



**UNITED STATES ENVIRONMENTAL PROTECTION  
AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 155  
Seattle, WA 98101-3188

SUPERFUND &  
EMERGENCY  
MANAGEMENT DIVISION

April 27, 2020

**Via Email**

**URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY**

Richard Coffin  
President  
MMGL, LLC  
34407 Dupont Blvd., Ste. 6  
Frankford, Delaware 19945

Peter B. Saba  
Senior VP - General Counsel & Corporate Secretary  
Schnitzer Steel Industries, Inc.  
299 SW Clay, Ste. 350  
Portland, Oregon 97201

Re: Unilateral Administrative Order for Remedial Design at River Mile 3.5 East Project Area issued to Schnitzer Steel Industries, Inc. and MMGL, LLC, Amendment No. 1  
Portland Harbor Superfund Site, CERCLA Docket No. 10-2020-0052

Dear Mssrs. Coffin and Saba:

On March 26, 2020, the United States Environmental Protection Agency issued a Unilateral Administrative Order (UAO) for Remedial Design at River Mile 3.5 East Project Area to Schnitzer Steel Industries, Inc. and MMGL, LLC (Respondents). Respondents requested a conference, per the UAO, which occurred on April 10, 2020, and subsequently submitted written materials to EPA on April 15, 2020. By letter dated April 17, 2020, Respondents were notified of EPA's intent to modify the UAO based on information provided by Respondents during the conference and in the written materials.

Please see attached UAO, Amendment No. 1, that amends the UAO and Statement of Work (SOW). As you will see, the only changes made to the UAO are in reference to MMGL, LLC—changing corporation to limited liability company. The changes made to the SOW are in response to Respondents' request to extend certain deadlines due to COVID-19 and related health concerns and staffing. Additionally, per Respondents' request, the Project Area map was updated. A redline version of the SOW is enclosed for ease in identifying all modifications made to the document.

The above-captioned UAO, as amended, shall be effective 5 days after signature by the Director of EPA Region 10's Superfund and Emergency Management Division or May 4, 2020. On or before the effective date, each Respondents shall notify EPA in writing of Respondents' irrevocable intent to comply with the Order.

If you have technical questions regarding the Order, contact Eva DeMaria, Remedial Project Manager, at (206) 553-1970 or email [demaria.eva@epa.gov](mailto:demaria.eva@epa.gov). Legal questions and communications from attorneys should be directed to Stephanie Ebright, Assistant Regional Counsel, at (206) 553-0774 or email [ebright.stephanie@epa.gov](mailto:ebright.stephanie@epa.gov).

Sincerely,

Calvin J. Terada  
Director

Enclosures: Unilateral Administrative Order, Amendment No. 1, and Statement of Work  
Statement of Work RLSO

cc and email: w/enclosures

Greg Christianson  
Alston & Bird  
560 Mission Street, Ste. 2100  
San Francisco, California 94105-0912  
[greg.christianson@alston.com](mailto:greg.christianson@alston.com)