



March 17, 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 February 2025. 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**

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 February 2025, with the system operating in full long-term operational mode.

A total of 8,611,326 gallons of water were treated in the on-site groundwater treatment plant and discharged during February 2025 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 February 2025. The system recovered approximately 27 gallons of fluids in February. Recovered fluids (accumulating since tank emptying on October 4, 2023) are estimated to be approximately 33% DNAPL with 424 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, with no DNAPL recovered during February 2025.

Baseline DNAPL removal as needed to maintain levels below the top of the well sumps was conducted by Anchor QEA during February 2025 in the following wells near the river shoreline.

- MW-18-30
- MW-26U
- MW-27U
- MW-38U
- MW-PW2L
- PW-2L
- PW-11U

Water removal from the Koppers Basin continued during February 2025 as needed to keep the basin free of standing water. A total of 613,449 gallons of water were removed from the basin during February 2025 with treatment through the Groundwater Treatment System. Visual observations during February confirmed that the basin remained free of standing water during this timeframe.

The following upland FS related field tasks were in progress during February 2025:

- Monthly measurements of DNAPL presence at Fill WBZ wells MW-10-25, MW-43F, MW-44F, MW-45F, and MW-50F were conducted during February 2025. No measurable DNAPL was present in wells MW-43F or MW-44F; 0.53 feet of DNAPL was measured within well MW-45F; 0.44 feet of DNAPL was measured within well MW-10-25; and 3.53 feet of DNAPL was measured within well MW-50F during

February. 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. The DNAPL from well MW-50F (1.25 gallons) was removed on March 6, 2025.

## **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.

The routine semi-annual groundwater monitoring event including select wells on the NW Natural and adjacent Siltronic properties will occur during March 2025.

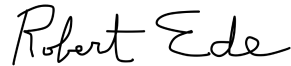
Monitoring since September 2017 indicates that DNAPL proximate to wells MW-43F and MW-44F has not been sufficiently mobile to accumulate the minimum thickness required for sampling (0.5 feet). A DNAPL sample will be collected for laboratory DNAPL mobility assessment testing from wells MW-43F and MW-44F 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,

A handwritten signature in black ink that reads "Robert Ede". The signature is written in a cursive, flowing style.

Rob Ede, RG

Principal

[rede@EdeEnvironmental.com](mailto:redede@EdeEnvironmental.com)

cc: Bob Wyatt, NW Natural  
Patty Dost, Pearl Legal Group PC  
Heather Tourgee, Pearl Legal Group PC  
John Edwards, Anchor QEA  
Ben Hung, Coalition Environmental LLC  
Ryan Barth, Anchor QEA  
Halah Voges, Anchor QEA  
Jen Mott, Anchor QEA  
John Renda, Anchor QEA  
Tim Stone, Anchor QEA  
Chip Byrd, Severson Environmental Services, Inc.  
Mike Crystal, Severson Environmental Services, Inc.  
Amanda Wozab, 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.