



September 16, 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 August 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 August 2024, with the system operating in full long-term operational mode.

A total of 8,538,609 gallons of water were treated in the on-site groundwater treatment plant and discharged during August 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 August 2024. The system recovered

approximately 9 gallons of fluids in August. Recovered fluids (accumulating since tank emptying on October 4, 2023) are estimated to be approximately 35% DNAPL with 291 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 622 gallons of DNAPL have been recovered from the T-50 sump, approximately 25 gallons of which were recovered during August 2024.

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

- MW-18-30
- MW-26U
- MW-27U
- MW-38U
- PW-2L
- PW-6U
- PW-13U

Water removal from the Koppers Basin continued during August 2024 as needed to keep the basin free of standing water. A total of 21,203 gallons of water were removed from the basin during August 2024 with treatment through the Groundwater Treatment System. Visual observations during August confirmed that the basin remained free of standing water during this timeframe.

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

- Monthly measurements of DNAPL presence at Fill WBZ wells MW-10-25, MW-43F, MW-44F, and MW-45F were conducted during August 2024. No measurable DNAPL was present in well MW-44F; 0.01 feet of DNAPL was measured within well MW-43F; 0.98 feet of DNAPL was measured within well MW-45F; and 0.16 feet of DNAPL was measured within well MW-10-25 during August. The DNAPL from well MW-10-25 (0.15 gallons) was last removed on April 2, 2024 and the DNAPL from well MW-45F (0.22 gallons) was last removed on August 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.

Routine groundwater monitoring activities as part of the Integrated Groundwater Monitoring Program will be completed during September 2024.

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, trenching, and infrastructure for integration of replacement groundwater extraction well PW-6Ub into the HC&C system will be conducted.

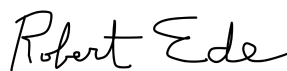
Monitoring since September 2017 indicates that DNAPL proximate to wells MW-43F and MW-44F has not been sufficiently mobile to accumulate the minimum thickness required for sampling (0.5 feet). A DNAPL sample will be collected for laboratory DNAPL mobility assessment testing from wells MW-43F and MW-44F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

3. Problems Experienced During the Previous Month

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

Should you have any questions, please contact the undersigned.

Sincerely,



Rob Ede, RG

Principal

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