



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region
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September 10, 2025

via electronic delivery

GeoEngineers, Inc.
Chris Breemer
Principal Geologist

Re: **DEQ Approval of MW-82 Area Supplemental Investigation Work Plan**
Gunderson Inc. (ECSI No. 1155)

Dear Chris Breemer,

The Oregon Department of Environmental Quality (DEQ) has reviewed the work plan titled ***MW-82 Area Supplemental Investigation Work Plan*** (Work Plan) submitted on August 29, 2025, by GeoEngineers Incorporated (GeoEngineers) on behalf of Gunderson LLC (Gunderson). The objective of the proposed work is to further characterize the extent of arsenic in soil and groundwater near monitoring well MW-82. Arsenic has been detected in groundwater from MW-82 and porewater offshore near MW-82 at elevated concentrations relative to other monitoring wells at the site. DEQ comments on the Work Plan are provided below.

- 1) **Section 2.3 2023 Porewater Investigation Offshore of MW-82 Area** – Please note that DEQ’s Regional Background Metals Concentrations were developed for soil and not in-river sediment. Any comparison should document that the regional background values were not developed to assess Willamette River sediment background concentrations.
- 2) **Section 3.1 Monitoring Well Installation** – Please describe how the subset of samples to be analyzed for polychlorinated biphenyls will be chosen.

The United States Environmental Protection Agency, Region 10 (EPA) also reviewed the Work Plan and provided the following comment on September 3, 2025, via email:

“My only recommendation is that they also run a couple of soil samples above 18’ bgs in each boring in order to use the opportunity to get a comprehensive understanding of arsenic concentrations in the area immediately next to the in water contamination. Their current CSM is that to the significant contamination is co-located with the bottom of the launch ways. If they are trying to increase certainty that the Gunderson uplands are not a source of arsenic in-water, having results from the fill above the waterline would be informative.”

DEQ approves the work plan, but requests Gunderson address and/or respond to both DEQ’s and EPA’s comments in a response-to-comment document and submit within 30 days. DEQ requests

Gunderson notify DEQ at least 2 days prior to the start of field work. In the meantime, do not hesitate to call (503-926-2257) or email (rebecca.digiustino@deq.oregon.gov) if you have questions.

Sincerely,



Rebecca Digiustino
Project Manager
NWR Cleanup Section

ec: Dave Lacey, DEQ
Dan Hafley, DEQ
Dave Harvey, Gunderson
Jack Isselmann, Gunderson
Jeanette Schuster, Tonkon Torp LLC
Kirsten White, GeoEngineers
Sam Russell, GeoEngineers