Portland

Analyte	Batch Number	Date Prepared	Date Analyzed	Specific Method	Reporting Limit	Result	Units	Notes*
SW-1			**P902220-01**				**Water**	
Oil & Grease	0290510	2/19/99	2/19/99	EPA 1664	5.00	ND	mg/l	1
SW-2			**P902220-02**				**Water**	
Oil & Grease	0290510	2/19/99	2/19/99	EPA 1664	5.00	ND	mg/l	1

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (425) 420-9200 ■ FAX 420-9210
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 906-9200 ■ FAX 906-9210

Schnitzer Steel Products Company	Project:	Edible Oils Site	Sampled: 2/8/99
PO Box 10047	Project Number:	na	Received: 2/12/99
Portland, OR 97296	Project Manager:	Jim Jakubiak	Reported: 2/22/99 00:06

Conventional Chemistry Parameters per APHA/EPA Methods/Quality Control
North Creek Analytical - Portland

Analyte	Date Analyzed	Spike Level	Sample Result	QC Result	Units	Reporting Limit / Recov. Limits	Recov. %	RPD Limit	RPD %	Notes*
Batch: 0290510	**Date Prepared: 2/19/99**					**Extraction Method: EPA 1664**				
Blank	**0290510-BLK1**									
Oil & Grease	2/19/99			**ND**	mg/l	**5.00**				
Oil & Grease (non-polar)	"			**ND**	"	**5.00**				
LCS	**0290510-BS1**									
Oil & Grease	2/19/99	80.0		70.2	mg/l	73.0-109	87.7			
Oil & Grease (non-polar)	"	40.0		31.4	"	57.0-113	78.5			
LCS Dup	**0290510-BSD1**									
Oil & Grease	2/19/99	80.0		74.1	mg/l	73.0-109	92.6	18.0	5.44	
Oil & Grease (non-polar)	"	40.0		32.5	"	57.0-113	81.3	24.0	3.50	

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ▪ (425) 420-9200 ▪ FAX 420-9210
SPOKANE ▪ (509) 924-9200 ▪ FAX 924-9290
PORTLAND ▪ (503) 906-9200 ▪ FAX 906-9210

Schnitzer Steel Products Company		Project:	Edible Oils Site	Sampled:	2/8/99
PO Box 10047		Project Number:	na	Received:	2/12/99
Portland, OR 97296		Project Manager:	Jim Jakubiak	Reported:	2/22/99 00:06

Notes and Definitions

#	Note
1	Since Total Oil & Grease was ND, sample was not analyzed for Non-polar hydrocarbons.
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
Recov.	Recovery
RPD	Relative Percent Difference

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

18939 120th Avenue N.E., Suite 101, Bothell, WA 98011-9508 (425) 420-9200 FAX 420-9210
East 11115 Montgomery, Suite B, Spokane, WA 99206-4779 (509) 924-9200 FAX 924-9290
9405 S.W. Nimbus Avenue, Beaverton, OR 97008-7132 (503) 906-9200 FAX 906-9210

COPY

CHAIN OF CUSTODY REPORT

12.8°

Work Order # 902270

REPORT TO:		INVOICE TO:	
ATTENTION:	Jim Jakubiak	ATTENTION:	Jim Jakubiak
ADDRESS:	P.O. Box 10047	ADDRESS:	Same as report
	Portland, Oregon 97296		
PHONE:	FAX: (503) 286-6948	P.O. NUMBER:	NCA QUOTE #:
PROJECT NAME:	Premier Edible Oils	Analysis Request:	Oil & Grease 413.2/1664/9070
PROJECT NUMBER:			
SAMPLED BY:			

TURNAROUND REQUEST in Business Days *

Organic & Inorganic Analyses: [X] Standard | 7 | 5 | 4 | 3 | 2 | 1 | Same Day

Fuels & Hydrocarbon Analyses: 5 Standard | 3-4 | 2 | 1 | Same Day

OTHER Specify:

* Turnaround Requests less than standard may incur Rush Charges.

	CLIENT SAMPLE IDENTIFICATION	SAMPLING DATE/TIME	NCA SAMPLE ID (Laboratory Use Only)	Oil & Grease 413.2/1664/9070	MATRIX (W, S, A, O)	# OF CONTAINERS	COMMENTS
1.	SW-1	2-8-99/0830		X	Water	1	See Comment below
2.	SW-2	2-8-99/0900		X	Water	1	See Comment below
3.							
4.							
5.							
6.							
7.							
8.							
9.							
10.							

RELINQUISHED BY (Signature): Jim Jakubiak	DATE: 2-12-99	RECEIVED BY (Signature): Mary McShane	DATE: 2/12/99
PRINT NAME: Jim Jakubiak FIRM: SIC	TIME: 2:45PM	PRINT NAME: Mary McShane FIRM: NCA	TIME: 14:45
RELINQUISHED BY (Signature):	DATE:	RECEIVED BY (Signature):	DATE:
PRINT NAME: FIRM:	TIME:	PRINT NAME: FIRM:	TIME:

ADDITIONAL REMARKS:
*Please call me to discuss analytical methods prior to analysis
changed to 1664

PAGE OF

SCHN00261677

Hand Delivered
2-15-99

SCHNITZER INVESTMENT CORP.

3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 323-2804

February 13, 1999

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1999-002 (January 1999)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of January 1999. We discharged storm water to the sanitary sewer during this month on four different occasions. All discharge was done in compliance with permit requirements.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

CITY OF PORTLAND

BATCH DISCHARGE REPORT

For City Use Only

Batch-1999-002

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- [X] January 1999
- [ ] February 1999
- [ ] March 1999
- [ ] April 1999
- [ ] May 1999
- [ ] June 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
1			
2			
3			
4			
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7			
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10			
11			
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16			
17			
18			
19			
20			
21			
22	~200	Dry	less than 15 gpm
23			
24	~250	Dry	less than 15 gpm
25	~250	Dry	less than 15 gpm
26	~300	Dry	less than 15 gpm
27			
28			
29			
30			
31			

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 **Date:** February 13, 1999

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SCHN00261679

SCHNITZER INVESTMENT CORP.
3200 N.W. Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

January 13, 1999

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North [illegible] Avenue
Portland [illegible]03-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1998-060 (December 1998)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of December 1998. We discharged storm water to the sanitary sewer during this month on six different occasions. All discharge was done in compliance with permit requirements.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Printed on recycled paper

CITY OF PORTLAND

BATCH DISCHARGE REPORT

Batch-1998-060

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ July 1998
- ☐ August 1998
- ☐ September 1998
- ☐ October 1998
- ☐ November 1998
- ☒ December 1998

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
1			
2	~375	Dry	Pumped @ ~15gpm
3	~525	Dry	Pumped @ ~15gpm
4			
5			
6			
7			
8			
9	~300	Dry	Pumped @ ~15gpm
10			
11			
12			
13			
14	~585	Dry	Pumped @ ~15gpm
15	~200	Dry	Pumped @ ~15gpm
16	~400	Dry	Pumped @ ~15gpm
17			
18			
19			
20			
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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 F Johnson Date: 1-13-99

SCHN00261681

****
*** ACTIVITY REPORT ***
****

TRANSMISSION OK

TX/RX NO.	6824
CONNECTION TEL	98235559
CONNECTION ID	ENV. SERVICES
START TIME	01/13 14:14
USAGE TIME	01'05
PAGES	2
RESULT	OK

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

January 13, 1999

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1998-060 (December 1998)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of December 1998. We discharged storm water to the sanitary sewer during this month on six different occasions. All discharge was done in compliance with permit requirements.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

January 13, 1999

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1998-060 (December 1998)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of December 1998. We discharged storm water to the sanitary sewer during this month on six different occasions. All discharge was done in compliance with permit requirements.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Printed on recycled paper

CITY OF PORTLAND

BATCH DISCHARGE REPORT

Batch-1998-060

For City Use Only

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ July 1998
- ☐ August 1998
- ☐ September 1998
- ☐ October 1998
- ☐ November 1998
- ☒ December 1998

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
1			
2	~ 375	Dry	Pumped @ ~ 15gpm
3	~ 525	Dry	Pumped @ ~ 15gpm
4			
5			
6			
7			
8			
9	~ 300	Dry	Pumped @ ~ 15gpm
10			
11			
12			
13			
14	~585	Dry	Pumped @ ~ 15gpm
15	~ 200	Dry	Pumped @ ~ 15gpm
16	~ 400	Dry	Pumped @ ~ 15gpm
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
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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 Johnlich Date: 1-13-99

SCHN00261684

CITY OF PORTLAND

MULTIPLE BATCH DISCHARGES

MONITORING AND REPORTING REQUIREMENTS

INDUSTRY NAME: **Premier Edible Oils Corporation** **Batch 1999-002**

DISCHARGE PERIOD: 1 January to 30 June 1999

Note: ♦ indicates the month(s) for monitoring, the parameters to be tested, and the sample types required. Shaded areas indicate the date(s) monitoring reports are due.

Parameters	Sample Type	1st Quarter			2nd Quarter			3rd Quarter			4th Quarter		
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Batch Discharge Report		♦	♦	♦	♦	♦	♦						
Oil and Grease (note 1) (EPA Method 1664)	Grab		♦			♦							
Request for discharge renewal							♦						
Report Due Date:		15 Feb	15 Mar	15 Apr	15 May	15 Jun	15 Jul						

note 1 Total oil and grease may be reported if the concentration is less than or equal to 100 mg/liter. If the total oil and grease concentration exceeds 110 mg/liter, the non-polar oil and grease fraction shall be determined and reported.

SCHN00261685

Columbia Analytical Services, Inc.
An Employee-Owned Company

CHAIN OF CUSTODY

Sediment and Tissue Chemistry

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: Premier Edible Oils
PROJECT NUMBER:
PROJECT MANAGER: Tim Dakniak
COMPANY/ADDRESS: PO Box 10047
Portland Oregon
PHONE # (503) 786-6976 FAX # (503) 786-6548
SAMPLER'S SIGNATURE:

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Metals (list below) ☐ Total Volatile Solids ☐ Total Solids ☐ Lipids	TOC (ASTM D4129M)	Grain size - PSEP / ASTM D422	Sulfide ☐ Total (9030M) ☐ Water Soluble	AVS / SEM	Ammonia ☐ Total (350.1m) ☐ Pore water	Pesticides (8081)	PCBs (8082) ☐ Arochlors ☐ Congeners	Semivolatiles (GC/MS SIM) ☐ PAHs ☐ Phthalates ☐ Phenols ☐ PSEP	Organotin - Sediment ☐ Mono ☐ Di ☐ Tri ☐ Tetra	Organotin - Pore water ☐ Mono ☐ Di ☐ Tri ☐ Tetra	Volatiles (8260)	TRPH 8015 / 418.1	Oil & Grease 413.2					REMARKS
SW-1	5-25-99	1000		W	1														X					
SW-2	5-25-99	1005		W	1														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: _____

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:

SMS Metals: As Cd Cr Cu Pb Hg Ag Zn
CA Metals: Ag As Cd Cr Cu Hg Ni Pb Se Zn

SPECIAL INSTRUCTIONS/COMMENTS:

Oil & Grease 413.2

RELINQUISHED BY:	RELINQUISHED BY:	RELINQUISHED BY:	RELINQUISHED BY:
Signature: [signature] Date/Time: 6/4/99 1645	Signature: [signature] Date/Time: 6/4/99 4:10pm	Signature: _____ Date/Time: _____	Signature: _____ Date/Time: _____
Printed Name: Tim Jakubiak Firm: STC	Printed Name: [illegible] Firm: CAS	Printed Name: _____ Firm: _____	Printed Name: _____ Firm: _____

SCHN00261691

Premier
DHR Sample

ACKNOWLEDGMENT OF RECEIPT OF SAMPLES

TO:

Jim Jakubiak
Schnitzer Steel Products Co.
P.O. Box 10047
Portland, OR 97210

FROM:

Harvey Jacky, Project Chemist
Columbia Analytical Services, Inc.

This is to inform you that the samples received for testing have been assigned CAS Service Request number K9903552. Please verify information and notify me of any corrections.

A copy of our work order is attached. If you have any questions regarding the status of this work, please call me at (360) 577-7222.

Thank you for your business.

Number of pages - 2 - (including cover sheet).

Columbia Analytical Services, Inc.
1317 South 13th Avenue
P.O. Box 479
Kelso, WA 98626
(360) 577-7222
(360) 636-1068 - FAX

* During the next few months, you may notice format changes in some of the documents you receive from CAS. However, these documents should contain the same information you are accustomed to receiving.

Columbia Analytical Services -- Kelso
INTERNAL LOGIN SUMMARY REPORT (ILD1)
07-JUN-99 08:53

Bottles: 2 - Oil & Grease

Service Req. No. K9903552
Client No. 191647
Client Name Schnitzer Steel Products Co.

Project No.
Project Name Premier Edible Oils

Bill To: Schnitzer Steel Products Co.
Attn: Accounts Payable
P.O. Box 10047
Portland, OR 97210

Report To: Schnitzer Steel Products Co.
Jim Jakubiel
P.O. Box 10047
Portland, OR 97210

P.O. No.
Logged In By FADAIR
ISR Num
COC Received Y
Samples Submitted 04-JUN-99

Site ID
Project Chemist Harvey Tacky

Storage: NERK A6

CAS Samp No.	Client Sample No.	Matrix	Collected	DueDate	413IR
K9903552-001	SW-1	N20	29-MAY-99	11-JUN-99	1
K9903552-002	SW-2	N20	29-MAY-99	11-JUN-99	1

Comments:

Samples Found To Be Hazardous: NONE__ ALL__ *SOME__

Page 1 of 1

Reviewed By:_____

CITY OF PORTLAND
BUREAU OF ENVIRONMENTAL SERVICES
Water Pollution Control Laboratory
Industrial Source Control Division
6543 N. Burlington Avenue
Portland, Oregon 97203-5452
503-823-5322
FAX 503-823-5559

FACSIMILE TRANSMISSION

To: Jim Jakubiak
Schnitzer Investment Corp.

From: David S. Ball
Phone: 503-823-7554
Date: 30 December, 1998

We are sending you a fax from 503-823-5559 to fax **503-323-2804**

# Sheets	Description
1	Cover Sheet
2	Authorization Letter (Batch-1999-002)
1	Monitoring and Reporting Requirements
1	Batch Discharge Report
5	Total Sheets

Hard copies of authorization letter and discharge report are being sent by U.S. Mail.

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

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

30 December 1998

Mr. Jim Jakubiak
Environmental Administrator
Schnitzer Investment Corp.
3200 N.W. Yeon Avenue
P.O. Box 10047
Portland, Oregon 97296-0047

Subject: Industrial Waste Water Batch Discharge (Batch-1999-002)

Dear Mr. Jakubiak:

This letter responds to your 14 December 1998 request for frequent batch discharges from 10400 N. Burgard Way (formerly Premier Edible Oils Corp.).

The Industrial Source Control Division (ISCD) has reviewed the laboratory analytical reports provided for this type of wastewater and finds the waste meets the City's local limits for discharge to the sanitary sewer system. In order to verify that your discharges remain within the local discharge limits, the ISCD is requesting sampling and analysis of your wastewater.

This letter authorizes the periodic discharge of approximately 200 gallons of edible oil contaminated stormwater and is subject to the following stipulations:

- Parameters, listed on the attached *Monitoring and Reporting Requirements*, shall be analyzed each quarter.
- Discharge shall be to the sanitary sewer at either manhole #1 or manhole #2.
- The rate of discharge shall not exceed 50 gallons/minute.
- Discharge should occur during dry weather whenever possible. Dry weather is defined by the Oregon Department of Environmental Quality as a time it is not raining and it has not rained in the Portland metropolitan area during the previous eight (8) hours.
- This office must be notified of the dates and volumes of discharges by returning the enclosed *Batch Discharge Report* form on the schedule indicated on *Monitoring and Reporting Requirements*.

S:\PROJECTS\BATCHES\1999\99002LTR.DOC

This authorization is only for wastewater from secondary containment areas around the aboveground storage tanks for the period ending 30 June 1999. Future batch discharge authorization will be valid for six (6) months. A letter requesting a batch discharge reauthorization should be submitted before this authorization expires. The ISCD may modify or require increased monitoring and/or additional pollutants due to changes in Federal categorical or local discharge limits.

Please sign a copy of this letter acknowledging your agreement to the above-mentioned terms and return it to this office prior to the first discharge. If you have any questions concerning the above requirements, please contact the undersigned at 503-823-7554 or 503-823-5559 (facsimile).

Respectfully,

David S. Ball

David S. Ball
Environmental Technician
Industrial Source Control Division
Bureau of Environmental Services

Agreement to above terms:

_____
Name

_____
Title

_____
Date

S:\PROJECTS\BATCHES\1999\99002LTR.DOC

CITY OF PORTLAND

MULTIPLE BATCH DISCHARGES

MONITORING AND REPORTING REQUIREMENTS

INDUSTRY NAME: **Premier Edible Oils Corporation** **Batch 1999-002**

DISCHARGE PERIOD: 1 January to 30 June 1999

Note: ♦ indicates the month(s) for monitoring, the parameters to be tested, and the sample types required. Shaded areas indicate the date(s) monitoring reports are due.

Parameters	Sample Type	1st Quarter			2nd Quarter			3rd Quarter			4th Quarter		
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Batch Discharge Report		♦	♦	♦	♦	♦	♦						
Oil and Grease (note 1) (EPA Method 1664)	Grab		♦			♦							
Request for discharge renewal							♦						
Report Due Date:													

note 1 Total oil and grease may be reported if the concentration is less than or equal to 100 mg/liter. If the total oil and grease concentration exceeds 110 mg/liter, the non-polar oil and grease fraction shall be determined and reported.

SCHN00261697

CITY OF PORTLAND

BATCH DISCHARGE REPORT

For City Use Only

Batch-1999-002

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: **Premier Edible Oils Corporation**

DISCHARGE PERIOD:

- ☐ January 1999
- ☐ February 1999
- ☐ March 1999
- ☐ April 1999
- ☐ May 1999
- ☐ June 1999

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
1			
2			
3			
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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: _____ **Date:** _____

s:\projects\batches\1999\99002sum.doc

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

December 14, 1998

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1998-060 (November 1998)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of November 1998. We did not discharge storm water to the sanitary sewer during this month. However, a storm water sample was collected from the aboveground storage tank containment area as required by the permit.

The sample was collected during the first discharge event on December 2, 1998. This was done because no discharge events were conducted in November. The analytical results are attached for your review. The total oil and grease concentration was reported at 9.72 mg/L, well below the 100 mg/L reporting value.

We would also like to request renewal of the permit for additional six months. We hope this request meets with your approval.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

CITY OF PORTLAND

BATCH DISCHARGE REPORT

Batch-1998-060

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ July 1998
- ☐ August 1998
- ☐ September 1998
- ☐ October 1998
- ☒ November 1998
- ☐ December 1998

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
1			
2			
3			
4			
5			
6			
7			
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see below

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.

Note: No discharge during this reporting period.

Signature: James L Schulich Date: 12-14-98

SCHN00261703

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (425) 420-9200 ■ FAX 420-9210
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 906-9200 ■ FAX 906-9210

Schnitzer Steel Products Company	Project:	Edible Oils (Palmco)	Sampled: 12/2/98
PO Box 10047	Project Number:	na	Received: 12/3/98
Portland, OR 97296	Project Manager:	Jim Jakubiak	Reported: 12/11/98 05:43

Conventional Chemistry Parameters per APHA/EPA Methods
North Creek Analytical - Portland

Analyte	Batch Number	Date Prepared	Date Analyzed	Specific Method	Reporting Limit	Result	Units	Notes*
SW-2			P812071-01				Water	
Oil & Grease	1280078	12/4/98	12/4/98	EPA 413.2/418.1	0.500	9.72	mg/l	
Oil & Grease (non-polar)	"	"	"	EPA 413.2/418.1	0.500	0.730	"	
Oil & Grease (polar)	"	"	"	EPA 413.2/418.1	0.500	8.99	"	

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

FAX TRANSMITTAL COVER SHEET

TO: David Ball
BES

DATE: December 14, 1988

NUMBER OF PAGES BEING SENT (INCLUDING COVER PAGE) 4

FROM: Jim Jakubiak

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: Monthly discharge report is attached. A hard copy will be mailed today

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

December 14, 1998

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1998-060 (November 1998)
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility for the month of November 1998. We did not discharge storm water to the sanitary sewer during this month. However, a storm water sample was collected from the aboveground storage tank containment area as required by the permit.

The sample was collected during the first discharge event on December 2, 1998. This was done because no discharge events were conducted in November. The analytical results are attached for your review. The total oil and grease concentration was reported at 9.72 mg/L, well below the 100 mg/L reporting value.

We would also like to request renewal of the permit for additional six months. We hope this request meets with your approval.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Printed on recycled paper

CITY OF PORTLAND

BATCH DISCHARGE REPORT

Batch-1998-060

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ July 1998
- ☐ August 1998
- ☐ September 1998
- ☐ October 1998
- ☒ November 1998
- ☐ December 1998

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
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27			
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see below

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.

Note: No discharge during this reporting period.

Signature: James L Johnlich **Date:** 12-14-98

SCHN00261708

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (425) 420-9200 ■ FAX 420-9210
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 906-9200 ■ FAX 906-9210

Schnitzer Steel Products Company	Project:	Edible Oils (Palmco)	Sampled: 12/2/98
PO Box 10047	Project Number:	na	Received: 12/3/98
Portland, OR 97296	Project Manager:	Jim Jakubiak	Reported: 12/11/98 05:43

Conventional Chemistry Parameters per APHA/EPA Methods
North Creek Analytical - Portland

Analyte	Batch Number	Date Prepared	Date Analyzed	Specific Method	Reporting Limit	Result	Units	Notes*
SW-2			P812071-01				Water	
Oil & Grease	1280078	12/4/98	12/4/98	EPA 413.2/418.1	0.500	9.72	mg/l	
Oil & Grease (non-polar)	"	"	"	EPA 413.2/418.1	0.500	0.730	"	
Oil & Grease (polar)	"	"	"	EPA 413.2/418.1	0.500	8.99	"	

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ▪ (425) 420-9200 ▪ FAX 420-9210
SPOKANE ▪ (509) 924-9200 ▪ FAX 924-9290
PORTLAND ▪ (503) 906-9200 ▪ FAX 906-9210

Schnitzer Steel Products Company	Project:	Edible Oils (Palmco)	Sampled: 12/2/98
PO Box 10047	Project Number:	na	Received: 12/3/98
Portland, OR 97296	Project Manager:	Jim Jakubiak	Reported: 12/11/98 05:43

ANALYTICAL REPORT FOR SAMPLES:

Sample Description	Laboratory Sample Number	Sample Matrix	Date Sampled
SW-2	P812071-01	Water	12/2/98

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ▪ (425) 420-9200 ▪ FAX 420-9210
SPOKANE ▪ (509) 924-9200 ▪ FAX 924-9290
PORTLAND ▪ (503) 906-9200 ▪ FAX 906-9210

Schnitzer Steel Products Company	Project:	Edible Oils (Palmco)	Sampled: 12/2/98
PO Box 10047	Project Number:	na	Received: 12/3/98
Portland, OR 97296	Project Manager:	Jim Jakubiak	Reported: 12/11/98 05:43

Conventional Chemistry Parameters per APHA & EPA Methods/Quality Control
North Creek Analytical - Portland

Analyte	Date Analyzed	Spike Level	Sample Result	QC Result	Units	Reporting Limit / Recov. Limits	Recov. %	RPD Limit	RPD %	Notes*
Batch: 1280078	**Date Prepared: 12/3/98**					**Extraction Method: TPH Freon Extraction**				
Blank	**1280078-BLK1**									
Oil & Grease	12/3/98			ND	mg/l	0.500				
Oil & Grease (non-polar)	"			ND	"	0.500				
Blank	**1280078-BLK2**									
Oil & Grease	12/4/98			ND	mg/l	0.500				
Oil & Grease (non-polar)	"			ND	"	0.500				
LCS	**1280078-BS1**									
Oil & Grease	12/3/98	5.00		5.37	mg/l	50.0-150	107			
Oil & Grease (non-polar)	"	5.00		5.29	"	50.0-150	106			
LCS Dup	**1280078-BSD1**									
Oil & Grease	12/3/98	5.00		5.49	mg/l	50.0-150	110	50.0	2.76	
Oil & Grease (non-polar)	"	5.00		5.34	"	50.0-150	107	50.0	0.939	

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ▪ (425) 420-9200 ▪ FAX 420-9210
SPOKANE ▪ (509) 924-9200 ▪ FAX 924-9290
PORTLAND ▪ (503) 906-9200 ▪ FAX 906-9210

Schnitzer Steel Products Company	Project:	Edible Oils (Palmco)	Sampled: 12/2/98
PO Box 10047	Project Number:	na	Received: 12/3/98
Portland, OR 97296	Project Manager:	Jim Jakubiak	Reported: 12/11/98 05:43

Notes and Definitions

#	Note
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
Recov.	Recovery
RPD	Relative Percent Difference

North Creek Analytical, Inc.

Philip Nerenberg, Laboratory Manager

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

18939 120th Avenue N.E., Suite 101, Bothell, WA 98011-9508 (425) 420-9200 FAX 420-9210
East 11115 Montgomery, Suite B, Spokane, WA 99206-4779 (509) 924-9200 FAX 924-9290
9405 S.W. Nimbus Avenue, Beaverton, OR 97008-7132 (503) 906-9200 FAX 906-9210

CHAIN OF CUSTODY REPORT

Work Order # 812071

REPORT TO:	INVOICE TO:
ATTENTION: Jim Jakubiak	ATTENTION: Jim Jakubiak SIC
ADDRESS: P.O Box 10047	ADDRESS: P.O. Box 10047
Portland, OR 97296-0047	Portland, OR 97296
PHONE: (503) 286-6976 FAX: (503) 286-6948	P.O. NUMBER: NCA QUOTE #:
PROJECT NAME: Edible Oils (PALMCO)	
PROJECT NUMBER:	
SAMPLED BY: Jim Jakubiak	

TURNAROUND REQUEST in Business Days *
Organic & Inorganic Analyses: 10 (Standard) | 7 | 5 | 4 | 3 | 2 | 1 | Same Day
Fuels & Hydrocarbon Analyses: 5 (Standard) | 3-4 | 2 | 1 | Same Day
OTHER (Specify):
* Turnaround Requests less than standard may incur Rush Charges.

Analysis Request: EPA 8260B/624 (Halocarbons & Aromatics) | Oil & Grease (EPA 1664) | Oil & Grease (Hexane Extr.)

CLIENT SAMPLE IDENTIFICATION	SAMPLING DATE/TIME	NCA SAMPLE ID (Laboratory Use Only)	MATRIX (W, S, A, O)	# OF CONTAINERS	COMMENTS
SW2	12/2/98 1600		Water	1	

RELINQUISHED BY: Jim Jakubiak DATE: 12/3/98
PRINT NAME: Jim Jakubiak FIRM: SIC TIME: 12:20
RECEIVED BY: Mary MacShane DATE: 12/3
PRINT NAME: Mary MacShane FIRM: NCA TIME: 12:

RELINQUISHED BY: DATE:
PRINT NAME: FIRM: TIME:
RECEIVED BY: DATE:
PRINT NAME: FIRM: TIME:

ADDITIONAL REMARKS:

PAGE OF

SCHN00261713

12-11-1998 05:50AM FROM TO 8286948 P.05

SCHNITZER INVESTMENT CORP.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

October 30, 1998

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Monthly Sanitary Sewer Discharge Report – Batch 1998-060
Premier Edible Oils
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

Attached is a copy of the batch discharge report for the above-referenced facility. We discharged on two separate occasions this past month after receiving the permit. All discharge was done in compliance with discharge requirements.

If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

Printed on recycled paper

CITY OF PORTLAND

BATCH DISCHARGE REPORT

Batch-1998-060

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ July 1998
- ☐ August 1998
- ☐ September 1998
- ☒ October 1998
- ☐ November 1998
- ☐ December 1998

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20	20	Dry	Approximately 10 gallons per minute
21			
22			
23	195	Dry	Approximately 10 gallons per minute
24			
25			
26			
27			
28			
29			
30			
31			

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 Jakubiak Date: 10/30/98

SCHN00261715

Premier Permit - Copy

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

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

13 October 1998

Mr. Jim Jakubiak
Environmental Administrator
Schnitzer Investment Corp.
3200 N.W. Yeon Avenue
P.O. Box 10047
Portland, Oregon 97296-0047

Subject: Industrial Waste Water Batch Discharge (Batch-1998-060)

Dear Mr. Jakubiak:

This letter responds to your 5 October 1998 request for frequent batch discharges from 10400 N. Burgard Way (formerly Premier Edible Oils Corp.).

The Industrial Source Control Division (ISCD) has reviewed the laboratory analytical reports provided for this type of wastewater and finds the waste meets the City's local limits for discharge to the sanitary sewer system. In order to verify that your discharges remain within the local discharge limits, the ISCD is requesting sampling and analysis of your wastewater.

This letter authorizes the periodic discharge of approximately 200 gallons of edible oil contaminated stormwater and is subject to the following stipulations:

- Parameters, listed on the attached *Monitoring and Reporting Requirements*, shall be analyzed each quarter.
- Discharge shall be to the sanitary sewer at either manhole #1 or manhole #2.
- The rate of discharge shall not exceed 50 gallons/minute.
- Discharge should occur during dry weather whenever possible. Dry weather is defined by the Oregon Department of Environmental Quality as a time it is not raining and it has not rained in the Portland metropolitan area during the previous eight (8) hours.
- This office must be notified of the dates and volumes of discharges by returning the enclosed *Batch Discharge Report* form on the schedule indicated on *Monitoring and Reporting Requirements*.

SCHN00261716

This authorization is only for wastewater from secondary containment areas around the aboveground storage tanks for the period ending 31 December 1998. Future batch discharge authorization will be valid for six (6) months. A letter requesting a batch discharge reauthorization should be submitted before this authorization expires. The ISCD may modify or require increased monitoring and/or additional pollutants due to changes in Federal categorical or local discharge limits.

Please sign a copy of this letter acknowledging your agreement to the above-mentioned terms and return it to this office prior to the first discharge. If you have any questions concerning the above requirements, please contact the undersigned at 503-823-7554 or 503-823-5559 (facsimile).

Respectfully,

David S. Ball
Environmental Technician
Industrial Source Control Division
Bureau of Environmental Services

Agreement to above terms:

James F Jakubiak
Name

Environmental Administrator
Title

October 16, 1998
Date

S:\PROJECTS\BATCHES\1998\98060LTR.DOC

CITY OF PORTLAND

BATCH DISCHARGE REPORT

Batch-1998-060

For City Use Only

Please fill in the requested information for your discharges. Please sign the certification statement on the bottom.

INDUSTRY NAME: Premier Edible Oils Corporation

DISCHARGE PERIOD:

- ☐ July 1998
- ☐ August 1998
- ☐ September 1998
- ☐ October 1998
- ☐ November 1998
- ☐ December 1998

Day	Volume (gallons)	Weather (Wet/Dry)	Comments
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
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29			
30			
31			

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: _____ **Date:** _____

SCHN00261718

CITY OF PORTLAND

MULTIPLE BATCH DISCHARGES

MONITORING AND REPORTING REQUIREMENTS

INDUSTRY NAME: **Premier Edible Oils Corporation** **Batch 1998-060**

DISCHARGE PERIOD: 1 July to 31 December 1998

Note: ✓ indicates the month(s) for monitoring, the parameters to be tested, and the sample types required. Shaded areas indicate the date(s) monitoring reports are due.

Parameters	Sample Type	1st Quarter			2nd Quarter			3rd Quarter			4th Quarter		
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Batch Discharge Report											✔	✔	✔
Oil and Grease (note 1) (EPA Method 1664)	Grab											✔	
Request for discharge renewal												✔	
Report Due Date:											1 15 Nov	1 15 Dec	10 Jan

note 1 Total oil and grease may be reported if the concentration is less than or equal to 100 mg/liter. If the total oil and grease concentration exceeds 100 mg/liter, the non-polar oil and grease fraction shall be determined and reported.

SCHN00261719

****
*** TX REPORT ***
****

TRANSMISSION OK

TX/RX NO	4918	
CONNECTION TEL		98235559
SUBADDRESS		
CONNECTION ID	ENV. SERVICES	
ST. TIME	10/05 15:15	
USAGE T	01'57	
PGS.	3	
RESULT	OK	

Mr. David Ball
823-7554
FAX 823-5559
Water Pollution
Control Laboratory
6543 N. Burlington Ave
Portland, OR. 97203-
5452

SCHNITZER INVESTMENT CORP.

3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 323-2804

Post-it® Fax Note 7671		Date 10-5-98	# of pages ▶ 3
To Mr. David Ball		From Jim Jakobiak	
Co./Dept.		Co. SIC	
Phone #		Phone # (503) 286-6976	
Fax # (503) 823-5559		Fax #	

October 5, 1998

10-7-98 - David said the letter looks fine. Once we see the results they'll give us approval.

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Request to discharge storm water to sanitary sewer
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

We request that we be allowed to discharge storm water to an on-site sanitary sewer at the above referenced facility (Figure 1). The storm water accumulates within the secondary containment structures surrounding aboveground storage tanks currently in-place at the facility. Aboveground storage tanks formerly contained raw and refined edible oils (i.e., vegetable and palm oil). As storm water accumulates over the next 12 months we would like to have the ability to discharge as needed. The tanks are currently empty and scheduled to be dismantled in the near future.

At this time we have no idea as to the anticipated volume of discharge. The need and volume of discharge will be dependent on weather conditions. An approximate volume of storm water to be discharged each event should be approximately 100 to 200 gallons of water. Water will be discharge to the two manholes shown on Figure 2.

We have recently sampled accumulated storm water from one of the containment areas and have submitted it to Columbia Analytical Services for analysis of oil and grease and pH. The sample collected is thought to be representative of the batch to be discharged. We will forward the analytical results to you when they become available.

Thanks for your help on this matter. If you have further questions or comments, feel free

SCHNITZER INVESTMENT CORP.

3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 323-2804

October 5, 1998

Mr. David Ball
City of Portland
Bureau of Environmental Services
6543 North Burlington Avenue
Portland, Oregon 97203-5452

Re: Request to discharge storm water to sanitary sewer
10400 N. Burgard Way
Portland, Oregon

Dear Mr. Ball:

We request that we be allowed to discharge storm water to an on-site sanitary sewer at the above referenced facility (Figure 1). The storm water accumulates within the secondary containment structures surrounding aboveground storage tanks currently in-place at the facility. Aboveground storage tanks formerly contained raw and refined edible oils (i.e., vegetable and palm oil). As storm water accumulates over the next 12 months we would like to have the ability to discharge as needed. The tanks are currently empty and scheduled to be dismantled in the near future.

At this time we have no idea as to the anticipated volume of discharge. The need and volume of discharge will be dependent on weather conditions. An approximate volume of storm water to be discharged each event should be approximately 100 to 200 gallons of water. Water will be discharge to the two manholes shown on Figure 2.

We have recently sampled accumulated storm water from one of the containment areas and have submitted it to Columbia Analytical Services for analysis of oil and grease and pH. The sample collected is thought to be representative of the batch to be discharged. We will forward the analytical results to you when they become available.

Thanks for your help on this matter. If you have further questions or comments, feel free to contact me at (503) 286-6976.

Sincerely,

Schnitzer Investment Corp.

Jim Jakubiak
Environmental Administrator

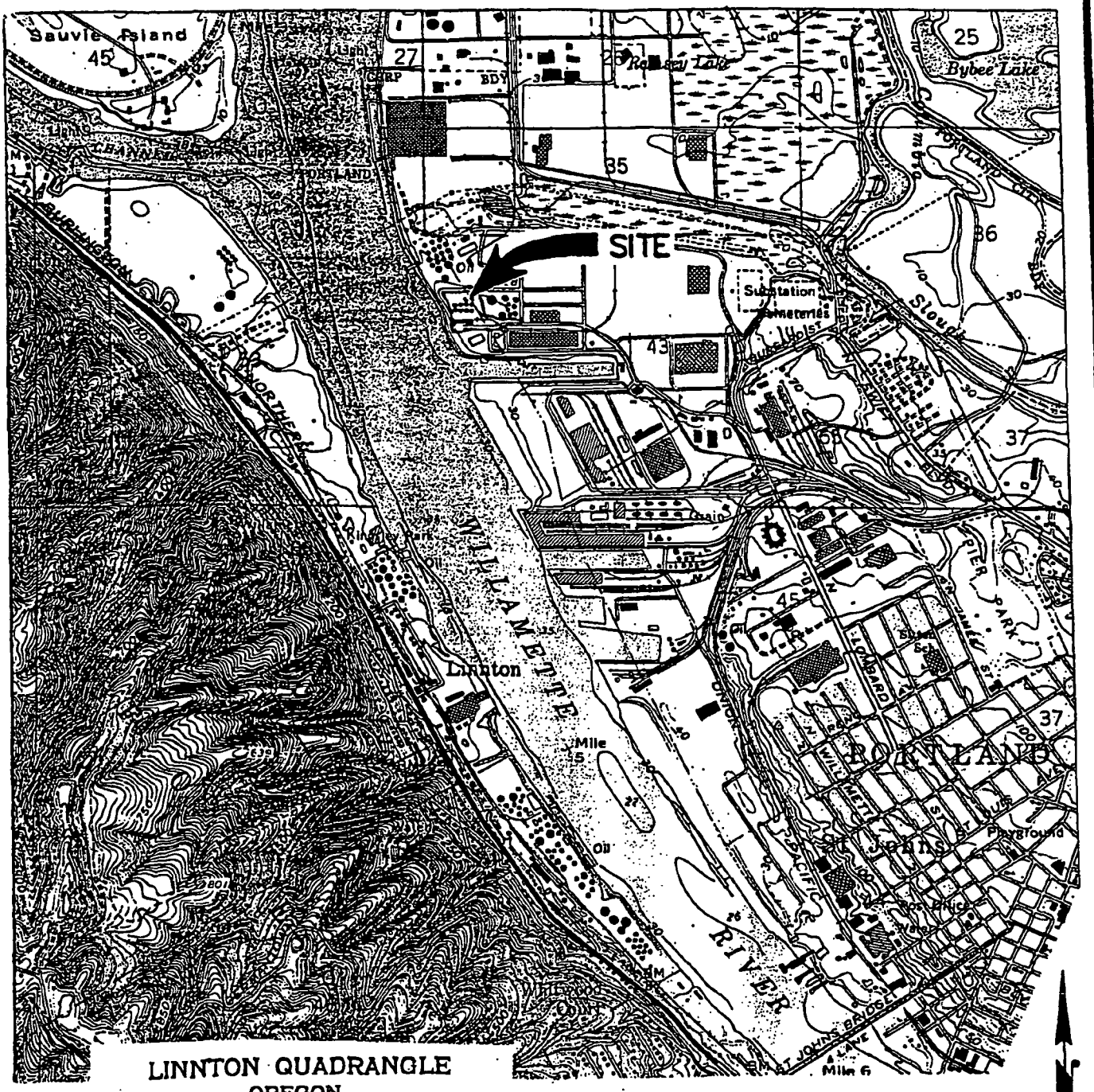

FIGURE 1

PREMIER EDIBLE OILS
10400 N. BURGARD WAY
PORTLAND, OREGON

SITE LOCATION MAP

SCHN00261736

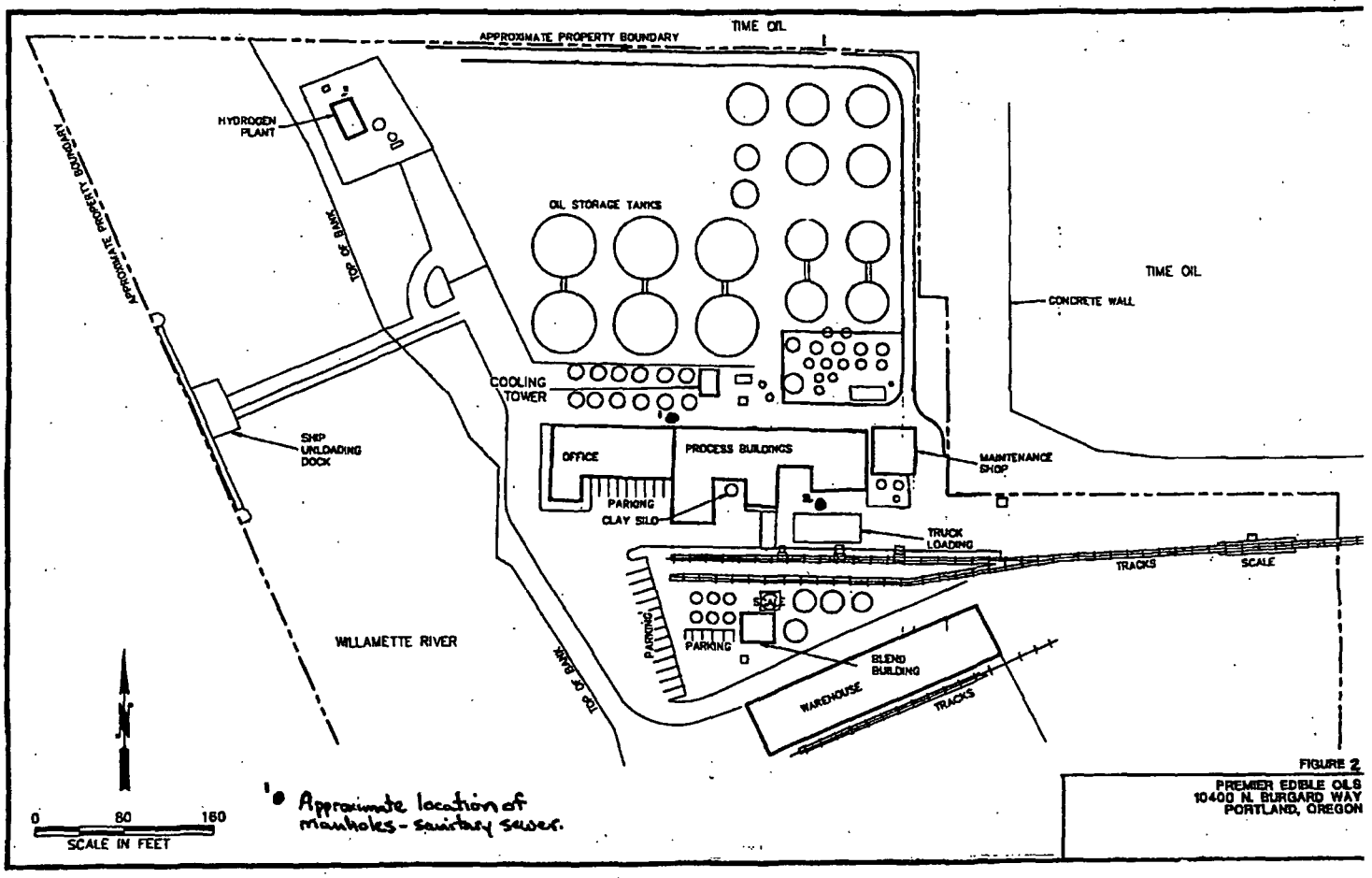

FIGURE 2
PREMIER EDIBLE OILS
10400 N. BURGARD WAY
PORTLAND, OREGON

SCHN00261737

Oregon
Theodore Kulongoski, 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

December 24, 2003

Jim Jakubiak (LQ-HW-AR)
Schnitzer Investment Corp
PO Box 10047
Portland, OR 97296-0047

HazWaste Personal Identification Number (PIN)

All hazardous waste generators that have an active RCRA Site Identification Number are required to file an annual report. A reminder and instructions will be sent to the forms contact each December indicating a March 1 due date. The PIN number below provides you access to HazWaste.net, the State of Oregon's Hazardous Waste Electronic Reporting application. The Web address for the HazWaste.net application is www.deq.state.or.us/wmc/hw/hwrptonlineforms.htm. Please go to this Web address and select the option to create an account. Provide your RCRA Site ID Number and PIN when prompted. You will then be asked to setup a user profile for future access to the application.

By default, the user who sets up the application is given the Administrator role. The administrator has the option of establishing additional "data entry" type roles so that others may have access to the application for this RCRA Site ID Number. Please refer to the application help for a definition of user roles.

RCRA Site ID Number:	ORD987180189
Personal Identification Number (PIN)	7080
Facility Name:	Premier Edible Oils Site
Site Location:	10400 N BURGARD WAY PORTLAND, OR 97203-6422

Thank you for using HazWaste.Net. If you have any questions, please call DEQ in Portland at (503) 229-6352 or toll-free with the Oregon at 1-800-452-4011, extension 6352. You can also email your questions to hazwaste@deq.state.or.us.

DEQ-DC1

Transmittal

To: DEQ- Accounting Section

From: Jim Jakubiak **Date:** 3/4/2004

Re: Annual Hazardous Waste Report

CC:

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☑ For Your Use

Attached is a copy of the DEQ Annual Hazardous Waste Report for 2003. Corrections were made to the form where appropriate. The form was also filed electronically as requested by DEQ. Please call me at (503) 286-6976 if you have questions or comments.

RCRA Waste Site Identification Form

Site ID

State of Oregon Department of Environmental Quality
Accounting Section
811 SW Sixth Avenue, Portland, OR 97204-1390
Questions: (503)229-6511 in Portland, OR or toll free in Oregon: (800)452-4011 Ext. 6511
Fax: (503)229-6977
TTY: (50)229-6993
Email: hazwaste@deq.state.or.us
Web site: www.deq.state.or.us

1. Reason for Submittal

- ☐ To provide **New** Notification of Regulated Waste Activity (complete entire form)
  - ☐ Initial Notification ($200 non-refundable fee required)
  - ☐ Change in business ownership (represent the new owner) (No fee required)
  - ☐ Reactivation of RCRA Site ID Number ($200 non-refundable fee required)
- ☒ To provide **Revised** Site Identification Information
- ☐ To **Withdraw** Site Identification Number
  - ☐ Completion of RCRA waste activity
  - ☐ Change in business ownership (represent the old owner) Effective Date:
- ☒ To provide as a component of the **Annual Hazardous Waste Report** (skip section 11, 12, and 13)
  Reporting Year: If ownership changed: ☐ Filing for entire year ☐ Filing for partial year
- ☐ To provide as a component of the ***Universal Waste or Used Oil Annual Report*** (skip sections 10 and 11)
  Reporting Year:

2. RCRA Site ID Number: ORD987180189

3a. Site Location Information

Company Name: Premier Edible Oils Site
Site Location: 10400 N BURGARD WAY
PORTLAND, OR 97203-5422
County: MULTNOMAH
Corp. Div. Reg. Nbr.:
NAICS Code:
Employee Count: 1

3b

Company Name:
Site Location:
City/State/Zip:
County:
Corp. Div. Reg. Nbr.:
NAICS Code:
Employee Count:

4a. Site Contact

Person Name: Jim Jakubiak
Mailing Address: PO Box 10047
Portland, OR 97296-0047
Country: United States
Phone Number (Ext): (503) 286-6976
Email Address:

4b

Person Name:
Mailing Address:
City/State/Zip:
Country:
Phone Number (Ext):
Email Address:

5a. Land Owner

Name: Mike Delashmit
Mailing Address: 2737 West Commodore Way
Seattle, WA 98199
Country: United States
Phone Number (Ext): (206) 285-2400
Owner Type: Private

5b

Name: Jim Jakubiak
Mailing Address: PO Box 10047
City/State/Zip: Portland, OR. 97296-0047
Country: United States
Phone Number (Ext): (503) 286-6976
Owner Type: ☒ Private ☐ Federal ☐ State ☐ County ☐ District ☐ Municipal ☐ Tribal ☐ Other

SCHN00261747

RCRA Waste Site Identification Form

Site ID

RCRA Site ID Number: ORD987180189

6a. Legal Owner	6b.
Name: Schnitzer Investment Corp Mailing Address: PO Box 10047 Portland, OR 97296-0047 Country: United States Phone Number (Ext): (503) 2249900 Owner Since: 03/09/2001 Owner Type: Private	Name: Mailing Address: City/State/Zip: Country: Phone Number (Ext): Owner Since: Owner Type: ☐ Private ☐ Federal ☐ State ☐ County ☐ District ☐ Municipal ☐ Tribal ☐ Other
7a. Site Operator	**7b.**
Name: Mailing Address: City/State/Zip: Country: Phone Number (Ext): Operator Since: Operator Type:	Name: Mailing Address: City/State/Zip: Country: Phone Number (Ext): Operator Since: Operator Type: ☐ Private ☐ Federal ☐ State ☐ County ☐ District ☐ Municipal ☐ Tribal ☐ Other
8a. Hazardous Waste Forms Contact	**8b.**
Person Name: Jim Jakubiak Organization: Schnitzer Investment Corp Mailing Address: PO Box 10047 Portland, OR 97296-0047 Country: United States Phone Number (Ext): (503) 286-6976 Email Address:	Person Name: Organization: Mailing Address: City/State/Zip: Country: Phone Number (Ext): Email Address:
9a. Hazardous Waste Fee Contact	**9b.**
Person Name: Jim Jakubiak Organization: Schnitzer Investment Corp Mailing Address: PO Box 10047 Portland, OR 97296-0047 Country: United States Phone Number (Ext): (503) 286-6976 Email Address:	Person Name: Organization: Mailing Address: City/State/Zip: Country: Phone Number (Ext): Email Address:

SCHN00261748

RCRA Waste Site Identification Form

Site ID

RCRA Site ID Number: ORD987180189

10. Hazardous Waste Activities (Mark the appropriate boxes for activities that apply to your site)

1. Generator of Hazardous Waste

- ☐ a. LQG: Large Quantity Generator (Generates greater than 2,200 lbs/mo or more than 2.2 lbs of acute hazardous waste)
- ☐ b. SQG: Small Quantity Generator: (Generates between 220-2,200 lbs/mo or more than 2,200 lbs accumulated on-site)
- ☒ c. CEG: Conditionally Exempt Generator: (Generates between 0-220 lbs/mo, less than 2.2 lbs of acute hazardous waste and less than 2,200 lbs accumulated on-site)

2. Are you a hazardous waste generator due to remediation of environmental contamination or a business closure?

☐ Yes ☐ No

If yes, find out about expedited annual reporting at: www.deq.state.or.us/wmc/hw/factsheets/HWFeesForCleanups.p

- ☐ **3. Importer of Hazardous Waste**
- ☐ **4. Generator of Mixed Waste (hazardous and radioactive)**

5. Transporter of Hazardous Waste

- ☐ a. Transports hazardous waste generated at this facility
- ☐ b. Transports for commercial purposes
- ☐ c. Hazardous Waste Transfer Facility

- ☐ **6. Treatment, Storage, Disposal (TSD) Facility**

(Note: A RCRA Permit is required for this activity)

7. Recycler of Hazardous Waste

- ☐ a. Recycles HW generated at this facility
- ☐ b. Recycles HW generated by other facilities

8. Hazardous waste management in RCRA permit exempt units (e.g. elementary neutralization units, waste water treatment units, or accumulation tanks or containers)

- ☐ a. Manages HW generated at this facility
- ☐ b. Manages HW generated by other facilities

9. Exempt Boiler and/or Industrial Furnace

- ☐ a. Small Quantity On-Site Burner Exemption
- ☐ b. Smelting, Melting, Refining Furnace Exemption

- ☐ **10. Underground Injection Control**

If yes, there may be addition reporting requirements at: www.deq.state.or.us/wq/groundwa/uichome.htm

11. Description of Hazardous Wastes

1. Waste Codes for Federally Regulated Hazardous Wastes: Identify the federal hazardous waste codes that best describe your waste (e.g., D001 - Ignitable, D002 - Corrosive, D003 - Reactive, etc.) List additional federal codes in the comments section.

2. Waste Codes for State Regulated(i.e., non-federal) Hazardous Wastes: Identify the Oregon state-only hazardous waste codes that best describe your waste (e.g., ORX001, ORX007, ORP003, ORU001, etc.)

12. Universal Waste Activities (Mark the appropriate boxes for activities that apply to your site)

- ☐ **1. Large Quantity Handler of Universal Waste**

(Accumulates a total of 11,000 lbs. or more of universal waste at any time, at the location at which it was generated)

- ☐ **2. Off-site Universal Waste Collection Site**

(Accumulates a total of 2,000 lbs. or more of universal waste received from off-site). If yes, there are additional notification requirements at: www.deq.state.or.us/wmc/documents/uwnotification.pdf

- ☐ **3. Pesticide Collection Program**

(Collects and accumulates waste pesticides from off-site). If yes, there are additional notification requirements at: www.deq.state.or.us/wmc/documents/uwnotification.pdf

- ☐ **4. Destination Facility for Universal Waste**

(A facility that treats, disposes of, or recycles universal wastes on-site)

5. Mark all boxes that apply

	Generate	Accumulate
a. Batteries	☐	☐
b. Mercury containing	☐	☐
c. Lamps	☐	☐
d. Pesticides	☐	☐

13. Used Oil Activities (Mark the appropriate boxes for activities that apply to your site)

- ☐ **1. Used Oil Collection Center**
- ☐ **2. Used Oil Transporter**
- ☐ **3. Used Oil Transfer Facility**

4. Used Oil Processor/Re-refiner

Indicate type(s) of activity(s)

- ☐ a. Processor
- ☐ b. Re-refiner

- ☐ **5. Off-Specification Used Oil Burner (not used oil space heaters operating according to CFR 279.23)**

6. Used Oil Fuel Marketer

Indicate type(s) of activity(s)

- ☐ a. Marketer who directs shipments of off-specification used oil to off-specification used oil burner
- ☐ b. Marketer who first claims the used oil to meet the specifications

SCHN00261749

RCRA Waste Site Identification Form

Site ID

RCRA Site ID Number: ORD987180189

14. Comments

15. Certification

This form cannot be processed without a signature

I certify that under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration 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 and imprisonment.

Signature

March 4, 2004

Date

Jim Jakubiak

Name (print or type)

Environmental Administrator

Title

If you have special accommodation needs or require this documentin an alternative format, please contact the Hazardous Waste Section in Portland at 503-229-6938 or toll-free within the State of Oregon at 1-800-452-4011, extension 6938

16. Electronic Submittals

DEQ will issue a PIN number and electronic filing instructions in a letter addressed to the Forms Contact in Section 8 on this form. The electronic reporting system may be used for your company's annual reporting and site identification updates.

SCHN00261750

Submitted electronically
3-4-04 - File Copy

RCRA Waste Site Identification Form — Site ID

State of Oregon Department of Environmental Quality
Accounting Section
811 SW Sixth Avenue, Portland, OR 97204-1390
Questions: (503)229-6511 in Portland, OR or toll free in Oregon: (800)452-4011 Ext. 6511
Fax: (503)229-6977
TTY: (50)229-6993
Email: hazwaste@deq.state.or.us
Web site: www.deq.state.or.us

1. Reason for Submittal

- ☐ To provide **New** Notification of Regulated Waste Activity (complete entire form)
  - ☐ Initial Notification ($200 non-refundable fee required)
  - ☐ Change in business ownership (represent the new owner) (No fee required)
  - ☐ Reactivation of RCRA Site ID Number ($200 non-refundable fee required)
- ☒ To provide **Revised** Site Identification Information
- ☐ To **Withdraw** Site Identification Number
  - ☐ Completion of RCRA waste activity
  - ☐ Change in business ownership (represent the old owner) Effective Date: 03/04/2004
- ☒ To provide as a component of the **Annual Hazardous Waste Report** (skip section 11, 12, and 13)
  - Reporting Year: 2003 If ownership changed: ☒ Filing for entire year ☐ Filing for partial year

2. RCRA Site ID Number: ORD987180189

3a. Site Location Information

Company Name: Premier Edible Oils Site
Site Location: 10400 N BURGARD WAY
PORTLAND, OR 97203-6422
County: MULTNOMAH
Corp. Div. Reg. Nbr.: 067357-16
NAICS Code: 531190
Employee Count: 1

4a. Site Contact

Person Name: Jim Jakubiak
Mailing Address: PO Box 10047
Portland, OR 97296-0047
Country: UNITED STATES
Phone Number (Ext): (503) 286-6976
Email Address:

5a. Land Owner

Name: Jim Jakubiak
Mailing Address: PO Box 10047
Portland, OR 97296-0047
Country: UNITED STATES
Phone Number (Ext): (503) 286-6976
Owner Type: ☒ Private ☐ Federal ☐ State ☐ County ☐ District ☐ Municipal ☐ Tribal ☐ Other

SCHN00261751

RCRA Waste Site Identification Form

Site ID

RCRA Site ID Number: ORD987180189

6a. Legal Owner

Name: Schnitzer Investment Corp
Mailing Address: PO Box 10047
Portland, OR 97296-0047
Country: UNITED STATES
Phone Number (Ext): (503) 224-9900
Owner Since: 03/09/2001
Owner Type: ☒ Private ☐ Federal ☐ State ☐ County ☐ District ☐ Municipal ☐ Tribal ☐ Other

7a. Site Operator

Name: Schnitzer Investment Corp
Mailing Address: PO Box 10047
Portland, OR 97296-0047
Country: UNITED STATES
Phone Number (Ext): (503) 224-9900
Operator Since:
Operator Type: ☒ Private ☐ Federal ☐ State ☐ County ☐ District ☐ Municipal ☐ Tribal ☐ Other

8a. Hazardous Waste Forms Contact

Person Name: Jim Jakubiak
Organization: Schnitzer Investment Corp
Mailing Address: PO Box 10047
Portland, OR 97296-0047
Country: UNITED STATES
Phone Number (Ext): (503) 286-6976
Email Address: jjakubiak@schn.com

9a. Hazardous Waste Fee Contact

Person Name: Jim Jakubiak
Organization: Schnitzer Investment Corp
Mailing Address: PO Box 10047
Portland, OR 97296-0047
Country: UNITED STATES
Phone Number (Ext): (503) 286-6976
Email Address:

SCHN00261752

RCRA Waste Site Identification Form

Site ID

RCRA Site ID Number: ORD987180189

10. Hazardous Waste Activities (Mark the appropriate boxes for activities that apply to your site)

1. Generator of Hazardous Waste

- ☐ a. LQG: Large Quantity Generator (Generates greater than 2,200 lbs/mo or more than 2.2 lbs of acute hazardous waste)
- ☐ b. SQG: Small Quantity Generator: (Generates between 220-2,200 lbs/mo or more than 2,200 lbs accumulated on-site)
- ☒ c. CEG: Conditionally Exempt Generator: (Generates between 0-220 lbs/mo, less than 2.2 lbs of acute hazardous waste and less than 2,200 lbs accumulated on-site)

2. Are you a hazardous waste generator due to remediation of environmental contamination or a business closure?

☐ Yes ☒ No

If yes, find out about expedited annual reporting at: www.deq.state.or.us/wmc/hw/factsheets/HWFeesForCleanups.p

- ☐ **3. Importer of Hazardous Waste**
- ☐ **4. Generator of Mixed Waste (hazardous and radioactive)**

5. Transporter of Hazardous Waste

- ☐ a. Transports hazardous waste generated at this facility
- ☐ b. Transports for commercial purposes
- ☐ c. Hazardous Waste Transfer Facility

- ☐ **6. Treatment, Storage, Disposal (TSD) Facility**
  (Note: A RCRA Permit is required for this activity)

7. Recycler of Hazardous Waste

- ☐ a. Recycles HW generated at this facility
- ☐ b. Recycles HW generated by other facilities

8. Hazardous waste management in RCRA permit exempt units (e.g. elementary neutralization units, waste water treatment units, or accumulation tanks or containers)

- ☐ a. Manages HW generated at this facility
- ☐ b. Manages HW generated by other facilities

9. Exempt Boiler and/or Industrial Furnace

- ☐ a. Small Quantity On-Site Burner Exemption
- ☐ b. Smelting, Melting, Refining Furnace Exemption

- ☐ **10. Underground Injection Control**

If yes, there may be addition reporting requirements at: www.deq.state.or.us/wq/groundwa/uichome.htm

11. Description of Hazardous Wastes

1. Waste Codes for Federally Regulated Hazardous Wastes: Identify the federal hazardous waste codes that best describe your waste (e.g., D001 - Ignitable, D002 - Corrosive, D003 - Reactive, etc.) List additional federal codes in the comments section.

2. Waste Codes for State Regulated(I.e., non-federal) Hazardous Wastes: Identify the Oregon state-only hazardous waste codes that best describe your waste (e.g., ORX001, ORX007, ORP003, ORU001, etc.)

12. Universal Waste Activities (Mark the appropriate boxes for activities that apply to your site)

- ☐ **1. Large Quantity Handler of Universal Waste**
  (Accumulates a total of 11,000 lbs. or more of universal waste at any time, at the location at which it was generated)
- ☐ **2. Off-site Universal Waste Collection Site**
  (Accumulates a total of 2,000 lbs. or more of universal waste received from off-site). If yes, there are additional notification requirements at: www.deq.state.or.us/wmc/documents/uwnotification.pdf
- ☐ **3. Pesticide Collection Program**
  (Collects and accumulates waste pesticides from off-site). If yes, there are additional notification requirements at: www.deq.state.or.us/wmc/documents/uwnotification.pdf

- ☐ **4. Destination Facility for Universal Waste**
  (A facility that treats, disposes of, or recycles universal wastes on-site)

5. Mark all boxes that apply

	Generate	Accumulate
a. Batteries	☐	☐
b. Mercury containing	☐	☐
c. Lamps	☐	☐
d. Pesticides	☐	☐

13. Used Oil Activities (Mark the appropriate boxes for activities that apply to your site)

- ☐ **1. Used Oil Collection Center**
- ☐ **2. Used Oil Transporter**
- ☐ **3. Used Oil Transfer Facility**

4. Used Oil Processor/Re-refiner

Indicate type(s) of activity(s)

- ☐ a. Processor
- ☐ b. Re-refiner

- ☐ **5. Off-Specification Used Oil Burner (not used oil space heaters operating according to CFR 279.23)**

6. Used Oil Fuel Marketer

Indicate type(s) of activity(s)

- ☐ a. Marketer who directs shipments of off-specification used oil to off-specification used oil burner
- ☐ b. Marketer who first claims the used oil to meet the specifications

SCHN00261753

RCRA Waste Site Identification Form

Site ID

RCRA Site ID Number: ORD987180189

14. Comments

No state or federal hazardous wastes were removed from the site in 2003. Questions above that were not answered, do not apply. Question 5a listed the incorrect land owner.

15. Certification — **This form cannot be processed without a signature**

I certify that under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration 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 and imprisonment.

J. Jakubiak
Signature

March 4, 2004
Date

Jim Jakubiak
Name (print or type)

Environmental Administrator
Title

If you have special accommodation needs or require this documentin an alternative format, please contact the Hazardous Waste Section in Portland at 503-229-6938 or toll-free within the State of Oregon at 1-800-452-4011, extension 6938

16. Electronic Submittals

DEQ will issue a PIN number and electronic filing instructions in a letter addressed to the Forms Contact in Section 8 on this form. The electronic reporting system may be used for your company's annual reporting and site identification updates.

SCHN00261754

HAZARDOUS WASTE
FILING INFORMATION ACKNOWLEDGEMENT

State of Oregon
Department of Environmental Quality

Waste Prevention and Management Division
Hazardous Waste Section
811 SW. 6th Avenue
Portland, OR 97204

DATE MAY 7, 2003

Your recent communication is hereby acknowledged.
This communication resulted in the following filing information action:

ACTION

- ☒ Modified/Added Status (as identified under 'Status')
- ☐ Issued new DEQ ID Number (identified under 'Facility')
- ☐ Canceled or Withdrawn DEQ ID Number (identified under 'Facility')
- ☐ Reactivate DEQ ID Number (identified under 'Facility')

STATUS

- ☐ Transporter
- ☐ Market/Burn Hazardous Waste Fuels
- ☐ Market/Burn Used Oil
- ☐ Recycler
- ☒ Generator Status Effective: FEBRUARY 27, 2003
  - ☐ Large Quantity Generator (LQG)
  - ☐ Small Quantity Generator (SQG)
  - ☒ Conditionally-Exempt Small Quantity Generator (CEG)

FACILITY

DEQ ID Number:	**ORD987180189**
Facility Name:	**PREMIER EDIBLE OILS SITE**
Site Address:	**10400 N BURGARD WAY**
City, State, Postal Code:	**PORTLAND, OR 97203-6422**

This DEQ ID Number is *permanently* assigned to the Physical Location listed above and is to be used on *all* shipping papers, manifests, and correspondence concerning hazardous waste pertaining to that site location. If the name, ownership, status, contact name, or similar changes occur, you will need to update your filing information.

If, for any reason, hazardous waste is no longer generated, stored, or disposed of, at this site, you may want to request a Temporary Withdrawal, or request a Cancellation of the DEQ ID Number. For these updates, request Notification Form from DEQ by calling 503-229-5913 or toll-free within the State of Oregon at 800-452-4011.

Please note that all Generators *must* respond to the Annual Reporting Requirements due by March 1 of each calendar year. Each facility with an active DEQ ID Number will receive instructions the previous December.

All LQGs, SQGs, and Toxics Release Inventory Reporters must prepare a Toxics Use Reduction (TUR) Plan. LQGs and Toxics Release Inventory Reporters must also develop a Toxics Use Reduction Annual Pounds Report. For more information on Toxic Use Reduction call Elaine Glendening at DEQ at 503-229-6015 or toll-free within the State of Oregon at 800-452-4011.

For more information, call the phone number listed above.

SCHN00261756

Registration Verification Report 2002

name chg.

1 *969

1. DEQ ID No: ORD987180189 Name: ~~Schnitzer Inv~~ Premier Edible Oils Site
Location: 10400 N BURGARD WAY
PORTLAND, OR 97203-6422
Site Contact Name: Jim Jakubiak Site Contact Phone: (503) 286-6976
Current information, if different from above: Premier Edible Oils Site

Your Standard Industrial Classification (SIC) code is currently:
2079: Shortening And Cooking Oils
Current code if different:

DEQ
State of Oregon Department of Environmental Quality

Your current employee count is listed as 1 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 Inv Premier Edible Oils Site is:

2. Indvidual or Organization: Schnitzer Investment Corp. ~~Corporation~~ Address: PO Box 10047 Portland, OR 97296-0047 Phone: (503) 224-9900	Indvidual or Organization: Schnitzer Investment Corp. Address: Phone: MAR 03 2003

The owner of the property on which Schnitzer Inv Premier Edible Oils Site is located is:

3. Individual or Organization: Schnitzer Investment Corp. ~~Corporation~~ Address: PO Box 10047 Portland, OR 97296-0047 Phone: (503) 224-9900	Individual or Organization: Schnitzer Investment Corp. Address: Phone:

The address for DEQ to send hazardous waste information to Schnitzer Inv Premier Edible Oils Site is:

4. Forms Contact: Jim Jakubiak Organization: Schnitzer Investment Corp. ~~Corporation~~ Address: PO Box 10047 Portland, OR 97296-0047 Internet E-Mail: Data missing, please update Phone: (503) 286-6976	Forms Contact: Schnitzer Investment Corp. Organization: Address: Internet E-Mail: Phone:

The address for DEQ to send hazardous waste fee invoices for Schnitzer Inv Premier Edible Oils Site is:

5. Fee Contact: Jim Jakubiak Organization Schnitzer Investment Corp. ~~Corporation~~ Address: PO Box 10047 Portland, OR 97296-0047 Phone: (503) 286-6976	Fee Contact: Schnitzer Investment Corp. Organization: Address: Phone:

Hazardous waste generator status:

6. Schnitzer Inv Premier Edible Oils Site last reported as a Large Quantity Generator on the 2001 Annual Report.
What was the generator status for Schnitzer Inv Premier Edible Oils Site in 2002, based on monthly generation records?

☐ Large Quantity Generato ☐ Small Quantity Generato ☒ Conditionally Exempt Generato

12/16/2002

EM 3/20/03
R2, R3

SCHN00261757

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.

The correct name of the property is "Premier Edible Oils Site".

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.*

Signature _____ Date 2-27-03

Jim Jakubiak Environmental Administrator

Name (please print) Title

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

SCHN00261758

THIS MEMORANDUM is an acknowledgement that a bill of lading has been issued and is not the Original Bill of Lading, not a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

Shipper's No. _____

(Name of Carrier) ENVIROTECH SYSTEMS, INC. **SCAC.** _____ **Carrier's No.** 16139

Received, subject to the classifications and tariffs in effect on the date of this Bill of Lading:

at PORTLAND, OR **date** 6/19/02 **from** SCHNITZER INVESTMENT CORP. / PREMIUM GOOD

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said company (the word company 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 own road or its own water line, 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 of said property, that every service to be performed hereunder shall be subject to all the conditions not prohibited by law, whether printed or written, herein contained. (as specified in Appendix B to Part 1035) which are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned to (Mail or street address of consignee – For purposes of notification only.)

SPENCER ENVIRONMENTAL 6400 ST. 101ST AVE.

Destination	**State**	**County**	**Zip**	**Delivery Address***
PORTLAND	OR		97266	

Route (*To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier _____ **Car or Vehicle Initials** _____ **No.** _____

Number of Packages	Description of articles, special marks, and exceptions	*Weight (Sub. to correction)	Class or rate	Check column
1	16 GAL DM MATERIAL NOT REGULATED BY D.O.T. (~~OFF SPEC~~ OIL) USE 5			
	RCVD SPENCER ENVIRONMENTAL DATE:			

Subject to Section 7 of 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)

If charges are to be prepaid, write or stamp here, "To be Prepaid".

Received $ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per _____

(The signature here acknowledges only the amount prepaid.)

Charges Advanced:

$ _____

Collect On Delivery $ _____ **and remit to** _____

C.O.D. Charge to be paid by Shipper ☐ Consignee ☐

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight".
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 _____

HM EMERGENCY RESPONSE TELEPHONE NUMBER (§172.604)

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

Shipper: SCHNITZER INVESTMENT CORP. Agent: ENVIROTECH SYSTEMS, INC.

Per: _____ Date: 7/2/02 Per: _____ Date: 7/2/02

Permanent post-office address of shipper

FORM NO. 1 BLC-Q3 (Rev. 8/95)

3

SCHN00261760

ENVIROTECH SYSTEMS, INC.
3601 121st STREET SW
LYNNWOOD, WA 98037
(206) 353-2000

WORK ORDER

FOR ACCOUNT

WORK ORDER NUMBER
16139

WORK ORDER DATE
Jun 14, 2002

SOLD TO:
SCHNITZER INVESTMENT CORP.
225 108TH AVENUE NE, STE 400
BELLEVUE, WA 98004

SITE:
PREMIER EDIBLE OILS
10400 NORTH BURGARD WAY
PORTLAND, OR 97210

PHONE: (503) 286-6976

SITE PHONE: 425-452-3700

CUSTOMER	PO NUMBER	ESI JOB #	ACCOUNT REP
SCHSTEPOR		02-151-16	OREGON
CUSTOMER CONTACT	EPA ID #	DATE ORDERED	DATE COMPLETED
J JAKUBIAK	ORD099155574	6/14/02	7/12/02

DESCRIPTION / MANIFEST #	QUANTITY	SIZE	TAX	UNIT PRICE	EXTENSION
REMOVE, TRANSPORT AND REUSE/RECYCLE/DISPOSE OF:					
DM UNAX AW46 AND WATER/ 16139	1.00	16 GAL	N		
PROFILE FACILITY APPROVAL OF UNAX 02-151-16	1.00				
UNAX NEW DRUM	1.00	16 GAL	Y		ON ACCOUNT
FUEL SURCHARGE	1.00	EA	N		

CUSTOMER CHANGES

WORK AUTHORIZATION

The undersigned hereby authorizes and acknowledges 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 J Schnitzer DATE: 7/2/02

SCHN00261761

ENVIROTECH SYSTEMS, INC.
3601 - 121st STREET SW
LYNNWOOD, WA 98037
TELEPHONE: (206) 363-9000 FAX: (425) 513-5839

WASTE PRODUCT QUESTIONNAIRE

PROFILE **ESI WPQ** 02-151-16

GENERATOR NAME: PREMIER EDIBLE OILS
INVOICE TO: SCHNITZER INVESTMENT CORP.
DATE: 6/6/02
SIC CODE:
SITE ADDRESS: 10400 NORTH BURGARD WAY
ADDRESS: 225 - 108TH AVE. NE, STE 400
GEN EPA ID: ORD987180189
CONTACT: JIM JAKUBIAK
PORTLAND , OR 97210
BELLEVUE , WA 98004
PHONE: 503 286-6976

WASTE PRODUCT DESCRIPTION AND CHARACTERISTICS

WASTE PRODUCT NAME: UNAX AW46 AND WATER
SOURCE:
PROCESS GENERATING WASTE: DISCARDING UNWANTED PRODUCT
FORM:

ODOR
○ NONE ◉ MILD ○ STRONG
DESCRIBE: OIL

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: 100

pH
○ 10.1 - 12.4
○ <= 2 ○ >= 12.5
○ 2 - 4 ○ EXACT:
○ 4.1 - 10 NA

DENSITY OR SPECIFIC GRAVITY
< 1
◉ 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)

	%
UNAX AW 46 OIL	50-80
(HYDROTREATED HEAVY PARAFFINIC	
DISTILLATE, SOLVENT-DEWAXED HEAVY PARAFFINIC,	
OIL PETROLEUM DISTILLATES,	
MINERAL OIL)	
WATER	20-50

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: UN1A1 16 GAL DM
VOLUME: 6-7 GALLONS

RCRA HAZ WASTE ☐ EXEMPT WASTE ☐
STATE ONLY WASTE ☐ TSCA ☐

WASHINGTON STATE DESIGNATION
○ DHW ○ 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: (USED OIL FOR RECYCLE)
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 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:

SCHN00261762

COLUMBIA RIDGE LANDFILL & RECYCLING CENTER
A WASTE MANAGEMENT COMPANY

18177 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2030
(541) 454-3312 Fax

October 13, 2000

Envirotech Systems, Inc.
18820 Aurora Avenue No. Ste 201
Seattle, WA 98133-3914

CERTIFICATE OF DISPOSAL

Oregon Waste Systems, Inc. has received NON HAZARDOUS Waste material from Envirotech Systems Inc. on behalf of Premier Edible Oils.

Date of Disposal:	October 12, 2000
Manifest #'s:	98580
Profile #:	550151, 550147
Pounds Disposed:	240 lbs.
Waste Type:	Soil Cuttings, Off-Spec Product

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.

Angela Timmerman

Angela Timmerman
Special Waste Billing Department

SCHN00261764

OCT - 8 1999

CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST
A WASTE MANAGEMENT COMPANY

17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2643
(541) 454-3227 Fax

September 29, 1999

SCHNITZER INVESTMENT CORP
PO BOX 10047
PORTLAND, OR 97296-0047

Dear: JIM JAKUBIAK,

Your profile number 545575 will expire on 11/30/99. Please review the attached profile sheet and make any necessary changes, sign and date the front page of the profile and answer questions 1 through 7 of Columbia Ridge Landfill Generator's Recertification form, sign and date and send it with analytical or MSD sheet to the below address.

CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST, INC.
17629 CEDAR SPRINGS LANE
ARLINGTON OR 97812
ATTN: LAB

We must receive this information 30 days before the expiration date to ensure continued uninterrupted service. If no sample is required it will be noted in question 17, lower right hand corner of the profile.

Once your profile has been received and reviewed you will receive a new confirmation letter showing your new expiration date. This will be your notification that an approval has been completed and you may continue to ship.

Please call your customer service representative at 1-800-843-3604 if you have any questions.

Sincerely,

LEAH SHANNON
Chemical Waste Management
Of the Northwest, Inc.
cc

_____**I do not wish to recertify my profile at this time.**

Waste Management, Inc.

Date Printed 09/30/99

GENERATOR'S WASTE PROFILE SHEET

Profile # CRL 545575

(X) Check here if this is a Recertification LOCATION OF ORIGINAL Columbia Ridge Landfill

GENERAL INFORMATION

1. Generator Name: SCHNITZER INVESTMENT CORP Generator USEPA ID: EXEMPT

2. Generator Address: 10400 N BURGARD WAY Billing Address: SCHNITZER INVESTMENT CORP
(_) Same
PO BOX 10047
PORTLAND OR 97203-6422 PORTLAND OR 97296-0047

3. Technical Contact/Phone: JIM JAKUBIAK 503/286-6976

4. Alternate Contact/Phone: Billing Contact/Phone: JIM JAKUBIAK 503/286-6976

PROPERTIES AND COMPOSITION

5. Process Generating Waste: THE FACILITY FORMERLY PRODUCED PALM (EDIBLE) OILS FOR USE IN COOKING

6. Waste Name: CONCRETE DEBRIS & SOIL

7A. Is this a USEPA hazardous waste (40 CFR Part 261)? Yes (_) No (X)
B. Identify ALL USEPA listed and characteristic waste code numbers (D,F,K,P,U): State Waste Codes:

8. Physical State @ 70F: A. Solid(X) Liquid(_) Both(_) Gas(_) B. Single Layer (X) Multilayer (_) C. Free liq. range 0 to 0%

9A. pH: Range or Not applicable (X) B. Strong Odor (_);describe

10. Liquid Flash Point: < 73F (_) 73-99F (_) 100-139F (_) 140-199F (_) >= 200F (_) N.A. (X) Closed Cup (X) Open Cup (_)

11. CHEMICAL COMPOSITION: List ALL constituents (incl. halogenated organics) present in any concentration and forward analysis

Constituents	Range	Unit Description
ORGANICS	0 to 128000	MG/KG
OIL	to	
GREASE	to	
TRICHLOROETHYLENE	0 to 13.7	MG/KG
NON-TRI CHEMICALS	0 to 1	MG/KG
CHLORINATED PETROLEUM AROMATIC HYDROCARBONS	to	See attach2
TOTAL COMPOSITION (MUST EQUAL OR EXCEED 100%):	100.000000	

12. OTHER: PCBs if yes, concentration _ ppm, PCBs regulated by 40 CFR 761 (_). Pyrophoric (_) Explosive (_)
Radioactive (_) Benzene if yes, concentration _ ppm. NESHAP (_) Shock Sensitive (_) Oxidizer (_)
Carcinogen (_) Infectious (_) Other

13. If waste subject to the land ban & meets treatment standards, check here: _ & supply analytical results where applicable.
000000

SHIPPING INFORMATION

14. PACKAGING: Bulk Solid (X) Bulk Liquid (_) Drum (_) Type/Size: CUBIC YARDS Other

15. ANTICIPATED ANNUAL VOLUME: 60 Units: CUBIC YARDS Shipping Frequency: ONE TIME

SAMPLING INFORMATION Sample Tracking Number:

16a. Sample source (drum, lagoon, pond, tank, vat, etc.):

Date Sampled: Sampler's Name/Company:

16b. Generator's Agent Supervising Sampling: 17. (_) No sample required (See instructions.)

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize WMI to obtain a sample from any waste shipment for purposes of recertification.

Signature Name and Title Date

SCHN00261767

Date Printed 09/30/99

Profile #
CRL 545575

18. This is a Nonwastewater.

19. If this waste is subject to any California list restrictions enter the letter from below (either A, B.1 or B.2) next to each restriction that is applicable:

___ HOCs, ___ PCBs, ___ Acid, ___ Metals, ___ Cyanides

20. Identify ALL Characteristic and Listed USEPA hazardous waste numbers that apply (as defined by 40 CFR 261). For each waste number, identify the subcategory (as applicable, check none, or write in the description from 40 CFR 268.41, 268.42, and 268.43).

REP #	A. US EPA HAZARDOUS WASTE CODE(S)	B. SUBCATEGORY Enter the subcategory description. If not applicable, simply check none		C. APPLICABLE TREATMENT STANDARDS			D. HOW MUST THE WASTE BE MANAGED?
				PERFORMANCE-BASED: Check as applicable		SPECIFIED TECHNOLOGY: If applicable enter the 40 CFR 268.42 table 1 treatment code(s)	
		DESCRIPTION	NONE	268.41(a)	268.43(a)	268.42	Enter letter from below
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

Management under the land disposal restrictions:

A. RESTRICTED WASTE REQUIRES TREATMENT

B.1 RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

B.2 RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)

B.3 GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS

C. RESTRICTED WASTE SUBJECT TO A VARIANCE

D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT

E. NOT CURRENTLY SUBJECT TO LAND DISPOSAL RESTRICTIONS

21. Is this waste a soil or debris? No: _ Yes, Soil: X Yes, Debris: _

22. Specific Gravity Range: _____ to _____

23. Indicate the range of each: Units

Cyanides: _ None _____ to _____ _____ Type (free, total, amenable, etc.) _____

Cyanides: _ None _____ to _____ _____ Type (free, total, amenable, etc.) _____

Sulfides: _ None _____ to _____ _____ Type _____

Optional
Phenolics: _ None _____ to _____ _____

24. Identify the waste color VARIES _____, DOT physical state Solid _____,

and physical appearance SOLID _____

SCHN00261768

Date Printed 09/30/99

Profile #
CRL 545575

25. COMPLETE ONLY FOR WASTES INTENDED FOR FUELS OR INCINERATION		26. RECLAMATION, FUELS or INCINERATION PARAMETERS (Provide if information is available)
	TOTAL	RANGE
Beryllium as Be	ppm	A. Heat Value (Btu/lb): ____-____
Potassium as K	ppm	B. Water: ____
Sodium as Na	ppm	C. Viscosity (cps): ____@____F _ 100 F _ 150 F
Bromine as Br	%	D. Ash: ____ %
Chlorine as Cl	%	E. Settleable solids: ____ %
Fluorine as F	%	F. Vapor Pressure @ STP (mm/Hg): ____
Sulfur as S	%	G. Is this waste a pumpable liquid? Yes _ No _
		H. Can this waste be heated to improve flow? Yes _ No _
		I. Is this waste soluble in water? Yes _ No _
		J. Particle size: Will the solid portion of this waste pass through a 1/8 inch screen? Yes _ No _

27. TRANSPORTATION INFORMATION

A. Is this a DOT Hazardous Material? Yes _ No X

B. Proper Shipping Name. . . . . : NON-REGULATED MATERIAL

and Additional Description if required: _____

C. DOT Regulations: _____ Hazard Class: ____ _____ I.D. _____ Packing Group: ___

D. CERCLA Reportable Quantity (RQ) and units (Lb, Kg): _____

E. Non-Bulk code ___ Bulk code ___

F. Special Provisions ___ ___ ___ ___ ___ ___

G. Labels Required _____ _____ _____

28. SPECIAL HANDLING INFORMATION

_ Material Safety Data Sheets Attached

29. OTHER INFORMATION

THE FACILITY FORMERLY PRODUCED PALM (EDIBLE) OILS FOR USE IN COOKING. THE SOIL WAS GENERATED DURING A PROPERTY INVESTIGATION. THE CONCRETE WAS GENERATED WHEN THE DRAINS & SUMPS WERE REMOVED FROM OUTDOOR LOCATIONS.

30. WASTE MANAGEMENT CERTIFICATION

Waste Management, Inc. has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile.

SCHN00261769

Date Printed 09/30/99

Profile # CRL 545575

31. OTHER HAZARDOUS CONSTITUENTS Indicate if the waste contains any of the following.

METALS	TCLP Information: Check only ONE for each constituent Use units: ppm, mg/l				TCLP Data	TCA or TOTAL Use units: ppm, mg/l, mg/kg or percent			
						California List			
	Less Than	TC Regulated Level	Equal or More	Waste No.	TCLP Actual	Less Than	Regulated Level	Equal or More	Actual
Arsenic as As	X	5.0 mg/l		D004			500 mg/l		
Barium as Ba	X	100.0 mg/l		D005					
Cadmium as Cd	X	1.0 mg/l		D006			100 mg/l		
Chromium tot Cr	X	5.0 mg/l		D007					
Lead as Pb	X	5.0 mg/l		D008			500 mg/l		
Mercury as Hg	X	.2 mg/l		D009			20 mg/l		
Selenium as Se	X	1.0 mg/l		D010			100 mg/l		
Silver as Ag	X	5.0 mg/l		D011					
Nickel as Ni							134 mg/l		
Thallium as Tl							130 mg/l		
Chromium Hex							500 mg/l		
Antimony									
Beryllium									
Copper									
Vanadium									
Zinc									

SCHN00261770

Date Printed 09/30/99

Profile # CRL 545575

32. OTHER HAZARDOUS CONSTITUENTS Indicate if the waste contains any of the following.

ORGANICS	TCLP Information: Check only ONE for each constituent				TCLP Data	TCA or TOTAL Use units: ppm, mg/l or %
	Less Than	Regulated Level	Equal or More	Waste No.	TCLP Analytical Test Results Use units: ppm or mg/l	
Benzene	X	0.5 mg/l		D018		
Carbon Tetrachloride	X	0.5 mg/l		D019		
Chlordane	X	0.03 mg/l		D020		
Chlorobenzene	X	100.0 mg/l		D021		
Chloroform	X	6.0 mg/l		D022		
m-Cresol	X	200 mg/l		D024		
o-Cresol	X	200.0 mg/l		D023		
p-Cresol	X	200.0 mg/l		D025		
Cresol	X	200.0 mg/l		D026		
2,4-D	X	10.0 mg/l		D016		
1,4 Dichlorobenzene	X	7.5 mg/l		D027		
1,2-Dichloroethane	X	0.5 mg/l		D028		
1,1-Dichloroethylene	X	0.7 mg/l		D029		
2,4-Dinitrotoluene	X	0.13 mg/l		D030		
Endrin	X	.02 mg/l		D012		
Heptachlor, & Hydroxide	X	0.008 mg/l		D031		
Hexachloro-1,3 Butadiene	X	0.5 mg/l		D033		
Hexachlorobenzene	X	0.13 mg/l		D032		
Hexachloroethane	X	3.0 mg/l		D034		
Lindane	X	0.4 mg/l		D013		
Methoxychlor	X	10.0 mg/l		D014		
Methyl Ethyl Ketone	X	200.0 mg/l		D035		
Nitrobenzene	X	2.0 mg/l		D036		
Pentachlorophenol	X	100.0 mg/l		D037		
Pyridine	X	5.0 mg/l		D038		
Tetrachloroethylene	X	0.7 mg/l		D039		
Toxaphene	X	0.5 mg/l		D015		
2,4,5-TP Silvex	X	1.0 mg/l		D017		
Trichloroethylene	X	0.5 mg/l		D040		
2,4,5-Trichlorophenol	X	400.0 mg/l		D041		
2,4,6-Trichlorophenol	X	2.0 mg/l		D042		
Vinyl Chloride	X	0.2 mg/l		D043		

SCHN00261771

Date Printed 09/30/99

Profile #
CRL 545575

ATTACHMENT 2

CHEMICAL COMPOSITION: Additional constituents NOT included on page 1 of the Waste Profile

Constituents	Range	Unit Description
GASOLINE	0 to 4380	MG/KG
ORGANICS	0 to 1000	MG/KG
DIESEL	to	
OIL	to	
ORGANICS	100000 to 500000	MG/KG
OIL	to	
GREASE	to	
INERTS	100 to 100	%
SOIL, CONCRETE	to	
COMMENTS	to	
** EXP DATE 11/30/99 **	to	
CO-MINGLE	to	

SCHN00261772

Date Printed 09/30/99

Profile #
CRL 545575

MISCELLANEOUS PROFILE FIELDS

Selling Region Lab: CWL
Master Profile No.: _____
Sales Office. . . : PDX
Location Orig. . .: CRL
Profile Expires . : 11/30/99
Approved. . . . . : 8/31/99
Signed Profile Present: Y Change Pending: _ Waste Status: A
Site (DCS) Status: 1 _____
Prof. Tracking No: 4935142

Fuels Approval.: _
Pumpable Liquid Exact: ___ % OR Range: ___ - ___ %
Type of Pump. .: _____
Additional Anticipated Vol: _____ Per: _ Unit Code/Des: ___ _____

Handling Codes: __ _____ __ _____
__ _____ __ _____
__ _____ __ _____

EPA Data: Status Code: U Tax Code. .: _
Permit No: _____ Expr. Date.: _____ Volume. . .: _____
Certificate of Destruction or Disposal Required ? _ Project # : _____
DOT Properties: Inhalation: _ Dermal: _ Oral: _ Flammable: _ Health: _

Percent Taxable: _____ No. of Labels. . .: __
Transhipp Dest .: ___ Download Generator: 1426411
Material Class.: _ DCS Generator #...: 9999999999
Treatment Codes: D80 ___ ___ ___ ___ ___
Process Codes .: 3P CRL ___ ___ ___ ___ ___ ___ ___ ___
Schedule Category : ____
Schedule Interval : _____
Listed Solvent Waste: _ Hal. Org. Compounds.: _ RCRA Reactive. . . .: _
Etiologic. . . . . .: _ Water Reactive . . .: _ Pesticide Mfg. Waste: _
Ignition Screen : ___ Gas Evolution : ___ Wet Zone . . . . . .: _
Self-heating cube sz ____ Vapor Concentration _____ Boiling Point F ___
Is Gas Ignitable? _ Corrosive to Steel or Aluminum _ Organic Peroxide _
Chemical Family Name _____

GENERATOR FROM PAGE 1

Business Name	USEPA ID	Rltn	Contract in Place	at	Expires on	Evergreen Contract
SCHNITZER INVESTMENT CORP	EXEMPT	G	_	___	_____	_

ADDITIONAL BUSINESSES

Business Name	USEPA ID	Rltn	Contract in Place	at	Expires on	Evergreen Contract
SCHNITZER INVESTMENT CORP	N/A	I	_	___	_____	_

ADDITIONAL PROFILE COMMENTS

Cat	Comment	Cat	Comment

SUPPLEMENTAL FIELDS

Field	Value

Date Printed 9/30/99

Profile Change History

Profile #
CRL 545575

This section lists comments describing changes made to the profile.

Profile Change Comments	Date	User
CWL/545575 Entire profile copied to CRL/545575	9/01/99	WM0225BMS

MATERIALS REMOVED

Hazardous Material	Hazard Class	I.D Number	Material Volume	End Use	Transported
Phosphoric Acid	8	UN1805	3-55 Gallon Drums	Recycled	12/3/98
Hydrochlorie Acid (solution)	8	UN1789	3-55 Gallon Drums	Recycled	12/3/98
Potassium Hydroxide (solution)	8	UN1814	1-55 Gallon Drum	Recycled	12/3/98
Neutralized Acid Tank Rinse Water	N.A.	N.A.	1-55 Gallon Drum	Disposed NW Enviro Service Seattle, WA.	12/3/98

HAZARDOUS MATERIALS TO BE REMOVED (IF Removed)

At this time it is our intention to use the Hydrogen Plant in future soil remediation options or for resale to potential purchasers

(~720 Gallons) of Potassium Hydroxide from Electrolytic Cells	N.A.	N.A.	~720 Gallons	Unknown	N.A.

Note: The scope of work should be to remove the tops of the electrolytic cells; remove the product from each cell; and rinse each cell. The collect rinsate water for transportation, treatment (?), and disposal.

ATERWYNNE LLP
ATTORNEYS AT LAW

Suite 1800
222 S.W. Columbia
Portland, OR 97201-6618
503-226-1191
Fax 503-226-0079

FACSIMILE TRANSMITTAL

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DATE: May 12, 1999

TO: Jim Jakubiak
Schnitzer Steel Industries

CITY/STATE:

FAX NUMBER: 286-6948

OFFICE NUMBER: 286-6976

FROM: Lori Irish Bauman

DOCUMENT: Schnitzer: Hazardous Substance Survey

PAGES (INCL. COVER) 10

CLIENT NUMBER:

AN ORIGINAL OF THIS FAX WILL ___ WILL NOT _x_ FOLLOW.

LIB\FAX\jakubiak

OFFICE OF STATE FIRE MARSHAL

Oregon State Police

FAX

Date 5-12-99

Number of pages including cover sheet 9

TO:	Cassandra Pfister Aterwynne LLP
Phone	503-226-1191
Fax Phone	503-226-0079
CC:	

FROM:	Angela Johnson Office of State Fire Marshal 4760 Portland Rd NE Salem OR 97305-1540
Phone	(503) 373-1540 ext. 220
Fax Phone	(503) 373-1825

Oregon State Fire Marshal's Network

☐ **To: Fire Defense Board Chiefs CC: OSFM Deputies**

Urgent network messages will also be sent by teletype to dispatch centers

REMARKS: ☐ Urgent ☐ For your review ☐ Reply ASAP ☐ Please Comment

Please Distribute to: Cassandra, The only company that we have in our database that comes up at 10400 North Burgard Way in Portland is C & T Quincy Foods. They are currently in our out of business Files and are no longer reporting. Hopefully the 1996-1997 Hazardous Substance Survey will be of help To you. If you need any further assistance, or have any questions, feel free to give me a call at (503) 373-1540 ext. 220. –Angela Johnson

Should you encounter difficulties with this transmission, please call (503) 378-3473

dsh

1996-1997

FORM
COMPANY

Facility ID Number 002530

OREGON STATE FIRE MARSHAL
HAZARDOUS SUBSTANCE INFORMATION SURVEY

PLEASE TYPE OR PRINT CHANGES OR ADDITIONS IN THE BRACKETED AREAS TO THE RIGHT OR BELOW THE PREPRINTED DATA.

SECTION A **HAZARDOUS SUBSTANCE PRESENCE** Check the correct box to the left.

☐ YES ☒ NO Are there hazardous substances present at this site in reportable quantities? If yes, complete sections B, C, and D. If no, complete sections B and C.

☐ YES ☐ NO Are there Extremely Hazardous Substances (EHS) at this site that meet the threshold planning quantities?

SECTION B **DEMOGRAPHIC DATA** Complete, correct or add information in the [bracketed] areas.

1. SIC CODE 1: 2079 DEFINITION: EDIBLE FATS & OILS, NEC-MFG

2. SIC CODE 2: DEFINITION:

3. BUSINESS ACTIVITY: EDIBLE OIL ~~REFINERY~~ DISTRIBUTION

4. DUN & BRADSTREET #:

5. MANAGER'S NAME: ~~MAX DOUGHERTY~~ BOB MASTERSON

6. SEND TO ATTENTION OF: BOB MASTERSON

7. BUSINESS NAME: PREMIER EDIBLE OILS CORP
[C/O Quincy Foods of Portland, LLC]

8. DEPT OR DIV:

9. SITE ADDRESS:
10400 N BURGARD WAY
CITY: PORTLAND
COUNTY: MULTNOMAH
STATE: OR ZIP CODE: 97203-6422

10. MAILING ADDRESS:
~~PO BOX 83599~~
NONE
CITY: PORTLAND
COUNTY: MULTNOMAH
STATE: OR ZIP CODE: 97283-0599

11. BUSINESS PHONE: 503-286-8341
[503-978-3540]

12. NUMBER OF EMPLOYEES AT THIS SITE: 36
[2]

13. EMERGENCY ASSISTANCE CONTACT PERSON FOR THIS SITE:
DON MORTON
[BOB MASTERSON]

14. EMERGENCY CONTACT PHONES:
DAY 503-286-8341 NIGHT
[503-978-3540]

15. RESPONSIBLE FIRE DEPARTMENT: PORTLAND FIRE BUREAU

SPECIAL FIRE DEPARTMENT INFORMATION This section is for information the fire service needs to know in case of an emergency.

16. ☐ YES ☒ NO WRITTEN EMERGENCY PLAN. IF YES, LOCATION: _____
17. ☐ YES ☒ NO AUTOMATIC FIRE SUPPRESSION SYSTEM PRESENT; e.g., sprinklered, halon system, etc.
18. ☐ YES ☒ NO ARE STORAGE BUILDINGS/TANKS/AREAS PLACARDED ACCORDING TO NFPA 704?
19. ☐ YES ☐ NO ARE OTHER TYPES OF PLACARDS USED?

SECTION C **PERSON COMPLETING FORM** This person will be contacted to answer any questions needing clarification.

1. PRINT NAME: Bob Masterson
2. SIGNATURE (REQUIRED): Bob Masterson
3. DATE SURVEY COMPLETED: 2-18-97

PREMIER EDIBLE OILS CORP
PO BOX 83599
PORTLAND OR 97283-0599

RETAIN A COPY OF THIS SURVEY FOR 3 YEARS
PLEASE TYPE OR PRINT ALL ANSWERS. THANK-YOU

SCHN00261806

Due Date: March 1, 1997

FORM COMPANY

1996-1997

Facility ID Number 002530

OREGON STATE FIRE MARSHAL
HAZARDOUS SUBSTANCE INFORMATION SURVEY

PLEASE TYPE OR PRINT CHANGES OR ADDITIONS IN THE [BRACKETED] AREAS TO THE RIGHT OR BELOW THE PREPRINTED DATA.

SECTION A HAZARDOUS SUBSTANCE PRESENCE Check the correct box to the left.

☐ YES ☒ NO Are there hazardous substances present at this site in reportable quantities? If yes, complete sections B, C, and D. If no, complete sections B and C.

☐ YES ☐ NO Are there Extremely Hazardous Substances (EHS) at this site that meet the threshold planning quantities?

SECTION B DEMOGRAPHIC DATA Complete, correct or add information in the [bracketed] areas.

1. SIC CODE 1: 2079 DEFINITION: EDIBLE FATS & OILS, NEC-MFG

2. SIC CODE 2: DEFINITION:

RESUBMITTED 2-4-98 WITH CHANGE TO FORMS bm

THIS SENT ON 2-19-97 bm

3. BUSINESS ACTIVITY: EDIBLE OIL ~~REFINERY~~ DISTRIBUTION

4. DUN & BRADSTREET #:

5. MANAGER'S NAME: ~~MAX DOUGHERTY~~ BOB MASTERSON

6. SEND TO ATTENTION OF: BOB MASTERSON

7. BUSINESS NAME: PREMIER EDIBLE OILS CORP
[C-47 QUINCY FOODS OF PORTLAND, INC]

8. DEPT OR DIV:

9. SITE ADDRESS:
10400 N BURGARD WAY
CITY: PORTLAND
COUNTY: MULTNOMAH
STATE: OR ZIP CODE: 97203-6422

10. MAILING ADDRESS:
~~PO BOX 83599~~
NONE
CITY: PORTLAND
COUNTY: MULTNOMAH
STATE: OR ZIP CODE: 97283-0599

11. BUSINESS PHONE: 503-286-8341 [503-978-3540]

12. NUMBER OF EMPLOYEES AT THIS SITE: 36 [2]

13. EMERGENCY ASSISTANCE CONTACT PERSON FOR THIS SITE:
DON MORTON
[BOB MASTERSON]

14. EMERGENCY CONTACT PHONES:
DAY 503-286-8341 [503-978-3540] NIGHT

15. RESPONSIBLE FIRE DEPARTMENT: PORTLAND FIRE BUREAU

SPECIAL FIRE DEPARTMENT INFORMATION This section is for information the fire service needs to know in case of an emergency.

16. ☐ YES ☒ NO WRITTEN EMERGENCY PLAN. IF YES, LOCATION:
17. ☐ YES ☒ NO AUTOMATIC FIRE SUPPRESSION SYSTEM PRESENT; e.g., sprinklered, halon system, etc.
18. ☐ YES ☒ NO ARE STORAGE BUILDINGS/TANKS/AREAS PLACARDED ACCORDING TO NFPA 704?
19. ☐ YES ☐ NO ARE OTHER TYPES OF PLACARDS USED?

SECTION C PERSON COMPLETING FORM This person will be contacted to answer any questions needing clarification.

1. PRINT NAME: Bob Masterson
2. SIGNATURE (REQUIRED): Bob Masterson
3. DATE SURVEY COMPLETED: 2-18-97

PREMIER EDIBLE OILS CORP
PO BOX 83599
PORTLAND OR 97283-0599

RETAIN A COPY OF THIS SURVEY FOR 3 YEARS

PLEASE TYPE OR PRINT ALL ANSWERS. THANK YOU!

SCHN00261807

FORM CHEMICAL

1996-1997 OREGON STATE FIRE MARSHAL
HAZARDOUS SUBSTANCE INFORMATION SURVEY

Facility ID Number 002530

SECTION D — SUBSTANCE INFORMATION - TYPE OR PRINT CHANGES IN THE [BRACKETED] AREAS

COMMON NAME/TRADE NAME: ACETYLENE
HAZARDOUS INGREDIENT IN HIGHEST CONCENTRATION: ACETYLENE

1 - PURE 2 - MIXTURE	1 - NEW 2 - NO LONGER REPORTABLE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)	UN/NA NO. (IF KNOWN)
1	2	3	3	11	11	20	365	L 2 4	2.1 6.3	0000074-86-2	1001

STORAGE LOCATIONS AT SITE

COMMON NAME/TRADE NAME: ACTIVATED CARBON
HAZARDOUS INGREDIENT IN HIGHEST CONCENTRATION: CARBON

1 - PURE 2 - MIXTURE	1 - NEW 2 - NO LONGER REPORTABLE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)	UN/NA NO. (IF KNOWN)
1	2	1	1	20	20	30	365	J 1 4	4.1 4.2	0007440-44-0	1362

STORAGE LOCATIONS AT SITE

COMMON NAME/TRADE NAME: CATALYST NICKEL
HAZARDOUS INGREDIENT IN HIGHEST CONCENTRATION: NICKEL

1 - PURE 2 - MIXTURE	1 - NEW 2 - NO LONGER REPORTABLE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)	UN/NA NO. (IF KNOWN)
2	2	1	1	30	30	40	365	D 1 4	6.4 0	0000000-00-0	0000

STORAGE LOCATIONS AT SITE

COMMON NAME/TRADE NAME: CAUSTIC SODA BEADS
HAZARDOUS INGREDIENT IN HIGHEST CONCENTRATION: SODIUM HYDROXIDE

1 - PURE 2 - MIXTURE	1 - NEW 2 - NO LONGER REPORTABLE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO.(IF KNOWN)	UN/NA NO. (IF KNOWN)
1	2	1	1	20	20	20	365	J 1 4	6.3 8.0	0001310-73-2	1823

STORAGE LOCATIONS AT SITE

FORM CHEMICAL

1996-1997 OREGON STATE FIRE MARSHAL HAZARDOUS SUBSTANCE INFORMATION SURVEY

Facility ID Number 002530

SECTION II SUBSTANCE INFORMATION - TYPE OR PRINT CHANGES IN THE [BRACKETED] AREAS

COMMON NAME/TRADE NAME: CAUSTIC SODA SOLUTION
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: SODIUM HYDROXIDE

1 - PURE 2 - MIXTURE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
2	2	2	10	20	20	365	D 1 4 / A 1 4	8.0 6.3	0001310-73-2

1 - NEW 2 - NO LONGER REPORTABLE: 2

STORAGE LOCATIONS AT SITE

UN/NA NO. (IF KNOWN): 1824

COMMON NAME/TRADE NAME: CITRIC ACID
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: CITRIC ACID

1 - PURE 2 - MIXTURE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
1	2	1	10	10	20	365	J 1 4	6.3	0000077-92-9

1 - NEW 2 - NO LONGER REPORTABLE: 2

STORAGE LOCATIONS AT SITE

OUSE

UN/NA NO. (IF KNOWN): 1759

COMMON NAME/TRADE NAME: CLAY BLEACHING
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: ALUMINUM SILICATE

1 - PURE 2 - MIXTURE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
2	1	1	30	40	51	365	A 1 4 / H 1 4	6.4 0	0012199-27-0

1 - NEW 2 - NO LONGER REPORTABLE: 2

STORAGE LOCATIONS AT SITE

UN/NA NO. (IF KNOWN): 0000

COMMON NAME/TRADE NAME: COMPRESSED AIR
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: NITROGEN

1 - PURE 2 - MIXTURE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
2	3	3	11	11	21	365	L 2 4	2.2	0025635-88-5

1 - NEW 2 - NO LONGER REPORTABLE: 2

STORAGE LOCATIONS AT SITE

UN/NA NO. (IF KNOWN): 1002

FORM CHEMICAL

1996-1997 OREGON STATE FIRE MARSHAL
HAZARDOUS SUBSTANCE INFORMATION SURVEY

Facility ID Number 002530

SECTION D — SUBSTANCE INFORMATION - TYPE OR PRINT CHANGES IN THE BRACKETED AREAS

COMMON NAME/TRADE NAME: DIESEL FUEL
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: PETROLEUM MID-DISTILLATES

1 - PURE 2 - MIXTURE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
2	2	2	20	20	10	365	A 1 4	3.3 6.3	0068476-34-6

1 - NEW 2 - NO LONGER REPORTABLE: 2

STORAGE LOCATIONS AT SITE

UN/NA NO. (IF KNOWN): 1993

COMMON NAME/TRADE NAME: DOWTHERM A HEAT TRANSFER FLUID
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: DIPHENYL OXIDE

1 - PURE 2 - MIXTURE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
2	2	2	11	11	20	365	D 1 4	9.0	0000101-84-8

1 - NEW 2 - NO LONGER REPORTABLE: 2

STORAGE LOCATIONS AT SITE

UN/NA NO. (IF KNOWN):

COMMON NAME/TRADE NAME: HELIUM
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: HELIUM

1 - PURE 2 - MIXTURE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
1	3	3	11	11	21	365	L 2 4	2.2	007440-59-7

1 - NEW 2 - NO LONGER REPORTABLE: 2

STORAGE LOCATIONS AT SITE

UN/NA NO. (IF KNOWN): 1046

COMMON NAME/TRADE NAME: HYDROCHLORIC ACID
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: HYDROCHLORIC ACID

1 - PURE 2 - MIXTURE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO.(IF KNOWN)
2	2	2	20	20	30	365	E 1 4 A 1 4	8.0 6.3	007647-01-0

1 - NEW 2 - NO LONGER REPORTABLE: 2

STORAGE LOCATIONS AT SITE

UN/NA NO. (IF KNOWN): 1789

1996-1997 OREGON STATE FIRE MARSHAL
HAZARDOUS SUBSTANCE INFORMATION SURVEY

Facility ID Number 002530

SECTION D SUBSTANCE INFORMATION - TYPE OR PRINT CHANGES IN THE [BRACKETED] AREAS

COMMON NAME/TRADE NAME: HYDROGEN
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: HYDROGEN

1 - PURE 2 - MIXTURE	1 - NEW 2 - NO LONGER REPORTABLE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
1		3	3	40	40	60	365	L 2 4 / A 2 4	2.1 6.3	0001333-74-0
2										

STORAGE LOCATIONS AT SITE

UN/NA NO. (IF KNOWN): 1049

COMMON NAME/TRADE NAME: HYDROGEN
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: HYDROGEN

1 - PURE 2 - MIXTURE	1 - NEW 2 - NO LONGER REPORTABLE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
1		3	3	11	11	20	365	L 2 4	2.1 6.3	0001333-74-0
2										

STORAGE LOCATIONS AT SITE

UN/NA NO. (IF KNOWN): 1049

COMMON NAME/TRADE NAME: HYFLO SUPER-CEL
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: SILICA

1 - PURE 2 - MIXTURE	1 - NEW 2 - NO LONGER REPORTABLE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
2		1	1	20	20	30	365	J 1 4	6.4	
2										

STORAGE LOCATIONS AT SITE

UN/NA NO. (IF KNOWN):

COMMON NAME/TRADE NAME: NITROGEN
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: NITROGEN

1 - PURE 2 - MIXTURE	1 - NEW 2 - NO LONGER REPORTABLE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
1		3	3	20	20	40	365	A 2 7	2.2 6.3	007727-37-9
2										

STORAGE LOCATIONS AT SITE

UN/NA NO. (IF KNOWN): 1066

FORM
CHEMICAL

1996-1997 OREGON STATE FIRE MARSHAL
HAZARDOUS SUBSTANCE INFORMATION SURVEY

Facility ID Number
002530

SECTION D SUBSTANCE INFORMATION - TYPE OR PRINT CHANGES IN THE [BRACKETED] AREAS

COMMON NAME/TRADE NAME: NITROGEN
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: NITROGEN

1 - PURE 2 - MIXTURE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
1	3	3	11	11	21	365	L 2 4	2.2 6.3	007727-37-9
2 - NEW 3 - NO LONGER REPORTABLE									UN/NA NO. (IF KNOWN)
STORAGE LOCATIONS AT SITE									1066

COMMON NAME/TRADE NAME: NITROGEN CRYOGENIC LIQUID
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: NITROGEN

1 - PURE 2 - MIXTURE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
1	3	2	03	04	20	365	S 2 7	2.2 6.3	0007727-37-9
2 - NEW 3 - NO LONGER REPORTABLE									UN/NA NO. (IF KNOWN)
STORAGE LOCATIONS AT SITE									1977

COMMON NAME/TRADE NAME: OXYGEN
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: OXYGEN

1 - PURE 2 - MIXTURE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
1	3	3	20	20	21	365	L 2 4	2.2 5.1	007782-44-7
2 - NEW 3 - NO LONGER REPORTABLE									UN/NA NO. (IF KNOWN)
STORAGE LOCATIONS AT SITE									1072

COMMON NAME/TRADE NAME: PETROLEUM NAPHTHA
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: PETROLEUM NAPHTHA

1 - PURE 2 - MIXTURE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
2	2	2	03	03	03	365	D 1 4	3.3 6.3	0064742-47-8
2 - NEW 3 - NO LONGER REPORTABLE									UN/NA NO. (IF KNOWN)
STORAGE LOCATIONS AT SITE									1255

FORM CHEMICAL

1996-1997 OREGON STATE FIRE MARSHAL
HAZARDOUS SUBSTANCE INFORMATION SURVEY

Facility ID Number 002530

SECTION D — SUBSTANCE INFORMATION - TYPE OR PRINT CHANGES IN THE [BRACKETED] AREAS

COMMON NAME/TRADE NAME: PHOSPHORIC ACID
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: PHOSPHORIC ACID

1 - PURE 2 - MIXTURE	1 - NEW 2 - NO LONGER REPORTABLE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
2	2	2	2	20	20	30	365	A 1 4	8.0 6.3	007664-38-2

STORAGE LOCATIONS AT SITE

UN/NA NO. (IF KNOWN): 1805

COMMON NAME/TRADE NAME: SODIUM METHYLATE
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: SODIUM METHYLATE

1 - PURE 2 - MIXTURE	1 - NEW 2 - NO LONGER REPORTABLE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
1	2	1	1	20	20	30	365	F 1 4	4.3 4.1	0000124-41-4

STORAGE LOCATIONS AT SITE

UN/NA NO. (IF KNOWN): 1431

COMMON NAME/TRADE NAME: WASTE LABORATORY MIXTURE
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION: CYCLOHEXANE

1 - PURE 2 - MIXTURE	1 - NEW 2 - NO LONGER REPORTABLE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO. (IF KNOWN)
2	2	2	2	02	03	10	365	E 1 4	9.0	

STORAGE LOCATIONS AT SITE

UN/NA NO. (IF KNOWN):

COMMON NAME/TRADE NAME:
HAZARDOUS INGREDIENT
IN HIGHEST CONCENTRATION:

1 - PURE 2 - MIXTURE	1 - NEW 2 - NO LONGER REPORTABLE	PHYSICAL STATE (USE TABLE I)	UNIT OF MEASURE (USE TABLE II)	AVG. AMT. CODE (USE TABLE III)	MAX. AMT. CODE (USE TABLE III)	AMT. PER YEAR CODE (USE TABLE III)	NUMBER OF DAYS ON SITE (3 DIGIT NO.)	STORAGE CODE (USE TABLES IV & V)	HAZARD CLASSES (USE TABLE VI)	CAS NO.(IF KNOWN)

STORAGE LOCATIONS AT SITE

UN/NA NO. (IF KNOWN):

SCHN00261813

3E COMPANY
4920 Carroll Canyon Road
San Diego, CA 92121
Ph: 619-677-0150
Fax: 619-677-0270

Material Safety Data Sheet Transmittal Form

Total # of Pages: 3

12-Nov-98

Request #: 223563
Processed By: Karla Figueroa

Recipient:

ATTN: JIM JAKUBIAK

Schnitzer Steel Industries, Inc.
503-286-6948

Requester:

JIM JAKUBIAK

Schnitzer Steel Industries, Inc. CORP
Schnitzer Steel Industries, Inc.

Thank you for using 3E's MSDS Paperless Compliance™ service. This service may eliminate the requirement to maintain MSDS on site. Below is a list of the MSDS you requested. Please verify that the MSDS sheet(s) enclosed/attached match what you have ordered.

3E COMPANY does not develop, prepare, or review the contents of any MSDS; the MSDS is prepared by the manufacturer. The statements, technical information and recommendations contained herein are transmitted without warranty or guarantee of any kind, expressed or implied, by 3E COMPANY. Furthermore, 3E COMPANY assumes no responsibility for any loss, damage, or expense, direct or consequential, arising out of their use.

If you have any questions regarding the MSDS, or you would like further information on the paperless compliance program, please call 3E Company at (619) 677-0150.

Index3E	Manufacturer ORDERED/Actual	Brand Name ORDERED	Product Name ORDERED/Actual	UPC	Item SKU
R	**The MSDS is attached for the following product(s).**				
BFII00000101	Best Food, CPC International, Inc.		MAZOLA OIL		
Verified Current: 10/19/1998	Best Food, CPC International, Inc.		Mazola Corn Oil		

END OF ORDER DETAIL - Request # 223563

3E is North America's leader in hazardous materials information management. 3E simplifies compliance for over 60,000 business locations worldwide. For more information call (800) 360-3220. * MSDS on Demand * Chemical Spill/Information Hotline * Exposure/Poison Control Hotline * Transportation Services * Government Disclosure * Hazardous Waste Management * Emergency Response Hotline * Site-

3E COMPANY
4920 Carroll Canyon Road
San Diego, CA 92121
Ph: 619-677-0150
Fax: 619-677-0270

Material Safety Data Sheet Transmittal Form

Total # of Pages: 3

12-Nov-98

Request #: 223563
Processed By: Karla Figueroa

Recipient:

ATTN: JIM JAKUBIAK

Schnitzer Steel Industries, Inc.
503-286-6948

Requester:

JIM JAKUBIAK

Schnitzer Steel Industries, Inc. CORP
Schnitzer Steel Industries, Inc.

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Index3E	Manufacturer ORDERED/Actual	Brand Name ORDERED	Product Name ORDERED/Actual	UPC	Item SKU
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BFII00000101	Best Food, CPC International, Inc.		MAZOLA OIL		
Verified Current: 10/19/1998	Best Food, CPC International, Inc.		Mazola Corn Oil		

END OF ORDER DETAIL - Request # 223563

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MSDS NO.: CL-2

MATERIAL SAFETY DATA SHEET

PRODUCT/TRADE NAME: MAZOLA CORN OIL

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: N/A
EFFECTS OF OVERDOSE OR OVEREXPOSURE: No adverse health effects
EMERGENCY OR FIRST AID PROCEDURE: Not a hazard at ambient temperature. Treat for burns if in contact with hot oil.

SECTION VI - REACTIVITY DATA

CONDITIONS CONTRIBUTING TO INSTABILITY: Stable
INCOMPATIBLE MATERIALS: None with normal handling
HAZARDOUS DECOMPOSITION PRODUCTS: None
HAZARDOUS POLYMERISATION POTENTIAL: Will not occur
CONDITIONS TO AVOID: Avoid heating to very high temperatures (above 500F). Avoid contact with hot oil.

SECTION VII - SPILLS OR LEAK PROCEDURES

CONTAINMENT OF LEAKS OR SPILLS AND WASTE DISPOSAL METHODS:
Small spill: add solid absorbent, shovel into disposable container and hose down area. Large spill: squeegee or pump into holding container. Dispose in accordance with Local, State and Federal regulations.

SECTION VIII - SPECIAL PROTECTION & PRECAUTIONS

VENTILATION (TYPE): None
RESPIRATOR: Required if oil mist present
EYE PROTECTION: None
GLOVES: None at normal temperature
HANDLING, STORAGE, OTHER PRECAUTIONS:
Avoid overheating and contact with hot oil if held at high temperature. Overheating may cause fire. Do not leave oil unattended while heating or frying. If oil smokes, reduce heat. Do not pour hot oil into plastic containers. Keep oil in plastic containers away from intense heat or flames.

The foregoing data has been compiled from sources which the company, in good faith, believes to be dependable and is accurate and reliable to the best of our knowledge and belief. However, the company cannot make any warranty or representation respecting the accuracy or completeness of the data and assumes no responsibility for any liability or damages relating thereto or for advising you regarding the protection of your employees or others. (Users should make their own tests to determine the applicability, of such information or the suitability of any products for specific use.

SCHN00261816

MSDS NO.: OL-2

MATERIAL SAFETY DATA SHEET

Best Foods, CPC International, Inc.
Box 8000
Englewood Cliffs, New Jersey 07632-9976
Telephone: 201-894-4000

Date: 5/19/94
Prepared by: B. Linke

SECTION I -- IDENTIFICATION

PRODUCT/TRADE NAME: MAZOLA CORN OIL

CHEMICAL NAME: N/A
CAS NO.: 8001-30-7
CHEMICAL FAMILY: Vegetable Oil
FORMULA: N/A

NFPA RATINGS (SCALE 0-4): HEALTH: 0 FIRE: 1 REACTIVITY: 0

SECTION II -- HAZARDOUS INGREDIENTS

INGREDIENTS (IN MIXTURE)	% (Approx)	ACGIH TLV	ACGIH STEL	OSHA PEL	OSHA STEL	CAS NO
Veg. Oil	100	10mg/m³ (as oil mist)	NE	15mg/m³ (total particulated) 5mg/m³ (respiry particulated)	NE	8001-30-7

SECTION III - PHYSICAL DATA

BOILING POINT: N/A
VAPOR PRESSURE (mm Hg): N/A
VAPOR DENSITY (Air=1): N/A
SPECIFIC GRAVITY (H_2O=1): 0.92
SOLUBILITY IN WATER: Insoluble
% VOLATILE (BY VOLUME): 0%
EVAPORATION RATE (BuAc=1) N/A

APPEARANCE & ODOR: Pale yellow, faint characteristic odor and taste

SECTION IV - FIRE & EXPLOSION HAZARD DATA

FIRE & EXPLOSION HAZARD: Will burn when heated to very high temperatures (Flash Point: 610F)

FLASH POINT: 610F (321C) (METHOD) Closed Cup
EXPLOSION LIMIT UPPER: N/A % LOWER N/A %
AUTOIGNITION TEMP: N/A
FLAMMABILITY CLASS (OSHA): IIIB (Flash point above 200F)
FIRE FIGHTING MEDIA: Foam, Dry Chemical and Carbon Dioxide

SPECIAL FIREFIGHTING PROCEDURES OR HAZARDS: Do not use water. Rags and other material may heat and spontaneously ignite if exposed to air. Store wiping rags and similar material in metal cans with tight fitting lids.

N/A = NOT APPLICABLE
NE = NONE ESTABLISHED

INTER - ORGANIZATION

MEMO

TO: File

ATTENTION:

FROM: Jim Jakubiak

DATE: 12/3/98

SUBJECT: Premier / PAMCO

This product was removed from ASTs and containers at the former PAMCO site. Product removal activities were conducted in late November 1998. Transportation of materials for recycling was initiated December 3, 1998.

AST rinsate waters were transported to a permitted recycling facility in Seattle, Washington on December 3, 1998.

Paperwork regarding transportation is attached. Tank cleaning, product characterization, and product transportation was all conducted by Envirotech of Seattle, Washington.

W O R K O R D E R

ENVIROTECH SYSTEMS, INC.
18020 Aurora Ave N. Suite 201
Seattle, WA 98133
(206) 363-9000

Number: 84084
Date: 11/30/98
Page: 1

Bill To: SCHNITZER ~~STEEL~~ INVESTMENT CORP
ATTN Jim Jakubiak
P.O. BOX 10047
~~12005 N. BURGARD~~
PORTLAND OR 97210
Phone: 503-286-6944

Site: ~~SCHNITZER STEEL~~ SIC
P.O. BOX 10047
12005 N. BURGARD
PORTLAND OR 97210
Contact: TIM TODD OR JIM JAKUBIAK

Generator	Date Ord.	Completed	EPA ID #	Generator PO #	ESI Job #
SCHSTEPOR	11/ 2/98	12/3/98	ORD099155574	VERBAL	8-305-11

Manifest	Qty	Size	Description	Tax	Unit	Extension
			PREPARE UNIFORM HAZARDOUS WASTE MANIFEST, LAND DISPOSAL RESTRICTION NOTIFICATION, LABEL AND TAG DRUMS, TRANSPORT AND DISPOSE OF :			
84084A	3	55 GAL	DRUMS PHOSPHORIC ACID	N		ON ACCOUNT
84084B	3	55 GAL	DRUMS HYDROCHLORIC ACID	N		ON ACCOUNT
84084C	1	55 GAL	DRUM POTASSIUM HYDROXIDE	N		ON ACCOUNT
84085A	1	55 GAL	DRUM NEUTRALIZED ACID TANK RINSE WATER	N		ON ACCOUNT
8-305-11	1	EACH	PROFILE FACILITY APPROVAL OF NEUTRALIZED ACID TANK RINSE WATER	N		ON ACCOUNT

W O R K A U T H O R I Z A T I O N

We do hereby make and appoint Envirotech Systems, Inc. our true and lawful agent for the purposes of managing our waste responsibilities. I understand that this does not relieve my firm of its responsibilities as a generator even though title of the waste transfers to Envirotech Systems, Inc.. Prices quoted herein are subject to inspection and acceptance of waste at the T.S.D. facility.

Signed: Jim Jakubiak Date: 12/3/98

SCHN00261819

CONTAINS HAZARDOUS MATERIALS

THIS MEMORANDUM

Is an acknowledgement 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.

Shipper's No. _____

Carrier's No. 84084

CARRIER: ENVIROTECH SYSTEMS, INC. SCAC Date NOV. 30,1998

TO: Consignee / Street / Destination	WESTERN FARM SERVICES 310 1/2 WASHINGTON AVE. TOPPENISH, WA Zip 98948	**FROM:** Shipper / Street / Origin	SCHNITZER ~~STEEL~~ INVESTMENT CORP P.O. BOX 10047 ~~12005 N. BURGARD~~ PORTLAND, OR Zip 97210

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
3		PHOSPHORIC ACID	8	UN1805	PGIII	55 GAL	
3		HYDROCHLORIC ACID, SOLUTION	8	UN1789	PGII	55 GAL	
1		POTASSIUM HYDROXIDE, SOLUTION	8	UN1814	PGII	55 GAL	

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~~ INVESTMENT CORP.
PER: _____ DATE: 12/3/98

CARRIER: ENVIROTECH SYSTEMS, INC.
PER: _____ DATE: 12-3-98

EMERGENCY RESPONSE TELEPHONE NUMBER: (206) 363-9000/425-771-0452

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

SCHN00261820

NORTHWEST ENVIROSERVICE INC.

NORTHWEST ENVIROSERVICE NON-HAZARDOUS FACILITY BILL OF LADING SHIPPER CERTIFICATION

BILL OF LADING NUMBER: 84085

NON-HAZARDOUS GENERIC PROFILE NUMBER: ~~AG~~ 600501.

NON-HAZARDOUS MATERIAL PRODUCT NAME:

NEUTRALIZED ACID TANK RINSE WATER

SHIPPER/GENERATOR NAME, ADDRESS, CITY, STATE, ZIP:

SCHNITZER ~~STEEL~~ INVESTMENT CORP.
12005 N. BURAND
PORTLAND, OR 97210

Shipper's/Generator Certification: I hereby declare that the contents of the consignment are fully and accurately described on the attached bill of lading by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway, vessel and rail according to applicable international and national government regulations and this material is not regulated under WAC 173-303, 40 CFR Part 261 or 40 CFR Part 761.

Jim Jakubiak		12/3/98
Shipper/Generator (Print Name)	Signature	Date

SCHN00261821

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 8-305-11

Generator U.S. EPA I.D.	Sample Numbers	Date
08D099155574		11/30/98

Generator Name	Billing Address (if other than site)
SCHNITZER ~~STEEL~~ INVESTMENT CORP.	SCHNITZER ~~STEEL~~ Investment Corp.
Site Address P.O. BOX 10047	P.O. BOX 10047
12005 N. BURGARD	12005 N. BURGARD
PORTLAND , OR 97210	PORTLAND , OR 97210

Generator Contact	Title	Phone
TIM TODD OR JIM JAKUBIAK		503-286-6944

WASTE PRODUCT DESCRIPTION & CHARACTERISTICS

Waste Product Name: [illegible] ACID TANK [illegible] WATER
Process Generating Waste: RINSING EMPTY HCL TANK

ODOR: [X] None [ ] Mild [ ] Strong
Describe

COLOR/CLARITY: Transparent

PHYSICAL STATE AT 70°F: [ ] Solid [ ] Sludge [X] Liquid [ ] Powder
Average Consistency

TOXIC CATEGORIES PRESENT
WDOE Equivalent Conc.
Batch/Monthly Weight) 220 lbs

LAYERS: [ ] Multi-Layered [ ] Bi-Layered [X] Homogenous
Free Liquids 100 %

pH: [ ] ≤ 2 [ ] 10.1-12.4 [ ] 2-4 [ ] ≥ 12.5 [X] 4.1-10 [ ] Exact

DENSITY OR SPECIFIC GRAVITY: 1.0-1.1
[X] 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 Cat
Tox Scan [ ] Positive	CITY WATER	95-99 %	
[X] Negative	HYDROCHLORIC ACID	1-3 %	
	POTASSIUM HYDROXIDE	1-3 %	
Halogenated Organic Compounds (HOC's) PPM		%	
Chemical Nature [X] O [ ] I/O [ ]		%	
Generator has provided the following		%	
[ ] 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) 1H1-55
Anticipated Volume/Units per Batch/Frequency 1-1 TIME

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 J. Jakubiak Title Environmental Administrator Date 12/3/98

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

SCHN00261822

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 Name: ENVIROTECH SYSTEMS, INC. Carrier's No. 84085

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading.

at PORTLAND, OR (Date) NOV.30 19 98 FROM SCHNITZER STEEL

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company 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 own railroad, water line, highway route or routes, or within the territory of its highway operations, 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 of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO EMERALD PETROLUEM SERVICES, INC.

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination 1500 AIRPORT WAY SOUTH Street SEATTLE City

KING County WA State 98134 Zip

Route _____ Delivery Address ★ _____

(★To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery $ _____ And Remit to _____

_____ Street _____ City _____ State

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
1		55 GAL DRUM NEUTRALIZED ACID TANK RINSE WATER MATERIAL NOT REGULATED BY D.O.T. #G00501			
		RECVD EPS: DATE:			
		RECVD ESI: SAL DATE: 12-3-98			

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
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 _____

SCHNITZER STEEL Shipper, Per _____

Permanent post-office address of shipper, INVESTMENT CORP. 12005 N. BURGARD, PORTLAND, OR 97210

Subject to Section 7 of 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. Charges to be Paid by
☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received $ _____ to apply in prepayment of the charges on the property described hereon.

_____ Agent or Cashier

Per _____ (The signature here acknowledges only the amount prepaid.)

Charges Advanced:

$ _____

1 "The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 6 of the National Motor Freight Classification."
Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

☞ Agent must detach and retain this Shipping Order and must sign the Original Bill of Lading.

2

CONTRACT TERMS AND CONDITIONS

Sec. 1. (a) The carrier or party in possession of any of the property herein described shall be liable as at common law for any loss thereof or damage thereto, except as hereinafter provided.

(b) No carrier or party in possession of all or any of the property herein described shall be liable for any loss thereof or damage thereto or delay caused by the Act of God, the public enemy, the authority of law, or the act or default of the shipper or owner, or for natural shrinkage. The carrier's liability shall be that of warehouseman, only, for loss, damage, or delay caused by fire occurring after the expiration of the free time (if any) allowed by tariffs lawfully on file (such free time to be computed as therein provided) after notice of the arrival of the property at destination or at the port of export (if intended for export) has been duly sent or given, and after placement of the property for delivery at destination, or tender of delivery of the property to the party entitled to receive it, has been made. Except in case of negligence of the carrier or party in possession (and the burden to prove freedom from such negligence shall be on the carrier or party in possession), the carrier or party in possession shall not be liable for loss, damage, or delay occurring while the property is stopped and held in transit upon the request of the shipper, owner, or party entitled to make such request, or resulting from a defect or vice in the property, or for country damage to cotton, or from riots or strikes. Except in case of carrier's negligence, no carrier or party in possession of all or any of the property herein described shall be liable for delay caused by highway obstruction, faulty or impassable highway, or lack of capacity of any highway, bridge or ferry, and the burden to prove freedom, from such negligence shall be on the carrier or party in possession.

(c) In case of quarantine the property may be discharged at risk and expense of owners into quarantine depot or elsewhere, as required by quarantine regulations or authorities, or for the carrier's dispatch at nearest available point in carrier's judgement, and in any such case carrier's responsibility shall cease when property is so discharged, or property may be returned by carrier at owner's expense to shipping point, earning freight both ways. Quarantine expenses of whatever nature or kind upon or in respect to property shall be borne by the owners of the property or be a lien thereon. The carrier shall not be liable for loss or damage occasioned by fumigation or disinfection or other acts required or done by quarantine regulations or authorities even though the same may have been done by carrier's officers, agents, or employees, nor for detention, loss, or damage of any kind occasioned by quarantine or the enforcement thereof. No carrier shall be liable, except in case of negligence, for any mistake or inaccuracy in any information furnished by the carrier, its agents, or officers, as to quarantine laws or regulations. The shipper shall hold the carriers harmless from any expense they may incur, or damages they may be required to pay, by reason of the introduction of the property covered by this contract into any place against the quarantine laws or regulations in effect at such place.

Sec. 2. (a) No carrier is bound to transport said property by any particular schedule, train, vehicle or vessel, or in time for any particular market or otherwise than with reasonable dispatch. Every carrier shall have the right in case of physical necessity to forward said property by any carrier or route between the point of shipment and the point of destination. In all cases not prohibited by law, where a lower value than actual value has been represented in writing by the shipper or has been agreed upon in writing as the released value of the property as determined by the classification or tariffs upon which the rate is based, such lower value plus freight charges if paid shall be the maximum amount to be recovered, whether or not such loss or damage occurs from negligence.

(b) As a condition precedent to recovery, claims must be filed in writing with the receiving or delivering carrier, or carrier issuing this bill of lading, or carrier on whose line the loss, damage, injury or delay occurred, or carrier in possession of the property when the loss, damage, injury or delay occurred, within nine months after delivery of the property (or, in the case of export traffic, within nine months after delivery at port of export) or, in case of failure to make delivery, then within nine months after a reasonable time for delivery has elapsed; and suits shall be instituted against any carrier only within two years and one day from the day when notice in writing is given by the carrier to the claimant that the carrier has disallowed the claim or any part or parts thereof specified in the notice. Where claims are not filed or suits are not instituted thereon in accordance with the foregoing provisions, no carrier shall be liable, and such claims will not be paid.

(c) Any carrier or party liable on account of loss of or damage to any of said property shall have the full benefit of any insurance that may have been effected upon or on account of said property, so far as this shall not avoid the policies or contracts of insurance: PROVIDED, That the carrier reimburse the claimant for the premium paid thereon.

Sec. 3. Except where such service is required as the result of carrier's negligence, all property shall be subject to necessary cooperage and bailing at owner's cost. Each carrier over whose route cotton or cotton linters is to be transported hereunder shall have the privilege, at its own cost and risk, of compressing the same for greater convenience in handling or forwarding, and shall not be held responsible for deviation or unavoidable delays in procuring such compression. Grain in bulk consigned to a point where there is a railroad, public or licensed elevator, may (unless otherwise expressly noted herein, and then if it is not promptly unloaded) be there delivered and placed with other grain of the same kind and grade without respect to ownership (and prompt notice thereof shall be given to the consignor), and if so delivered shall be subject to a lien for elevator charges in addition to all other charges hereunder.

Sec. 4. (a) Property not removed by the party entitled to receive it within the free time (if any) allowed by tariffs, lawfully on file (such free time to be computed as therein provided), after notice of the arrival of the property at destination or at the port of export (if intended for export) has been duly sent or given, and after placement of the property for delivery at destination has been made, or property not received, at time tender of delivery of the property to the party entitled to receive it has been made, may be kept in vessel, vehicle, car, depot, warehouse or place of business of the carrier, subject to the tariff charge for storage and to carrier's responsibility as warehouseman, only, or at the option of the carrier, may be removed to and stored in a public or licensed warehouse at the point of delivery or other available point, or if no such warehouse is available at point of delivery or other available point, then in other available storage facility; at cost of the owner, and there held without liability on the part of the carrier, and subject to a lien for all freight and other lawful charges, including a reasonable charge for storage. In the event consignee cannot be found at address given for delivery, then in that event, notice of the placing of such goods in warehouse shall be mailed to the address given for delivery and mailed to any other address given on the bill of lading for notification, showing the warehouse in which such property has been placed, subject to the provisions of this paragraph.

(b) Where nonperishable property which has been transported to destination hereunder is refused by consignee or the party entitled to receive it upon tender of delivery, or said consignee or party entitled to receive it fails to receive or claim it within 15 days after notice of arrival shall have been duly sent or given, the carrier may sell the same at public auction to the highest bidder, at such place as may be designated by the carrier.

PROVIDED, That the carrier shall have first mailed, sent, or given to the consignor notice that the property has been refused or remains unclaimed, as the case may be, and that it will be subject to sale under the terms of the bill of lading if disposition be not arranged for, and shall have published notice containing a description of the property, the name of the party to whom consigned, or, if shipped order notify, the name of the party to be notified, and the time and place of sale, once a week for two successive weeks, in a newspaper of general circulation at the place of sale or the nearest place where such newspaper is published. PROVIDED, That 30 days shall have elapsed before publication of notice of sale after said notice that the property was refused or remains unclaimed was mailed, sent or given.

(c) Where perishable property which has been transported hereunder to destination is refused by consignee or party entitled to receive it, or said consignee or party entitled to receive or shall fail to receive it promptly, the carrier may, in its discretion, to prevent deterioration or further deterioration, sell the same to the best advantage at private or public sale: PROVIDED, That if time serves for notification to the consignor or owner of the refusal of the property or the failure to receive it and request for disposition of the property, such notification shall be given, in such manner as the exercise of due diligence requires, before the property is sold.

(d) Where the procedure provided for in the two paragraphs last preceding is not possible, it is agreed that nothing contained in said paragraphs shall be construed to abridge the right of the carrier at its option to sell the property under such circumstances and in such manner as may be authorized by law.

(e) The proceeds of any sale made under this section shall be applied by the carrier to the payment of freight, demurrage, storage, and any other lawful charges and the expense of notice, advertisement, sale, and other necessary expense and of caring for and maintaining the property, if proper care of same requires special expense, and should there be a balance it shall be paid to the owner of the property sold hereunder.

(f) Property destined to or taken from a station, wharf, landing or other place at which there is no regularly appointed freight agent shall be entirely at risk of owner after unloaded from cars, vehicles or vessels or until loaded into cars, vehicles or vessels, and, except in case of carrier's negligence, when received from or delivered to such stations, wharfs, landings, or other places, shall be at owner's risk until the cars are attached to and after they are detached from locomotive or train or until loaded into and after unloaded from vessels, or if property is transported in motor vehicles trailers or semi-trailers, until such trailers or semi-trailers are attached to and after they are detached from power units. Where a carrier is directed to unload or deliver property transported by motor vehicle at a particular location where consignee or consignee's agent is not regularly located, the risk after unloading, or delivery, shall be that of the owner.

Sec. 5. No carrier hereunder will carry or be liable in any way for any documents, specie, or for any articles of extraordinary value not specifically rated in the published classifications or tariffs unless a special agreement to do so and a stipulated value of the articles are endorsed hereon.

Sec. 6. Every party, whether principal or agent, shipping explosives or dangerous goods, without previous full written disclosure to the carrier of their nature, shall be liable for and indemnify the carrier against all loss or damage caused by such goods, and such goods may be warehoused at owner's risk and expense or destroyed without compensation.

Sec. 7. The owner or consignee shall pay the freight and average, if any, and all other lawful charges accruing on said property; but, except in those instances where it may lawfully be authorized to do so, no carrier shall deliver or relinquish possession at destination of the property covered by this bill of lading until all tariff rates and charges thereon have been paid. The consignor shall be liable for the freight and all other lawful charges, except that if the consignor stipulates, by signature, in the space provided for that purpose on the face of this bill of lading that the carrier shall not make delivery without requiring payment of such charges, and the carrier, contrary to such stipulation shall make delivery without requiring such payment, the consignor (except as hereinafter provided) shall not be legally liable for such charges. PROVIDED, That, a consignee shall not be liable for transportation charges (beyond those billed against him at the time of delivery for which he is otherwise liable) which may be found to be due after the property has been delivered to him subject to all of the following conditions:

(a) The shipper or consignor has instructed the carrier to deliver the property to a consignee other than the shipper or consignor, and

(b) The consignee is an agent only and has no beneficial title in the property and

(c) Prior to delivery, the consignee has notified the delivering carrier in writing that he is only an agent and has no beneficial title in the property, and

(d) In cases where the shipment has been reconsigned or diverted to a point other than that specified in the bill of lading, the consignee has also notified the delivering carrier in writing of the name and address of the beneficial owner of said property. Where the consignee is not liable for certain transportation charges in accordance with this provision and the preceding conditions, the shipper or consignor, or, in the case of a shipment so reconsigned or diverted as specified in condition (d), the beneficial owner shall be liable for such additional charges.

Sec. 8. If this bill of lading is issued on the order of the shipper, or his agent, in exchange or in substitution for another bill of lading, the shipper's signature to the prior bill of lading as to the statement of value or otherwise, or election of common law or bill of lading liability, in or in connection with such prior bill of lading, shall be considered a part of this bill of lading as fully as if the same were written or made in or in connection with this bill of lading.

Sec. 9. (a) If all or any part of said property is carried by water over any part of said route and loss, damage or injury to said property occurs while the same is in the custody of a carrier by water the liability of such carrier shall be determined by the bill of lading of the carrier by water (this bill of lading being such bill of lading if the property is transported by such water carrier thereunder) and by and under the laws and regulations applicable to transportation by water, and of other statutes of the United States according to carriers by water the protection of limited liability as well as the following subdivisions of this section, and to the conditions contained in this bill of lading not inconsistent therewith or with this section when this bill of lading becomes the bill of lading of the carrier by water.

(b) No such carrier by water shall be liable for any loss or damage resulting from any fire happening to or on board the vessel, or from explosion, bursting of boilers or breakage of shafts, unless caused by the design or neglect of such carrier.

(c) If the owner shall have exercised due diligence in making the vessel in all respects seaworthy and properly manned, equipped and supplied, no such carrier shall be liable for any loss or damage resulting from the perils of the lakes, seas, or other waters, or from latent defects in hull, machinery, or appurtenances whether existing prior to, at the time of, or after sailing, or from collision, stranding, or other accidents of navigation, or from prolongation of the voyage. And, when for any reason it is necessary, any vessel, carrying any or all of the property herein described shall be at liberty to call at any port or ports, in or out of the customary route, to tow and be towed, to transfer, transship, or lighter, to load and discharge goods at any time, to assist vessels in distress, to deviate for the purpose of saving life or property, and for docking and repairs. Except in case of negligence such carrier shall not be responsible for any loss or damage to property if it be necessary or is usual to carry the same upon deck.

(d) General Average shall be payable according to the York-Antwerp Rules of 1924, Sections 1 to 15, inclusive, and Sections 17 to 22, inclusive, and as to matters not covered thereby according to the laws and usages of the Port of New York. If the owners shall have exercised due diligence to make the vessel in all respects seaworthy and properly manned, equipped and supplied, it is hereby agreed that in case of danger, damage or disaster resulting from faults or errors in navigation, or in the management of the vessel, or from any latent or other defects in the vessel, her machinery or appurtenances, or from unseaworthiness, whether existing at the time shipment or at the beginning of the voyage (provided the latent or other defects or the unseaworthiness was not discoverable by the exercise of due diligence), the shippers, consignees and/or owners of the cargo shall nevertheless pay salvage and any special charges incurred in respect of the cargo, and shall contribute with the shipowner in general average to the payment of any sacrifices, losses or expenses of a general average nature that may be made or incurred for the common benefit or to relieve the adventure from any common peril.

(e) If the property is being carried under a tariff which provides that any carrier or carriers party thereto shall be liable for loss from perils of the sea, then as to such carrier or carriers the conditions of this section shall be modified in accordance with the tariff provisions, which shall be regarded as incorporated into the provisions of this bill of lading.

(f) The term "water carriage" in this section shall not be construed as including lighterage in or across rivers, harbors, or lakes, when performed by or on behalf of carriers other than water.

Sec. 10. Any alteration, addition, or erasure in this bill of lading which shall be made without the special notation hereon of the agent of the carrier issuing this bill of lading, shall be without effect, and this bill of lading shall be enforceable according to its original tenor.

M47

SCHN00261824

PROFESSIONAL SERVICES AGREEMENT

Contract No. _____ made between:

CONTRACTOR:

Envirocon, Inc.
500 Taylor Street (59802)
P.O. Box 16655 (59808)
Missoula, MT
(406) 523-1150
(406) 543-7987 FAX

COMPANY:

Name: Schnitzer Investment Corp.
Address: 3200 NW Yeon Avenue
P.O. Box 10047 Portland, OR. 97296
Phone No.: (503)286-6976
Fax No.: (503) 286-6948
Fed Tax ID No: _____
POC: _____

Schnitzer Investment Corp. **(hereinafter referred to as "Company"), does hereby retain** Envirocon, Inc. **(hereinafter referred to as "Contractor") to furnish certain services upon the following terms and conditions:**

I. DESCRIPTION AND LIMITATIONS OF SERVICE AGREEMENT

A. The Contractor shall furnish the services described below at the time and place designated by Company's Project Manager.

Item No.	Description of Work
1	Site redevelopment/cleanup tasks as shown in July 12, 1999 Envirocon, Inc. letter proposal.

B. Changes in the indicated scope of service beyond this Agreement shall be subject to renegotiation and implemented by a formal Change Order to the Agreement.

II. PERIOD OF SERVICE AND TERMINATION

A. The period of service hereunder is estimated to be On or before September 30, 1999.

B. Either the Company or the Contractor may terminate this Agreement at any time by giving the other party written notice of such action at least 30 days prior to the date of termination.

III. COMPENSATION

A. The Company will pay costs and fees to the Contractor for services performed hereunder on the following basis:
See ~~Exhibit A~~ attached hereto July 12, 1999 proposal letter.

B. Payment to the contractor will be made within 30 days after the Contractor's submission of invoices which identify the Service Agreement and which set forth the agreed-upon charges. Weekly copies of supporting payroll reports or time cards, material invoices, and expense receipts may be required to be submitted the following Monday to a person named in Section V of this Agreement. (Certified payrolls and/or proof of payment may also be necessary subsequently.)

IV. TAXES

The compensation stated herein includes all applicable taxes, permits, and licenses and will not be changed hereafter as the result of any change in the Contractor's liabilities.

V. REPORTING

In performing the services defined herein, the Contractor shall report to the person or persons appointed by the Company as follows:

NAME	TITLE	PHONE (day/night)
Jim Jakubiak	Project Manager	(503) 286-6976 (day) (503) 271-0151 (pager)

VI. CONFLICT OF INTEREST AND COORDINATION

A. The Contractor will not hire any employee of the Company to perform any service covered by this Agreement. The Contractor will understand that all contact with employees of the Company will be conducted on a consulting basis and the Contractor will not attempt to perform managerial duties.

B. The Contractor affirms that to the best of its knowledge no conflict of interest exists between the Contractor and the Company, and in the event of a change in either its private interests or its service under this Agreement, the Contractor will raise with the Company any question regarding possible conflicts of interest which may arise as a result of such change.

C. The Contractor will coordinate its work with that of the Company and other contractors and subcontractors working at the Company's site(s).

VII. THIS SERVICE AGREEMENT IS ALSO SUBJECT TO THE FOLLOWING PROVISIONS:

A. Levels of Competence - The Contractor is responsible to perform to the level of competence presently maintained by other practicing professionals engaged in the same type of professional services.

B. Discounts - The Company will not be responsible for any delay in receipt of the Contractor's invoices and supporting documents. Should any delay occur, the time allowed by the Contractor for payment of invoices, or for taking a cash discount, shall commence not earlier than the date that the invoices, complete with all supporting documents, are received by the Company.

C. Loss In Transit - Regardless of any other provision in this Service Agreement, the Contractor shall be responsible to the Company for any loss or damage suffered until the completed items have been received intact and in good order by the Company at the destination shown on Page 1 or as instructed per Section V.

D. Warranty - Notwithstanding inspection or acceptance by the Company, and regardless of any other provisions in this Service Agreement, the Contractor guarantees and warrants to the Company and to its client all of the items covered by this Service Agreement to the full extent, if any, required by the Prime Contract between the Company and its client. Said items are purchased from the Contractor in reliance of this warranty.

E. Tests, Samples, Drawings, Data - The testing of all materials shall be conducted by the Company unless specifically stated otherwise in each task order. All submittals, as well as all required contacts with the Company's client or its representatives, shall be made through the Company. Approval of submittals shall not relieve the Contractor of responsibility for errors in, omissions of, or deviations from Prime Contract requirements.

F. Noninfringement of Patents - The Contractor warrants that no items or processes furnished under this Service Agreement, or used in the Contractor's performance, will infringe any patent, and the Contractor will indemnify the Company against any claim, liability, loss, damage, or expense arising from claims alleging that the sale or use of said items or processes constitutes patent infringement.

G. Confidentiality - Because of the sensitive nature of the work contemplated by this Agreement, the Contractor agrees to treat all information discussed between the Contractor and the Company as confidential information. The contractor will treat all information belonging to the Company, its affiliated companies, and any third party, which is disclosed to the Contractor in the course of the Contractor's services, as proprietary information.

H. Assignments - Neither this Service Agreement nor any interest therein may be transferred, voluntarily or involuntarily, without the written consent of the Company. Any attempted transfer, by assignment; attachment; filing of voluntary petition in bankruptcy (including a petition for an arrangement); appointment of a receiver, trustee, or

SCHN00261882

administrator; or otherwise, shall be void and may, at the option of the Company, be deemed to be a default under Section J.

I. No Liens or Claims - The Contractor will defend and hold the Company, the Company's client, and the property owner(s) harmless from any lien or claim (including a stop notice or claim against the Company's bond) arising out of the Contractor's nonpayment or alleged nonpayment of obligations incurred in connection with the items covered by this Service Agreement or any of the components for said items. The Company may require interim or final lien releases or waivers before payment is made.

J. Default - If the Contractor fails to make any delivery within the time specified, or otherwise fails at any time to fully comply with its obligations hereunder, the Company may, at its option, terminate the right to proceed under this Service Agreement (or such part or parts with which there has been a default) without incurring any cancellation or other charges.

K. Nonwaiver - Failure of the Company to insist on strict and timely performance shall not be a waiver of any right or remedy that it may have and shall not be a waiver of any subsequent default. Neither payment for nor acceptance of any or all of the items shall relieve the Contractor of liability for failure to fully perform its obligations.

VIII. CONTRACTOR LIABILITY AND INSURANCE REQUIREMENTS

A. The Contractor is an independent contractor and all persons employed by the Contractor in connection with this Agreement shall be its employees and not employees of the Company in any respect whatsoever. The Contractor shall indemnify the Company against any claim, loss, damage, expense, or liability arising out of the Contractor's acts or omissions which are connected with the performance of this Agreement, unless due solely to the Company's negligence. The foregoing shall include indemnity for property damage and for injury or death of any person, including employees of the Company or the Contractor. The Contractor shall, at its own expense following the Company's request, defend any suit asserting a claim covered by its indemnity. The Contractor shall pay all costs, including attorney's fees, incurred in enforcing this indemnity. "Acts or omissions of the Contractor" shall include acts or omissions of suppliers or others operating within the scope of authorization from the Contractor.

B. Prior to starting work, the Contractor shall procure, and maintain in force, statutory worker's compensation insurance, employers' liability insurance, commercial general liability insurance with contractual coverage, and automobile liability insurance; and, such other insurance, in accordance with the provisions of this Agreement.

C. The limits for the Contractor's worker's compensation insurance shall be as required statutorily and as otherwise discussed below. The Contractor's commercial general insurance and automobile liability insurance shall be written for not less than the limits of liability shown below:

Insurance Requirements:

Note: Schnitzer Investment Corp. shall be named as additionally insured.

- Statutory Worker's Compensation Insurance with Employer's Liability Insurance for all employees of Subcontractor with a limit of no less than $100,000. Such insurance shall cover claims filed under the Worker's Compensation Law of the State in which the work is to be performed, or any law of any State under which liability or any compensation claims shall arise.

- Commercial General Liability Insurance shall be written with minimum limits of $1,000,000 per occurrence / $1,000,000 aggregate, combined single limit, covering personal injury, bodily injury, and property damage. Insurance shall cover premises-operations, explosion and collapse hazard, underground hazard, products/completed operations hazard, contractual hazard, broad form property damage, independent contractors and personal injury. This insurance may be arranged under a single policy for the full limits required or by a combination of underlying policies with the balance provided by an excess or umbrella liability policy.

- Comprehensive Automobile Liability Insurance covering both bodily injury and property damage shall be written with minimum limits of $1,000,000 each occurrence. Insurance shall cover owned, hired and non-owned automobiles.

D. The foregoing policies shall each contain a provision that coverages afforded under the policies will not be cancelled or not renewed unless at least thirty (30) days prior written notice has been given to Company. With respect to the Commercial General Liability Insurance and the Comprehensive Automobile Liability Insurance: Waivers of Subrogation are required; and, Company and Owner shall also be named as an "Additional Insured". All aggregate limits shall apply separately for this Agreement. Each of the requirements listed in this paragraph shall be addressed in writing on the face of the Certificate(s) of Insurance. Certificates of Insurance acceptable to Company shall be filed with Company prior to the commencement of work.

SCHN00261883

E. All insurance requirements herein shall flowdown in their entireties to any and all lower-tier subcontractors. Contractor shall require all lower-tier subcontractors to provide copies of insurance certificates reflecting the required coverages to Company as well as to the Contractor.

F. When the Company is entitled under this or other articles to be indemnified by the Contractor, the indemnity shall extend to the Company, its partners, and its affiliates and their directors, officers, agents, and employees.

IX. SPECIAL PROVISIONS

A. Contractor is responsible for its own on-site health and safety and is also required to comply with the site specific Health and Safety Plan, copies of which are available at the job site. The Contractor shall take all reasonable safety precautions pertaining to this work and the conduct thereof including, but not limited to, compliance with all applicable laws, ordinances, rules, regulations and order issued by a public authority, whether federal, state, local or otherwise, the Federal Occupational Safety and Health Act, any similar state laws and, in addition, the safety measure called for by Company.

This Agreement contains the entire understanding between the parties, and there are no understandings or representations except those set forth or incorporated by reference herein. No subsequent modifications of this Agreement shall be of any force or effect unless in writing and signed by duly authorized officials of both parties.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the date fully signed below:

CONTRACTOR (ENVIROCON, INC.):

_____
Signature

_____
Printed Name & Title

_____
Date

COMPANY (Schnitzer Investment Corp):

J. Jakubiak
Signature

Jim Jakubiak Environmental
Printed Name & Title Administrator

August 16, 1999
Date

ENVIROCON

ENVIROCON, INC.
500 TAYLOR STREET
POST OFFICE BOX 8243
MISSOULA, MONTANA 59807
(406) 523-1150
(406) 543-7987 FAX

James Jakubiak
Environmental Administrator
Schnitzer ~~Steel Industries~~ Investment Corp.
3200 NW Yeon Avenue
Portland, Oregon 97210

July 12, 1999

Mr. Jakubiak:

Envirocon is pleased to present this revised proposal for site restoration activities to Schnitzer Steel Industries (Schnitzer). Based on the information provided it is Envirocon's understanding that the scope of services to be provided are the following;

1) Site Restoration
Includes:

a) Removal of sediment from approximately 390' of drainage trenches, (indoor/outdoor) removal of concrete portion of trenches, backfilling trenches with fill from onsite source. Trench sediment shall be containerized onsite with previously drummed sediments and shipped to Waste Management's Columbia Ridge Facility for disposal.

b) Grading of unpaved area to allow for vehicle parking. Two unpaved areas will be filled and contoured to allow for a smooth parking area with adequate drainage. Crushed concrete stockpiled onsite will be utilized for fill material.

c) Removal ~~of 5'X5' concrete pad and~~ approximately 2 cubic yards of impacted soils. (near transformer) 8/16/99

d) Remove telephone line which has been partially exposed by prior demolition activities.

e) ~~Straighten bollards surrounding fire hydrant.~~ No 8/16/99

Subtotal: $5940.00

2) Site Restoration (optional item)
Includes:

a) Removal of concrete tank farm pad, and placement in onsite stockpile.

Subtotal: $1700.00

3) Disposal of trench and drummed sediments
Includes:

b) Offsite disposal of trench sediments and 13 drums of previously containerized sediments at Waste Management's Columbia Ridge Facility.

Transport (one 25 yd box)..... $ 650.00
Disposal (10 tons @ $42.00/ton).....$ 420.00

Subtotal: $1070.00

Sincerely,

Gene Tienken
Pacific Branch Manager
Envirocon

SCHN00261885

PROFESSIONAL SERVICES AGREEMENT

Contract No. _____ made between:

CONTRACTOR:

Envirocon, Inc.
500 Taylor Street (59802)
P.O. Box 16655 (59808)
Missoula, MT
(406) 523-1150
(406) 543-7987 FAX

COMPANY:

Name: Schnitzer Investment Corp.
Address: 3200 NW Yeon Avenue
P.O. Box 10047 Portland, OR. 97296
Phone No.: (503) 286-6976
Fax No.: (503) 286-6948
Fed Tax ID No: _____
POC: _____

Schnitzer Investment Corp. **(hereinafter referred to as "Company"), does hereby retain Envirocon, Inc. (hereinafter referred to as "Contractor") to furnish certain services upon the following terms and conditions:**

I. DESCRIPTION AND LIMITATIONS OF SERVICE AGREEMENT

A. The Contractor shall furnish the services described below at the time and place designated by Company's Project Manager.

Item No.	Description of Work
1	Site redevelopment/cleanup tasks as shown in July 12, 1999 Envirocon, Inc. letter proposal.

B. Changes in the indicated scope of service beyond this Agreement shall be subject to renegotiation and implemented by a formal Change Order to the Agreement.

II. PERIOD OF SERVICE AND TERMINATION

A. The period of service hereunder is estimated to be On or before September 30, 1999.

B. Either the Company or the Contractor may terminate this Agreement at any time by giving the other party written notice of such action at least 3 days prior to the date of termination.

III. COMPENSATION

A. The Company will pay costs and fees to the Contractor for services performed hereunder on the following basis:
See ~~Exhibit A~~ attached hereto July 12, 1999 proposal letter.

B. Payment to the contractor will be made within 30 days after the Contractor's submission of invoices which identify the Service Agreement and which set forth the agreed-upon charges. Weekly copies of supporting payroll reports or time cards, material invoices, and expense receipts may be required to be submitted the following Monday to a person named in Section V of this Agreement. (Certified payrolls and/or proof of payment may also be necessary subsequently.)

IV. TAXES

The compensation stated herein includes all applicable taxes, permits, and licenses and will not be changed hereafter as the result of any change in the Contractor's liabilities.

V. REPORTING

In performing the services defined herein, the Contractor shall report to the person or persons appointed by the Company as follows:

NAME	TITLE	PHONE (day/night)
Jim Jakubiak	Project Manager	(503) 286-6976 (day) (503) 271-0151 (pager)

VI. CONFLICT OF INTEREST AND COORDINATION

A. The Contractor will not hire any employee of the Company to perform any service covered by this Agreement. The Contractor will understand that all contact with employees of the Company will be conducted on a consulting basis and the Contractor will not attempt to perform managerial duties.

B. The Contractor affirms that to the best of its knowledge no conflict of interest exists between the Contractor and the Company, and in the event of a change in either its private interests or its service under this Agreement, the Contractor will raise with the Company any question regarding possible conflicts of interest which may arise as a result of such change.

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D. Warranty - Notwithstanding inspection or acceptance by the Company, and regardless of any other provisions in this Service Agreement, the Contractor guarantees and warrants to the Company and to its client all of the items covered by this Service Agreement to the full extent, if any, required by the Prime Contract between the Company and its client. Said items are purchased from the Contractor in reliance of this warranty.

E. Tests, Samples, Drawings, Data - The testing of all materials shall be conducted by the Company unless specifically stated otherwise in each task order. All submittals, as well as all required contacts with the Company's client or its representatives, shall be made through the Company. Approval of submittals shall not relieve the Contractor of responsibility for errors in, omissions of, or deviations from Prime Contract requirements.

F. Noninfringement of Patents - The Contractor warrants that no items or processes furnished under this Service Agreement, or used in the Contractor's performance, will infringe any patent, and the Contractor will indemnify the Company against any claim, liability, loss, damage, or expense arising from claims alleging that the sale or use of said items or processes constitutes patent infringement.

G. Confidentiality - Because of the sensitive nature of the work contemplated by this Agreement, the Contractor agrees to treat all information discussed between the Contractor and the Company as confidential information. The contractor will treat all information belonging to the Company, its affiliated companies, and any third party, which is disclosed to the Contractor in the course of the Contractor's services, as proprietary information.

H. Assignments - Neither this Service Agreement nor any interest therein may be transferred, voluntarily or involuntarily, without the written consent of the Company. Any attempted transfer, by assignment; attachment; filing of voluntary petition in bankruptcy (including a petition for an arrangement); appointment of a receiver, trustee, or

SCHN00261887

administrator; or otherwise, shall be void and may, at the option of the Company, be deemed to be a default under Section J.

I. No Liens or Claims - The Contractor will defend and hold the Company, the Company's client, and the property owner(s) harmless from any lien or claim (including a stop notice or claim against the Company's bond) arising out of the Contractor's nonpayment or alleged nonpayment of obligations incurred in connection with the items covered by this Service Agreement or any of the components for said items. The Company may require interim or final lien releases or waivers before payment is made.

J. Default - If the Contractor fails to make any delivery within the time specified, or otherwise fails at any time to fully comply with its obligations hereunder, the Company may, at its option, terminate the right to proceed under this Service Agreement (or such part or parts with which there has been a default) without incurring any cancellation or other charges.

K. Nonwaiver - Failure of the Company to insist on strict and timely performance shall not be a waiver of any right or remedy that it may have and shall not be a waiver of any subsequent default. Neither payment for nor acceptance of any or all of the items shall relieve the Contractor of liability for failure to fully perform its obligations.

VIII. CONTRACTOR LIABILITY AND INSURANCE REQUIREMENTS

A. The Contractor is an independent contractor and all persons employed by the Contractor in connection with this Agreement shall be its employees and not employees of the Company in any respect whatsoever. The Contractor shall indemnify the Company against any claim, loss, damage, expense, or liability arising out of the Contractor's acts or omissions which are connected with the performance of this Agreement, unless due solely to the Company's negligence. The foregoing shall include indemnity for property damage and for injury or death of any person, including employees of the Company or the Contractor. The Contractor shall, at its own expense following the Company's request, defend any suit asserting a claim covered by its indemnity. The Contractor shall pay all costs, including attorney's fees, incurred in enforcing this indemnity. "Acts or omissions of the Contractor" shall include acts or omissions of suppliers or others operating within the scope of authorization from the Contractor.

B. Prior to starting work, the Contractor shall procure, and maintain in force, statutory worker's compensation insurance, employers' liability insurance, commercial general liability insurance with contractual coverage, and automobile liability insurance; and, such other insurance, in accordance with the provisions of this Agreement.

C. The limits for the Contractor's worker's compensation insurance shall be as required statutorily and as otherwise discussed below. The Contractor's commercial general insurance and automobile liability insurance shall be written for not less than the limits of liability shown below:

Insurance Requirements:

Note: Schnitzer Investment Corp. shall be named as additionally insured.

- **Statutory Worker's Compensation Insurance with Employer's Liability Insurance for all employees of Subcontractor with a limit of no less than $100,000. Such insurance shall cover claims filed under the Worker's Compensation Law of the State in which the work is to be performed, or any law of any State under which liability or any compensation claims shall arise.**

- **Commercial General Liability Insurance shall be written with minimum limits of $1,000,000 per occurrence / $1,000,000 aggregate, combined single limit, covering personal injury, bodily injury, and property damage. Insurance shall cover premises-operations, explosion and collapse hazard, underground hazard, products/completed operations hazard, contractual hazard, broad form property damage, independent contractors and personal injury. This insurance may be arranged under a single policy for the full limits required or by a combination of underlying policies with the balance provided by an excess or umbrella liability policy.**

- **Comprehensive Automobile Liability Insurance covering both bodily injury and property damage shall be written with minimum limits of $1,000,000 each occurrence. Insurance shall cover owned, hired and non-owned automobiles.**

D. The foregoing policies shall each contain a provision that coverages afforded under the policies will not be cancelled or not renewed unless at least thirty (30) days prior written notice has been given to Company. With respect to the Commercial General Liability Insurance and the Comprehensive Automobile Liability Insurance: Waivers of Subrogation are required; and, Company and Owner shall also be named as an "Additional Insured". All aggregate limits shall apply separately for this Agreement. Each of the requirements listed in this paragraph shall be addressed in writing on the face of the Certificate(s) of Insurance. Certificates of Insurance acceptable to Company shall be filed with Company prior to the commencement of work.

E. All insurance requirements herein shall flowdown in their entireties to any and all lower-tier subcontractors. Contractor shall require all lower-tier subcontractors to provide copies of insurance certificates reflecting the required coverages to Company as well as to the Contractor.

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IX. SPECIAL PROVISIONS

A. Contractor is responsible for its own on-site health and safety and is also required to comply with the site specific Health and Safety Plan, copies of which are available at the job site. The Contractor shall take all reasonable safety precautions pertaining to this work and the conduct thereof including, but not limited to, compliance with all applicable laws, ordinances, rules, regulations and order issued by a public authority, whether federal, state, local or otherwise, the Federal Occupational Safety and Health Act, any similar state laws and, in addition, the safety measure called for by Company.

This Agreement contains the entire understanding between the parties, and there are no understandings or representations except those set forth or incorporated by reference herein. No subsequent modifications of this Agreement shall be of any force or effect unless in writing and signed by duly authorized officials of both parties.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the date fully signed below:

CONTRACTOR (ENVIROCON INC.):

Signature

Printed Name & Title

8-16-99

Date

COMPANY (Schnitzer Investment Corp):

Signature

Jim Jakubiak Environmental Administrator

Printed Name & Title

August 16, 1999

Date

ENVIROCON

ENVIROCON, INC.
500 TAYLOR STREET
POST OFFICE BOX 8243
MISSOULA, MONTANA 59807
(406) 523-1150
(406) 543-7987 FAX

James Jakubiak
Environmental Administrator
Schnitzer ~~Steel Industries~~ Investment Corp.
3200 NW Yeon Avenue
Portland, Oregon 97210

July 12, 1999

Mr. Jakubiak:

Envirocon is pleased to present this revised proposal for site restoration activities to Schnitzer Steel Industries (Schnitzer). Based on the information provided it is Envirocon's understanding that the scope of services to be provided are the following:

1) Site Restoration
Includes:

a) Removal of sediment from approximately 390' of drainage trenches, removal of concrete portion of trenches, backfilling trenches with fill from onsite source. Trench sediment shall be containerized onsite with previously drummed sediments and shipped to Waste Management's Columbia Ridge Facility for disposal.
b) Grading of unpaved area to allow for vehicle parking. Two unpaved areas will be filled and contoured to allow for a smooth parking area with adequate drainage. Crushed concrete stockpiled onsite will be utilized for fill material.
c) Removal ~~of 5'X5' concrete pad and~~ approximately 2 cubic yards of impacted soils. (near transformer)
d) Remove telephone line which has been partially exposed by prior demolition activities.
e) ~~Straighten bollards surrounding fire hydrant.~~ No

Subtotal: $5940.00

2) Site Restoration (optional item)
Includes:

a) Removal of concrete tank farm pad, and placement in onsite stockpile.

Subtotal: $1700.00

3) Disposal of trench and drummed sediments
Includes:

b) Offsite disposal of trench sediments and 13 drums of previously containerized sediments at Waste Management's Columbia Ridge Facility.

Transport (one 25 yd box)..... $ 650.00
Disposal (10 tons @ $42.00/ton).....$ 420.00

Subtotal: $1070.00

Sincerely,

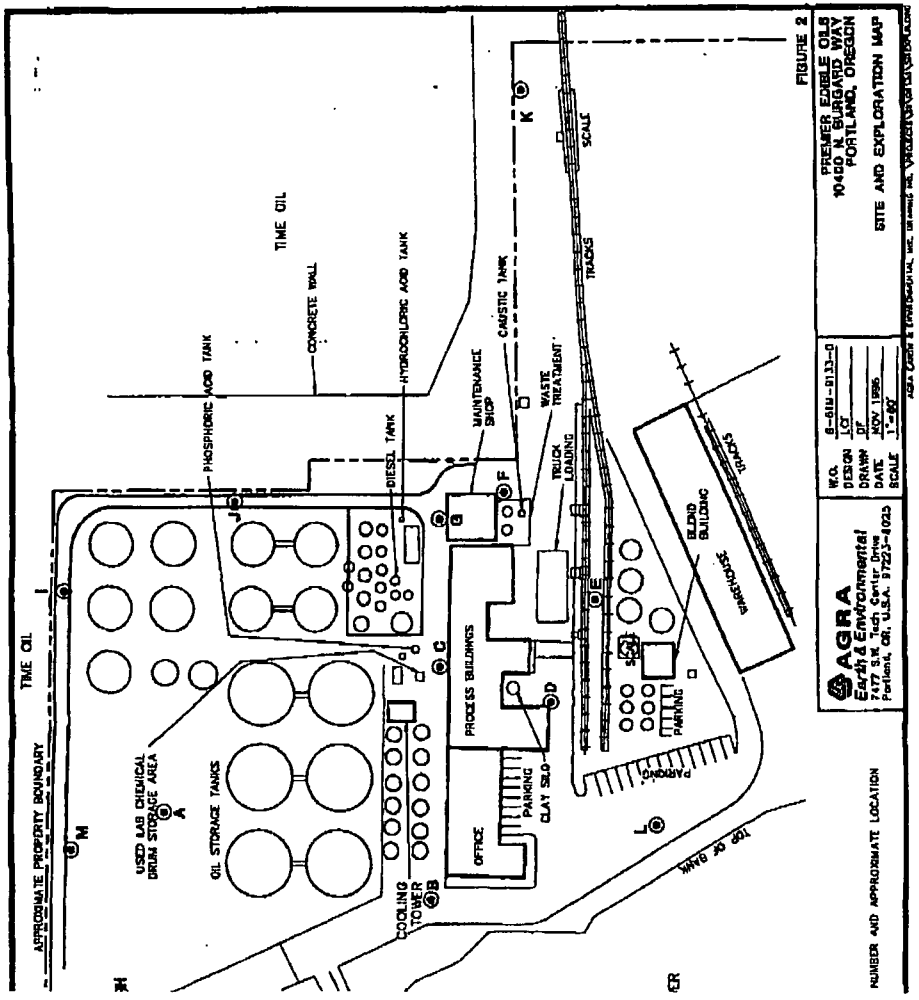
Gene Tienken
Pacific Branch Manager
Envirocon

****
*** ACTIVITY REPORT ***
****

TRANSMISSION OK

TX/RX NO.	3155
CONNECTION TEL	92856205
CONNECTION ID	
START TIME	08/10 14:53
USAGE TIME	00'37
PAGES	1
RESULT	OK

SCHN00261891



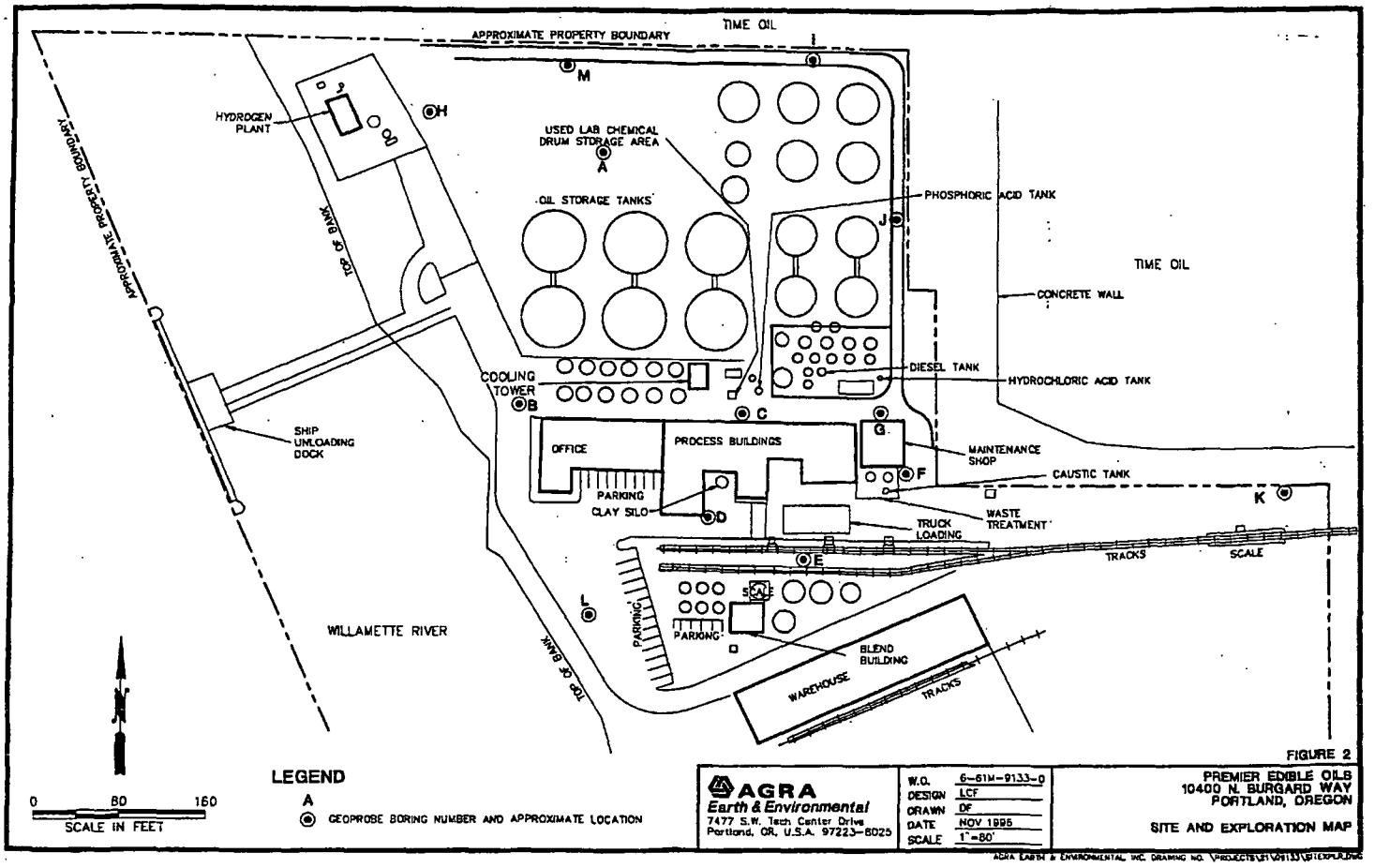


FIGURE 2

SCHN00261893

SCHNITZER INVESTMENT CORP.

Memorandum

To: File

From: Jim Jakubiak

CC: Tom Zelenka

Date: 10/31/02

Re: Premier Edible Oils Site – River Bank Debris Removal

During the month of October 2002, Total Construction and Maintenance, Inc. performed debris removal activities at the Premier Edible Oils shoreline in Portland, Oregon. Debris removed included floatable solid waste (Styrofoam from docks, tires, etc.). All materials removed were transported offsite for proper disposal and/or recycling.

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.

SCHN00261905

Registration Verification Report 2002

1 * 969

1. DEQ ID No: **ORD987180189** Name: ~~**Schnitzer Inv**~~ **Premier Edible Oils Site**
Location: **10400 N BURGARD WAY**
PORTLAND, OR 97203-6422
Site Contact Name: **Jim Jakubiak** Site Contact Phone: **(503) 286-6976**

Current information, if different from above: Premier Edible Oils Site

Your Standard Industrial Classification (SIC) code is currently:
2079: Shortening And Cooking Oils
Current code if different:

DEQ
State of Oregon Department of Environmental Quality

Your current employee count is listed as [1] 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 Inv Premier Edible Oils Site is:

2. Individual or Organization: **Schnitzer Investment ~~Corporation~~ Corp.** Address: **PO Box 10047** **Portland, OR 97296-0047** Phone: **(503) 224-9900**	Individual or Organization: Schnitzer Investment Corp. Address: Phone:

The owner of the property on which Schnitzer Inv Premier Edible Oils Site is located is:

3. Individual or Organization: **Schnitzer Investment ~~Corporation~~ Corp.** Address: **PO Box 10047** **Portland, OR 97296-0047** Phone: **(503) 224-9900**	Individual or Organization: Schnitzer Investment Corp. Address: Phone:

The address for DEQ to send hazardous waste information to Schnitzer Inv Premier Edible Oils Site is:

4. Forms Contact: **Jim Jakubiak** Organization: **Schnitzer Investment ~~Corporation~~ Corp.** Address: **PO Box 10047** **Portland, OR 97296-0047** Internet E-Mail: **Data missing, please update** Phone: **(503) 286-6976**	Forms Contact: Schnitzer Investment Corp. Organization: Address: Internet E-Mail: Phone:

The address for DEQ to send hazardous waste fee invoices for Schnitzer Inv Premier Edible Oils Site is:

5. Fee Contact: **Jim Jakubiak** Organization **Schnitzer Investment ~~Corporation~~ Corp.** Address: **PO Box 10047** **Portland, OR 97296-0047** Phone: **(503) 286-6976**	Fee Contact: Schnitzer Investment Corp. Organization: Address: Phone:

Hazardous waste generator status:

6. Schnitzer Inv Premier Edible Oils Site last reported as a Large Quantity Generator on the 2001 Annual Report.
What was the generator status for Schnitzer Inv Premier Edible Oils Site in 2002, based on monthly generation records?

[ ] Large Quantity Generato [ ] Small Quantity Generato [X] Conditionally Exempt Generato

12/16/2002

SCHN00261906

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.

The correct name of the property is "Premier Edible Oils Site".

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.*

Signature	Date
J. Jakubiak	2-27-03
Jim Jakubiak	Environmental Administrator
Name (please print)	Title

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

Registration Verification Report 2001

2 * 403

1. DEQ ID No: **ORD987180189** Name: **Schnitzer Inv Premier Edible Oils Site**
Location: **10400 N BURGARD WAY**
PORTLAND, OR 97203-6422
Site Contact Name: **James L (Jim) Jakubiak** Site Contact Phone: **(503) 286-6976**
Current information, if different from above: Jim Jakubiak

Your Standard Industrial Classification (SIC) code is currently:
2079: Shortening And Cooking Oils
Current code if different:

DEQ
State of Oregon Department of Environmental Quality

Your current employee count is listed as: 1 Please indicate the correct count if it has changed: ϕ

Verify the information in the left column, and make any corrections in the right column:

The owner of Schnitzer Inv Premier Edible Oils Site is:

2. Individual or Organization: **Schnitzer Investment Corporation** Address: **PO Box 10047** **Portland, OR 97296-0047** Phone: **(503) 224-9900**	Individual or Organization: Address: Phone:

The owner of the property on which Schnitzer Inv Premier Edible Oils Site is located is:

3. Individual or Organization: Schnitzer Investment Corp. ~~NW Pipe Co~~ Address: ~~12005 N Burgard~~ ~~Portland, OR 97203~~ Phone: ~~(503) 285-1400~~	Individual or Organization: Schnitzer Investment Corp. Address: PO Box 10047 Portland, OR. 97296-0047 Phone: (503) 286-6976

The address for DEQ to send hazardous waste information to Schnitzer Inv Premier Edible Oils Site is:

4. Forms Contact: **James L (Jim) Jakubiak** Organization: **Schnitzer Investment Corporation** Address: **PO Box 10047** **Portland, OR 97296-0047** Internet E-Mail: **Data missing, please update** Phone: **(503) 286-6976**	Forms Contact: Jim Jakubiak Organization: Address: Internet E-Mail: Phone:

The address for DEQ to send hazardous waste fee invoices for Schnitzer Inv Premier Edible Oils Site is:

5. Fee Contact: **James L (Jim) Jakubiak** Organization **Schnitzer Investment Corporation** Address: **PO Box 10047** **Portland, OR 97296-0047** Phone: **(503) 286-6976**	Fee Contact: Jim Jakubiak Organization: Address: Phone:

Hazardous waste generator status:

6. Schnitzer Inv Premier Edible Oils Site Notified to DEQ as a Large Quantity Generator on 3/9/2001.
What was the generator status for Schnitzer Inv Premier Edible Oils Site in 2001, based on monthly generation records?

☒ Large Quantity Generator ☐ Small Quantity Generator ☐ Conditionally Exempt Generator

12/18/2001

SCHN00261913

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)

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.*

J. Jakubiak — 2-27-02

Signature — Date

Jim Jakubiak — Environmental Administrator

Name (please print) — Title

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 <u>any</u> part of 2001, 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

SCHN00261914

2001 Waste Generation & Management—Answer Sheet

PLEASE ENTER:
Facility Name: Premier Edible Oils Site

DEQ ID Number: ORD989180189

NOTE: Make as many two-sided copies of the answer sheet as you need BEFORE answering any questions.
REVIEW QUESTIONS ON PAGES 22-24 BEFORE COMPLETING ANSWER SHEET.

1. Waste Stream Description: Potassium hydroxide solution from electrolytic cells.
2. Waste Code(s): D002 D008
3. State-Only Code OR: —
4. Mixed Waste? ☒ No ☐ Yes
5. Source Code: A S6 6. Form Code: B 106
7. Waste Origin 1 ☐ 2 ☒ 3 ☐ 4 ☐
NA 7A. Residual Management Code M: _____
8. Reported Toxic Substances in Waste? 1 ☒ 2 ☐ 3 ☐
NA 8A. CAS Number (s): _____
9. Complete the Worksheet to the right and answer the following:
Total Quantity Generated in 2001 for This Waste Stream: 9,900 lbs. (934 gallons)
Unit of Measure P ☒ G ☐ ST ☐ C ☐ K ☐ L ☐ MT ☐
9A. Density: 1.2 ☒ Pounds/gallon ☐ Specific gravity ☐ Pounds/cubic yard
10. Managed On or Off-site? ☐ On-site (answer 10A) ☒ Off-site (answer 12) ☐ Both On-site & Off-site (answer both 10A and 12)
10A. Quantity Managed or Recycled On-site: ϕ Management Code M: ϕ
11. Total Quantity remaining on-site at the end of 2001: ϕ
(Not otherwise managed on-or off-site, but accumulated or stored)

Monthly Generation Worksheet (Question 9)
*Provide the actual monthly hazardous waste generation amounts for this waste stream (should not be a yearly average)

January		July	
February		August	
March	9900 lbs	September	
April		October	
May		November	
June		December	

Total Quantity Generated for 2001: _____

If any of this waste stream was shipped off-site in 2001, give details of each shipment on the back of this answer sheet.

(Comment Section Located on Reverse)

SCHN00261915

12. Provide the following information for each off-site shipment of waste.

(Include all shipments in 2001 for this waste stream even if it was generated in the previous year.)

Please Enter:
Facility Name: Premier Edible Oils Site
DEQ ID Number: ORD987180189

2001 Manifest Shipment Date (enter month/day)	Manifest Document Number	Quantity Shipped of this Waste Stream (use unit of measure from Question #9)	DEQ/U.S. EPA ID # of First Transporter	Final management (enter mgmt. code, other than M141)	DEQ/U.S. EPA ID # of Receiving Facility (Designated Facility)
3/22/01	11258	9,900 lbs. (99%)	WAD988479440	H111	ORD089452353

Comments: This was a one-time event.

ENVIROTECH SYSTEMS, INC.

FACSIMILE COVER SHEET

Sending Fax: (425) 513-5839

Pages in this transmission: 3 (Including Cover sheet)

Date: 2/25/02

TO:

Facsimile #: (503) 286-6948

Name: Jim Jakubek

Company: Schnitzer Investment

FROM:

Name: Lynda Osgood

Subject: DW Summaries

CONFIDENTIALITY NOTICE

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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: _____

ENVIROTECH SYSTEMS, INC.

3601 121ST ST SW LYNNWOOD, WA 98037 ☐ TELEPHONE (206) 363-9000 ☐ FAX (425) 513-5839

PREMIER EDIBLE OILS

2001 ANNUAL DANGEROUS WASTE SUMMARY

SITE ADDRESS: 10400 North Burgard Way
Portland, OR 97210
ORD987180189

WASTE STREAM: Potassium hydroxide solution

PROFILE:	00-145-10-EC	**WASTE DESIGNATION:**	DW/HW
EPA CODES:	D002 D008	**WA CODES:**	
FORM CODES:	B106	**SYSTEM CODE:**	M111
WEIGHT:	9900# lbs.	**RECYCLING CREDIT:**	0%

RECEIVING FACILITY: Chemical Waste Management of the Northwest
17629 Cedar Springs Lane
Arlington, OR 97812
ORD089452353

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

December 26, 2001

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 2001 as required by Oregon Administrative Rules (OAR) 340-102-0012, OAR 340-102-0041 and OAR 340-104-0075. Please read the general information below for each of these forms. 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 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 Toxics Use/Waste Reduction Assistance Program and Conditionally Exempt Generator (CEG) collection events.

The completed forms are due back to DEQ by **March 1, 2002**. Upon written request and reasonable justification, DEQ may grant an extension to the reporting deadline of up to 30 days. Mail the completed forms to: **Oregon DEQ, Land Quality Division, Attn: Hazardous Waste Forms Clerk, 811 SW Sixth Avenue, Portland, OR, 97204-1390.**

Registration Verification Report (RVR)

The RVR was generated using information last reported by your facility. 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 2001. Your generator status is determined by the largest amount of hazardous waste you generated or had on-site in **any one month** during the 2001 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 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 2001, you only need to return a completed and signed RVR.

DEQ-DC1

Hazardous Waste Reporting Forms Booklet

The Forms Booklet includes the Hazardous Waste Generation and Management Annual Report and the Hazardous Waste Received Annual Report, plus all the reference material and instructions needed to complete these forms. In order to streamline the annual reporting process and to clarify reporting questions, there were several modifications made to the Forms Booklet for 2001 that are worth mentioning. These changes include:

- Deletion of two data elements from the answer sheets because it was determined that there is no significant need for this information from this source. 1. "Point of Measurement" which indicated if the waste was mixed with other wastes prior to being measured; and 2. "Managed at Commercial Facility" which indicated if the waste was managed at a commercial Treatment, Storage, and Disposal facility.

- Expanded Helpful Hint Section #8 "How do I report wastes managed in on-site distillation units" by providing a formula for counting spent materials.

- Expanded Helpful Hint Section #9 "Reporting waste managed in wastewater treatment units" to include elementary neutralization units.

- Requested that a comment be provided for use of the Management System Code "M111 Stabilization/Chemical Fixation."

2001 Waste Generation & Management Annual Report

As a Large Quantity Generator (LQG) or Small Quantity Generator (SQG) you will need to complete the 2001 Hazardous Waste Generation and Management Annual Report located on Pages 21 through 30 of the enclosed Forms Booklet. Please follow the "Question" guidance on Pages 22 through 24 when filling out the Answer Sheet on Page 27. Other key points include:

- One copy of the 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.

- All off-site shipment information should be provided on the reverse side of the answer sheet. Remember to include all shipments for calendar year 2001, even if the waste stream was generated in the previous year. The amount generated in the previous year should not be included in the amount generated for 2001 (the amount generated should have been reported on the 2000 forms).

- 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, 2002.

2001 Hazardous Waste Received Annual Report

If your facility received hazardous waste from off-site for treatment, storage, disposal or recycling, you must complete the 2001 Hazardous Waste Received Annual Report. 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 provide 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 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/hw.htm for information on hazardous waste management, technical resources, laws, regulations, fact sheets, plus a lot more.

DEQ REGIONAL OFFICES

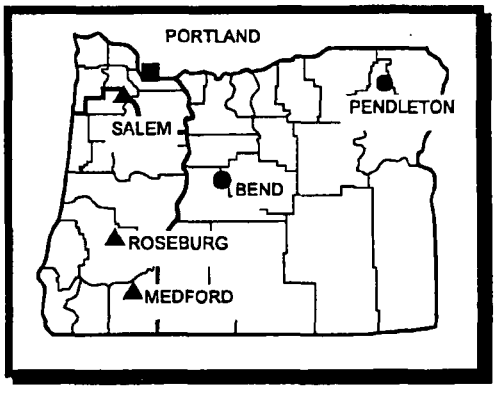
■ Northwest Region

2020 SW 4th, Suite 400
Portland, OR 97201

Jay Collins
(503) 229-5165

Laurey Cook
(503) 229-5058

Kevin Masterson
(503) 229-5615



▲ Western Region

750 Front St. NE, Suite 120
Salem, OR 97310

Eric Clark
(503) 378-8240 x253

Bart Collinsworth
(503) 378-8240 X258

-or-

201 W. Main St., 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

SCHN00262001

HAZARDOUS WASTE
FILING INFORMATION ACKNOWLEDGEMENT

State of Oregon
Department of Environmental Quality

Waste Prevention and Management Division
Hazardous Waste Section
811 SW. 6th Avenue
Portland, OR 97204

DATE APRIL 25, 2001

Your recent communication is hereby acknowledged.
This communication resulted in the following filing information action:

ACTION

- ☐ Modified/Added Status (as identified under 'Status')
- ☐ Issued new DEQ ID Number (identified under 'Facility')
- ☐ Canceled or Withdrawn DEQ ID Number (identified under 'Facility')
- ☒ Reactivate DEQ ID Number (identified under 'Facility')

STATUS

- ☐ Transporter
- ☐ Market/Burn Hazardous Waste Fuels
- ☐ Market/Burn Used Oil
- ☐ Recycler
- ☒ Generator Status Effective: 09 - MARCH - 2001
  - ☒ Large Quantity Generator (LQG)
  - ☐ Small Quantity Generator (SQG)
  - ☐ Conditionally-Exempt Small Quantity Generator (CEG)

FACILITY

DEQ ID Number:	**ORD987180189**
Facility Name:	**SCHNITZER INV PREMIER EDIBLE OILS SITE**
Site Address:	**10400 N BURGARD WAY (10350 N TIME OIL RD)**
City, State, Postal Code:	**PORTLAND OR 97203**

This DEQ ID Number is *permanently* assigned to the Physical Location listed above and is to be used on *all* shipping papers, manifests, and correspondence concerning hazardous waste pertaining to that site location. If the name, ownership, status, contact name, or similar changes occur, you will need to update your filing information.

If, for any reason, hazardous waste is no longer generated, stored, or disposed of, at this site, you may want to request a Temporary Withdrawal, or request a Cancellation of the DEQ ID Number. For these updates, request Notification Form from DEQ by calling 503-229-5913 or toll-free within the State of Oregon at 800-452-4011.

Please note that all Generators *must* respond to the Annual Reporting Requirements due by March 1 of each calendar year. Each facility with an active DEQ ID Number will receive instructions the previous December.

All LQGs, SQGs, and Toxics Release Inventory Reporters must prepare a Toxics Use Reduction (TUR) Plan. LQGs and Toxics Release Inventory Reporters must also develop a Toxics Use Reduction Annual Pounds Report. For more information on Toxic Use Reduction call Mark Raltson at DEQ at 503-229-5316 or toll-free within the State of Oregon at 800-452-4011.

For more information, call the phone number listed above.

3/9/0

Post-it® Fax Note 7671	Date 3/9/01	# of pages ▶ 5
To James Jakubiak	From Susan Eidman	
Co./Dept. Schnitzer Steel	Co. ODEQ HQ HW	
Phone # 503 286-6976	Phone # 503 229-6511	
Fax # 503 286-6948	Fax # 503 229-6977	

From: Schnitzer Investment Corp.

RECEIVED
MAR 09 2001
Waste Management & Cleanup Division
Department of Environmental Quality

Notification of Hazardous Waste Activity

Oregon Department of Environmental Quality
Waste Management & Cleanup Division
811 SW 6th Avenue
Portland, OR 97204

Printed May 1999

Notification of Hazardous Waste Activity

Oregon DEQ
Waste Management & Cleanup Division
811 SW 6th Avenue
Portland, OR 97204-1390

1. Why are you completing the Notification Form? (Check one)

☒ **First notification:** This is the first notification of hazardous waste activity for this location. This facility needs to receive a DEQ ID number.

☐ **Update information:** To update information, please check all that apply:

- ☐ Business closed at this location. Date of closure _____
- ☐ Business change of ownership. Date of change _____.
- ☐ Business name change.
- ☐ Generator status change.
- ☐ Business address officially changed through the U.S. Post Office.
- ☐ Other _____.

RECEIVED
MAR 09 2001
Waste Management & Cleanup Division
Department of Environmental Quality

2. What is the DEQ ID number for this facility (if it already has one)? ORD987180189

3. Facility name Premier Edible Oils Site

4. If different from #3, how is your facility name filed with the Oregon Secretary of State, Corporations Division?

5. The PHYSICAL LOCATION of this facility is (Do NOT enter a PO Box):

Street Address: 10400 North Burgard Way (SAME AS 10350 N TIME OIL Rd)
City: Portland State: OR ZIP: 97210 County: Multnomah
4105 1/26
Specific Location (if available): _____
(If available, provide the precise location of the facility. Indicate whether you used Township/Range, UTM Number, tax lot, latitude/longitude, or another indicator to provide this.)

Are there other businesses located at this address? ☒ YES ☐ NO

6. The MAILING ADDRESS of this facility is:

Street Address or PO Box: P.O. Box 10047
City: Portland State: OR ZIP: 97296-0047
HAZARDOUS WASTE FORMS contact: Name: Jim Jakubiak Phone: (503) 286-6976
SITE VISITS contact: Name: Jim Jakubiak Phone: (503) 286-6976

SCHN00262005

7. The LEGAL OWNER of this business or operation is:
   Name of person or organization: Mitsubishi Corporation
   Street Address or PO Box: SAME AS #8
   City: _____ State: ____ ZIP: _____ Phone: _____

8. The LAND OWNER of the property where this facility is located is:
   Name of person or organization: Schnitzer Investment Corp.
   Street Address or PO Box: P.O. Box 10047
   City: Portland State: OR. ZIP: 97296-0047 Phone: (503) 286-6976

9. Whom should DEQ contact about hazardous waste fees?
   Name: Jim Jakubiak Organization: Schnitzer Investment Corp.
   Street Address or PO Box: P.O. Box 10047
   City: Portland State: OR ZIP: 97296-0047 Phone: 503-286-6976

10. Please select the most appropriate classification for the Business Owner and Property Owner.

	Business Owner (check one)	Property Owner (check one)
Private	☒	☒
Federal	☐	☐
State	☐	☐
County	☐	☐
District	☐	☐
Municipal	☐	☐
Native American Tribe	☐	☐

11. The Standard Industrial Classification (SIC) code that best describes the principal products or services rendered at the site is: 2079 SIC codes are listed on page 15 of the Hazardous Waste Reference Guidebook.

12. Approximately how many people are currently employed full time at this facility? Zero

13. If this facility is CURRENTLY a hazardous waste generator, what is its status? If the facility is NOT YET generating a hazardous waste, what will the status be? Refer to Helpful Hint #5 of the Hazardous Waste Reference Guidebook if you need assistance determining your generator status. (please check appropriate box below)

   Sh 950 gallons as per Envirotech 4/5/01 Sh +3/23/01 - Jakubiak

   ☒ Large Quantity Generator ☐ Small Quantity Generator ☐ Conditionally Exempt Generator

   ☒ Facility does not generate hazardous waste.

   13a. Hazardous waste generated at this location is the result of (check all that apply):

   ☐ Ongoing or periodic generations of process waste
   ☐ Remediation of environmental contamination
   ☒ Removal of outdated or off-specification material
   ☐ Other _____

14. If this facility manages hazardous waste in units exempt from RCRA permit requirements such as elementary neutralization units, permitted WWTUs or accumulation tanks or containers, does this facility manage hazardous waste :

☐ Generated at this facility ☐ Generated by other facilities

Which permit-exempt activities occur at this facility? Not Applicable

☐ Treatment ☐ Disposal ☐ Recycling

Does your facility intend to develop permit-exempt capability in the future? ☐ YES ☒ NO

15. If this facility markets or burns hazardous waste fuels, please check the boxes below for activities applicable to your site. Used oil managed under used oil regulations are not considered hazardous waste fuels.

☐ Generator marketing to burner ☐ Other marketer ☐ Boiler and/or industrial furnace

15a. Burner operating under

☐ Smelter deferral ☐ Small Quantity Exemption

15b. Type of combustion device used at your facility

☐ Utility boiler ☐ Industrial boiler Not Applicable

☐ Industrial furnace ☐ Other _____

16. If this facility is a hazardous waste transporter, please check as many of the following boxes as appropriate.

☐ Transports only hazardous waste generated at this facility Not Applicable

☐ Transports for commercial purposes

☐ Transports hazardous waste by: (check all appropriate boxes)

☐ Air ☐ Rail ☐ Highway ☐ Water

My PUC Authority # is _____

17. If this facility manages hazardous waste in RCRA permitted units or units subject to a permit,

Does the facility manage hazardous waste:

☐ Generated at this facility? ☐ Generated by other facilities? Not Applicable

Which RCRA permitted activities occur at this facility?

☐ Treatment ☐ Disposal ☐ Storage

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.

James L Jakubiak — Signature

3/9/01 — Date

James L. Jakubiak — Name (please print)

Env. Administrator — Title

Comments:
This is a one-time site removal activity. A former tenant of STC has abandoned the property

Send completed form to:

Oregon DEQ
Waste Management and Cleanup Division
Attn: Hazardous Waste Forms Clerk
811 SW Sixth Avenue
Portland, OR 97205-1390

113

3S7240

/ NDR

Emergency Contact Telephone Number

(206) 363-9000 OR (425) 771-0452

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ORD987180189

Manifest Document No.: 11258

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: PREMIER EDILBE OILS
10400 NORTH BURGARD
PORTLAND, OR 97210
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: WEST COAST MARINE CLEANING

6. US EPA ID Number: WAD988479440

C. State Transporter's ID

D. Transporter's Phone: 360-835-3780

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 NORTHWEST
17629 CEDAR SPRINGS LANE
ARLINGTON, OR 97812

10. US EPA ID Number: ORD089452353

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.		RQ, WASTE POTASSIUM HYDROXIDE SOLUTION (EPA D002,D008 DW) 8 UN1814 PG II	001	TT	934	LM G	D002,D008
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
A. CWM#CO5157, ESI#00-145-10-EC,ERG#154

K. Handling Codes for Wastes Listed Above
CERTIFICATE OF DISPOSAL REQUIRED
SU-1B 9900P 934G

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 Jakubiak | Signature: [signature] | Month 03 Day 22 Year 01

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: JOHN L MURPHY SR | Signature: John L Murphy SR | Month 3 Day 22 Year 01

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

19. Discrepancy Indication Space

WEIGHT CHGD BY DRIVER NDR 3/23/01

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: Nicole D. Rouska | Signature: Nicole D Rouska | Month 03 Day 23 Year 01

GENERATOR

TRANSPORTER

FACILITY

ORIGINAL - RETURN TO GENERATOR

BMS

SCHN00262010

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.

SCHN00262011

ENVIROTECH SYSTEMS, INC.
3601121st STREET SW
LYNNWOOD, WA 98037
TELEPHONE: (206) 363-9000 FAX: (425) 513-5839

WASTE PRODUCT QUESTIONNAIRE

PROFILE ESI WPQ 00-145-10-EC

GENERATOR NAME: PREMIER EDILBÈ OILS
SITE ADDRESS: 10400 NORTH BURGARD WAY
PORTLAND , OR 97210

INVOICE TO: SCHNITZER INVESTMENT CORP.
ADDRESS: P.O. BOX 10047
PORTLAND , OR 97296-

DATE: 3/1/01
SIC CODE:
GEN EPA ID: ORD987180189
CONTACT: JIM JAKUBIAK
PHONE: 503-286-6976

WASTE PRODUCT DESCRIPTION AND CHARACTERISTICS

WASTE PRODUCT NAME: POTASSIUM HYDROXIDE SOLUTION
PROCESS GENERATING WASTE: REMOVAL OF ELECTROLYTIC FLUID FROM H GENERATOR
SOURCE:
FORM:

ODOR
(•) NONE ( ) MILD ( ) STRONG
DESCRIBE:

COLOR AND CLARITY
COLOR: CLEAR
CLARITY: TRANSPARANT

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:

DENSITY OR SPECIFIC GRAVITY
1.2
(•) LIQUID lbs/gal
( ) SOLID lbs/ft3

FLASH POINT
( ) < 73 F ( ) 73 - 141 F ( ) 142 - 199 F
( ) > 200 F (•) NO FLASH ( ) EXACT:
[x] CC [ ] EPA
[ ] CC [ ] DOT

CONSTITUENTS
CHEMICAL COMPOSITION (ACCOUNT FOR 100% OF TOTAL)

	%
WATER	50-65
POTASSIUM HYDROXIDE SOLUTION	35-50
SEDIMENT	1-8

CHEMICAL NATURE
( ) I
( ) O
(•) I/O

METALS (PPM)
( ) TOTAL ( ) EPA TCLP
(•) GEN KNOWLEDGE

ARSENIC (As)	NS
BARIUM (Ba)	0.052
CADMIUM (Cd)	NS
CHROMIUM (Cr)	0.05
COPPER (Cu)	NS
LEAD (Pb)	47.0
MERCURY (Hg)	NS
NICKEL (Ni)	NS
SELENIUM (Se)	NS
SILVER (Ag)	NS
ZINC (Zn)	NS
HEXCHROME	NS
OTHER	NS

GENERATOR HAS PROVIDED THE FOLLOWING
[x] SAMPLE [ ] MSDS [ ] WASTE ANALYSIS

SHIPPING INSTRUCTIONS
IS THIS A DOT HAZARDOUS MATERIAL
(•) YES ( ) NO
DOT RQ
BULK LIQUID: [x]
BULK SOLID: [ ]
DRUM/CONTAINER TYPE: TANK TRUCKS
VOLUME: 4 DRUMS

RCRA HAZ WASTE [x] EXEMPT WASTE [ ]
STATE ONLY WASTE [ ] TSCA [ ]

WASHINGTON STATE DESIGNATION
( ) EHW ( ) EXEMPT (•) DW

WASTE CODES
US EPA WASTE CODES: D002,D008
WA DOE WASTE CODES:
CA WASTE CODES:
OR WASTE CODES:
SUBJECT TO LAND DISPOSAL RESTRICTIONS [x]

US DOT DESCRIPTION

PROPER SHIPPING NAME: , RQ, WASTE POTASSIUM HYDROXIDE SOLUTION ,
ADDITIONAL DESCRIPTION: (EPA D002,D008 DW)
HAZARD CLASS: 8 DOT ID NUMBER: UN1814 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 WAST 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 [signature] TITLE Environmental Administrator 3/22/01

THE UNDERSIGNED CERTIFIES THAT HE/SHE OBTAINED A REPRESENTATIVE SAMPLE OF THE WASTE MATERIAL DESCRIBED ABOVE, AND THAT THE FOLLOWING REPRESENTATION: ARE TRUE AND CORRECT.

SAMPLING METHOD:
SAMPLE QUANTITY: 6 OZ.
NAME: DON HUNT
SOURCE OF MATERIAL SAMPLED: DRUM THIEF
DATE:

SCHN00262013

WORK ORDER

ENVIROTECH SYSTEMS, INC.
3601 121st STREET SW
LYNNWOOD, WA 98037
(206) 363-9000

FOR ACCOUNT

WORK ORDER NUMBER: 11258

WORK ORDER DATE: Mar 7, 2001

SOLD TO:
SCHNITZER INVESTMENT CORP.
P.O. BOX 10047
PORTLAND, OR 97296-0047

SITE:
PREMIER EDIBLE OILS
10400 NORTH BURGARD WAY
PORTLAND, OR 97210

PHONE: (503) 286-6976

SITE

CUSTOMER NUMBER	PO NUMBER	ESI JOB #	ACCOUNT REP
SCHSTEPOR		00-145-10	OREGON
CUSTOMER	EPA ID #	DATE ORDERED	DATE COMPLETED
J. JAKUBIAK	ORD099155174	3/7/01	3 R2 10/

DESCRIPTION / MANIFEST #	QUANTITY	SIZE	TAX	UNIT	EXTENSION
REMOVE, TRANSPORT AND REUSE/RECYCLE/DISPOSE OF:					
LABOR, MATERIALS, TRANSPORTATION & DISPOSAL 750 GALS OF FLUID & NRS rate	1.00	EA	N		ON ACCOUNT
>750 GALS	750 TO 880	GALS	N		

WORK AUTHORIZATION

The undersigned hereby authorizes and awknowledges 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: _____ DATE: 3/22/01

Emergency Contact Telephone Number

(206) 381-9000 OR (425) 771-0452

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ORD 987130189

Manifest Document No.: [illegible]

2. Page 1 of

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: PREMIER EDIBLE OILS
10400 NORTH BURGARD
PORTLAND, OR 97210
ATTN: JIM JAKUBIAK

4. Generator's Phone (503) 286-0976

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: WEST COAST MARINE CLEANING

6. US EPA ID Number: WAD988479440

C. State Transporter's ID

D. Transporter's Phone: [illegible]

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 NORTHWEST
17629 CEDAR SPRINGS LANE
ARLINGTON, OR 97812

10. US EPA ID Number: ORD089452353

G. State Facility's ID

H. Facility's Phone: (541) 454-2632

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.		RQ, WASTE POTASSIUM HYDROXIDE SOLUTION (EPA D002,D008 DW) [illegible]					D002,D008
b.			001	TT	00 800	G	
c.							
d.							

J. Additional Descriptions for Materials Listed Above: [illegible]

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.

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Printed/Typed Name	Signature	Month	Day	Year
[illegible]				

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Johnny Murphy SR	John L Murphy SR			

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

SCHN00262015

UNIFORM HAZARDOUS WASTE MANIFEST AND INSTRUCTIONS EPA FORM 8700-22

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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.

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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.

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Note – All of the above information *except* the handwritten signature required in item 16 may be preprinted.

TRANSPORTERS

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EPA Regional Administrators

Regional Administrator, U.S. EPA Region I, J.F. Kennedy Fed. Bldg., Boston, MA 02203

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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.

SCHN00262016

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM (UTS)

Generator Name: PREMIER EDIBLE OILS Manifest Doc No. 11258

CWM Profile Number: 0 0 5 1 5 7 State Manifest No. _____

1. Is this waste a non-wastewater or a wastewater? (See 40 CFR 268.2) Check ONE: Non-Wastewater ☒ Wastewater ☐
2. If this waste is subject to any California List restrictions, enter the letter from below (either A, B1 or B2) next to each restriction that is applicable:
   ____ HOCs ____ PCBs ____ Metals ____ Acid ____ Cyanides
3. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent and California List treatment standards are listed on the back of this form. If F039, multi-source leachate applies, those constituents must be listed and attached by the generator. If D001, D002 or D012-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

REF #	4. US EPA HAZARDOUS WASTE CODE(S)	5. SUBCATEGORY ENTER THE SUBCATEGORY DESCRIPTION *(If not applicable, simply check "NONE".)*		6. HOW MUST THE WASTE BE MANAGED? *Enter the letter from below*
		Description	None	
1	D002		☒	A
2	D008		☒	A
3				
4				
5				
6				
7				
8				
9				
10				

To identify F039 or D001, D002, D012-D043, underlying hazardous constituent(s), use the "F039/Underlying Hazardous Constituent Form" provided (CWM-2004) and check here: ☒
If no UHCs are present in the waste upon its initial generation, check here: ☐
To list additional USEPA waste code(s) and subcategory(s), use the supplemental sheet provided (CWM-2005-B) and check here: ☐

HOW MUST THE WASTE BE MANAGED? In column 7 above, enter the letter (A, B1, B2, B3, C, D or E) below that describes how the waste must be managed to comply with the land disposal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B2, B3 or D, you are making the appropriate certification as provided below.

A. RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268 Subpart D, 268.32 or RCRA Section 3004(d).

B 1 RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR part 268, Subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

B 2 RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY).
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

B 3 GOOD FAITH ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by incineration in units operated in accordance with 40 CFR Part 264, Subpart O, or 40 CFR Part 265, Subpart O, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

C RESTRICTED WASTE SUBJECT TO VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 7 above. ☐For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

D RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I have determined that this waste meets all applicable treatment standards set forth in 40 CFR Part 268 Subpart D, and all applicable prohibition levels set forth in Section 268.32 or RCRA Section 3004(d), and therefore, can be land disposed without further treatment. A copy of all applicable treatment standards and specified treatment methods is maintained at the treatment, storage and disposal facility named above." "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 40 CFR 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 false certification, including the possibility of a fine and imprisonment."

E. WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

Signature _____ Title Environmental Administrator Date 3/22/01

CWM-2005A (12/94)

SCHN00262017

D001, D002, F039/UNDERLYING HAZARDOUS CONSTITUENT FORM

Generator Name: PREMIER DOUBLE OILS
Profile Number: Co-5157

Manifest Doc. No.: 41258
State Manifest No.: _____

If D001-D003 or D012-D043 requires treatment for underlying hazardous constituents, then each underlying hazardous constituent present in the waste at the point of generation, and at a level above the F039 and UTS constituent specific treatment standard, must be listed. Write the letter (A, B1, B3 or C which corresponds to the letter on form CWM-2001A) beside each constituent present to properly describe how the constituent(s) must be managed under 40 CFR 268.7.

CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/Kg)	CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/Kg)
A2213		0.042[2]	1.4[2]	Benzo (k) fluoranthene		0.059	3.4
Acenaphthylene		0.059	3.4	Benzo (g,h,i) perylene		0.0055	1.5
Acenaphthene		0.059	3.4	Benzo (a) pyrene		0.061	3.4
Acetone		0.28	160	Bromodichloromethane		0.35	15
Acetonitrile		5.6	1.8[2]	Bromoform (Tribromomethane)		0.63	15
Acetophenone		0.010	9.7	Bromomethane (methyl bromide)		0.11	15
2-Acetylaminofluorene		0.059	140	4-Bromophenyl phenyl ether		0.055	15
Acrolein		0.29	NA	n-Butanol (n-butyl alcohol)		5.6	2.6
Acrylamide		19[2]	23[2]	Butyl benzyl phthalate		0.017	2.8
Acrylonitrile		0.24	84	Butylate		0.042[2]	1.4[2]
Aldicarb Sulfone		0.056[2]	0.28[2]	2-sec-Butyl-4,6-dinitrophenol (Dinoseb)		0.066	2.5
Aldrin		0.021	0.066	Carbon disulfide		0.014	4.8[1,2]
4-Aminobiphenyl		0.13	NA	Carbaryl		0.006[2]	0.14[2]
Aniline		0.81	14	Carbendazim		0.056[2]	1.4[2]
Anthracene		0.059	3.4	Carbofuran		0.006[2]	0.14[2]
Aramite		0.36	NA	Carbofuran phenol		0.056[2]	1.4[2]
Aroclor 1016		0.013	0.92	Carbon tetrachloride		0.057	5.6
Aroclor 1221		0.014	0.92	Carbosulfan		0.028[2]	1.4[2]
Aroclor 1232		0.013	0.92	Chlordane (alpha & gamma)		0.0033	0.13
Aroclor 1242		0.017	0.92	p-Chloroaniline		0.46	16
Aroclor 1248		0.013	0.92	Chlorobenzene		0.057	5.7
Aroclor 1254		0.014	1.8	Chlorobenzilate		0.10	NA
Aroclor 1260		0.014	1.8	2-chloro-1,3-butadiene		0.057	0.28[2]
alpha-BHC		0.00014	0.066	Chlorodibromomethane		0.057	15
beta-BHC		0.00014	0.066	Chloroethane		0.27	6.0
delta-BHC		0.023	0.066	bis-(2-Chloroethoxy) methane		0.036	7.2
gamma-BHC (Lindane)		0.0017	0.066	bis-(2-Chloroethyl) ether		0.033	6.0
Barban		0.056[2]	1.4[2]	Chloroform		0.046	5.6
Bendiocarb		0.056[2]	1.4[2]	bis-(2-Chloroisopropyl) ether		0.055	7.2
Bendiocarb phenol		0.056[2]	1.4[2]	p-Chloro-m-cresol		0.018	14
Benomyl		0.056[2]	1.4[2]	2-Chloroethyl Vinyl ether		0.062[2]	NA
Benzene		0.14	10	Chloromethane (methyl chloride)		0.19	30
Benzo (a) anthracene		0.059	3.4	2-Chloronaphthalene		0.055	5.6
Benzal chloride		0.055[2]	6.0[2]	2-Chlorophenol		0.044	5.7
Benzo (b) fluoranthene		0.055	3.4	3-Chloropropylene		0.036	28

If you have any questions, please call 1-800-843-3604 for Customer Service.
Chemical Waste Management, Inc.

SCHN00262018

CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/Kg)	CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/Kg)
Chrysene		0.059	3.4	2,4-Dinitrophenol		0.12	160
o-Cresol		0.11	5.6	2,4-Dinitrotoluene		0.32	140
Cresol (m- and p- isomers)		0.77	3.2	2,6-Dinitrotoluene		0.55	28
m-Cumenyl methylcarbamate		0.056[2]	1.4[2]	Di-n-octyl phthalate		0.017	28
Cycloate		0.042[2]	1.4[2]	Di-n-propylnitrosoamine		0.40	14
Cyclohexanone		0.36	0.75[1,2]	1,4-Dioxane		0.12	170
1,2-Dibromo-3-Chloropropane		0.11	15	Diphenyl amine		0.52	13[2]
1,2-Dibromoethane (Ethylene dibromide)		0.028	15	Diphenylnitrosoamine		0.40	13[2]
Dibromomethane		0.11	15	1,2-Diphenyl hydrazine		0.087	NA
2,4-Dichlorophenoxyacetic acid (2,4-D)		0.72	10	Disulfoton		0.017	6.2
o,p-DDD		0.023	0.087	Dithiocarbamates (total)		0.028[2]	28[2]
p,p-DDD		0.023	0.087	Endosulfan I		0.023	0.066
o,p-DDE		0.031	0.087	Endosulfan II		0.029	0.13
p,p-DDE		0.031	0.087	Endosulfan sulfate		0.029	0.13
o,p-DDT		0.0039	0.087	Endrin		0.0028	0.13
p,p-DDT		0.0039	0.087	Endrin aldehyde		0.025	0.13
Dibenzo (a,h) anthracene		0.055	8.2	EPTC		0.042[2]	1.4[2]
Dibenzo (a,e) pyrene		0.061	NA	Ethyl acetate		0.34	33
m-Dichlorobenzene		0.036	6.0	Ethyl benzene		0.057	6.0
o-Dichlorobenzene		0.088	6.0	Ethyl cyanide (Propanenitrile)		0.24	360
p-Dichlorobenzene		0.090	6.0	Ethyl ether		0.12	160
Dichlorodifluoromethane		0.23	7.2	bis-(2-Ethylhexyl) phthalate		0.28	28
1,1-Dichloroethane		0.059	6.0	Ethyl methacrylate		0.14	160
1,2-Dichloroethane		0.21	6.0	Ethylene oxide		0.12	NA
1,1-Dichloroethylene		0.025	6.0	Famphur		0.017	15
trans-1,2-Dichloroethylene		0.054	30	Fluoranthene		0.068	3.4
2,4-Dichlorophenol		0.044	14	Fluorene		0.059	3.4
2,6-Dichlorophenol		0.044	14	Formetanate hydrochloride		0.056[2]	1.4[2]
1,2-Dichloropropane		0.85	18	Formparanate		0.056[2]	1.4[2]
cis-1,3-Dichloropropene		0.036	18	Heptachlor		0.0012	0.066
trans-1,3-Dichloropropene		0.036	18	Heptachlor epoxide		0.016	0.066
Dieldrin		0.017	0.13	Hexachlorobenzene		0.055	10
Diethyl phthalate		0.20	28	Hexachlorobutadiene		0.055	5.6
Diethyleneglycol dicarbamate		0.056[2]	1.4[2]	Hexachlorocyclopentadiene		0.057	2.4
p-Dimethylaminoazobenzene		0.13[2]	NA	Hexachlorodibenzo-furans		0.000063	0.001
2,4-Dimethyl phenol		0.036	14	Hexachlorodibenzo-p-dioxins		0.000063	0.001
Dimethyl phthalate		0.047	28	Hexachloroethane		0.055	28
Dimetilan		0.056[2]	1.4[2]	Hexachloropropylene		0.035	28
Di-n-butyl phthalate		0.057	28	Indeno (1,2,3-c,d) pyrene		0.0055	3.4
1,4-Dinitrobenzene		0.32	2.3	Iodomethane		0.19	65
4,6-Dinitro-o-cresol		0.28	160	3-Iodo-2-propynyl-n-butyl carbamate		0.056[2]	1.4[2]

SCHN00262019

CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/Kg)	CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/Kg)
Isobutanol (Isobutyl Alcohol)		5.6	170	Pentachloroethane		0.055 [2]	6.0 [2]
Isodrin		0.021	0.066	Pentachlorodibenzo-furans		0.000063	0.001
Isolan		0.056 [2]	1.4 [2]	Pentachlorodibenzo-p-dioxins		0.000063	0.001
Isosafrole		0.081	2.6	Pentachloronitrobenzene		0.055	4.8
Kepone		0.0011	0.13	Pentachlorophenol		0.089	7.4
Methylacrylonitrile		0.24	84	Phenacetin		0.081	16
Methanol		5.6	0.75 [1,2]	Phenanthrene		0.059	3.1
Methapyrilene		0.081	1.5	Phenol		0.039	6.2
Methiocarb		0.056 [2]	1.4 [2]	o-Phenylenediamine		0.056 [2]	5.6 [2]
Methomyl		0.028 [2]	0.14 [2]	Phorate		0.021	4.6
Methoxychlor		0.25	0.18	Phthalic acid		0.055 [2]	28 [2]
3-Methylcholanthrene		0.0055	15	Phthalic anhydride		0.055 [2]	28 [2]
4,4-Methylene-bis-(2-chloroaniline)		0.50	30	Physostigmine		0.056 [2]	1.4 [2]
Methylene chloride		0.089	30	Physostigmine salicylate		0.056 [2]	1.4 [2]
Methyl ethyl ketone		0.28	36	Promecarb		0.056 [2]	1.4 [2]
Methyl isobutyl ketone		0.14	33	Pronamide		0.093	1.5
Methyl methacrylate		0.14	160	Propham		0.056 [2]	1.4 [2]
Methyl methanesulfonate		0.018	NA	Propoxur		0.056 [2]	1.4 [2]
Methyl parathion		0.014	4.6	Prosulfocarb		0.042 [2]	1.4 [2]
Metolcarb		0.056 [2]	1.4 [2]	Pyrene		0.067	8.2
Mexacarbate		0.056 [2]	1.4 [2]	Pyridine		0.014	16
Molinate		0.056 [2]	1.4 [2]	Safrole		0.081	22
Naphthalene		0.059	3.1	Silvex (2,4,5-TP)		0.72	7.9
2-Naphthylamine		0.52	NA	2,4,5-T		0.72	7.9
o-Nitroaniline		0.27 [2]	14 [2]	1,2,4,5-Tetrachlorobenzene		0.055	14
p-Nitroaniline		0.028	28	Tetrachlorodibenzo-furans		0.000063	0.001
Nitrobenzene		0.068	14	Tetrachlorodibenzo-p-dioxins		0.000063	0.001
5-Nitro-o-toluidine		0.32	28	1,1,1,2-Tetrachloroethane		0.057	6.0
o-Nitrophenol		0.028 [2]	13 [2]	1,1,2,2-Tetrachloroethane		0.057	6.0
p-Nitrophenol		0.12	29	Tetrachloroethylene		0.056	5.6
N-Nitrosodiethylamine		0.40	28	2,3,4,6-Tetrachlorophenol		0.030	7.4
N-Nitrosodimethylamine		0.40	2.3 [2]	Thiodicarb		0.019 [2]	1.4 [2]
N-Nitroso-di-n-butylamine		0.40	17	Thiophanate-methyl		0.056 [2]	1.4 [2]
N-Nitrosomethylethylamine		0.40	2.3	Tirpate		0.056 [2]	0.28 [2]
N-Nitrosomorpholine		0.40	2.3	Toluene		0.080	10
N-Nitrosopiperidine		0.013	35	Toxaphene		0.0095	1.3
N-Nitrosopyrrolidine		0.013	35	Triallate		0.042 [2]	1.4 [2]
Oxamyl		0.056 [2]	0.28 [2]	1,2,4-Trichlorobenzene		0.055	19
Parathion		0.014	4.6	1,1,1-Trichloroethane		0.054	5.6
Pebulate		0.042 [2]	1.4 [2]	1,1,2-Trichloroethane		0.054	5.6
Pentachlorobenzene		0.055	10	Trichloroethylene		0.054	5.6

SCHN00262020

CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/Kg)	CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/Kg)
Trichloromonofluoromethane		0.020	30				
2,4,5-Trichlorophenol		0.18	7.4				
2,4,6-Trichlorophenol		0.035	7.4				
1,2,3-Trichloropropane		0.85	28				
1,1,2-Trichloro-1,2,2-trifluoroethane		0.057	28				
Triethylamine		0.081[2]	1.5[2]				
Tris(2,3-dibromopropyl) phosphate		0.11	0.10[2]				
Vernolate		0.042[2]	1.4[2]				
Vinyl chloride		0.27	6.0				
Xylenes (sum of o-, m-, and p- isomers)		0.32	28				
Cyanides (Total)		1.2	1.8				
Cyanides (Amenable)		0.86	30[2]				
Antimony		1.9	0.23[1]				
Arsenic		1.4	5.0[1]				
Barium	X	1.2	7.6[1]				
Beryllium		0.82	0.014[1,2]				
Cadmium		0.20	0.066[1]				
Chromium (Total)		0.37	0.86[1]				
Copper		1.3	NA				
Fluoride		35	NA				
Lead	X	0.28	0.37[1]				
Mercury (Not from retorting)		0.15	0.025[1]				
Nickel		0.55	0.32[1]				
Mercury (From retorting)		N/A	1.4[1]				
Selenium		0.82	0.16[1]				
Silver		0.29	0.072[1]				
Sulfide		14	NA				
Thallium		1.4	0.078[1,2]				
Vanadium		0.042	0.23[1,2]				

1 These concentrations are expressed in mg/l and are measured through an analysis of TCLP extract (268.41); all others measured through a total waste analysis (268.43).

2 These constituents are only applicable as Underlying Hazardous Constituents. They are not constituents requiring treatment in F039 wastes.

SCHN00262021

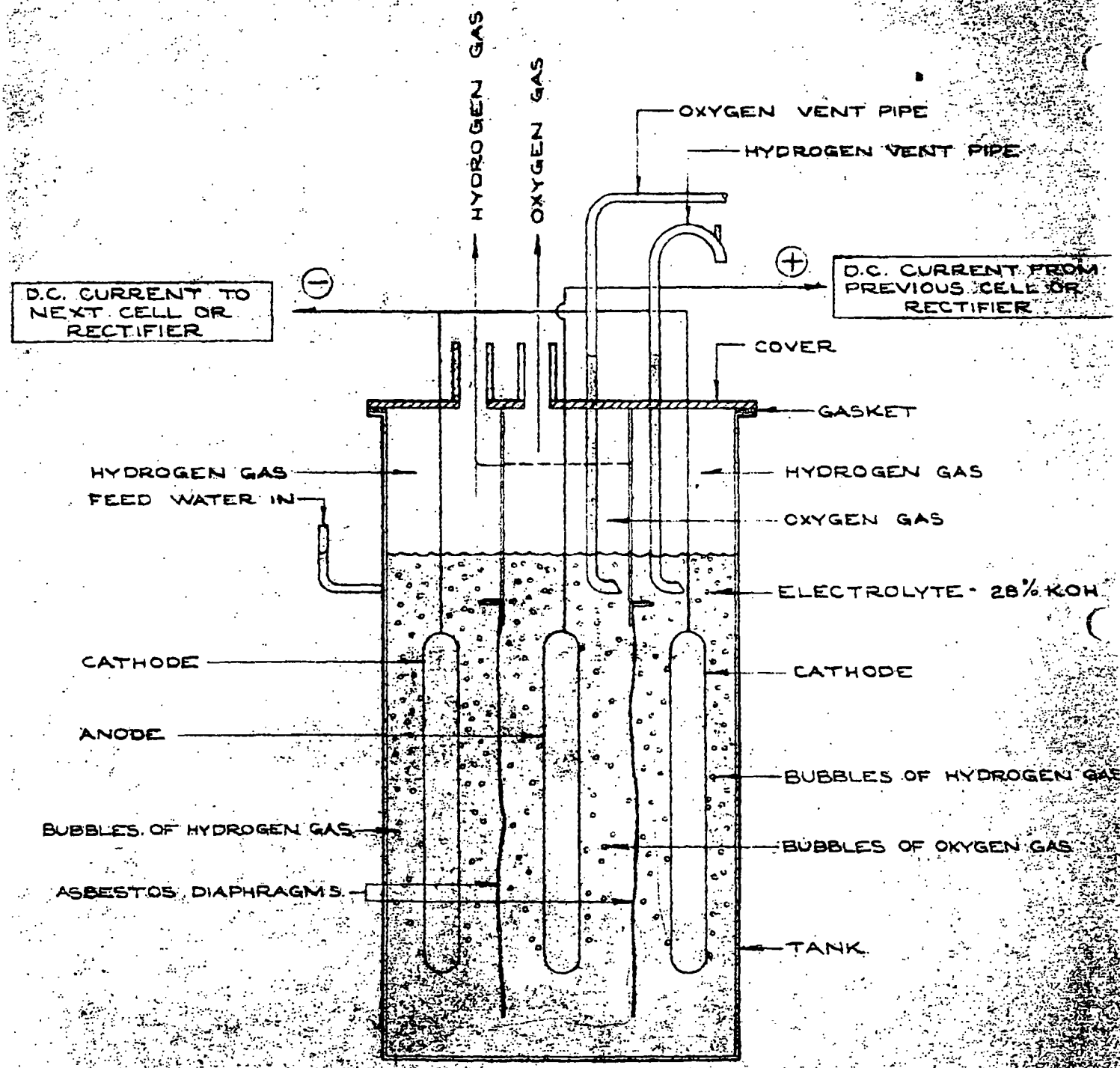

FIG. SCHEMATIC OF ELECTROLYTIC CELL

18/5/76

SCHN00262027

Confirmation Report – Memory Send

Time : Feb-01-2001 09:12am
Tel line :
Name :

Job number	:	360
Date	:	Feb-01 09:11am
To	:	914255135839
Document pages	:	001
Start time	:	Feb-01 09:11am
End time	:	Feb-01 09:12am
Pages sent	:	001
Status	:	OK

Job number : 360 *** SEND SUCCESSFUL ***

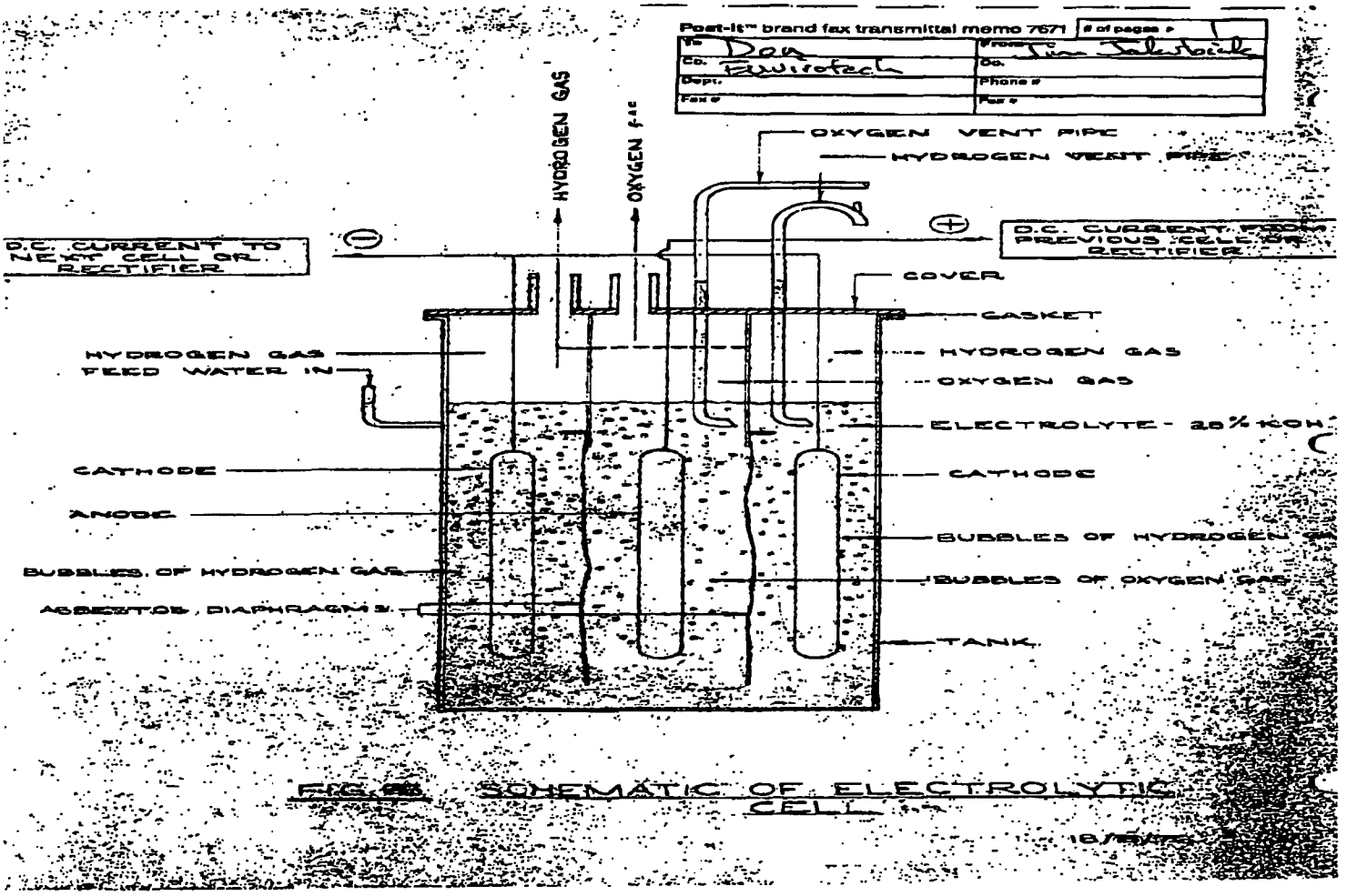

FIG. 2B SCHEMATIC OF ELECTROLYTIC CELL

ENVIROTECH SYSTEMS, INC.

FACSIMILE COVER SHEET

Sending Fax: (425) 513-5839

Pages in this transmission: 5 (Including Cover sheet)

Date: 2/15/01

TO: Facsimile #: 503-286-6948

Name: Jim Jakubiak

Company: Schnitzer Investment Corp.

FROM: Name: Elaine

Subject: Application for EPA ID#

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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: The attached needs to be completed & ~~returned~~ mailed to Oregon DEQ.

Thanks.

ENVIROTECH SYSTEMS, INC.

3601 121ST ST SW LYNNWOOD, WA 98037 ☐ TELEPHONE (206) 363-9000 ☐ FAX (425) 513-5839

Notification of Hazardous Waste Activity

Oregon DEQ
Waste Management & Cleanup Division
811 SW 6th Avenue
Portland, OR 97204-1390

Kevin Masterson

1. Why are you completing the Notification Form? (Check one)

☒ **First notification:** This is the first notification of hazardous waste activity for this location. This facility needs to receive a DEQ ID number.

Susan Eidman (503) 229-6511

☐ **Update Information:** To update information, please check all that apply:

- ☐ Business closed at this location. Date of closure _____
- ☐ Business change of ownership. Date of change _____
- ☐ Business name change.
- ☐ Generator status change.
- ☐ Business address officially changed through the U.S. Post Office.
- ☐ Other _____

Edna Mayes

2. What is the DEQ ID number for this facility (if it already has one)? ☐☐☐☐☐☐☐☐☐☐☐☐

3. Facility name Premier Edible Oils

4. If different from #3, how is your facility name filed with the Oregon Secretary of State, Corporations Division?

5. The PHYSICAL LOCATION of this facility is (Do NOT enter a PO Box):

Street Address: 10400 North Burgard Way

City: Portland State: OR ZIP: 97210 County: Multnomah

Specific Location (if available):

(If available, provide the precise location of the facility. Indicate whether you used Township/Range, UTM Number, tax lot, latitude/longitude, or another indicator to provide this.)

Are there other businesses located at this address? ☒ YES ☐ NO

6. The MAILING ADDRESS of this facility is:

Street Address or PO Box: P.O. Box 10047

City: Portland State: OR ZIP: 97296-0047

HAZARDOUS WASTE FORMS contact: Name: Jim Jakubiak Phone: 503-286-6976

SITE VISITS contact: Name: Jim Jakubiak Phone: 503-286-6976

SCHN00262043

7. The LEGAL OWNER of this business or operation is:
   Name of person or organization: Mitsubishi Corporation
   Street Address or PO Box: _____
   City: _____ State: ___ ZIP: _____ Phone: _____

8. The LAND OWNER of the property where this facility is located is:
   Name of person or organization: Schnitzer Investment Corp.
   Street Address or PO Box: P.O. Box 10047
   City: Portland State: OR ZIP: 97296-0047 Phone: 503-286-6976

9. Whom should DEQ contact about hazardous waste fees?
   Name: Jim Jakubiak Organization: Schnitzer Investment Corp.
   Street Address or PO Box: P.O. Box 10047
   City: Portland State: OR ZIP: 97296-0047 Phone: 503-286-6976

10. Please select the most appropriate classification for the Business Owner and Property Owner.

	Business Owner (check one)	Property Owner (check one)
Private	☒	☒
Federal	☐	☐
State	☐	☐
County	☐	☐
District	☐	☐
Municipal	☐	☐
Native American Tribe	☐	☐

11. The Standard Industrial Classification (SIC) code that best describes the principal products or services rendered at the site is: [2][0][7][9] SIC codes are listed on page 15 of the Hazardous Waste Reference Guidebook.

12. Approximately how many people are currently employed full time at this facility? Zero

13. If this facility is CURRENTLY a hazardous waste generator, what is its status? If the facility is NOT YET generating a hazardous waste, what will the status be? Refer to Helpful Hint #5 of the Hazardous Waste Reference Guidebook if you need assistance determining your generator status. (please check appropriate box below)

☐ Large Quantity Generator ☐ Small Quantity Generator ☐ Conditionally Exempt Generator
☐ Facility does not generate hazardous waste.

13a. Hazardous waste generated at this location is the result of (check all that apply):
☐ Ongoing or periodic generations of process waste
☐ Remediation of environmental contamination
☐ Removal of outdated or off-specification material
☐ Other _____

SCHN00262044

14. If this facility manages hazardous waste in units exempt from RCRA permit requirements such as elementary neutralization units, permitted WWTUs or accumulation tanks or containers, does this facility manage hazardous waste:

☐ Generated at this facility ☐ Generated by other facilities

Which permit-exempt activities occur at this facility?

☐ Treatment ☐ Disposal ☐ Recycling

Does your facility intend to develop permit-exempt capability in the future? ☐ YES ☐ NO

15. If this facility markets or burns hazardous waste fuels, please check the boxes below for activities applicable to your site. Used oil managed under used oil regulations are not considered hazardous waste fuels.

☐ Generator marketing to burner ☐ Other marketer ☐ Boiler and/or industrial furnace

15a. Burner operating under

☐ Smelter deferral ☐ Small Quantity Exemption

15b. Type of combustion device used at your facility

☐ Utility boiler ☐ Industrial boiler

☐ Industrial furnace ☐ Other _____

16. If this facility is a hazardous waste transporter, please check as many of the following boxes as appropriate.

☐ Transports only hazardous waste generated at this facility

☐ Transports for commercial purposes

☐ Transports hazardous waste by: (check all appropriate boxes)

☐ Air ☐ Rail ☐ Highway ☐ Water

My PUC Authority # is _____

17. If this facility manages hazardous waste in RCRA permitted units or units subject to a permit.

Does the facility manage hazardous waste:

☐ Generated at this facility? ☐ Generated by other facilities?

Which RCRA permitted activities occur at this facility?

☐ Treatment ☐ Disposal ☐ Storage

SCHN00262045

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.

Signature | Date

Name (please print) | Title

Comments:

Send completed form to:

Oregon DEQ
Waste Management and Cleanup Division
Attn: Hazardous Waste Forms Clerk
811 SW Sixth Avenue
Portland, OR 97205-1390

SCHN00262046

Confirmation Report – Memory Send

Time : Mar-09-2001 10:18am
Tel line :
Name :

ORD987180189

Job number	:	534
Date	:	Mar-09 10:16am
To	:	95032296977
Document pages	:	005
Start time	:	Mar-09 10:16am
End time	:	Mar-09 10:18am
Pages sent	:	005
Status	:	OK

Job number : 534 *** SEND SUCCESSFUL ***

DEQ 9TH FLOOR 001

From: Schnitzer Investment Corp.

Post-it® Fax Note 7671	Date 3/9/01	# of pages ▸ 5
To James Jakubiak	From Susan Eidman	
Co./Dept. Schnitzer Steel	Co. ODEQ HQ HW	
Phone # 503 286-6976	Phone # 503 229-6511	
Fax # 503 286-6948	Fax # 503 229-6977	

Susan indicated
She will have us use
Premier Edible Oils #.

Notification of Hazardous Waste Activity

Oregon Department of
Environmental Quality
Waste Management
& Cleanup Division
811 SW 6th Avenue
Portland, OR 97204

Printed May 1999

SCHN00262048

3/9/0

Post-it® Fax Note 7671 | Date 3/8/01 | # of pages ▶ 95

From: Schnitzer Investment Corp.

To James Jakubiak	From Susan Fidman
Co./Dept. ~~Schnitzer Steel~~	Co. ODEQ HQ HW
Phone # 503 286-6976	Phone # 503 229-6511
Fax # 503 286-6948	Fax # 503 229-6977

:To

Notification of Hazardous Waste Activity

Oregon Department of Environmental Quality
Waste Management
& Cleanup Division
811 SW 6th Avenue
Portland, OR 97204

Printed May 1999

Notification of Hazardous Waste Activity

Oregon DEQ
Waste Management &
Cleanup Division
811 SW 6th Avenue
Portland, OR 97204-1390

1. Why are you completing the Notification Form? (Check one)

   ☒ **First notification:** This is the first notification of hazardous waste activity for this location. This facility needs to receive a DEQ ID number.

   ☐ **Update Information:** To update information, please check all that apply:
   - ☐ Business closed at this location. Date of closure _____
   - ☐ Business change of ownership. Date of change _____.
   - ☐ Business name change.
   - ☐ Generator status change.
   - ☐ Business address officially changed through the U.S. Post Office.
   - ☐ Other _____.

2. What is the DEQ ID number for this facility (if it already has one)? ☐☐☐☐☐☐☐☐☐☐☐☐☐☐

3. Facility name Premier Edible Oils Site

4. If different from #3, how is your facility name filed with the Oregon Secretary of State, Corporations Division?

5. The PHYSICAL LOCATION of this facility is (Do NOT enter a PO Box):
   Street Address: 10400 North Burgard Way
   City: Portland State: OR ZIP: 97210 County: Multnomah
   Specific Location (if available): _____
   (If available, provide the precise location of the facility. Indicate whether you used Township/Range, UTM Number, tax lot, latitude/longitude, or another indicator to provide this.)

   Are there other businesses located at this address? ☒ YES ☐ NO

6. The MAILING ADDRESS of this facility is:
   Street Address or PO Box: P.O. Box 10047
   City: Portland State: OR ZIP: 97296-0047
   HAZARDOUS WASTE FORMS contact: Name: Jim Jakubiak Phone: (503) 286-6976
   SITE VISITS contact: Name: Jim Jakubiak Phone: (503) 286-6976

SCHN00262050

7. The LEGAL OWNER of this business or operation is:
   Name of person or organization: Mitsubishi Corporation
   Street Address or PO Box: _____
   City: _____ State: ___ ZIP: _____ Phone: _____

8. The LAND OWNER of the property where this facility is located is:
   Name of person or organization: Schnitzer Investment Corp.
   Street Address or PO Box: P.O. Box 10047
   City: Portland State: OR ZIP: 97296-0047 Phone: (503) 286-6976

9. Whom should DEQ contact about hazardous waste fees?
   Name: Jim Jakubiak Organization: Schnitzer Investment Corp.
   Street Address or PO Box: P.O. Box 10047
   City: Portland State: OR ZIP: 97296-0047 Phone: 503-286-6976

10. Please select the most appropriate classification for the Business Owner and Property Owner.

	Business Owner (check one)	Property Owner (check one)
Private	☒	☒
Federal	☐	☐
State	☐	☐
County	☐	☐
District	☐	☐
Municipal	☐	☐
Native American Tribe	☐	☐

11. The Standard Industrial Classification (SIC) code that best describes the principal products or services rendered at the site is: 2079 SIC codes are listed on page 15 of the Hazardous Waste Reference Guidebook.

12. Approximately how many people are currently employed full time at this facility? Zero

13. If this facility is CURRENTLY a hazardous waste generator, what is its status? If the facility is NOT YET generating a hazardous waste, what will the status be? Refer to Helpful Hint #5 of the Hazardous Waste Reference Guidebook if you need assistance determining your generator status. (please check appropriate box below)

☐ Large Quantity Generator ☐ Small Quantity Generator ☐ Conditionally Exempt Generator
☒ Facility does not generate hazardous waste.

13a. Hazardous waste generated at this location is the result of (check all that apply):
☐ Ongoing or periodic generations of process waste
☐ Remediation of environmental contamination
☒ Removal of outdated or off-specification material
☐ Other _____

14. If this facility manages hazardous waste in units exempt from RCRA permit requirements such as elementary neutralization units, permitted WWTUs or accumulation tanks or containers, does this facility manage hazardous waste :

☐ Generated at this facility ☐ Generated by other facilities

Which permit-exempt activities occur at this facility? Not Applicable

☐ Treatment ☐ Disposal ☐ Recycling

Does your facility intend to develop permit-exempt capability in the future? ☐ YES ☒ NO

15. If this facility markets or burns hazardous waste fuels, please check the boxes below for activities applicable to your site. Used oil managed under used oil regulations are not considered hazardous waste fuels.

☐ Generator marketing to burner ☐ Other marketer ☐ Boiler and/or industrial furnace

15a. Burner operating under

☐ Smelter deferral ☐ Small Quantity Exemption

15b. Type of combustion device used at your facility

☐ Utility boiler ☐ Industrial boiler Not Applicable

☐ Industrial furnace ☐ Other _____

16. If this facility is a hazardous waste transporter, please check as many of the following boxes as appropriate.

☐ Transports only hazardous waste generated at this facility Not Applicable

☐ Transports for commercial purposes

☐ Transports hazardous waste by: (check all appropriate boxes)

☐ Air ☐ Rail ☐ Highway ☐ Water

My PUC Authority # is _____

17. If this facility manages hazardous waste in RCRA permitted units or units subject to a permit,

Does the facility manage hazardous waste:

☐ Generated at this facility? ☐ Generated by other facilities? Not Applicable

Which RCRA permitted activities occur at this facility?

☐ Treatment ☐ Disposal ☐ Storage

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.

James L Jakubiak
Signature

3/9/01
Date

James L. Jakubiak
Name (please print)

Env. Administrator
Title

Comments:
This is a one-time site removal activity. A former tenant of STC has abandoned the property

Send completed form to:

Oregon DEQ
Waste Management and Cleanup Division
Attn: Hazardous Waste Forms Clerk
811 SW Sixth Avenue
Portland, OR 97205-1390

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

Waste Prevention & Management

Search

About DEQ | Regulations | News & info | Programs | Contact Us

Features

- Compliance & Permitting
- Links
- Pollution Prevention & Recycling
- Program and Policy Development
- Resource Library
- Staff Directory.
- Technical Assistance
- Contact Us

Home > Programs > Hazardous Waste

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.

New to *Our* Website

- DEQ-Sponsored Hazardous Waste Training

Hazardous Waste Programs

- ANNUAL HAZARDOUS WASTE REPORT - Download reports or submit reports electronically
- 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.

Hazardous Waste factsheets are also available on the DEQ Publications page.

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.

DEQ Online is the official web site for the Oregon Department of Environmental Quality.
If you have questions or comments about the web site contact DEQ's webmaster.

Click on ANY of the "Features" for additional info.

Introduction

What is the purpose of the Notification of Hazardous Waste Activity Form?

The Notification Form is used by facilities that are required to notify the Oregon Department of Environmental Quality (DEQ) that they are involved in hazardous waste activities.

Facilities that have already notified with DEQ may also use this form to update information. For example, if a business owner or land owner changes, this information must be updated.

This form is a modified EPA Notification Form as described in Oregon Administrative Rule 340-102-012 and is used in lieu of EPA notification form 8700-12. Hazardous waste notifications must be submitted to DEQ, not to EPA.

Who needs to notify DEQ of their hazardous waste activities?

If you fit into any of the following categories, you must notify DEQ using this form:

- Hazardous Waste Transporter
- Large Quantity Hazardous Waste Generator
- Small Quantity Hazardous Waste Generator
- Treatment, Storage or Disposal Facility
- Hazardous Waste Recycling Facility
- Marketer or Burner of Hazardous Waste Fuel

These activities are defined in the Definitions section of the attached Hazardous Waste Reference Guidebook.

How do I notify of used oil activities?

If you fit any of the following categories, you must notify DEQ using the Used Oil Activity Notification form:

- Used oil collection center
- Used oil transporters
- Used oil transfer facility
- Used oil processor/re-refiner
- Used oil fuel marketer
- Used oil burner

These activities are defined in the Used Oil Definitions section of the attached Hazardous Waste Reference Guidebook.

Please call DEQ at (503) 229-5913 to obtain a copy of DEQ's Used Oil Activity Notification Form.

How do I notify of Universal Waste Activities?

If you fit into any of the following categories, you must notify DEQ using the Notification of Universal Waste Activity Form:

- Large quantity handler of universal waste
- Pesticide collection program
- Off-site universal waste collection site

These activities are defined in the Universal Waste Definitions Section of the attached Hazardous Waste Reference Guidebook.

Please call DEQ at (503) 229-5913 to obtain a copy of the Notification of Universal Waste Activity Form.

Who do I contact if I have questions about the Hazardous Waste Activity Notification Form?

If you have any questions about this form contact Oregon DEQ at (503) 229-6511.

Who do I contact if I have questions about the Hazardous Waste Regulations?

DEQ's Waste Reduction Assistance Program (WRAP) staff are available to provide technical assistance to hazardous waste generators. If you would like assistance, please contact the WRAP staff at your nearest regional office. Locations and phone numbers of the regional offices are on the map on the back cover of this booklet.

Where do I send my completed Notification Form?

Send your completed form to:

Oregon DEQ
Waste Management & Cleanup Division
Attn: Hazardous Waste Forms Clerk
811 SW Sixth Avenue
Portland, Oregon 97204-1390

Susan H. Eidman
Technical Assistant
Hazardous Waste Reduction

Oregon
DEPARTMENT OF
ENVIRONMENTAL
QUALITY

Waste Management and Cleanup
811 SW Sixth Ave.
Portland, Oregon 97204
(503) 229-6811 • FAX (503) 229-6977
TDD (503) 229-6993
1-800-452-4011
Susan.Eidman@state.or.us

You may FAX the completed form back —

503 229-6977

Northwest
DEMOLITION & DISMANTLING

P.O. Box 930, Wilsonville, OR 97070. Ph: 503-638-6900 Fax: 503-638-1019

Change Order # MS1181

Project: Schnitzer Investment Corp Job #: 1038

Location: T-4 Date:

Description of work: Finish Demo of Building, Haul off Concrete, Steel & Trash
Remove Fencing & posts (Saved Gates)

Quantity	Labor (in addition to that included with equipment)		Hours	Rate (hr)	Item Total
	Project Manager				
1	Job Supervisor	Mark Stoller	8		
	Foreman				
	Laborers				

Quantity	Labor (in addition to that included with equipment)	Hours	Rate (hr)	Item Total
	Komatsu PC 400 with bucket and thumb			
	Komatsu PC 400 with grapple/hammer			
	Komatsu PC 400 with LaBounty Universal Processor			
	Komatsu PC with long reach 3-piece boom			
	Komatsu PC 220 with LaBounty Universal Processor			
1	Komatsu PC 220 with bucket and thumb	8		
	Komatsu PC 220 with grapple/hammer			
	Cat 966 Front End Loader			
	Cat 977 Track Loader/demolition bucket			
	Eagle concrete crushing plant & magnet, scale & conveyer			
	Whiphammer			
	Peterbilt & Clement end dump or 3 axle LoadKing lowboy			
1	Peterbilt and Kenworth drop box truck and boxes			
1	Drop box trailer and box (no operator)			
	Drop box (daily charge)			
1	763 Bobcat with bucket, grapple and hard tires	8		
	763 Bobcat with concrete breaker			
	Construction forklift			
1	Ford F250 Diesel Pick-Ups ("per day" - no operator)	Daily		

Subcontractor Services			
(1) Bottle O2 Quinby W.O. # 341737-00			
		Total Cost	

Owner Approval

Authorized Signature (Owner):	Date: 4/20/04
Authorized Signature (NW Demo):	Date:

Note: This change order becomes part of and in conformance with the existing contract. The signature of Owner signifies that the above prices and specifications of this Change Order are satisfactory and are hereby accepted. All work to be performed under the same terms and conditions as specified in original contract unless otherwise stipulated.

This agreed adjustment in the contract price and time is a complete and equitable adjustment for all direct costs (including overhead and profit thereon) and for the time needed to perform the work of this Change Order. Contractor expressly reserves the right to claim additional compensation and time for performance if this Change Order and/or other modifications, changes or addtional work cause and impact on Contractor's performance.

Northwest
DEMOLITION & DISMANTLING

P.O. Box 930, Wilsonville, OR 97070. Ph: 503-638-6900 Fax: 503-638-1019

Change Order # MS 1180

Project: Schnitzer Investment Corp Job #: 1038

Location: T-4 Date: 4/16/01

Description of work: Demo Bldg, deliver 763 Bobcat #2 to Job site. Haul all material, Remove misc. scrap, Fuse tubes & Rail. Drain oil out of Compressor

Quantity	Labor (in addition to that included with equipment)		Hours	Rate (hr)	Item Total
	Project Manager				
1	Job Supervisor	Mike Stoltz	5		
1	Foreman	Everett White	3 1/2		
	Laborers				

Quantity	Labor (in addition to that included with equipment)	Hours	Rate (hr)	Item Total
	Komatsu PC 400 with bucket and thumb			
	Komatsu PC 400 with grapple/hammer			
	Komatsu PC 400 with LaBounty Universal Processor			
	Komatsu PC with long reach 3-piece boom			
	Komatsu PC 220 with LaBounty Universal Processor			
1	Komatsu PC 220 with bucket and thumb	4 1/2		
	Komatsu PC 220 with grapple/hammer			
	Cat 966 Front End Loader			
	Cat 977 Track Loader/demolition bucket			
	Eagle concrete crushing plant & magnet, scale & conveyer			
	Whiphammer			
	Peterbilt & Clement end dump or 3 axle LoadKing lowboy			
1	Peterbilt and Kenworth drop box truck and boxes	5		
1	Drop box trailer and box (no operator)	5		
X	Drop box (daily charge)	Dump		
1	763 Bobcat with bucket, grapple and hard tires	4 1/2		
	763 Bobcat with concrete breaker			
	Construction forklift			
2	Ford F250 Diesel Pick-Ups ("per day" - no operator)	Daily		

Subcontractor Services			
	Total Cost		

Owner Approval

Authorized Signature (Owner):	Date: 4/20/01
Authorized Signature (NW Demo):	Date:

Note: This change order becomes part of and in conformance with the existing contract. The signature of Owner signifies that the above prices and specifications of this Change Order are satisfactory and are hereby accepted. All work to be performed under the same terms and conditions as specified in original contract unless otherwise stipulated.

This agreed adjustment in the contract price and time is a complete and equitable adjustment for all direct costs (including overhead and profit thereon) and for the time needed to perform the work of this Change Order; Contractor expressly reserves the right to claim additional compensation and time for performance if this Change Order and/or other modifications, changes or additional work cause and impact on Contractor's performance.

Northwest
DEMOLITION & DISMANTLING

P.O. Box 930, Wilsonville, OR 97070. Ph: 503-638-6900 Fax: 503-638-1019

Change Order # MS1179

Project: Schnitzer Investment Corp
Location: T-4 Job #: 1038
Description of work: Mobilize 220-5 Hoe w/C-6 w/lowboy. Install Date: 4/17/01
Silt Fence on river side of project

Quantity	Labor (in addition to that included with equipment)		Hours	Rate (hr)	Item Total
	Project Manager				
1	Job Supervisor	Mark Stoller	2 1/2		
1	Foreman	Everett White	2 1/2		
	Laborers				

Quantity	Labor (in addition to that included with equipment)	Hours	Rate (hr)	Item Total
	Komatsu PC 400 with bucket and thumb			
	Komatsu PC 400 with grapple/hammer			
	Komatsu PC 400 with LaBounty Universal Processor			
	Komatsu PC with long reach 3-piece boom			
	Komatsu PC 220 with LaBounty Universal Processor			
	Komatsu PC 220 with bucket and thumb			
	Komatsu PC 220 with grapple/hammer			
	Cat 966 Front End Loader			
	Cat 977 Track Loader/demolition bucket			
	Eagle concrete crushing plant & magnet, scale & conveyer			
	Whiphammer			
1	Peterbilt & Clement end dump or 3 axle LoadKing lowboy	2 1/2		
	Peterbilt and Kenworth drop box truck and boxes			
	Drop box trailer and box (no operator)			
	Drop box (daily charge)			
	763 Bobcat with bucket, grapple and hard tires			
	763 Bobcat with concrete breaker			
	Construction forklift			
1	Ford F250 Diesel Pick-Ups ("per day" - no operator)	Daily		

Subcontractor Services

2) 100' Rolls silt fencing @ $50.00/Roll

Owner Approval

Authorized Signature (Owner): [signature] Date: 4/20/01

Authorized Signature (NW Demo): Date:

Total Cost

Note: This change order becomes part of and in conformance with the existing contract. The signature of Owner signifies that the above prices and specifications of this Change Order are satisfactory and are hereby accepted. All work to be performed under the same terms and conditions as specified in original contract unless otherwise stipulated.

This agreed adjustment in the contract price and time is a complete and equitable adjustment for all direct costs (including overhead and profit thereon) and for the time needed to perform the work of this Change Order; Contractor expressly reserves the right to claim additional compensation and time for performance if this Change Order and/or other modifications, changes or addtional work cause and impact on Contractor's performance.

SCHN00262060

Jim Jakubiak
From: Ann Gardner
Sent: Wednesday, April 04, 2001 12:48 PM
To: Jim Jakubiak
Cc: Tom Zelenka; Marion Haynes
Subject: N. Burgard - Permit # 01131346 CO

Please advise the demolition contractor that he can return to the city of Portland permit counter and complete the permit process. Sterling Bennett has reviewed the zoning code and can issue the permit without a greenway or landscape review.

The contractor will still need sign off for erosion control and some other code requirements, but that big landscape item has been eliminated. I think the total fee will be $579.38, but not 100% sure.

I have in my notes the sections of the code that were helpful in avoiding this landscape requirement. I will keep this for future reference, and we will also initiate discussions with the city so that this experience isn't duplicated down the road.

Give me a holler if I can be of further assistance.

Ann L. Gardner
Schnitzer Investment Corp
417-2041

Jim Jakubiak
From: Ann Gardner
Sent: Wednesday, April 04, 2001 3:12 PM
To: Jim Jakubiak
Subject: Demo permit

If I wasn't clear on this before, make sure the contractor asks for a demolition permit. The fact that we are leaving the slab is not relevant; he shouldn't mention that. So, complete demo permit. We phase our work, doing the roof, walls etc now. The slab will come later....

Ann L. Gardner
Schnitzer Investment Corp
417-2041

CWM OF THE NORTHWEST
Federal EPA ID: ORD089452353
17629 CEDAR SPRINGS LANE
ARLINGTON, OR 97812

PREMIER EDIBLE OILS
ATTN: MANIFEST SECTION
ORD987180189
12005 NORTH BURGARD
PORTLAND OR 97210

CONFIRMATION OF DESTRUCTION

Chemical Waste Management, Inc. has received waste material from PREMIER EDIBLE OILS on 03/23/01 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 11258.

Profile Number: CO5157
CWM Tracking ID: 35724001
Process: CHEMICAL FIXATION
Treatment Date: 03/27/01

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 # 87644
04/12/01

SCHN00262063

NORTHWEST DEMOLITION & DISMANTLING

Date: 5/18/01

To: Schnitzer Steel Industries, Inc.
James Jakubiak
Phone: 503-286-6976
Fax: 503-286-6948

From: Northwest Demolition & Dismantling
Richard Wayper
Phone: 503-519-8214
Fax: 503-620-1708

Pages: 1

Subject: Hydrogen Plant – Timing

Jim,

I reviewed the daily sheets for the job and here are the daily activities:

3/20/01	Utility locates
4/13/01	Permitting
4/17/01	Mobilization and install silt fence
4/18/01	Demolition
4/19/01	Demolition
4/20/01	Complete demolition and demobilize

Please call should you need any additional information.

LAWYERS

Copy to Jim J. 11/29/00

Davis Wright Tremaine LLP

ANCHORAGE BELLEVUE CHARLOTTE HONOLULU LOS ANGELES N
PORTLAND SAN FRANCISCO SEATTLE WASHINGTON, D.C. SHANGHAI

RICHARD M. GLICK
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SUITE 2300
1300 SW FIFTH AVENUE
PORTLAND, OR 97201-5682

TEL (503) 241-2300
FAX (503) 778-5299
www.dwt.com

August 28, 2000

VIA MESSENGER

Michael E. Rosen, Manager
Voluntary Cleanup and Portland Harbor
DEQ Northwest Region
2020 SW Fourth Ave., Suite 400
Portland, OR 97201-4987

Re: Schnitzer Investment Corp./Former Premier Edible Oils Site

Dear Mike:

As requested in Lynne Perry's letter of August 23, we are providing the enclosed documents:

- *"Preliminary Environmental Site Assessment (Phase I) – Premier Edible Oils Refinery 10400 North Burgard Way, Portland Oregon 97203,"* Hanson Engineers Incorporated; October 1996.
- *"Environmental Site Assessment (Phase I) – Premier Edible Oils Refinery 10400 North Burgard Way, Portland Oregon 97203,"* Hanson Engineers Incorporated; October 1996.
- *"Focused Site Characterization for 10400 N. Burgard Way – Summary Report"*, Bridgewater Group, Inc.; September 1998.
- Memorandum: Titled *"Field Observations and File Review – Premier Edible Oils"*, Bridgewater Group, Inc.; May 17,1999.
- *"Assessment of Diesel-Impacted Soils"*, Bridgewater Group, Inc.; May 17, 1999.
- *"Site Preparation / Redevelopment Status Report"*, Schnitzer Investment Corp.; June 1, 1999.

cc: C. Ford
B. Cobb
F:\1\12611\6\LTR\ROSEN-02 LTR.DOC
Portland
Tom Zelenka

- Memorandum: To Anton Pardini from Bill Cobb Titled *" Field Observations of Trenching Activities – Premier Edible Oils"*, Bridgewater Group, Inc.; August 25, 1999.

- Memorandum: To Rick Glick from Doug Smith, Titled *"Analysis of Existing Data—Former Premier Edible Oils Site"*, AGRA Earth & Environmental, Inc.; August 28, 2000.

The August 28, 2000 AGRA memo is the only one of the listed documents that the other parties do not have, and so we provide them copies of only that memo with this letter. Thanks again for coming to the settlement conference this Thursday. In the meantime, please call if you have questions.

Very truly yours,

Davis Wright Tremaine LLP

Richard M. Glick

Enclosures
RMG:mr/as
cc: Lynne Perry, Esq.
Daniel Skerritt, Esq.
Patricia Dost, Esq.
Kazuichiro Hayashi, Esq.

SCHN00262126

AGRA
ENGINEERING GLOBAL SOLUTIONS

AGRA Earth & Environmental, Inc.
7477 SW Tech Center Drive
Portland, Oregon, 97223-8025
Tel (503) 639-3400
Fax (503) 620-7892
Web www.agra.com

MEMORANDUM

DATE: 8/28/00 **FILE NO.:** 9-61M-10092

TO: Rick Glick, DWT

FROM: Doug Smith

SUBJECT: Analysis of Existing Data

The purpose of this memo is to discuss the nature, extent and likely sources of key contaminants identified at the subject site, as well as a discussion of historical land use and the extent to which these uses may have affected the distribution of site contaminants. The opinions and conclusions drawn are based upon a review of all available sample test data extending back to November 1996, when AGRA performed the first known site-wide investigation, and upon a review of air photos and chain-of-title documentation dating back to the 1930s.

Site History

Aerial Photographic Review

Aerial photographs were reviewed in an effort to identify the history of development at the site and the surrounding area. The photographs reviewed cover the years 1936, 1944, 1948, 1951, 1955, 1959, 1963, 1970, 1980, 1982, 1986, 1990, and 1994. The aerial photographs were obtained from either Spencer Gross or the US Army Corps of Engineers. No photographs depicting the site prior to 1936 were available. A discussion of the photographs is presented below.

1936: The 1936 aerial photograph (Figure 1a) shows the site as undeveloped. The photograph shows that much of the site was a backwater area in 1936, separated from the Willamette River by a sand levee. A wetland area which likely flooded seasonally is present behind the dike. The levee may have been formed naturally, or, more likely, as a result of dredge spoil placement on the site. In fact, an active dredge spoil placement operation is visible in the photo. The elevation in this backwater area likely was as low as 5 to 10 feet above mean sea level (MSL). The elevation of the levee likely was approximately 30 feet above MSL.

1944: In a 1944 aerial photograph (Figure 1b), it is evident that significant fill has been placed across the entire site. One can only conclude that the pipe dredge operation visible in the 1936 photo was continued until filling was completed. No record of other fill placement activities have been identified. Thus, the filling that occurred between 1936 and 1944 likely brought the elevation of the site to the grades that existed prior to construction of the Palmco Inc. facility (1972). Approximately 20 to 25 feet of fill, probably hydraulically placed dredge spoils, are present on the site. This is consistent with what has been described during drilling conducted at the site.

The subject site and vicinity properties have been developed principally as the Oregon Shipyards facility. Figure 2 illustrates the recent Premier site features superimposed over the 1944 aerial photo. In the 1944 photo, materials such as propellers, crates and containers are stacked all over the subject site, covering much of the recent northern tank farm area. A dozen or more sheds or small buildings are located along the northern margin of what will later become the Premier site. Several large buildings or other structure are located in the central area of the site, including above-ground storage tank farms and the central portion of the process building. Train tracks that have been absent for decades cross the site in an east-west direction.

A large slip for ships has been dredged south of the PEO property. Just north of the slip, and east of what will later become the Premier property, a large rectangular building has been constructed. On the subject site, three large structures have been constructed. One of the structures (BLD#1) is a former paint storage building (NTL, 1988) used by Oregon Shipyards. It is rectangular in shape and approximately 12,000 square feet in size. A large concrete slab is located adjacent to and south of the former paint storage building. A railroad spur is evident along the southern edge of BLD#1. A second building (BLD#2) is located between BLD#1 and the eastern property boundary. It is square in shape and approximately 7,000 square feet in size. No evidence suggesting possible uses of this building are evident in the photo. The third building (BLD#3) is located north of BLD#1. BLD#3 appears to be composed of a southern portion into which a railroad spur enters, and a northern portion which appears to be an approximately 13,500 square foot warehouse.

The area surrounding the two southernmost building is relatively free of stored ship building materials or debris. The area within the boundaries of the subject site east and north of BLD#3 is occupied by several railroad spurs. Between the railroad spur, what presumably are ship building materials are stored in the open or in small covered sheds.

1948: No change to site structures or the large warehouse east of the subject site area evident (Figure 1c). All of the ship building materials previously stored on the subject site have been removed. A dock structure extending out into the river has been constructed.

1956: It appears that a building has been constructed atop the concrete slab south of BLD#1 (Figure 1d). No changes to BLD#2 or BLD#3 are evident. Seven above-ground storage tanks (ASTs) are apparent east of the subject site, on property currently owned by Time Oil. Lines visible on the photo may be pipelines connecting the seven ASTs east of the site to a tank farm north of the subject site.

1961: No obvious on-site changes are apparent (Figure 1e). Activity on railroad spurs near BLD#1 and BLD#3 is apparent. Two additional large ASTs have been added to the tank farm east of the subject site.

1966: It appears that the building constructed atop the concrete slab south of BLD#1 has been removed (Figure 1f). Some unidentifiable debris appears to be present north of BLD#3. Otherwise, the site and vicinity appear unchanged.

1967: This subject site (Figure 1g) in this photo appears unchanged, except for abundant unidentifiable debris surrounding BLD#3.

1972: In this photo (Figure 1h), BLD #2 and BLD#3 have been removed. The debris surrounding BLD#3 in the previous photo is no longer visible. The Palmco, Inc. facility has been constructed at the site. The layout of the facility is consistent with Zarosinski-Tatone Engineers General Plot Plan (Drawing 152D-A109-3) for the site.

1977: Five additional ASTs have been erected in the northeast corner of the subject site (Figure 1i). One large AST also was erected on the tank farm site located east of the subject site. Otherwise, the site and vicinity appear unchanged.

1980: Two additional small ASTS have been erected north of the original tank farm located on the subject site (Figure 1j). Otherwise, the site and vicinity appear unchanged.

1994: The subject site (Figure 1k) and vicinity appear unchanged.

Historical Maps

AGRA contracted with Environmental Data Resources, Inc. (EDR) to conduct a search for historical Sanborn Fire Insurance maps. According to EDR, there is no map coverage for the subject site or vicinity. AGRA did locate 1936 and 1944 maps from the Metsker Atlas. Unfortunately, these maps do not provide useful information about historical land use.

Source, Nature and Extent of Contamination

Edible Oils in Soil

The Palmco and Premier operations consisted of receiving, refining, packaging and shipping edible tropical oils, such as palm and cottonseed oils, for use in the processed food industry.

Edible oils are relatively widespread, though spotty, in shallow soils throughout the northern half of the site, where most of the former above-ground storage tanks were located since the 1970s. Edible oils also have been detected in shallow soils in the southern half of the site, where storage, handling and transport of oils were carried out for approximately 20 years.

The clearest picture of the extent and magnitude of edible oils in site soils is presented in the September 1998 "Focused Site Characterization" report by Bridgewater Group, Inc. (BGI). The report presents test results for dozens of samples analyzed for the presence of "oil & grease and heavy oil." AGRA agrees with interpretation of North Creek Analytical chemists (see page 4-1) who "attributed ... part of the heavy oil range hydrocarbons to edible oils." In fact, AGRA chemists believe it is likely that the vast majority if not all of the heavy oil range hydrocarbons identified in soil samples reflects edible oils. No data or conclusion presented in the BGI report documents a heavy oil source other than edible oils.

The BGI (1998) report summarizes the distribution of edible oils in soil samples in Figure 7. An examination of data compiled in Table 1 of the report indicates that for the most part, the concentrations of edible oils are highest in the 0-1 foot range where sampled, and then decrease by an order of magnitude or more in the 1-2 foot range.

It should be noted that the near-surface soil conditions at the subject site have been altered since the BGI investigation was carried out in 1998. During the most recent visit to the site by AGRA staff, in the Spring of 1999, it was observed that the ASTs and tank foundations had been demolished, and this had resulted in a strong alteration of the surface topography. This may be of particular importance since the highest concentrations of edible oils were identified in very shallow soils, and following site demolition and regrading activities, this near-surface profile may have been severely disturbed.

Polynuclear Aromatic Hydrocarbons in Groundwater and Soil

Palmco/Premier installed a single, above-ground diesel tank located outside the processing plant, and connected to the plant by an overhead pipeline. Diesel was used solely as fuel for an emergency electrical generator. There has never been a reported spill or leak from the tank.

Groundwater

During the November 1996 investigation by AGRA, groundwater samples were collected from two Geoprobe boring locations and tested for polynuclear aromatic hydrocarbons (PAHs). One of the samples was collected from GP-C, which was determined in the field to be impacted by fuel hydrocarbons. Testing for PAHs in groundwater indicated the presence of napthalene at 310 ug/l, along with much lower concentrations (0.3-1.5 ug/l) of other non-carcinogenic PAHs including acenaphthene and phenanthrene. The second groundwater sample tested (GP-J) was collected from an area determined not to be impacted by fuel hydrocarbons. PAHs were not detected in GP-J. PAHs were not tested in any of the soil samples collected during the November 1996 investigation, and the general conclusion about GP-C was that it presented the typical profile of PAHs associated with fuel hydrocarbons. AGRA has found no evidence of an on-site source of fuel hydrocarbons detected in site groundwater.

Soil

PAHs have been analyzed at the site during several phases of investigation by BGI. In its September 1998 investigation, BGI documents the testing of 24 shallow soil samples at depths less than 24", two soil samples of intermediate depth (24-48") and two shoreline samples representing two relatively shallow depths from the same general location. Test results indicated the presence of carcinogenic and non-carcinogenic PAHs in most of the widely-scattered samples tested. The suite of PAHs identified in the two shoreline samples is similar to that seen for most of the upland soil samples.

Did not collect samples from wells having Free Product! Also data from Pyles excluded!

Bridgewater also documents the testing of groundwater samples collected from more than a dozen locations at the site. Carcinogenic PAHs are identifed at less than 1 ug/l in several of the samples. However, it is significant that no carcinogenic PAHs were identified in samples collected from monitoring wells. Furthermore, BGI states on page 4-6 that "Given the extremely low solubility of carcinogenic PAHs, the detected PAHs are likely attached to soil particles that were present in the Geoprobe samples rather than actually dissolved in groundwater."

Sampling and testing of PAHs is also discussed in two short reports, one prepared by BGI and dated May 17, 1999, and the other prepared by Schnitzer Investment Corp. (SIC) staff and dated

June 1, 1999. The BGI report discussed the results of two soil samples (SS-1 and SS-2), respectively collected in the vicinity of the tank-farm loading terminal and beneath the concrete pad. The report states that there are "17-261 ug/kg of individual PAHs". The June 1, 1999 report documents the results of testing for four other shallow soil samples collected beneath demolished concrete pads. Test results indicate carcinogenic and non-carcinogenic PAHs in all four samples tested. PAH concentrations in one of the samples (HB4-2) are an order of magnitude higher than those in the other samples tested.

The sampling and testing of shallow soil samples for PAHs also is documented in an August 25, 1999 report by BGI. The shallow soil samples (TR-1 through TR-5) were collected from a trench dug along the northern margin of the main process building. Results are similar to those of other soil samples collected about the site, and include carcinogenic and non-carcinogenic PAHs ranging from ND to 3.98 mg/kg per analyte.

Some additional sampling and testing of groundwater samples for PAHs is documented in Table 3, attached to a March 28, 2000 memo by Ater Wynn LLP, attorneys for SIC. The table indicates that Naphthalene was detected at 1,200 ug/l in a March 12, 2000 sample collected from MW-5.

In its September 1998 report, BGI suggests that there are several possible sources for the PAHs detected in shallow soils (< 4 feet of depth). These include coal tar, tack coat, heavy oils, asphaltic materials and materials related to past dust suppression measures. For deeper soils beneath the static water table, BGI suggests a petroleum source of PAH contamination. Bridgewater's August 25, 1999 report suggests that shallow PAHs are associated with diesel in soil. The August 26, 1999 Ater Wynn document states that "Bridgewater Group has concluded that the likely source of the PAHs on the shoreline was the tack coat material applied in the tank farm area and that the PAHs were discharged with stormwater."

AGRA believes that diesel and tack coat materials are not the source of widespread PAHs in site soils, nor are they the source of PAHs in river bank sediment samples. Figure 3 is a summary of the chemical composition of diesel fuel, borrowed from a State of California UST cleanup program guidance document. It shows that the carcinogenic PAHs common in virtually all shallow soil samples from the subject site, are not part of the chemical makeup of diesel fuel. Rather, naphthalene and methylnaphthalene are the PAHs expected to be associated with diesel fuel. Soil samples collected above the static water table by Bridgewater staff and tested for PAHs were found, for the most part, not to contain naphthalene or methylnaphthalene.

Bridgewater also has suggested that the tack coat materials used beneath the above-ground edible oil tanks at the site, also are a source of PAHs in upland soil and river sediment samples. There are three main reasons why it is highly unlikely that tack coat materials have contributed to widespread PAHs in soils or sediments. First, the tack coat materials applied at the site occur beneath the above-ground tanks prior to the tanks' demolition during 1999. These tanks therefore served as barriers to water leaching through the tack coat materials. Second, soil samples with pyrogenic PAHs are widespread throughout the site, including in areas well away from tack coat materials. Finally, even if the tack coat materials were not protected from infiltrating rainwater, as pointed out above, the potential for these materials to leach PAHs more than a few centimeters into the soil would be very low. The possibility of stormwater transporting PAHs leached from tack coat materials and depositing them in river sediments is extremely unlikely.

AGRA believes that the most likely sources for PAH in upland soil and river sediment samples are coal tar used during wartime shipbuilding activities, and/or the emplacement of river-dredge spoils containing coal tar residues or other PAH-containing process waste residues throughout the site in the mid to late 1930s. It is also possible that site-wide regrading activities that were carried out prior to Premier's commencing operations at the site, also may have contributed to PAHs in shallow soils. The well documented history of fill emplacement, demolition/regrading and shipbuilding activities prior to Premier's time on the site is discussed in the Site History section of this memo.

In order to explain its conclusions about the probable source of PAHs at the site, AGRA has prepared a series of eight diagrams that illustrate the chemical species and concentrations of PAHs detected in specific samples. These are presented as Figures 4a-g.

Figure 4a illustrates the PAH characteristics of a sediment sample collected from the Willamette River near Linnton. These results are similar to other sediment sample results for the Willamette River that AGRA has had the opportunity to review. It contains elevated concentrations of carcinogenic PAHs, plus fluoranthene, phenanthrene and pyrene. This figure can be compared to figures 4b and 4c, which illustrate the characteristics of SS-75 (0-1') and SS-75 (1-2'), collected adjacent to the Premier site. These results show PAH constituents and an overall character that are virtually identical. The limited sampling and testing carried out by BGI adjacent to the Premier site appears to show results similar to those elsewhere throughout the Willamette River.

Figure 4d illustrates the PAH constituents for a sample (SS-93 0-1') collected near the concrete pad, south of the warehouse. The results are not dissimilar to those of the sediment samples collected from the Willamette River; elevated concentrations of pyrogenic PAHs occur alongside fluoranthene, pyrene and phenanthrene. This sample was collected approximately 200 feet from the closest AST. Figures 4e and 4f illustrate results for two trench samples (TR-01-1.5 and TR-02-1.5). BGI has suggested that samples with elevated PAHs are associated with diesel in the trench area north of the process building. Yet, the PAH profile of these samples is similar to those seen in river sediments and SS-93, near the concrete pad. The final figure (4g) illustrates results for a sample collected in the northern tank farm area. Once again, the constituents include carcinogenic and noncarcinogenic PAHs in similar percentages to those seen in other site and river sediment samples.

AGRA has mentioned past shipbuilding activities at the site. Coal tar was used widely in ship building, and BGI has indicated that there formerly was a Coke storage bin at the site. Coke is used to make coal tar. During the 1940s, coal tar was used widely for corrosion protection during ship construction. The possible production and use of this fluid at the site, along with the emplacement of river-dredge sediments, would appear to be a much more likely explanation for widespread PAHs in shallow soil, rather than diesel or tack coat materials used by Premier. It should also be noted that diesel was used as a cutting agent for coal tar, and the scattered occurrence of diesel in shallow site soils may in part or whole, predate Premier's time at the site.

Nickel in Groundwater

Both AGRA and BGI have detected the presence of nickel in groundwater at the site. AGRA detected concentrations ranging from 27 to 68 ug/l . BGI identified concentrations ranging from 15 to 233 ug/l. BGI has implied (though not stated clearly) that these detections in groundwater are

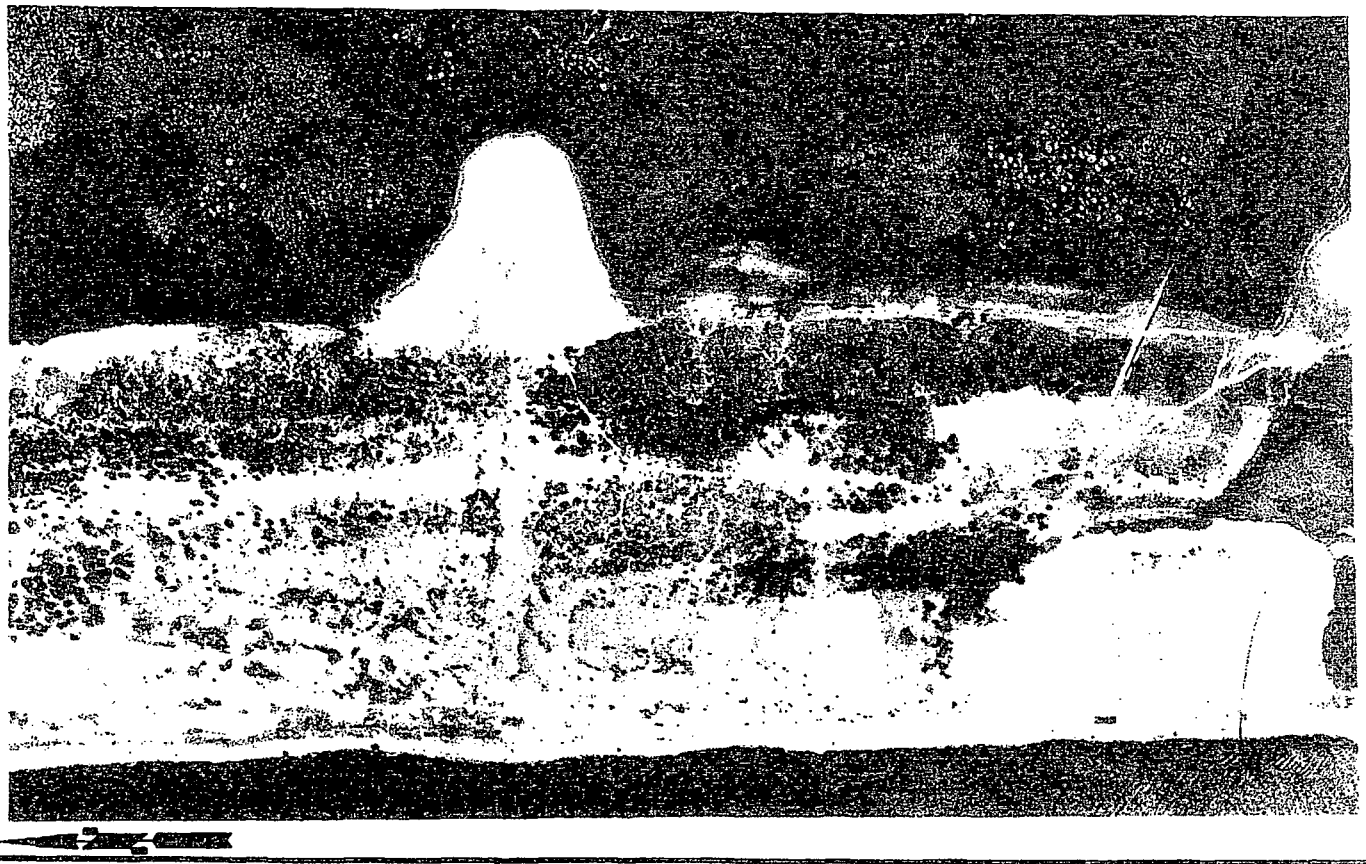
the result of nickel's use as a catalyst. AGRA has concluded that there is no evidence that the concentrations of nickel reflect a release. Nickel is a naturally occurring element in soil. It is generally insoluble in groundwater and its detection is often a result of the presence of suspended sediment. The fact that detectable nickel has been detected in unfiltered samples at widely scattered locations, in concentrations that are more or less within the same order of magnitude, suggests that the nickel is not related to a chemical release.

TCE in Soil and Groundwater South of Maintenance Shop

There is good evidence that a minor on-site release of TCE has taken place. Results of sampling and testing by BGI Group indicate 13.7 mg/kg in a single soil sample and 13.5 ug/l in a single groundwater sample. TCE has not been detected elsewhere on the site, suggesting no evidence of a large, widespread problem. AGRA estimates a modest level of effort would be required to delineate the TCE in soil and groundwater, monitor its presence in up to three wells for one year, perform a RBCA analysis, have the file reviewed and approved by the DEQ for "no further action", and to abandon the three monitoring wells.

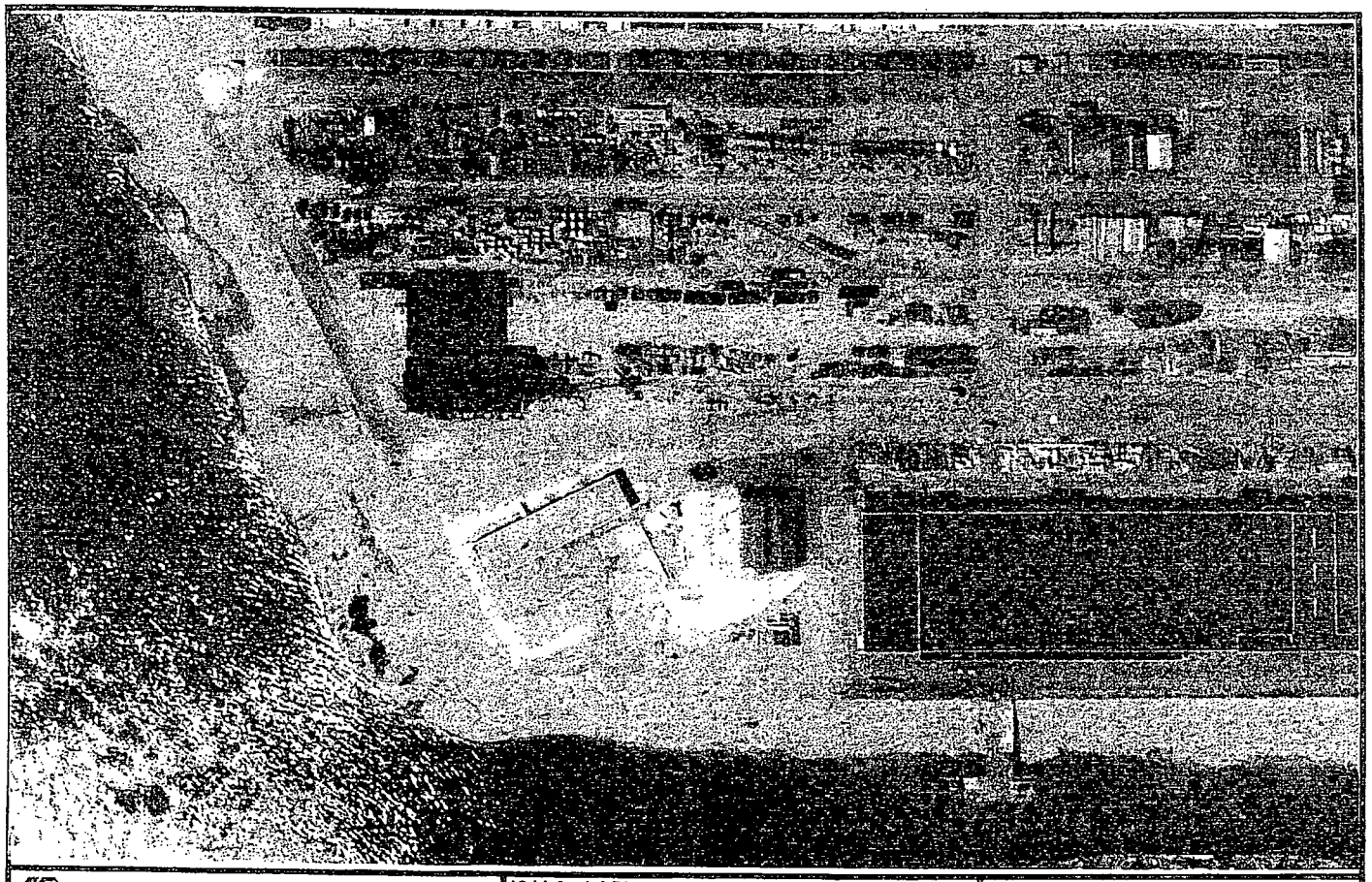
Fuel Hydrocarbons in Soil and Groundwater

Well-documented releases of fuel hydrocarbons (weathered gasoline and diesel) have been detected in soil and groundwater samples collected from the central area of the property, mainly north of the Process Building. The extent and nature of these releases are discussed in AGRA's 1996 report, as well as BGI's September 1998 report. One other small, isolated area of fuel hydrocarbon contamination was identified by BGI (September 1998) in the southern area of the site, near the western area of the Warehouse Building. All other fuel hydrocarbon releases at the site appear to be surficial or very limited in extent. It is important to note that no fuel hydrocarbons have been detected in soil at intermediate depths anywhere on the property, nor has a release been documented at the site of the only fuel storage tank at the site. Soils are impacted either near ground surface or beneath the surface of the water table. For the most part, impacts to groundwater are characterized by heavily weathered dissolved-phase gasoline or diesel, with no detection or very low concentrations of benzene. Based upon AGRA's review of all available data, there is no evidence of a significant fuel hydrocarbon release at the site that has resulted in impacts to groundwater, nor is there any evidence of an off-site release that would require on-site remedial actions. It is AGRA's opinion that issues related to past fuel hydrocarbon releases identified at the subject site likely would be resolved through risk-based corrective action.



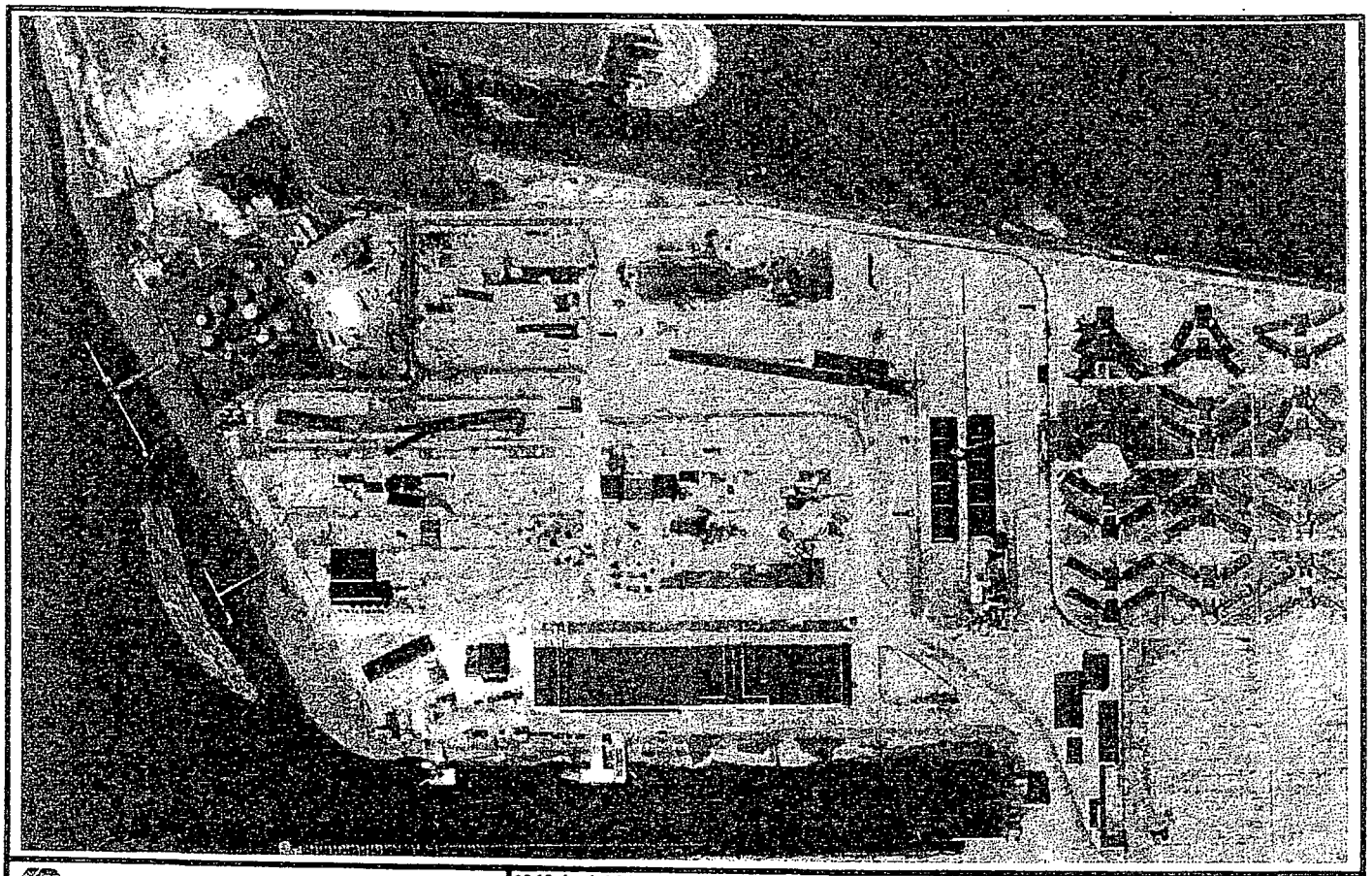
AGRA ENGINEERING GLOBAL SOLUTIONS 7477 SW Tech Center Dr Portland, Oregon, 97223	1936 Aerial Photo Project # 9-61M-10092-0	Premier Edible Oils Site 10400 N Burgard Way Portland, Oregon Figure 1a

SCHN00262134



AGRA ENGINEERING GLOBAL SOLUTIONS 7477 SW Tech Center Dr Portland, Oregon, 97223	1944 Aerial Photo Project # 9-61M-10092-0	Premier Edible Oils Site 10400 N Burgard Way Portland, Oregon Figure 1b

SCHN00262135



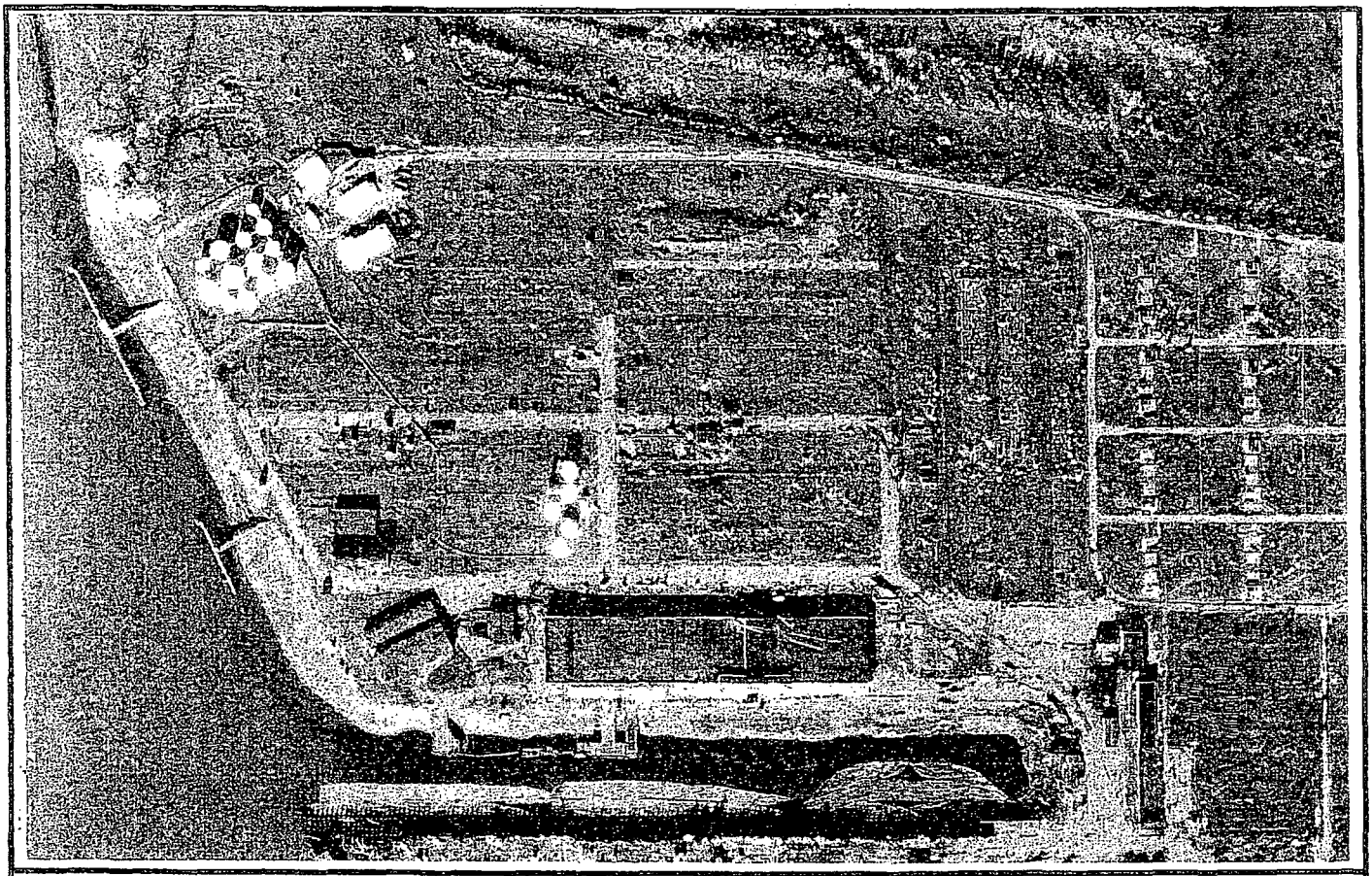
AGRA
ENGINEERING GLOBAL SOLUTIONS
7477 SW Tech Center Dr
Portland, Oregon, 97223

1948 Aerial Photo
Project # 9-61M-10092-0

Premier Edible Oils Site
10400 N Burgard Way
Portland, Oregon

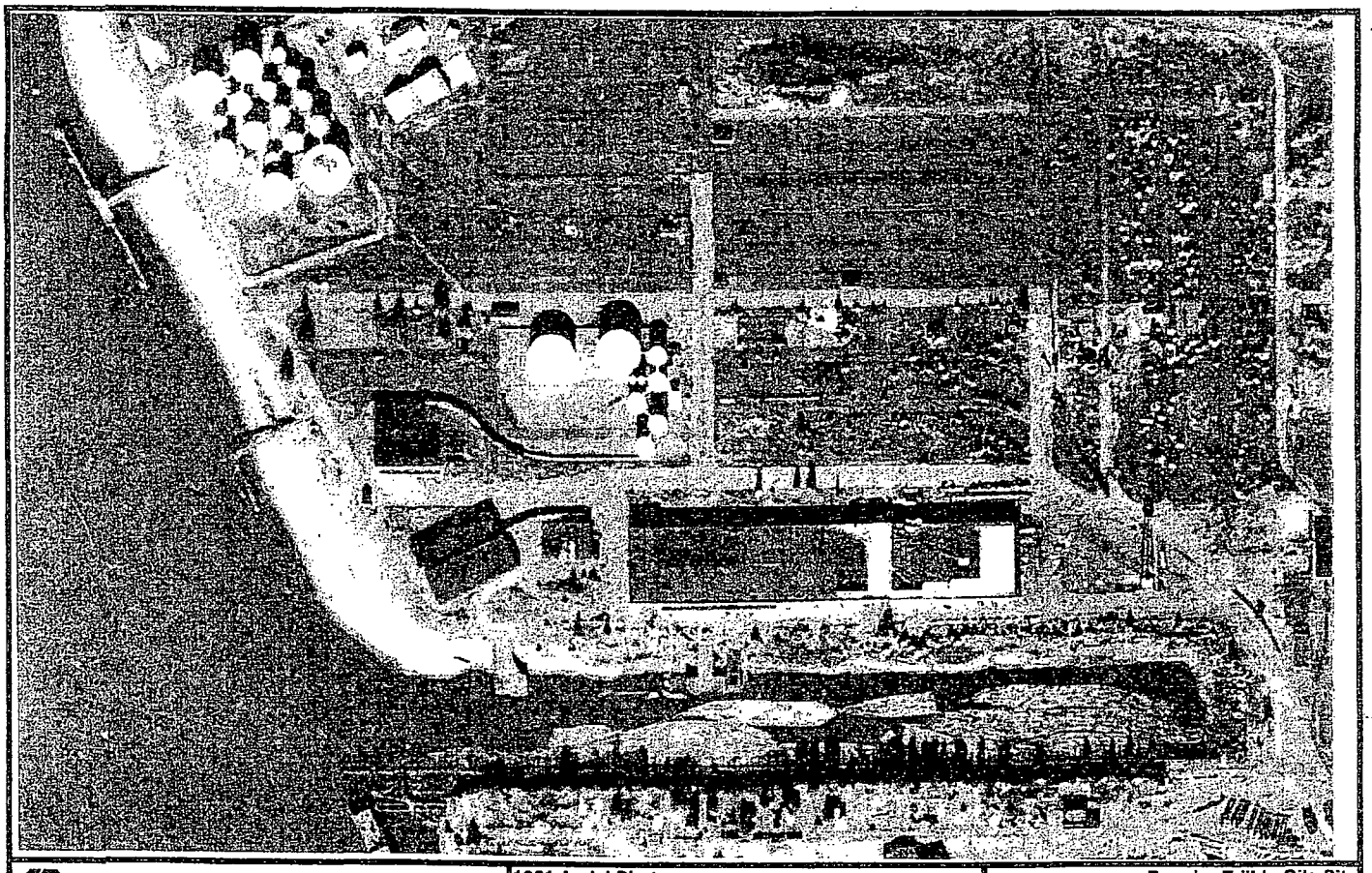
Figure 1c

SCHN00262136



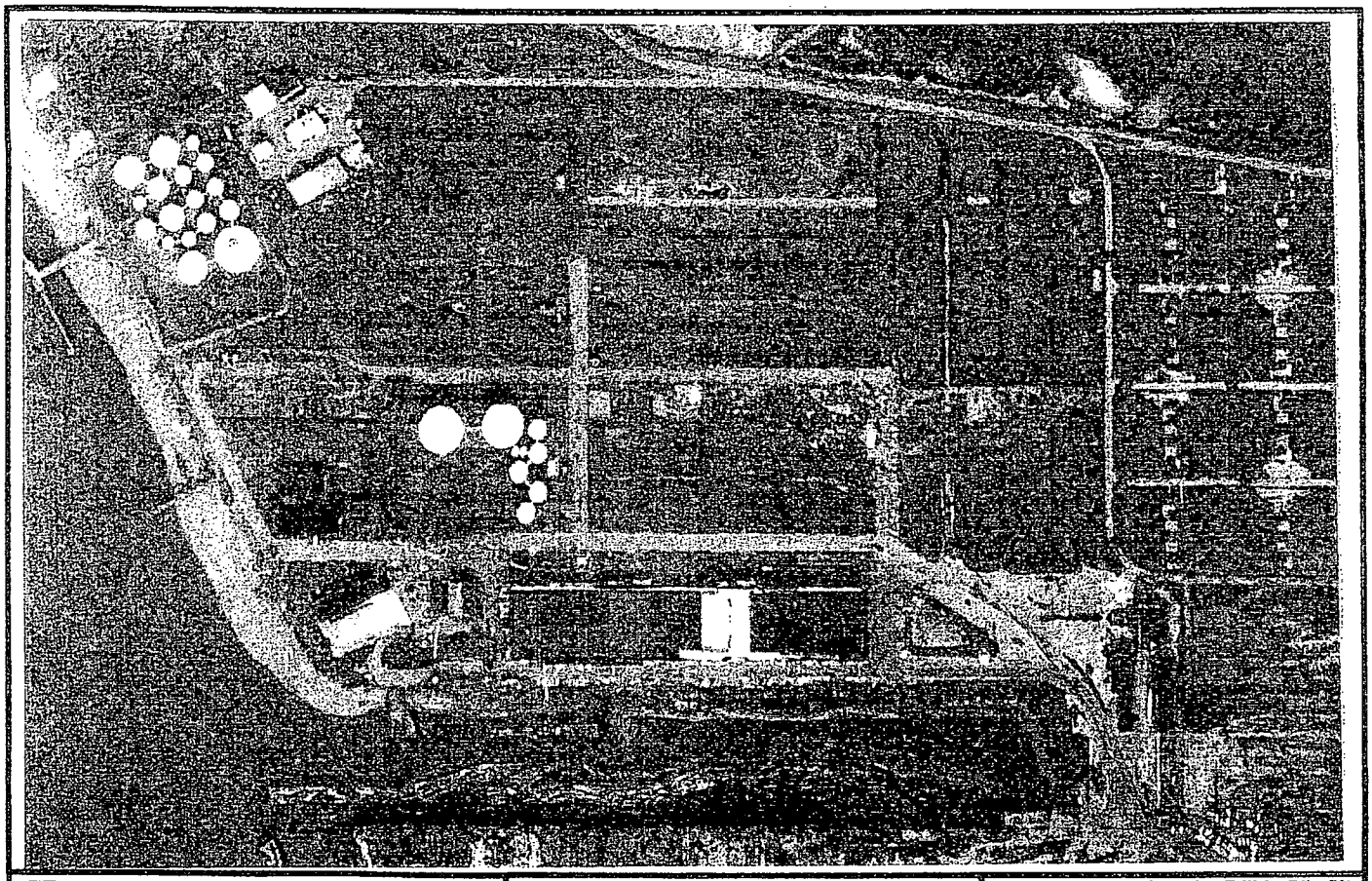
AGRA ENGINEERING GLOBAL SOLUTIONS 7477 SW Tech Center Dr Portland, Oregon, 97223	1956 Aerial Photo Project # 9-61M-10092-0	Premier Edible Oils Site 10400 N Burgard Way Portland, Oregon Figure 1d

SCHN00262137



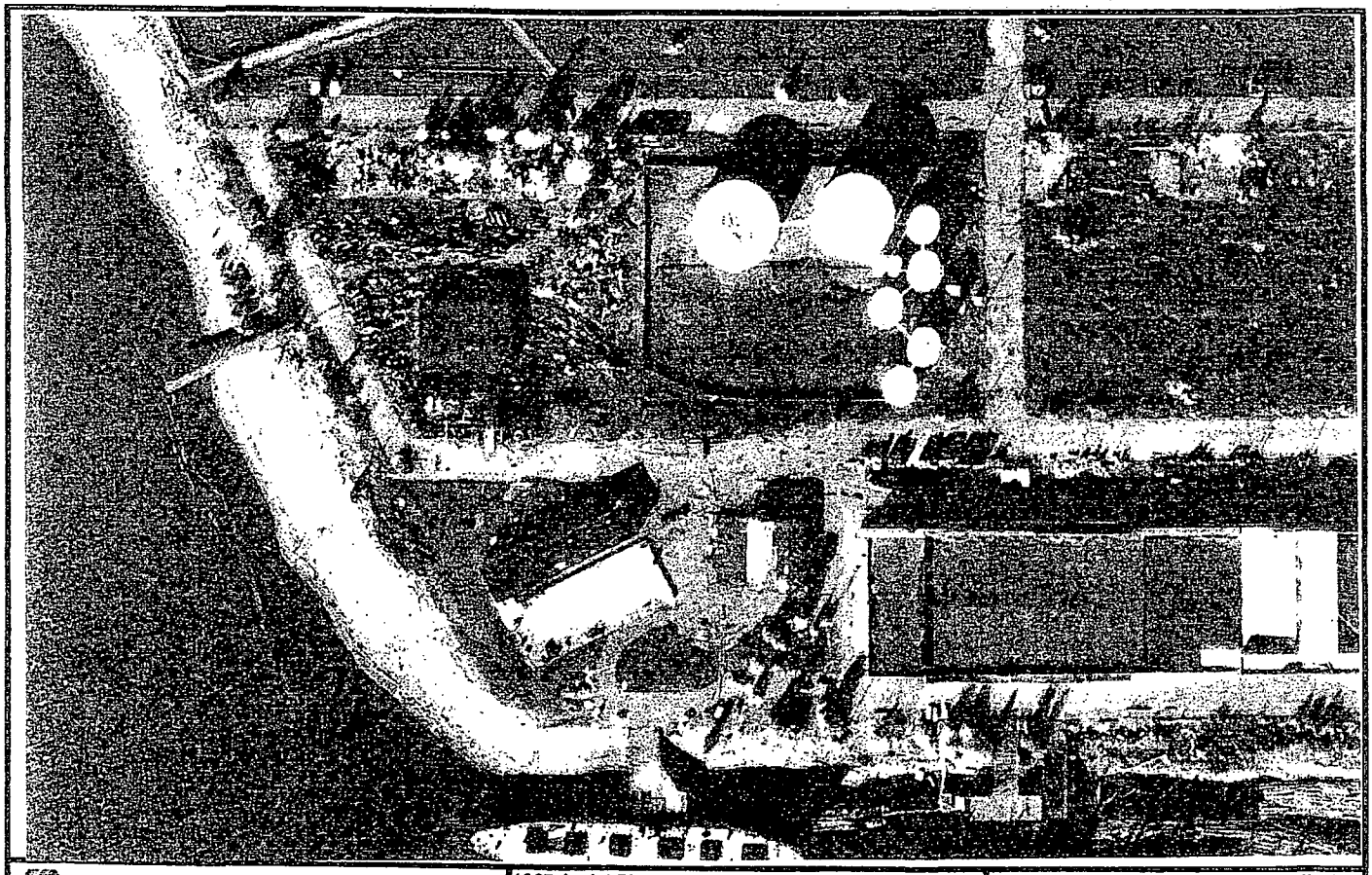
AGRA ENGINEERING GLOBAL SOLUTIONS 7477 SW Tech Center Dr Portland, Oregon, 97223	1961 Aerial Photo Project # 9-61M-10092-0	Premier Edible Oils Site 10400 N Burgard Way Portland, Oregon Figure 1e

SCHN00262138



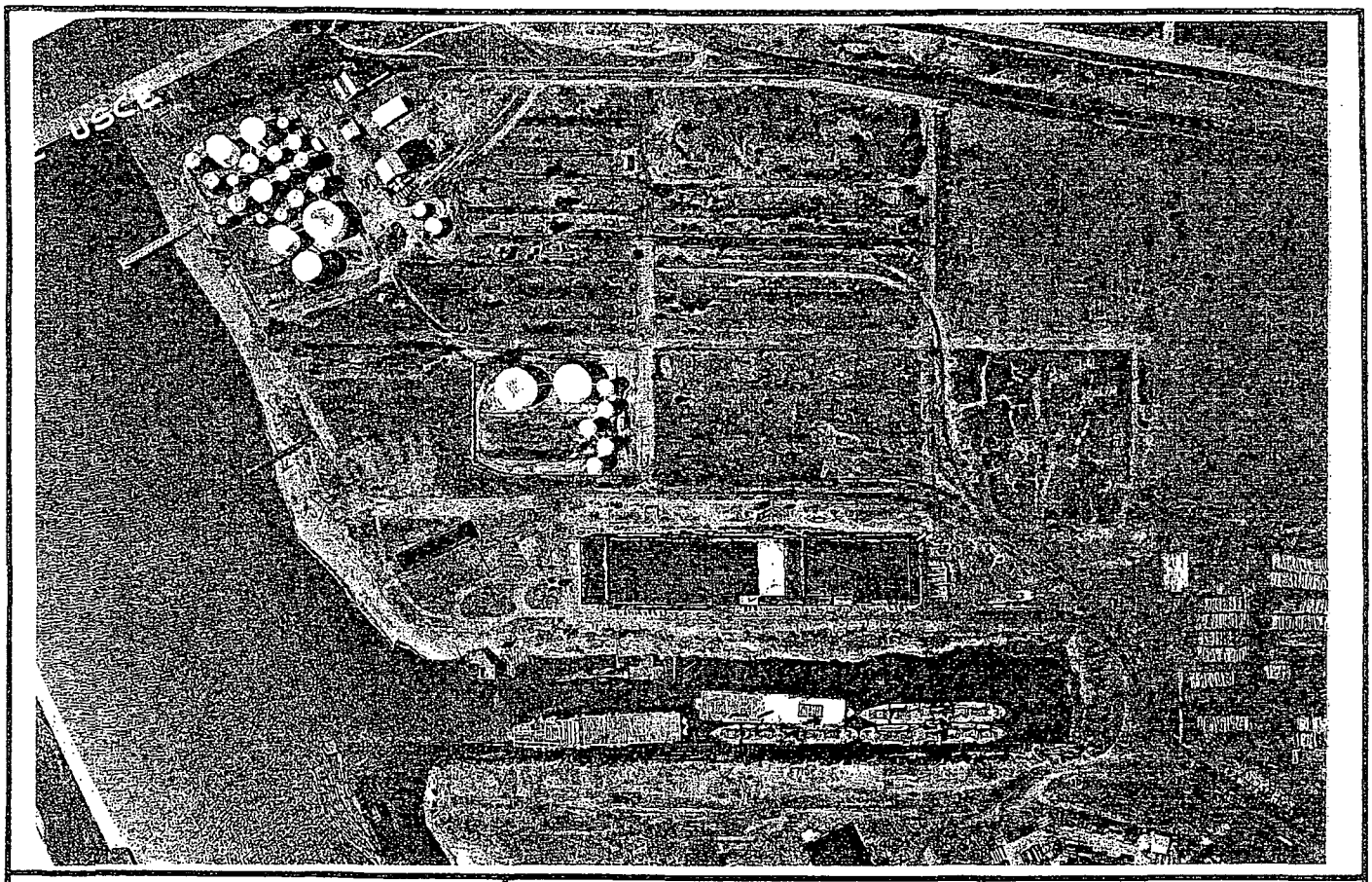
AGRA ENGINEERING GLOBAL SOLUTIONS 7477 SW Tech Center Dr Portland, Oregon, 97223	1966 Aerial Photo Project # 9-61M-10092-0	Premier Edible Oils Site 10400 N Burgard Way Portland, Oregon Figure 11

SCHN00262139



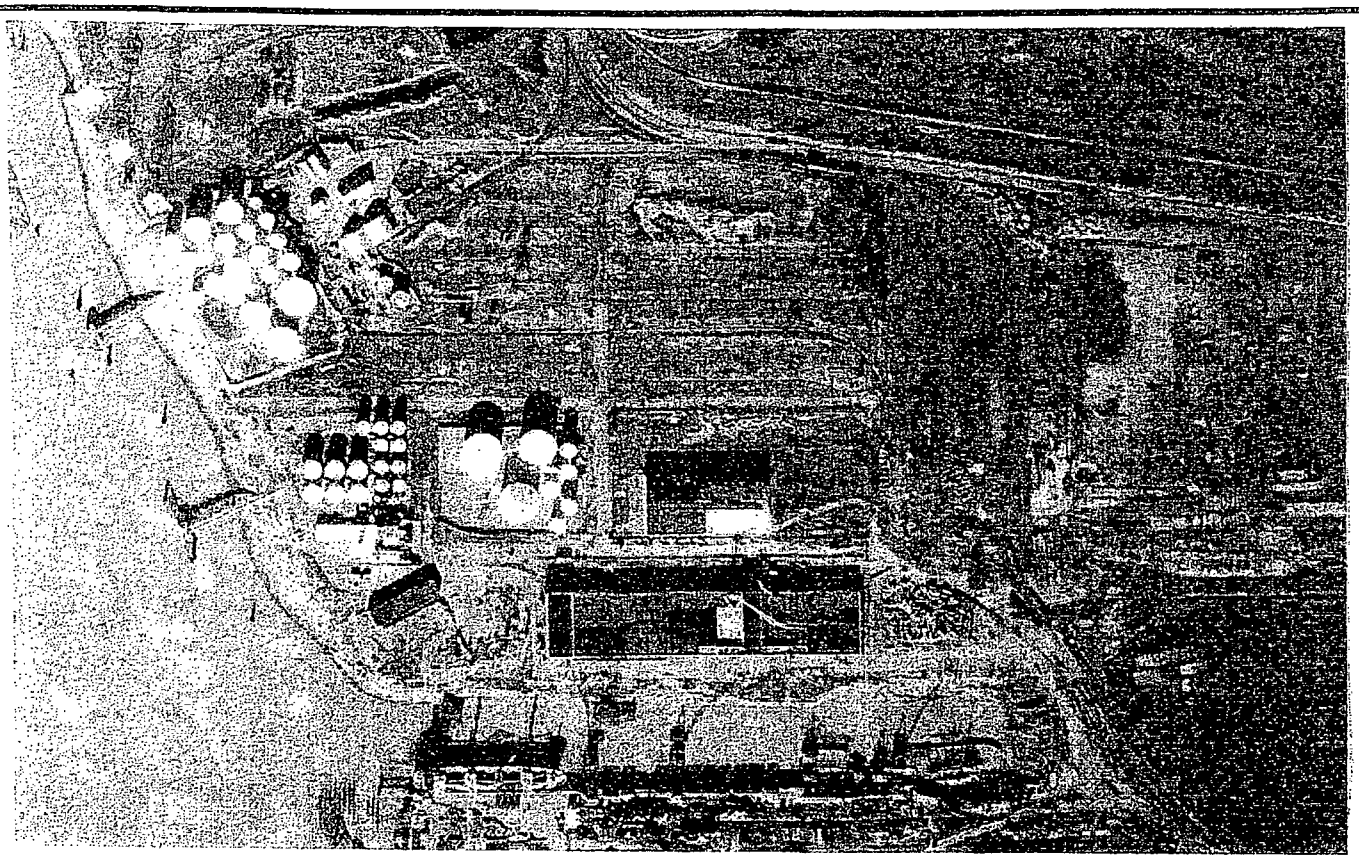
AGRA ENGINEERING GLOBAL SOLUTIONS 7477 SW Tech Center Dr Portland, Oregon, 97223	1967 Aerial Photo Project # 9-61M-10092-0	Premier Edible Oils Site 10400 N Burgard Way Portland, Oregon Figure 1g

SCHN00262140



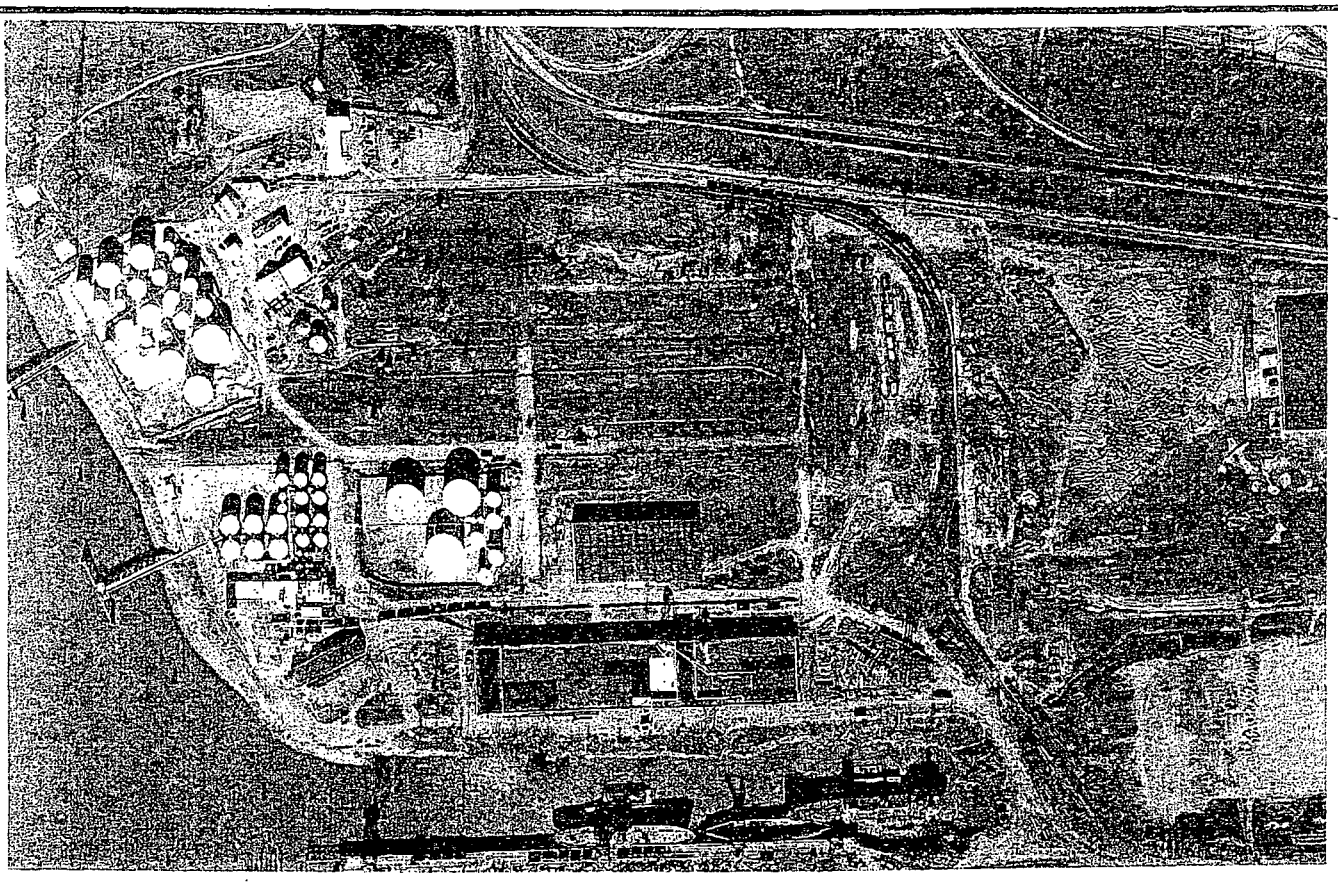
AGRA ENGINEERING GLOBAL SOLUTIONS 7477 SW Tech Center Dr Portland, Oregon, 97223	1972 Aerial Photo *Project # 9-61M-10092-0*	Premier Edible Oils Site *10400 N Burgard Way* Portland, Oregon Figure 1h

SCHN00262141



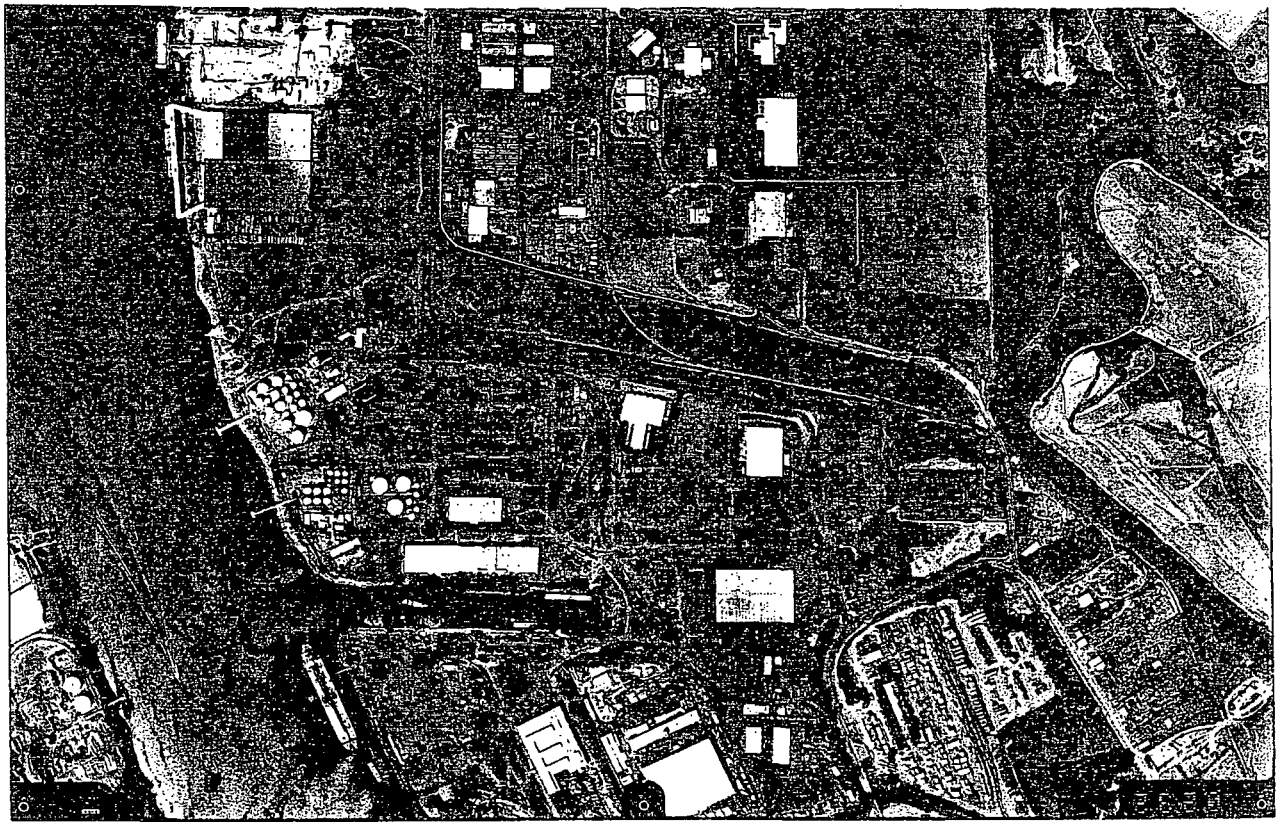
AGRA ENGINEERING GLOBAL SOLUTIONS 7477 SW Tech Center Dr Portland, Oregon, 97223	1977 Aerial Photo Project # 9-61M-10092-0	Premier Edible Oils Site 10400 N Burgard Way Portland, Oregon Figure 1i

SCHN00262142



AGRA ENGINEERING GLOBAL SOLUTIONS 7477 SW Tech Center Dr Portland, Oregon, 97223	1980 Aerial Photo Project # 9-61M-10092-0	Premier Edible Oils Site 10400 N Burgard Way Portland, Oregon Figure 1

SCHN00262143



AGRA ENGINEERING GLOBAL SOLUTIONS 7477 SW Tech Center Dr Portland, Oregon, 97223	1994 Aerial Photo Project # 9-61M-10092-0	Premier Edible Oils Site 10400 N Burgard Way Portland, Oregon Figure 1k

SCHN00262144

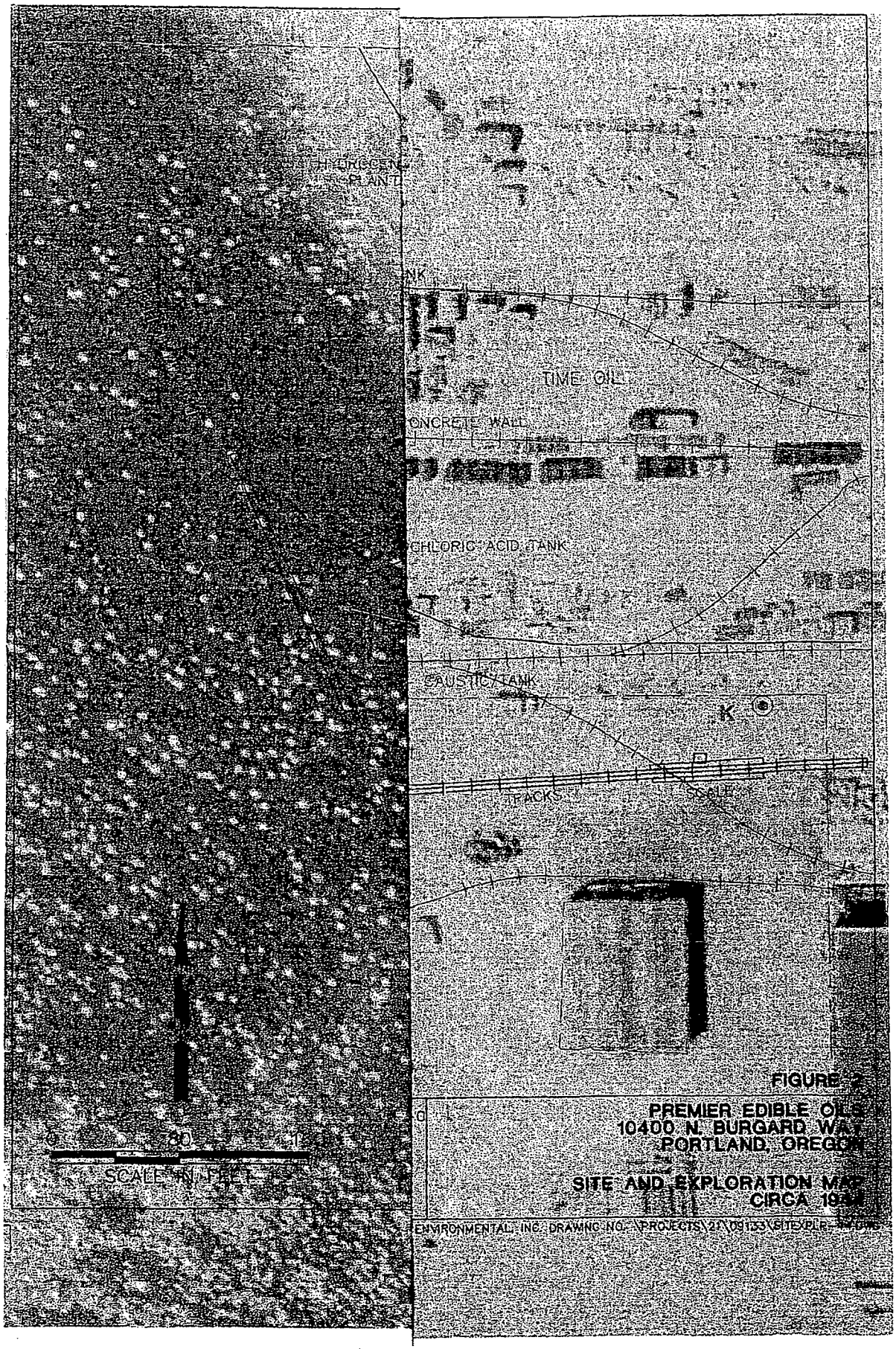


FIGURE 2
PREMIER EDIBLE OILS
10400 N. BURGARD WAY
PORTLAND, OREGON
SITE AND EXPLORATION MAP
CIRCA 1944

ENVIRONMENTAL, INC. DRAWING NO. \PROJECTS\21\09133\CHTEXPLR.DWG

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APPENDIX J

Figure 3

CHEMICAL COMPOSITION OF DIESEL FUEL

Compound	Number of Carbons	Concentration (Weight/ Percent)	Referance
traight Chain Alkanes			
n-Nonane	9	0.1	6,7
n-Decane	10	0.5 - 2	1,2,6,7
n-Undecane	11	0.98 - 9	1,2,6,7
n-Dodecane	12	0.96 - 11	1,2,6,7
n-Tridecane	13	1.1 - 10	1,2,6,7
n-Tetradecane	14	1.1 - 9	1,2,6,7
n-Pentadecane	15	1.0 - 7	1,2,6,7
n-Hexadecane	16	1.2 - 6	1,2,6,7
n-Heptadecane	17	1.2 - 6	1,2,6,7
n-Octadecane	18	0.82 - 5	1,2,6,7
n-Nonadecane	19	0.53 - 4	1,2,6,7
n-Eicosane	20	0.23 - 3	1,2,6,7
n-Henelcosane	21	1	1,2,7
n-Docosane	22	< 0.2	1,2,7
Branched Alkanes			
2-Methylheptadecane	18		7
2,6,10,14-Tetramethyl-pentadecane	19		1
2,6,10,14-Tetramethyl-pentadecane	20		1
Alkyl Benzenes			
Benzene	6		7
Toluene	7		7
o-Xylene	8		7
m-Xylene	8		7
2-Ethyltoluene	9		7
3-Ethyltoluene	9		7
4-Ethyltoluene	9		7
Isopropylbenzene	9		7
1,2,3-Trimethylbenzene	9		7
1,2,4-Trimethylbenzene	9		7
1,3,5-Trimethylbenzene	9		7
1,2,3,5-Tetramethylbenzene	10		7
1,2,4,5-Tetramethylbenzene	10		7
Pentamethylbenzene	11		7
Biphenyl	12		7

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Figure 3 Continued

Compound	Number of Carbons	Concentration (Weight/ Percent) (a)	Reference
Polynuclear Aromatic Hydrocarbons			
Naphthalene(d)	10	0.13	6,7
Methylnaphthalene	11	0.57 - 0.91	6,7
2,3,5-Trimethylnaphtalene	13		7
Fluorene	13		7
Phenanthrene	14		4
Anthracene	14		4
Pyrene	16		4
Benz(a)pyrene	20	0.07 ug/kg	4,8
Benzo(b)flouranthene	20		4
Benzo(g,h,i)perylene	21		4
Elements			
Barium		0.007 - 0.7 ug/g	3
Cadmium		0.001 - 0.07 ug/g	3
Calcium		0.1 ug/ml	6
Chromium		0.01 - 0.7 ug/g	3
Cobalt		0.007 - 0.1 ug/g	3
Copper		0.01 - 0.3 ug/g	3
Lead		0.1 ug/ml	6
Molybdenum		<0.001 - 0.07 ug/g	3
Nickel		0.007 - 0.1 ug/g	3
Selenium		0.001 - 0.03	3
Vanadium		0.0007 - 0.003 ug/g	3
Zinc		0.01 - 3 ug/g	5

Notes

a. Conversion from other units for gasoline assumed 0.75 specific gravity.
b. ASTM specification, max., unleaded gasoline, 0.013 g/l max., conventional grade gasoline, 1.1 g/l, Title 13, CAC, Section 2253.2, max., leaded gasoline other than leaded high octane gasoline, 0.8 g/gal max., leaded high octane gasoline, 1.0 g/gal. Federal standards, January 1, 1986, max., 0.1 g/gal.
c. ASTM max., unleaded gasoline, 0.10 weight percent conventional grade gasoline, 0.15 weight percent, Title 13, CAC, Section 2252, max. 300 ppm by weight.
d. Compounds for which AALs have been or are being developed.

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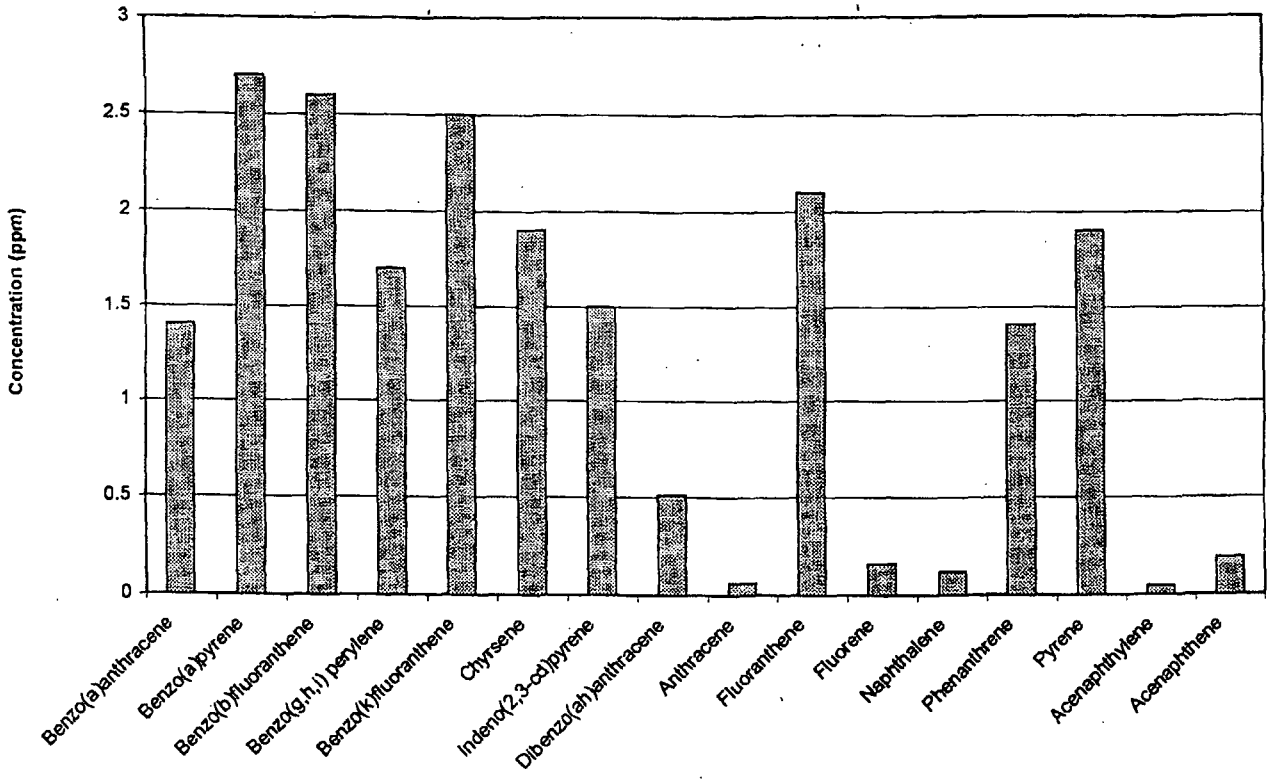
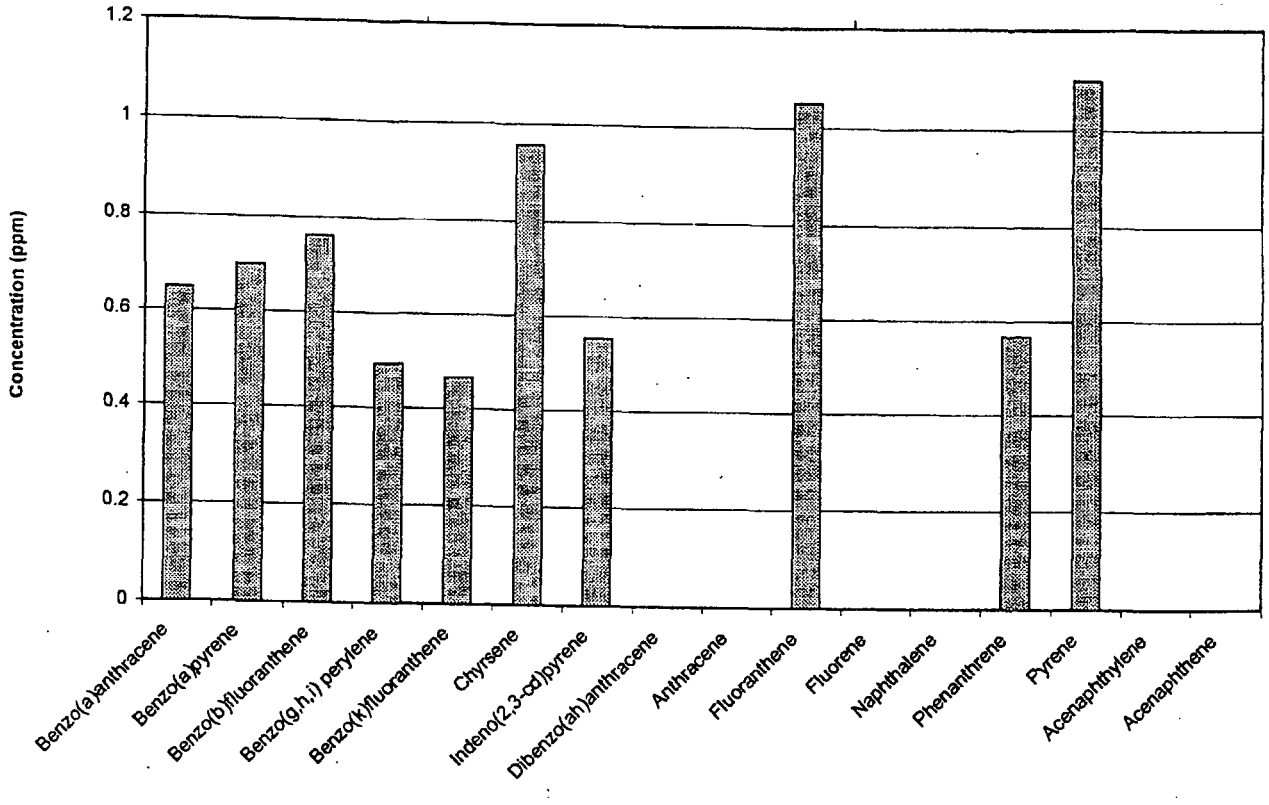
Willamette River Near Linnton

Figure 4a



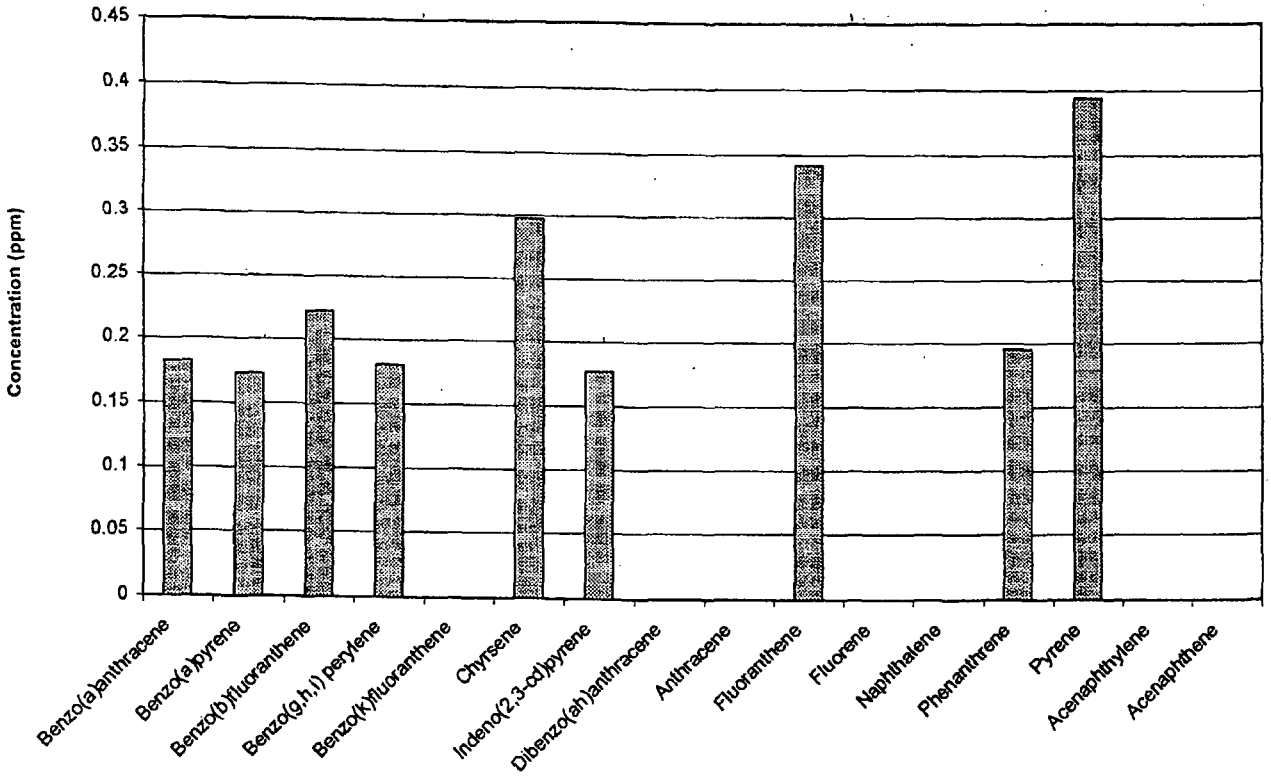
SS-75 0-1'

Figure 4b



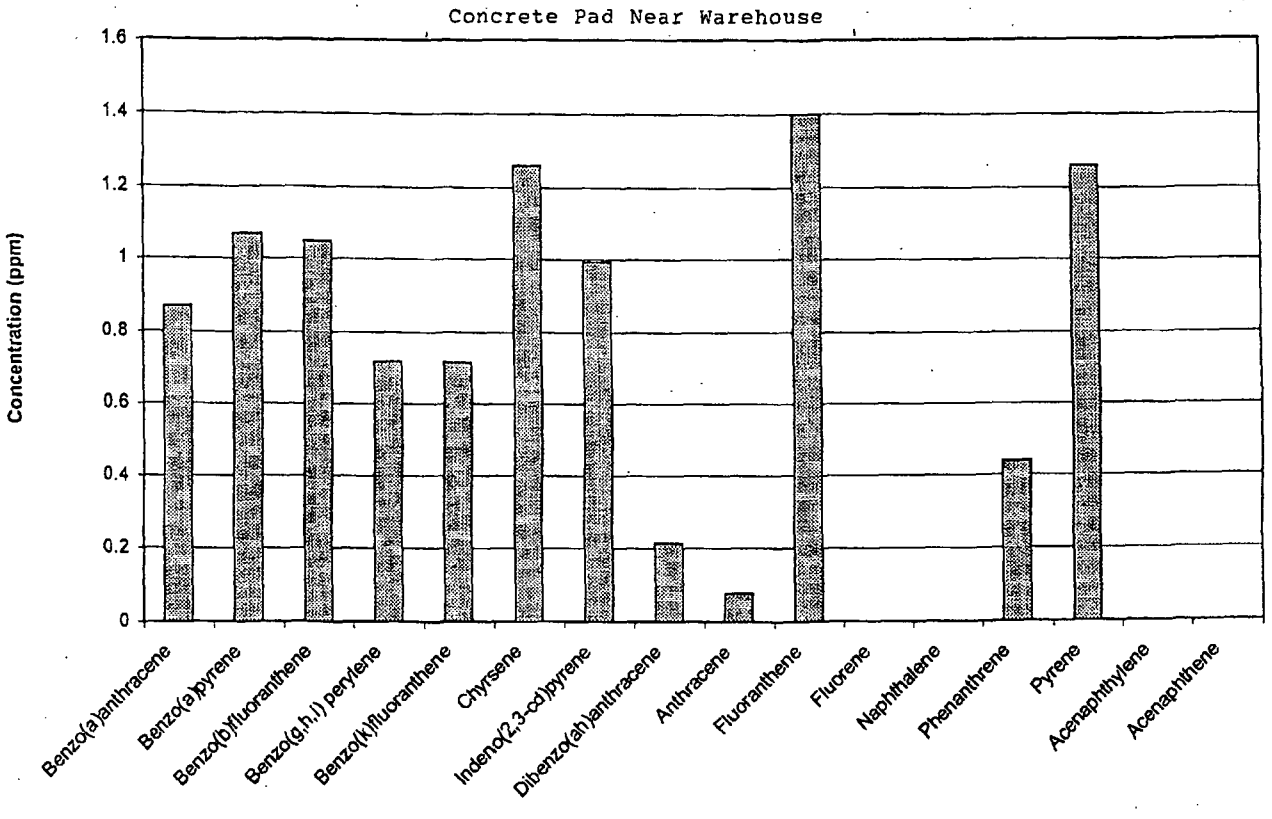
SS-75 1-2'

Figure 4c



SS-93 0-1'

Figure 4d



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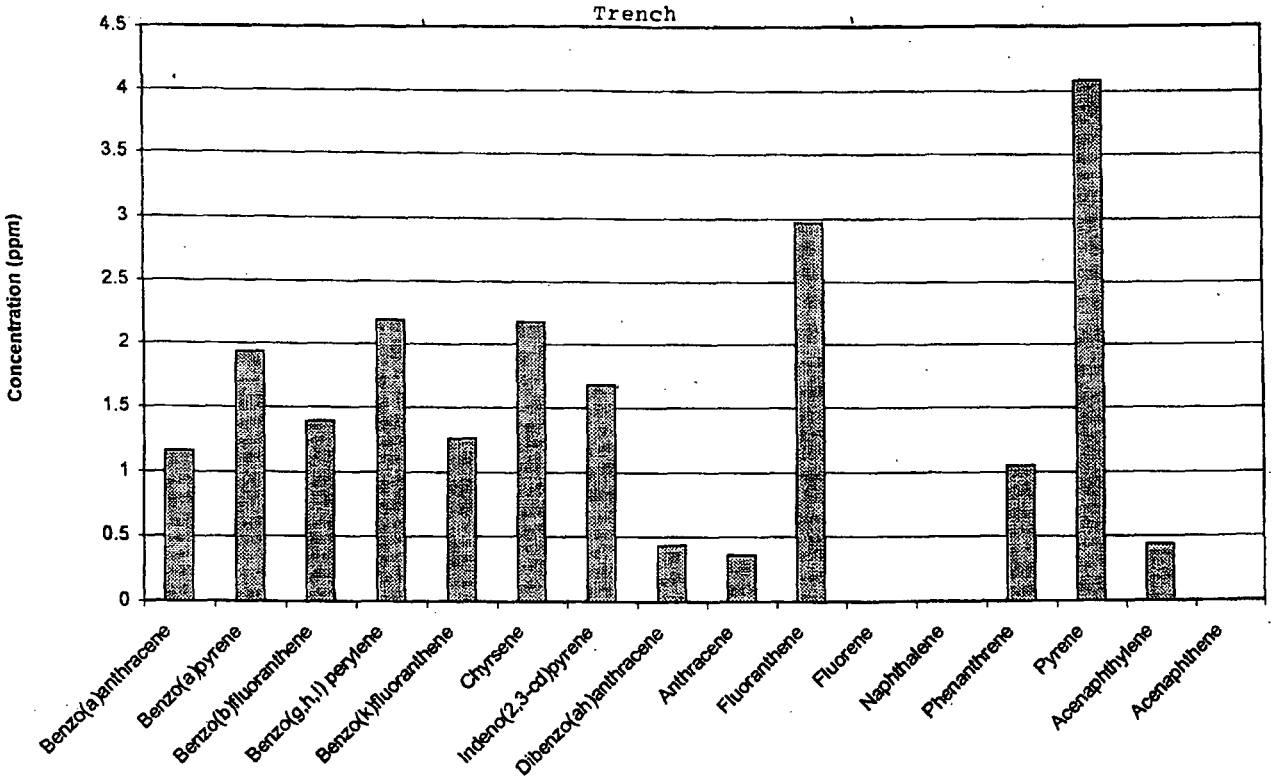
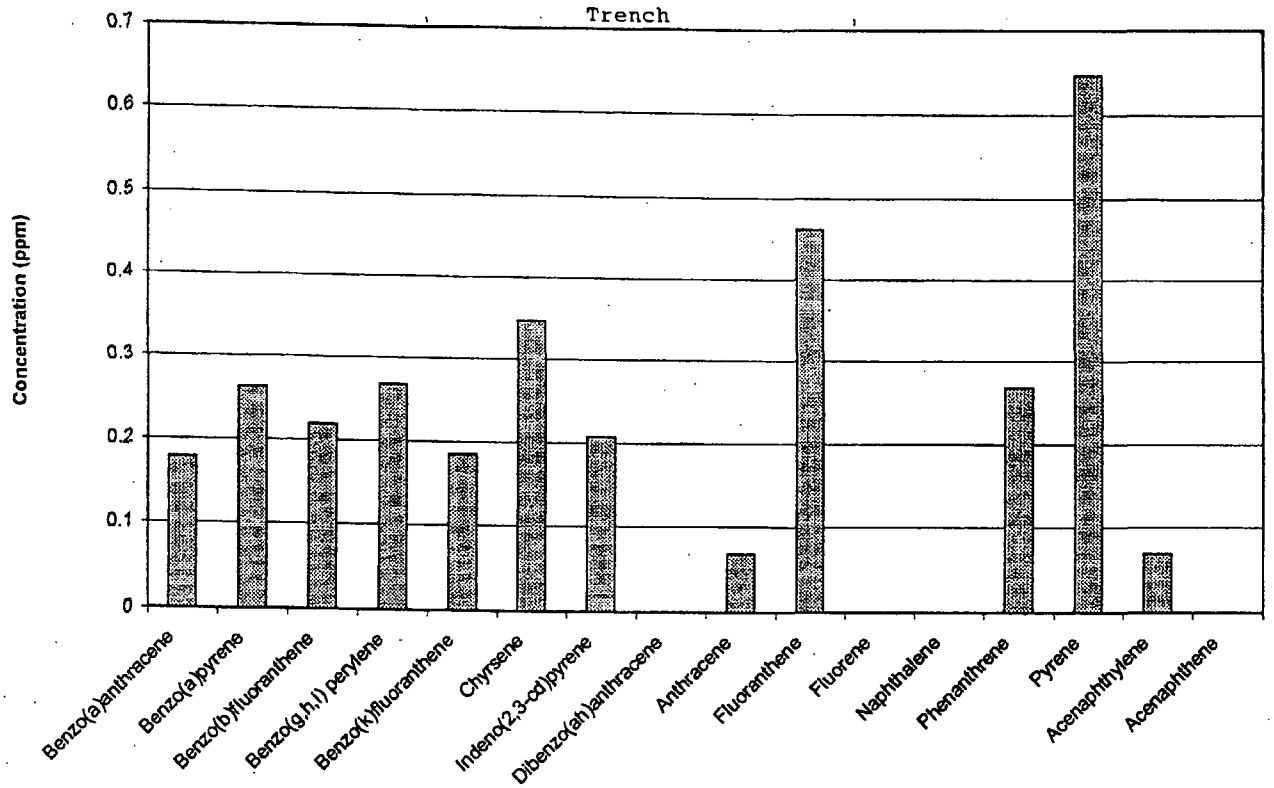
TR-01-1.5 **Figure 4e**



TR-02-1.5

Figure 4f



HB-2-2 1-2'

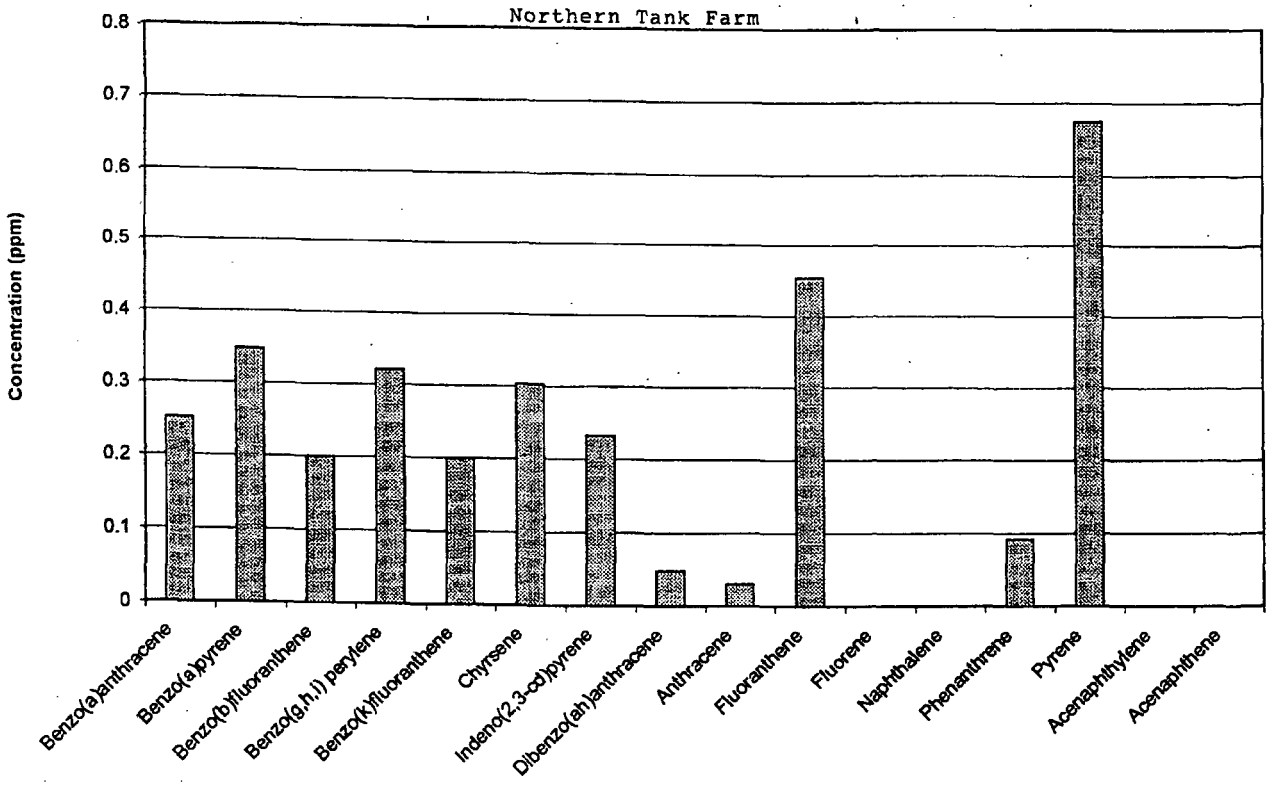



Figure 4g