



January 15, 2025

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 December 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

The Feasibility Study Report for the Gasco OU, which screens cleanup remedial technologies; assembles, evaluates, and ranks remedial action alternatives for the Gasco OU, and recommends a preferred alternative, was submitted to DEQ on December 16, 2024.

Communications, planning, and coordination related to the design of the Interim Removal Action Measure (IRAM), including work on a Basis of Design Report (BODR), was performed during this timeframe.

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

A total of 9,285,227 gallons of water were treated in the on-site groundwater treatment plant and discharged during December 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 December 2024. The system recovered approximately 23 gallons of fluids in December. Recovered fluids (accumulating since tank emptying on October 4, 2023) are estimated to be approximately 33% DNAPL with 381 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 657 gallons of DNAPL have been recovered from the T-50 sump, approximately 1 gallon of which was recovered during December 2024.

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

- MW-26U
- MW-27U
- MW-38U
- MW-PW2L
- PW-2L

Water removal from the Koppers Basin continued during December 2024 as needed to keep the basin free of standing water. A total of 716,845 gallons of water were removed from the basin during December 2024 with treatment through the Groundwater Treatment System. Visual observations during December confirmed that the basin remained free of standing water during this timeframe.

Installation of controls, trenching, and infrastructure for integration of replacement groundwater extraction well PW-6Ub into the HC&C system were completed during December 2024.

Routine groundwater monitoring activities as part of the Integrated Groundwater Monitoring Program were completed during December 2024.

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

- Monthly measurements of DNAPL presence at Fill WBZ wells MW-10-25, MW-43F, MW-44F, and MW-45F were conducted during December 2024. No measurable DNAPL was present in wells MW-43F or MW-44F; 0.26 feet of DNAPL was measured within well MW-45F; and 0.37 feet of DNAPL was measured within well MW-10-25 during December. The DNAPL from well MW-10-25 (0.15 gallons) was last removed on April 2, 2024 and the DNAPL from well MW-45F (0.09 gallons) was last removed on November 7, 2024.

2. Actions Scheduled to be Taken in the Next Month

NW Natural will continue development of the IRAM design during this timeframe.

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.

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

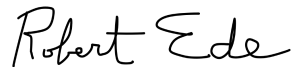
DNAPL mobility assessment testing from wells MW-43F and MW-44F if measurable thicknesses / sufficient volumes of DNAPL are identified at these locations in the future.

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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