



The Greenbrier Companies

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September 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 – July/August 2025
Gunderson Marine & Iron Facility
4350 NW Front Avenue, Portland, Oregon (Facility)**

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 the above-referenced Facility, which was formerly owned and operated by Gunderson LLC (Gunderson) as a barge- and railcar-manufacturing facility. This letter is submitted in accordance with the DEQ Consent Order No. LQVC – NWR-13-02. This progress report includes the following for July and August 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 current Facility owner and operator, OGM Properties LLC and Gunderson Marine LLC doing business as Gunderson Marine & Iron (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 July 15, 2025 Progress Report for Groundwater and Stormwater Source Control Activities – May/June 2025 was submitted to DEQ.
- b) Stormwater Source Control:
 - i) The Supplemental Stormwater Source Control Evaluation—Dioxin and Furan Congeners letter report was prepared. As noted below, the report will be submitted to DEQ in September 2025.

- c) Groundwater Source Control:
 - i) Scoping for decommissioning of INF 2-3 was conducted. As noted below, the Source Control Measures Work Plan for decommissioning of INF 2-3 will be submitted to DEQ in September 2025.
 - ii) Implementation of the Well MW-74 Area Investigation Work Plan was conducted in July and August 2025. Work completed included decommissioning of catch basins influent piping and excavation to attempt to plug the main WR-377B stormwater pipe. Additional stormwater improvements to the WR-377B stormwater system are planned for September/October as noted below.
 - iii) The MW-82 Area Supplemental Investigation Work Plan was submitted to DEQ on September 2, 2025.

2. ACTIONS SCHEDULED FOR NEXT REPORTING PERIOD (SEPTEMBER AND OCTOBER 2025)

- a) Stormwater Source Control:
 - i) The Supplemental Stormwater Source Control Evaluation—Dioxin and Furan Congeners letter report will be submitted in September 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) The MW-82 Area Supplemental Investigation Work Plan was submitted to DEQ on September 2, 2025. The proposed scope includes additional groundwater and soil investigation and installation of two groundwater monitoring wells outside of the extent of historical Launchways 3 to assess the extent of elevated arsenic detected in Facility monitoring well MW-82. DEQ approved the work plan and provided DEQ and United States Environmental Protection Agency (EPA) comments in a September 10, 2025 letter. Gunderson will provide comment responses by October 10, 2025 and will schedule the monitoring well installations as soon as possible, pending drilling subcontractor availability. Ideally the field work schedule will allow for the investigation results to be reported in the Revised MW-82 Area Investigation Report (estimated DEQ deadline of November 30, 2025).
 - ii) Continued implementation of the Well MW-74 Area Investigation Work Plan, including stormwater improvements to the WR-377B stormwater system.
 - iii) Submittal of the Source Control Measure Work Plan for decommissioning of infiltration feature INF 2-3 to DEQ by September 30, 2025.
 - iv) Submittal of the Second Quarter Groundwater Monitoring Report to DEQ by September 30, 2025.
 - v) Completion of the third quarter 2025 groundwater monitoring event in September 2025.

3. SAMPLING, TEST RESULTS, AND ANY OTHER DATA GENERATED DURING JULY AND AUGUST 2025

- None

4. PROBLEMS EXPERIENCED AND RESOLUTION

- Gunderson has experienced challenges identifying a suitable access location for plugging the WR-377B stormwater pipe. Gunderson is scheduling contractor remobilization to continue this process.

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, flowing style.

David J. Harvey
Senior Director Environmental
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:	Health, Safety and Environment	Document No	101.1875.17
TITLE:	Gunderson River Bank Erosion Inspection Form	Issue Date	07/01/2019
		Rev.	1
		Page	1 of 1
		Prepared By	Phillip Kolander
		Approved By	David Harvey

Inspectors Name Phillip Kolander Date 7/21/25

Precipitation in the last 24 hours(inches) .25

Unusual River Conditions (eg – flood stage)? _____

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?	
	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

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 7/31/25

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 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		✓	✓	✓	

NO PROBLEMS
FOUND

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 8/6/25

Precipitation in the last 24 hours(inches) .1

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
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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

8/14 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 8/14/25

Signature Phillip Kolander Title ENVIRONMENTAL TECH

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

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Wattles	Upper	Middle	Lower	Minimum of 1 functional?	Comments
Ways 1		✓	✓	✓	
Ways 2		✓	✓	✓	
Ways 3	✓	✓	✓	✓	
Ways 4		✓	✓	✓	
Ways 5		✓	✓	✓	
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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