



The Greenbrier Companies
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May 31, 2023

VIA EMAIL AND US MAIL

Oregon Department of Environmental Quality
Attention: Rebecca Digiustino
Northwest Region Cleanup Program
700 NE Multnomah Street, Suite 600
Portland, OR 97232
Email: Rebecca.Digiustino@deq.oregon.gov

Oregon Department of Environmental Quality
Attention: Krista Ratliff
Industrial Stormwater Program
700 NE Multnomah Street, Suite 600
Portland, OR 97232
Email: Krista.Ratliff@deq.oregon.gov

City of Portland Bureau of Environmental Services
Attention: Matthew Poole
Industrial Stormwater Permit Manager
6543 N. Burlington Avenue
Portland, OR 97203
Email: matthew.poole@portlandoregon.gov

Re: Notice of Transfer of Property

Dear Ms. Digiustino, Ms. Ratliff, and Mr. Poole:

Gunderson LLC ("Gunderson") hereby notifies the Oregon Department of Environmental Quality ("DEQ") and the City of Portland Bureau of Environmental Services ("BES") that, effective today May 15, 2023, Gunderson has sold its marine business and property located at 4012-4350 and 4700 NW Front Avenue, Portland, OR 97210 ("Property"). Following the change of ownership, the new owner of the Property is:

Oregon Green Manufacturing LLC ("OGM")

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8444 NW St. Helens Road
Portland, OR 97231
Attention: Dee Burch
Deeb@callaac.com

The transfer of property implicates multiple stormwater and source control-related obligations at the Property, as described in more detail below.

1. Industrial Stormwater Permit 1200-Z (DEQ File #30386)
("Stormwater Permit")

As of May 15, 2023, all ongoing requirements of the Stormwater Permit will be assumed by OGM. OGM understands that it is required to provide an updated stormwater pollution control plan as necessary to reflect its operations. OGM agrees to fully comply with all of the terms and conditions of the stormwater permit and DEQ's and BES' applicable requirements. OGM does not anticipate that the transfer of ownership will initially result in a change in the character of pollutants being discharged or a new or increased discharge not addressed by current permit conditions. To the extent such changes occur in the future, any permit-required changes will be the sole obligation of OGM.

Gunderson hereby submits the required "Name Change and/or Permit Transfer NPDES or WPCF Permit" form, a copy of which is attached to this letter, and the applicable fee of \$135 to DEQ.

Prior to the transfer of the Property, Gunderson applied for an individual stormwater discharge permit from DEQ, which DEQ is in the process of reviewing. OGM wishes to continue this process. If there are additional actions that Gunderson or OGM need to take to transfer the application, please let us know.

2. Tier 2 Corrective Actions

On March 24, 2023, Gunderson submitted a revised Tier 2 corrective action report as part of a stormwater pollution control plan addendum, proposing stormwater upgrades in two areas of the facility (the "Revised Tier 2 Corrective Action Report").

First, the facility must have installed and maintained absorptive inserts in each of the eight catch basins in the "Marine Operations" drainage basin, for discharge points 019 (WR-141) and 024 (WR-145). Gunderson has committed to doing this work by September 30, 2023.

Second, for the new, middle portion of the outfitting dock that is currently undergoing renovation, the facility must have installed and maintained a stormwater pipeline capture system and stormwater treatment totes at each of eight catch basins ("Middle Outfitting Dock Stormwater Measures") by September 30, 2024. Gunderson has requested an exception to the implementation of any stormwater updates at the older portions of the dock and gantry due to design difficulty and cost. The exception, if granted, would require that if, in the future, such older portions of the dock are replaced, infrastructure to capture and treat stormwater runoff will be incorporated into the future construction plans, installed, and maintained. OGM will be responsible for all responsibility for Tier 2 corrective actions related to the outfitting dock/discharge point 037.

BES approval is pending for both measures.

3. Source Control

Gunderson has been identifying, evaluating, and controlling sources of contamination that may reach the Willamette River pursuant to an 2013 order on consent for source control, DEQ No. LQVC-NWR-13-02 ("Order"), with DEQ (prior to this order, Gunderson conducted this work under a voluntary cleanup agreement).

A variety of source control measures have been implemented at the Property, including construction and operation of stormwater infiltration areas, routine facility cleaning and stormwater system maintenance, planting vegetation on the riverbanks, the installation wattles at the launchway, and pavement modifications to prevent stormwater runoff over the riverbank. DEQ has advised Gunderson that it may initially issue a "comfort letter" for completion of stormwater source control measures, and will issue a combined source control decision for both stormwater and groundwater when both such measures are completed. Final riverbank source control will be achieved as part of the remedial action under the January 2017 record of decision for the Portland Harbor Superfund Site ("ROD"). The groundwater source control decision will await Gunderson's completion of porewater sampling at two locations in the Willamette River (targeted for summer 2023) and the results of such sampling; DEQ is currently reviewing Gunderson's proposed plan for such porewater sampling.

As part of the sale transaction, Gunderson has agreed to retain liability under the Order for all tasks required to reach groundwater and stormwater source control decisions.

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On the other hand, OGM has agreed to be responsible for the operation and maintenance of all current and future source control measures and structures approved by DEQ under the Order. Gunderson has provided a copy of the Order to OGM.

Gunderson and OGM request to meet with DEQ and BES to discuss these issues and to work together to put a process in place for each party's obligation under the Stormwater Permit and the Order.

If you have any questions or need further information, please contact me at jack.isselmann@gbrx.com; 503-603-4310.

Sincerely,



Jack Isselmann
Senior Vice President, External Affairs and Corporate Communications


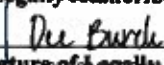
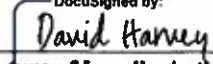
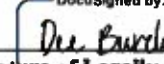
ACKNOWLEDGED AND AGREED TO:

Oregon Green Manufacturing LLC



Dee Burch, Manager

JUN 07 2023

DEQ USE ONLY Application #: _____ Legal name checked <input type="checkbox"/> Notes: _____ <input type="checkbox"/> IND <input type="checkbox"/> DOM <input type="checkbox"/> STM <input type="checkbox"/> OSS <input type="checkbox"/> UIC: _____	 Oregon Department of Environmental Quality Name Change and/or Permit Transfer NPDES or WPCF Permit	DEQ USE ONLY Date Rcvd: _____ Amt Rcvd: _____ Check #: _____ Rcvd From: _____ Deposit #: _____ Receipt #: _____
A. ACTION TO BE PERFORMED		
<input checked="" type="checkbox"/> Name Change / Effective or Scheduled Date: _____		<input type="checkbox"/> Transfer of Permit / Scheduled Date: _____
B. PREVIOUS INFORMATION		
1. Previous Legal Name: Gunderson LLC Previous Common Name: Gunderson Marine		3. Permit #: ORR11014 DEQ File#: 30386
2. Facility Physical Address: 4350 NW Front Avenue City, State, Zip Code: Portland, Oregon 97210 County: Multnomah		
C. NEW INFORMATION		
1. NEW Legal Name: Oregon Green Manufacturing		
2. NEW Common Name: Gunderson Marine		
3. Responsible Official: Marvin "Dee" Burch Title: President Mailing Address, City, State, Zip Code: 4350 NW Front Avenue, Portland, OR 97210 Email Address: Dee.burch@grbx.com Telephone #: _____		
4. Facility Contact: Phillip Kolander Title: _____ Mailing Address, City, State, Zip Code: 4350 NW Front Avenue, Portland, OR 97210 Email Address: phillip.kolander@grbx.com Telephone #: 503-972-5928		
5. Invoice to: Marvin "Dee" Burch Title: President Mailing Address, City, State, Zip Code: 4350 NW Front Avenue, Portland, OR 97210 Email Address: Dee.burch@grbx.com Telephone #: _____		
6. Will the name change or transfer of ownership result in a change in the character of pollutants being discharged or a new or increased discharge not addressed by current permit conditions? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes (attach explanation)		
D. SIGNATURE REQUIRED FOR NAME CHANGE		
I hereby authorize the above referenced name change.		
Dee Burch Name of Legally Authorized Representative (Type or Print)		President Title
 Signature of Legally Authorized Representative		5/30/2023 Date
E. SIGNATURES REQUIRED FOR TRANSFER OF PERMIT		
Previous owner: I hereby acknowledge the pending transfer of the above referenced permit. David Harvey		
David Harvey Name of Legally Authorized Representative (Type or Print)		Senior Director EHS Title
DocuSigned by:  Signature of Legally Authorized Representative		5/30/2023 Date
New owner: I hereby apply for permission to transfer the above referenced permit and certify that I have acquired a property interest in the permitted activity. I agree to fully comply with all terms and conditions of the permit and DEQ rules. Dee Burch		
Dee Burch Name of Legally Authorized Representative (Type or Print)		President Title
DocuSigned by:  Signature of Legally Authorized Representative		5/30/2023 Date