THE GREENBRIER COMPANIES

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May 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 – March/April 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 March and April 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, 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) The January/February 2025 Source Control Progress Report was submitted to DEQ on March 15, 2025.

b) Stormwater Source Control:
   i) Stormwater source control samples were collected from outfall WR-135 on March 12 and April 6, 2025. These were the third and fourth dioxin/furans stormwater sampling events for this outfall.
   ii) The laboratory results of the February 19, 2025 dioxin/furan stormwater source control sampling event were received and the sampling program for three outfalls (WR-127, WR-136, and WR-141) was deemed completed following collection of two samples from each outfall. In accordance with the DEQ-approved October 11, 2024 work plan, because none of the five individual dioxin/furan congeners in Portland Harbor Record of Decision (ROD) Table 17 were detected above the laboratory method detection limit (MDL) in the two samples collected from these outfalls (December 7, 2024 and February 19, 2025), no additional stormwater samples are required.

c) Groundwater Source Control:
   i) The first quarter 2025 groundwater monitoring event was conducted on March 7, 2025.
   ii) MW-82 Area Investigation
      (1) On March 25, 2025, Gunderson submitted a letter requesting deadline extensions for the two deliverables requested in the DEQ and EPA comments that were sent to Gunderson in a March 10, 2025 DEQ letter. In the March 25 letter, Gunderson requested deadline extensions for the: (1) Revised MW-82 Investigation Report; and (2) source control measures work plan for decommissioning of stormwater infiltration feature INF 2-3. Gunderson and GeoEngineers subsequently met with DEQ via Microsoft Teams on April 15, 2025 to discuss the deadline extension request. In an April 23, 2025 email and April 30, 2025 letter, DEQ approved the following extension requests: (1) the Revised MW-82 Area Investigation Report is due 60 days following FMC submittal of the Supplemental Pre-Design Investigation Report for River Mile 9W (expected in September 2025); and (2) the stormwater source control measures work plan for infiltration feature INF 2-3 is due by September 30, 2025.
      (2) Samples of the stormwater influent to infiltration feature INF 2-3 were collected on March 21 and April 6, 2025.
   iii) MW-74 Area Investigation
      (1) A camera survey of the WR-377B stormwater conveyance system was conducted on March 7, 2025. The results of the camera survey are being used to inform the scope of the planned conveyance system modifications, as noted in the DEQ-approved October 22, 2024 MW-74 Area Investigation Work Plan.
      (2) A pressure transducer was installed in monitoring well MW-74 on March 7, 2025.

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

a) Stormwater Source Control:
   i) Submittal of a letter report summarizing the results of the dioxin/furan stormwater source control sampling program will be submitted to DEQ. Consistent with the DEQ-approved October 11, 2024 work plan, the report will include a comparison of the results to the September 11, 2024 DEQ rank order curves for dioxin/furans in Portland Harbor stormwater and an assessment of recontamination risk to the Willamette River.

b) Groundwater Source Control:

i) Submittal of the First Quarter 2024 Groundwater Monitoring Report to DEQ by June 30, 2025.
ii) Continued implementation of the Well MW-74 Area Investigation Work Plan, including completion of the stormwater improvements to the WR-377B stormwater system.
iii) Collection of additional sample(s) of the stormwater influent to infiltration feature INF 2-3.
iv) Completion of the second quarter 2025 groundwater monitoring event.

3. SAMPLING, TEST RESULTS, AND ANY OTHER DATA GENERATED DURING MARCH AND APRIL

- Groundwater data from the March 7, 2025 first quarter 2025 monitoring event.
- Stormwater data from the March 12 and April 6, 2025 stormwater source control sampling at outfall WR-135 for dioxin/furans.
- Stormwater data from the infiltration feature INF 2-3 influent sampling on March 21 and April 6, 2025.

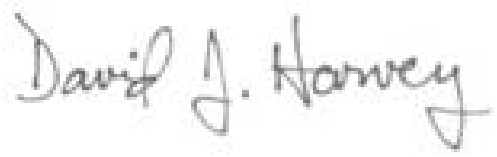
4. PROBLEMS EXPERIENCED AND RESOLUTION

- None

CLOSING

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

Sincerely,



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
DOCUMENT:	Health, Safety and Environment	Prepared By	Phillip Kolander
TITLE:	Gunderson River Bank Erosion Inspection Form	Approved By	David Harvey

Inspectors Name Phillip Kolander **Date** 3/4/25

Precipitation in the last 24 hours(inches) 0

Unusual River Conditions (eg – flood stage)? NO

		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 3/5 INSPECTION
	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

SCHNITZER RIVERBANK WEEDS CUT LAST MONTH

GUNDERSON MARINE		Document No	101.1875.13
		Issue Date	07/18/2019
		Rev.	1.0
		Page	1 of 2
DOCUMENT:	Health, Safety and Environment	Prepared By	Phillip Kolander
TITLE:	Bio D Silt Check Inspection Form	Approved By	Soren Hill
SITE:	Gunderson Portland, OR		

Visual Wattle Inspection Form

Inspectors Name Phillip Kolander **Date** 3/5/25

Signature Phillip Kolander **Title** ENVO 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	Upper	Middle	Lower	Minimum of 1 functional?	Comments
Ways 1		√	√	√	
Ways 2		√	√	√	
Ways 3	√	√		√	
Ways 4		√	√	√	
Ways 5				√	
Ways 6		√	√	√	
Ways 7		√	√	√	
Ways 8		√	√	√	
Ways 9		√	√	√	
Ways 10		√	√	√	No Problems Found
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		√	√	√	

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DOCUMENT:	Health, Safety and Environment	Prepared By	Phillip Kolander
TITLE:	Gunderson River Bank Erosion Inspection Form	Approved By	David Harvey

Inspectors Name Phillip Kolander **Date** 4/15/25

Precipitation in the last 24 hours(inches) NO

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

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

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Visual Wattle Inspection Form

Inspectors Name Phillip Kolander **Date** 4/15/25

Signature Phillip Kolander **Title** ENVO TECH

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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		√	√	√	