



The Greenbrier Companies
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March 15, 2025

SENT VIA EMAIL

Rebecca Digiustino
Oregon Department of Environmental Quality
Northwest Region Cleanup Program
700 NE Multnomah St, Suite 600
Portland, OR 97232

**Subject: Progress Report for Groundwater and Stormwater Source Control
Activities – January/February 2025
Former Gunderson LLC Portland Facility
Portland, Oregon**

Dear Ms. Digiustino,

The purpose of this letter is to provide the Oregon Department of Environmental Quality (DEQ) with the bi-monthly source control progress report for Gunderson LLC's (Gunderson's) former barge- and railcar-manufacturing facility located at 4350 NW Front Avenue in Portland, Oregon (the Facility). This letter is submitted in accordance with the DEQ Consent Order No. LQVC – NWR-13-02. This progress report includes the following for January and February 2025:

- 1) Actions performed;
- 2) Actions scheduled for the next two-month reporting period;
- 3) Data generated; and
- 4) Problems experienced and resolution.

The following describes source control activities conducted by Gunderson during the reporting period. As noted in Gunderson's October 3, 2023 letter to DEQ outlining the division of source control responsibilities for the Facility moving forward, the Facility owner and operator, OGM Properties LLC and Gunderson Marine LLC, respectively, are responsible for continued best management practices and operation and maintenance for implemented stormwater and riverbank source control measures. Gunderson Marine LLC is also responsible for facility compliance with the National Pollutant Discharge Elimination System General Industrial Stormwater Discharge Permit No. 1200-Z and the associated stormwater monitoring.

1. ACTIONS PERFORMED

- a) Submittal of the November/December 2024 Source Control Progress Report on January 15, 2025.
- b) Stormwater Source Control:
 - i) Stormwater source control sampling for analysis of dioxin/furans. Stormwater samples were collected from outfalls WR-127, WR-135, WR-136, WR-141 on

- February 19, 2025. This was the second dioxin/furans stormwater sampling event. Laboratory analysis is pending.
- ii) Tabulation of the laboratory results for the December 7, 2024 stormwater sampling event for dioxin/furans. None of the five individual dioxin/furan congeners with sediment cleanup levels in the Portland Harbor Record of Decision (ROD) Table 17 were detected above the method detection limit (MDL) in the samples collected from outfalls WR-127, WR-135, WR-136, and WR-141.
 - c) Groundwater Source Control:
 - i) Submittal of the MW-82 Area Investigation Report to DEQ on January 24, 2025.
 - ii) Initiation of the MW-74 area investigation field activities.

2. ACTIONS SCHEDULED FOR NEXT REPORTING PERIOD (MARCH AND APRIL 2025)

- a) Stormwater Source Control:
 - i) Continued weather tracking to enable the collection of additional stormwater samples from outfalls WR-127, WR-135, WR-136, and WR-141 for analysis of dioxin/furans, if required based on the results of the second stormwater sampling event. As specified in the DEQ-approved October 11, 2024 work plan, if none of the dioxin/furan congeners in ROD Table 17 were detected in the first or second samples collected from an outfall, then no additional stormwater samples are required for that outfall. If one or more dioxin/furan congeners in ROD Table 17 were detected in the first or second samples collected from an outfall, then two additional stormwater samples will be collected for that outfall.
- b) Groundwater Source Control:
 - i) Submittal of the Fourth Quarter 2024 Groundwater Monitoring Report by March 31, 2025.
 - ii) Continued implementation of the Well MW-74 Area Investigation Work Plan.
 - iii) Completion of the first quarter 2025 groundwater monitoring event.
 - iv) Gunderson will be responding to DEQ and EPA comments on the MW-82 Area Investigation Report that were sent to Gunderson on March 10, 2025.

3. SAMPLING, TEST RESULTS, AND ANY OTHER DATA GENERATED DURING JANUARY AND FEBRUARY 2025

- Stormwater data from the February 19, 2025 stormwater source control sampling event.

4. PROBLEMS EXPERIENCED AND RESOLUTION

- None

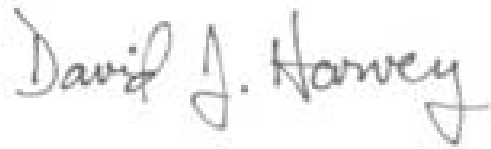
March 15, 2025

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CLOSING

If you have any questions, please call me at (503) 595-3805.

Sincerely,

A handwritten signature in black ink that reads "David J. Harvey". The signature is written in a cursive style with a large, stylized 'D' and 'H'.

David J. Harvey
Senior Director EHS
The Greenbrier Companies

Copy (via email only):

Dan Hafley, DEQ

David Lacey, DEQ

Jack Isselmann, The Greenbrier Companies

Stephanie HeldtSheller, The Greenbrier Companies

Jeanette Schuster, Tonkon Torp

Kirsten White, GeoEngineers, Inc.

Chris Breemer, GeoEngineers, Inc.

GUNDERSON MARINE

Document No 101.1875.17
 Issue Date 07/01/2019
 Rev. 1
 Page 1 of 1
 Prepared By Phillip Kolander
 Approved By David Harvey

DOCUMENT: Health, Safety and Environment
 TITLE: Gunderson River Bank Erosion Inspection Form

Inspectors Name Phillip Kolander Date 1/3/25

Precipitation in the last 24 hours(inches) 1/2"

Unusual River Conditions (eg – flood stage)? HIGHER THAN NORMAL

Observations, Effectiveness, and Corrective Actions Ordered		
AREA 1 RIVERBANK		
North/Northwest of Ways 2 Bldg		
Filter Strip	Is the filter strip intact and continuous?	YES
	Are there signs of concentrated overbank sheet flow?	NO
AREA 2 RIVERBANK		
North/Northwest of Wonder Bldg		
Riverbank Armoring	Are there visible signs of erosion (e.g., accumulation of soil, channelization)?	NO
	Are there signs of coir fabric deterioration?	NO
	Are there signs of rock/armoring movement?	NO
Filter Strip	Is the filter strip intact and continuous?	YES
	Are there signs of concentrated overbank sheet flow?	NO
Launch Ways		
Wattles	Are the wattle structures deteriorating?	NO
	Are the wattles buried or damaged?	NO
	Is sediment >1/2 the height of the wattle structure?	NO
	Is there evidence of sediment getting around or under the wattle barrier?	NO
Launch Ways	Is there accumulation of soil on the bulkhead?	NO
	Are there signs of armoring deterioration between Ways 1-3?	NO
Sandbags at Bulkhead	Is the sandbag structure deteriorating?	NO
	Is the cover over the sandbags deteriorating?	NEW TARPS WAYS 8, 9
SCHNITZER ASD YARD (AREA 3) RIVERBANK		
	Is coir fabric coverage continuous?	YES
	Is there visible coir fabric tenting?	NO
	Are there visible signs of erosion (e.g., accumulation of soil, channelization, scarps)?	NO
	Is plastic cover intact underneath south end of Outfitting Dock?	YES
	Is toe of coir fabric adequately staked/armored?	YES

1/17/25
 INSPECTION
 INSTRUCTED
 BY END OF SHEET. 1/2

GUNDERSON MARINE

Document No 101.1875.13
 Issue Date 07/18/2019
 Rev. 1.0
 Page 1 of 2
 Prepared By Phillip Kolander
 Approved By Soren Hill

DOCUMENT:	Health, Safety and Environment
TITLE:	Bio D Silt Check Inspection Form
SITE:	Gunderson Portland, OR

Visual Wattle Inspection Form

Inspectors Name Phillip Kolander Date 1/17/25

Signature Phillip Kolander Title ENVU TECH

Do the Wattles/ Launch way meet all the Success Criteria for being functional?
 Note: ✓ = yes "..." = functioning but needs attention "0" = Needs repair / replace

Wattles	Minimum of 1			functional?	Comments
	Upper	Middle	Lower		
Ways 1		✓	✓	✓	
Ways 2		✓	✓	✓	
Ways 3	✓	✓		✓	
Ways 4		✓	✓	✓	
Ways 5		✓	✓	✓	
Ways 6		✓	✓	✓	
Ways 7		✓	✓	✓	
Ways 8		✓	✓	✓	
Ways 9		✓	✓	✓	
Ways 10		✓	✓	✓	
Ways 11		✓	✓	✓	
Ways 12		✓	✓	✓	
Ways 13		✓	✓	✓	
Ways 14		✓	✓	✓	
Ways 15	✓	✓		✓	
Ways 16		✓	✓	✓	
Ways 17	✓	✓		✓	
Ways 18		✓	✓	✓	
Ways 19		✓	✓	✓	
Ways 20	✓	✓		✓	
Ways 21		✓	✓	✓	
Ways 22	✓	✓		✓	
Ways 23		✓	✓	✓	
Ways 24		✓	✓	✓	
Ways 25		✓	✓	✓	
Ways 26		✓		✓	
Ways 27		✓	✓	✓	
Ways 28					concrete
Ways 29					concrete
Ways 30		✓	✓		concrete
Ways 31		✓	✓	✓	

GUNDERSON MARINE

Document No 101.1875.17
 Issue Date 07/01/2019
 Rev. 1
 Page 1 of 1
 Prepared By Phillip Kolander
 Approved By David Harvey

DOCUMENT: Health, Safety and Environment
 TITLE: Gunderson River Bank Erosion Inspection Form

Inspectors Name Phillip Kolander Date 2/19/25

Precipitation in the last 24 hours(inches) .5

Unusual River Conditions (eg - flood stage)? NO

AREA 1 RIVERBANK		Observations, Effectiveness, and Corrective Actions Ordered
North/Northwest of Ways 2 Bldg		
Filter Strip	Is the filter strip intact and continuous?	YES
	Are there signs of concentrated overbank sheet flow?	NO
AREA 2 RIVERBANK		
North/Northwest of Wonder Bldg		
Riverbank Armoring	Are there visible signs of erosion (e.g., accumulation of soil, channelization)?	NO
	Are there signs of coir fabric deterioration?	NO
	Are there signs of rock/armoring movement?	NO
Filter Strip	Is the filter strip intact and continuous?	YES
	Are there signs of concentrated overbank sheet flow?	NO
Launch Ways		
Wattles	Are the wattle structures deteriorating?	NO
	Are the wattles buried or damaged?	NO
	Is sediment >1/2 the height of the wattle structure?	NO
	Is there evidence of sediment getting around or under the wattle barrier?	NO
Launch Ways	Is there accumulation of soil on the bulkhead?	NO
	Are there signs of armoring deterioration between Ways 1-3?	NO
Sandbags at Bulkhead	Is the sandbag structure deteriorating?	NO
	Is the cover over the sandbags deteriorating?	NO
SCHNITZER ASD YARD (AREA 3) RIVERBANK		
	Is coir fabric coverage continuous?	YES
	Is there visible coir fabric tenting?	NO
	Are there visible signs of erosion (e.g., accumulation of soil, channelization, scarps)?	NO
	Is plastic cover intact underneath south end of Outfitting Dock?	YES
	Is toe of coir fabric adequately staked/armored?	YES

RIVER BANK WEENS IN AREA 3 CUT LAST WEEK IN JANUARY



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SITE:	Gunderson Portland, OR

Visual Wattle Inspection Form

Inspectors Name Phillip Kolander Date 2/19/25

Signature Phillip Kolander Title ENVIRONMENTAL

Do the Wattles/ Launch way meet all the Success Criteria for being functional?

Note: ✓ = yes "..." = functioning but needs attention "0" = Needs repair / replace

Wattles	Upper	Middle	Lower	Minimum of 1	Comments
				functional?	
Ways 1		✓	✓	✓	
Ways 2		✓	✓	✓	
Ways 3	✓	✓	✓	✓	
Ways 4		✓	✓	✓	
Ways 5		✓	✓	✓	
Ways 6		✓	✓	✓	
Ways 7		✓	✓	✓	
Ways 8		✓	✓	✓	
Ways 9		✓	✓	✓	
Ways 10		✓	✓	✓	
Ways 11		✓	✓	✓	
Ways 12		✓	✓	✓	
Ways 13		✓	✓	✓	
Ways 14		✓	✓	✓	
Ways 15	✓	✓	✓	✓	
Ways 16		✓	✓	✓	
Ways 17	✓	✓	✓	✓	
Ways 18		✓	✓	✓	
Ways 19		✓	✓	✓	
Ways 20	✓	✓	✓	✓	
Ways 21		✓	✓	✓	
Ways 22	✓	✓	✓	✓	
Ways 23		✓	✓	✓	
Ways 24		✓	✓	✓	
Ways 25		✓	✓	✓	
Ways 26		✓	✓	✓	
Ways 27		✓	✓	✓	
Ways 28					concrete
Ways 29					concrete
Ways 30		✓	✓	✓	concrete
Ways 31		✓	✓	✓	

NO PROBLEMS
 FOUND DURING
 INSPECTION