



October 9, 2023

Jim Orr, R.G.
Project Manager
Oregon DEQ
700 NE Multnomah St Ste 600
Portland, Oregon 97232-4100

Subject: Quarterly Progress Report – 3rd Quarter 2023
Northwest Pipe Company – Remedial Investigation and Source Control Evaluation
ECSI Site 138
Submitted Electronically

Dear Mr. Orr,

Pursuant to the Oregon Department of Environmental Quality (DEQ) Voluntary Agreement for Remedial Investigation and Source Control Measures, LQVC-NWR-04-01, dated December 30, 2004 (Voluntary Agreement), and our discussions on these matters, we respectfully submit the following report. This letter report summarizes Remedial Investigation (RI) and Source Control (SC) activities at the Northwest Pipe Company (NW Pipe), Portland, OR, facility during the period of July through September 2023.

Actions Taken Under the Voluntary Agreement during this Quarter

- August 21 through 24, 2023 – NW Pipe conducted the Third Quarterly Groundwater Sampling event. This event included monitoring of the previously existing well network and the three wells installed in March 2022.
- August 30, 2023 – NW Pipe submitted a response to DEQ comments dated July 28, 2023, and EPA comments dated June 2, 2023, on the 2022 Annual Groundwater Monitoring Report as well as a revised version of the report.
- September 25, 2023 – NW Pipe conducted sampling of the stormwater system for dioxins/ furans.

Actions Scheduled to be Taken in the Next Quarter

- NW Pipe will conduct the Fourth Quarterly Groundwater Sampling event. This event will include the three wells installed in March 2022 and is tentatively scheduled for November 2023.
- NW Pipe will submit the Dioxin/Furan Stormwater Sampling Summary for all four events to DEQ and EPA within 60 days following receipt of results from the laboratory for the fourth event, as directed by DEQ in the February 14, 2023, response to the December 2022 *Dioxin/Furan Stormwater Sampling Second Event*.
- Per the approved MNA WP, data from the long-term MNA groundwater monitoring will be included in the annual monitoring report summarizing the groundwater sampling and any other site activities related to groundwater source control completed during calendar year 2023. The report will provide an evaluation of whether the MNA-based remedy is satisfying the source control objective and will be submitted to DEQ within 60 days of completion of data validation from the last event for the year.



Sampling, Test Results, and Other Data Generated by Northwest Pipe Company during the Previous Quarter pursuant to the Voluntary Agreement

- See above.

A Description of Any Problems Experienced During Previous Quarter and the Actions Taken to Resolve Them, pursuant to the Voluntary Agreement

- None.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephanie Heldt-Sheller", is written over a light blue horizontal line.

Stephanie Heldt-Sheller, CHMM
Corporate Environmental Manager

Cc: Ken Shump, R.G., Haute-Géologie LLC;
Gretchen Gee, Jacobs;
Claudia Powers, Buchalter;
Mike Merchant, Black Helterline LLP;
Tim Whitson & Shane Zeeman, NW Pipe Portland Site