



July 15, 2024

Mr. Wes Thomas
Oregon Department of Environmental Quality
Northwest Region, Portland Office
Portland Harbor Section
700 NE Multnomah Street, No. 600
Portland, Oregon 97232

EE Project No. 2708
DEQ ECSI File No. 84

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

Dear Mr. Thomas,

Ede Environmental, LLC (EE) 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 June 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 June 2024, with the system operating in full long-term operational mode.

A total of 8,453,438 gallons of water were treated in the on-site groundwater treatment plant and discharged during June 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 June 2024. The system recovered

approximately 20 gallons of fluids in June. Recovered fluids (accumulating since tank emptying on October 4, 2023) are estimated to be approximately 35% DNAPL with 252 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 587 gallons of DNAPL have been recovered from the T-50 sump, approximately 3 gallons of which were recovered during June 2024.

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

- MW-26U
- MW-27U
- MW-38U
- PW-2L

Water removal from the Koppers Basin continued during June 2024 as needed to keep the basin free of standing water. A total of 125,778 gallons of water were removed from the basin during June 2024 with treatment through the Groundwater Treatment System. Visual observations during June confirmed that the basin remained free of standing water during this timeframe.

The routine groundwater monitoring event for the Second Quarter 2024 was completed during June.

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

- Monthly measurements of DNAPL presence at Fill WBZ wells MW-10-25, MW-43F, MW-44F, and MW-45F were conducted during June 2024. No measurable DNAPL was present in wells MW-43F or MW-44F; 1.13 feet of DNAPL was measured within well MW-45F; and 0.08 feet of DNAPL was measured within well MW-10-25 during June. The DNAPL from well MW-10-25 (0.15 gallons) was last removed on April 2, 2024 and the DNAPL from well MW-45F (0.17 gallons) was last removed on June 6, 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 controls and integration of replacement groundwater extraction well PW-6Ub into the HC&C system will be initiated.

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, necessary vegetation removal, and marking of sample locations is scheduled to be completed during the second week of July 2024 and sampling is anticipated to occur during the third week of July 2024.

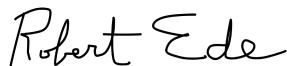
Monitoring since September 2017 indicates that DNAPL proximate to wells MW-43F and MW-44F has not been sufficiently mobile to accumulate the minimum thickness required for sampling (0.5 feet). A DNAPL sample will be collected for laboratory DNAPL mobility assessment testing from wells MW-43F and MW-44F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

3. Problems Experienced During the Previous Month

The logging software for the HC&C system (XLReporter) stopped recording on June 11, 2024 due to an unattended Microsoft Windows update on both the primary and redundant computers. The issue was identified and fixed on June 19, 2024. Elevation data for the connected transducers including the trenches, extraction wells, control wells, river, and piezometers (65 locations) as well as pumping rate data for the extraction wells and trenches was not logged by the system. Most of the elevation data was able to be recovered by manually downloading the data from the connected transducers but the transducers at some locations were out of calibration and the recovered data was unusable. Unattended updates have been disabled and a system alert was added to send out notifications if the XLReporter file is not uploaded each day to prevent this from happening in the future. The HC&C system continued to operate, but there is no record of individual extraction well pumping rates during this time. Influent data for each of the two groundwater pre-treatment systems and the main treatment plant is available to document overall groundwater treatment operation during this time.

Should you have any questions, please contact the undersigned.

Sincerely,



Rob Ede, RG

Principal

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