

**HAHN AND ASSOCIATES, INC.**  
ENVIRONMENTAL CONSULTANTS

April 15, 2024

Mr. Wes Thomas  
Oregon Department of Environmental Quality  
Northwest Region, Portland Office  
Portland Harbor Section  
700 NE Multnomah Street, #600  
Portland, Oregon 97232

HAI Project No. 2708  
DEQ ECSI File No. 84

**SUBJECT: Progress Report, NW Natural Site, 7900 NW St. Helens Avenue and  
7200 NW Front Avenue, Portland, Oregon**

Dear Mr. Thomas,

Hahn and Associates, Inc. (HAI) has prepared this monthly Progress Report to summarize Remedial Investigation/Feasibility Study (RI/FS) and source control-related work conducted by NW Natural relating to historic manufactured gas plant (MGP) activities at the NW Natural Site during the month of March 2024. NW Natural is completing upland investigation and cleanup activities at the NW Natural Site under the Voluntary Agreement No. ECVC-WMCVC-NWR-94-13 (Voluntary Agreement) between NW Natural and the Oregon Department of Environmental Quality (DEQ).

**1. ACTIONS TAKEN UNDER THE VOLUNTARY AGREEMENT DURING  
THE PREVIOUS MONTH**

Tasks related to maintenance of the HC&C system and the groundwater treatment system were conducted during March 2024, with the system operating in full long-term operational mode.

A total of 10,897,116 gallons of water were treated in the on-site groundwater treatment plant and discharged during March 2024 with all monitoring and reporting completed in accordance with the facility's NPDES permit.

Field activities related to monitoring and maintenance of the dense non-aqueous phase liquid (DNAPL) extraction system at Fill water bearing zone (WBZ) well locations MW-6-32 and MW-13-30 occurred during March 2024. The system recovered approximately 48 gallons of fluids in March. Recovered fluids (accumulating since tank emptying on October 4, 2023) are estimated to be approximately 95% DNAPL with 156 gallons of total fluids in tank storage.

DNAPL entry into Fill WBZ Trench T-50 was first observed during August 2022 with subsequent plumbing of a DNAPL pump within the sump at this location. To date approximately 553 gallons of DNAPL have been recovered from the T-50 sump, approximately 19 gallons of which were recovered during March 2024.

Baseline DNAPL removal as needed to maintain levels below the top of the well sumps was conducted by Anchor QEA during March 2024 in the following wells near the river shoreline.

- MW-16-45
- MW-26U

- MW-27U
- MW-38U
- PW-2L
- PW-11Ub

Water removal from the Koppers Basin continued during March 2024 as needed to keep the basin free of standing water. A total of 1,149,701 gallons of water were removed from the basin during March 2024 with treatment through the Groundwater Treatment System. Visual observations during March confirmed that the basin remained free of standing water during this timeframe.

Installation of replacement groundwater extraction well PW-6Ub was completed during March 2024.

The routine semi-annual groundwater monitoring event including select wells on the NW Natural and adjacent Siltronic properties was completed during March 2024.

The following upland FS related field tasks were in progress during March 2024:

- Monthly measurements of DNAPL presence at Fill WBZ wells MW-10-25, MW-43F, MW-44F, and MW-45F were conducted during March 2024. No measurable DNAPL was present in well MW-44F; 0.01 feet was detected in MW-43F; 0.59 feet of DNAPL was measured within well MW-45F; and 0.89 feet of DNAPL was measured within well MW-10-25 during March. The DNAPL from well MW-10-25 (0.3 gallons) was last removed on January 4, 2024 and the DNAPL from well MW-45F (0.43 gallons) was last removed on March 7, 2024.

## **2. ACTIONS SCHEDULED TO BE TAKEN IN THE NEXT MONTH**

NW Natural and DEQ technical working group communications and meetings will occur as needed within the next month to discuss ongoing project tasks.

Routine baseline DNAPL measurements and removal will continue as needed to maintain levels below the top of the well sumps in nearshore HC&C-related wells. Baseline measurement and removal of DNAPL from additional select upland area wells will also continue.

Tasks related to routine maintenance of the HC&C system and the groundwater treatment system will be conducted.

The Koppers tank basin will continue to be visually monitored to ensure that it remains free of standing water.

Installation of pump, controls, and integration of replacement groundwater extraction well PW-6Ub into the HC&C system will be initiated during April 2024.

The collection of soil embankment samples and surface sediment samples from Doane Creek is described in the January 25, 2023 *Feasibility Study Comprehensive Data Gaps Work Plan*, conditionally approved by DEQ in correspondence dated February 13, 2023. A fully executed Access Agreement with BNSF Railway Company, necessary to facilitate this sampling was received on January 29, 2024. Preparation for sampling, including reconnaissance of the creek

and marking of sample locations will be completed during April 2024 and sampling is anticipated to occur during late April or early May 2024.

Monitoring since September 2017 indicates that DNAPL proximate to wells MW-43F and MW-44F has not been sufficiently mobile to accumulate the minimum thickness required for sampling (0.5 feet). A DNAPL sample will be collected for laboratory DNAPL mobility assessment testing from wells MW-43F and MW-44F if measurable thicknesses / sufficient volumes of DNAPL are identified at these locations in the future.

### **3. LABORATORY TEST RESULTS RECEIVED DURING THE PREVIOUS MONTH**

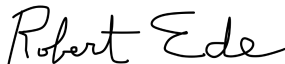
NW Natural receives test results on a regular basis as a result of routine monitoring related to groundwater quality or as specified by various permit requirements. Additionally, test results are periodically received through implementation of task-specific investigation activities resulting from agency-approved work plans. These data are provided to DEQ or the permitting authority (if different than DEQ) in accordance with previously approved formats and schedules.

### **4. PROBLEMS EXPERIENCED DURING THE PREVIOUS MONTH**

There were no problems of significance experienced during the previous month.

Should you have any questions, please contact the undersigned.

Sincerely,



Rob Ede, R.G.  
Principal

[robe@hahnenv.com](mailto:robe@hahnenv.com)

cc: Bob Wyatt, NW Natural  
Patty Dost, Pearl Legal Group PC  
John Edwards, Anchor QEA, L.L.C.  
Ben Hung, Coalition Environmental LLC  
Ryan Barth, Anchor QEA, L.L.C.  
Halah Voges, Anchor QEA, L.L.C.  
Jen Mott, Anchor QEA, L.L.C.  
John Renda, Anchor QEA, L.L.C.  
Tim Stone, Anchor QEA, L.L.C.  
Chip Byrd, Severson Environmental Services, Inc.  
Mike Crystal, Severson Environmental Services, Inc.  
Paul Seidel, DEQ NW Region  
Dan Hafley, DEQ NW Region

Amber Lutey, DEQ NW Region  
Heidi Nelson, DEQ NW Region  
Traci Parker, Siltronic Corporation  
Elizabeth Bingold, Siltronic Corporation  
Audrey Hackett, Maul Foster Alongi, Inc.  
Courtney Savoie, Maul Foster Alongi, Inc.  
Mike Murray, Maul Foster Alongi, Inc.  
Devra Slaughter, Jordan Ramis, PC  
David Rabbino, Jordan Ramis, PC  
Hunter Young, Region 10 EPA  
Lance Peterson, CDM, Inc.