



The Greenbrier Companies

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July 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 – May/June 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 May and June 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 (OGM/Gunderson Marine), respectively, are responsible for continued best management practices and operation and maintenance for implemented stormwater and riverbank source control measures. Gunderson Marine 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 May 15, 2025, Progress Report for Groundwater and Stormwater Source Control Activities – March/April 2025 was submitted to DEQ.

- b) Stormwater Source Control:
 - i) Laboratory analytical data for the dioxin/furan stormwater source control evaluation was received and evaluated and preparation of the Supplemental Stormwater Source Control Evaluation—Dioxin and Furan Congeners letter report was initiated. As noted below, the report will be submitted to DEQ in July 2025.
- c) Groundwater Source Control:
 - i) The second quarter 2025 groundwater monitoring event was conducted on June 25, 2025.
 - ii) The First Quarter 2025 Groundwater Monitoring Report was submitted to DEQ on June 30, 2025.
 - iii) MW-82 Area Investigation: Samples of the stormwater influent to infiltration feature INF 2-3 were collected on June 20, 2025. Scoping for decommissioning of INF 2-3 was conducted.
 - iv) MW-74 Area Investigation: Subcontractor selection and coordination with OGM/Gunderson Marine in preparation of the WR-377B stormwater modifications.

2. ACTIONS SCHEDULED FOR NEXT REPORTING PERIOD (JULY AND AUGUST 2025)

- a) Stormwater Source Control:
 - i) The Supplemental Stormwater Source Control Evaluation—Dioxin and Furan Congeners letter report will be submitted in July 2025. The data presented in the forthcoming report demonstrate that dioxin/furans in stormwater discharging from the Facility do not pose a recontamination threat to the Willamette River. The report will include a request for DEQ confirmation that no further stormwater source control evaluation will be required of Gunderson and that Gunderson has fulfilled their stormwater source control obligations.
- b) Groundwater Source Control:
 - i) Continued implementation of the Well MW-74 Area Investigation Work Plan, including completion of the stormwater improvements to the WR-377B stormwater system in July 2025.
 - ii) Continued scoping and coordination for decommissioning of stormwater infiltration feature INF 2-3. As noted previously, the Stormwater Source Control Measure Work Plan for decommissioning of infiltration feature INF 2-3 will be submitted to DEQ by September 30, 2025.
 - iii) Begin development of a work plan for additional groundwater and soil investigation Launchways 3 to assess the extent of elevated arsenic detected in Facility monitoring well MW-82.

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

- Groundwater data from the June 25, 2025, second quarter 2025 monitoring event.
- Stormwater data from the infiltration feature INF 2-3 influent sampling on June 20, 2025.

4. PROBLEMS EXPERIENCED AND RESOLUTION

- None

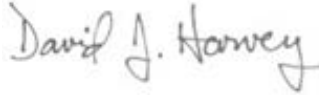
July 15, 2025

Page 3 of 3

CLOSING

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

Sincerely,

A handwritten signature in dark 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

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 5/12/25

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

5/30 INSPECTION



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 5/30/25

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	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		✓	✓	✓	
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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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 6/4/25

Precipitation in the last 24 hours(inches) 0" → .05"

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?	REPLACE LOWER
	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

6/13/25 INSPECTION

GUNDERSON MARINE

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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 6/13/25

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		✓	0	✓	
Ways 9		✓	0	✓	↑ REPAIR LOWER ON 8
Ways 10		✓	✓	✓	
Ways 11		✓	✓	✓	
Ways 12		✓	✓	✓	
Ways 13		✓	✓	✓	
Ways 14		✓	✓	✓	
Ways 15	✓	✓		✓	
Ways 16		✓	✓	✓	
Ways 17	✓	✓	0	✓	
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 101.1875.15
Issue Date 07/18/2019
Rev. 1.0
Page 1 of 2
Prepared By Phillip Kolander
Approved By Soren Hill

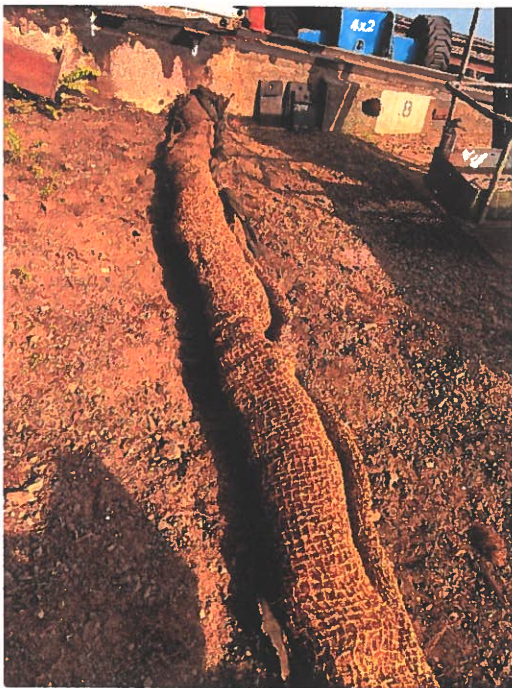
DOCUMENT: Health, Safety and Environment
TITLE: Corrective Actions Record
SITE: Gunderson Portland, OR

Inspector Name Phillip Kolander Date 6/13/25

Start time: End time: Corrective Action Completed? Yes No

Corrective Action Needed:

Replace lower waddle on Ways 8



Recommendations, Actions Taken & Comments: _____

I certify that I have made the corrective actions required to make the above items put back into the working order they were intended.

Signature Phillip Kolander Title EMV TECH