



June 16, 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 May 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) during this timeframe, with the IRAM Basis of Design Report (BODR) submitted to DEQ on May 9, 2025.

Tasks related to maintenance of the HC&C system and the groundwater treatment system were conducted during May 2025, with the system operating in full long-term operational mode.

A total of 8,853,919 gallons of water were treated in the on-site groundwater treatment plant and discharged during May 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 May 2025. The system reached capacity during late March triggering the auto shut-off feature. At the time of shut-off, recovered fluids (accumulating since tank emptying on October 4, 2023) were estimated to be approximately 33% DNAPL with 451 gallons of total fluids in tank storage. On May 13, 2025, approximately 324 gallons of groundwater (no DNAPL) were removed from the tank and treated through the on-site groundwater treatment plant, leaving 127 gallons of total fluids in the tank, 73% of which was estimated to be DNAPL. During the remainder of May, the system recovered approximately 9 gallons of fluids, with 136 gallons of total fluids in storage, approximately 73% of which is estimated to be DNAPL.

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 measurements showing between 0.5 and 0.8 feet of DNAPL in the sump. The most recent DNAPL recovery from the T-50 sump was in December 2024.

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

- MW-16-45
- MW-18-30
- MW-26U
- MW-27U
- MW-30U
- MW-38U
- MW-PW2L
- PW-2L
- PW-13U
- PW-14U

Water removal from the Koppers Basin continued during May 2025 as needed to keep the basin free of standing water. A total of 154,138 gallons of water were removed

from the basin during May 2025 with treatment through the Groundwater Treatment System. Visual observations during April confirmed that the basin remained free of standing water during this timeframe.

The following upland FS related field tasks were in progress during May 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 May 2025. No measurable DNAPL was present in wells MW-43F or MW-44F; 0.49 feet of DNAPL was measured within well MW-45F; 0.68 feet of DNAPL was measured within well MW-10-25; and 3.31 feet of DNAPL was measured within well MW-50F during May. The DNAPL from well MW-10-25 (0.15 gallons) was last removed on April 2, 2024 and the DNAPL from well MW-45F (0.26 gallons) was last removed on May 7, 2025. The DNAPL from well MW-50F (0.73 gallons) was last removed on May 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.

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

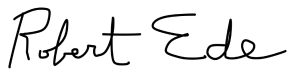
DNAPL mobility assessment testing from wells MW-43F and MW-44F if measurable thicknesses / sufficient volumes of DNAPL are identified at these locations in the future.

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

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