



October 13, 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 September 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) and revision to the Draft FS Report occurred during this timeframe.

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

A total of 8,094,844 gallons of water were treated in the on-site groundwater treatment plant and discharged during September 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 September 2025. During September, the system recovered approximately 8 gallons of fluids, with 173 gallons of total fluids in storage, approximately 69% 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 no DNAPL recovery in September 2025. 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 September 2025 in the following wells near the river shoreline.

- MW-26U
- MW-27U
- MW-34L
- MW-38U
- MW-PW2L
- PW-2L
- PW-14U

Water removal from the Koppers Basin continued during September 2025 as needed to keep the basin free of standing water. A total of 15,592 gallons of water were removed from the basin during September 2025 with treatment through the Groundwater Treatment System. Visual observations during September confirmed that the basin remained free of standing water during this timeframe.

Routine groundwater monitoring activities as part of the Integrated Groundwater Monitoring Program were completed during September 2025.

The following upland FS related field tasks were in progress during September 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 September 2025.

No measurable DNAPL was present in wells MW-43F or MW-44F; 1.13 feet of DNAPL was measured within well MW-45F; 0.94 feet of DNAPL was measured within well MW-10-25; and 3.36 feet of DNAPL was measured within well MW-50F during September. The DNAPL from well MW-10-25 (0.15 gallons) was last removed on April 2, 2024 and the DNAPL from well MW-45F (0.39 gallons) was last removed on August 7, 2025. The DNAPL from well MW-50F (0.60 gallons) was last removed on September 4, 2025.

2. Actions Scheduled to be Taken in the Next Month

DEQ approved NW Natural's September 15, 2025 *Test Plan to Assess Replacement of Selected HC&C System Electric Pumps with Direct Air Displacement Pumps Memorandum* in an e-mail dated October 2, 2025. Tasks related to this test plan anticipated to occur during October include removal of the electric pump from well PW-6U with installation and operation of the direct air displacement pump (during the last week of October).

NW Natural will continue development of the IRAM design and coordination of FS Report revisions 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

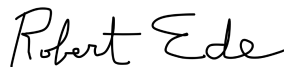
DNAPL mobility assessment testing from wells MW-43F and MW-44F if measurable thicknesses / sufficient volumes of DNAPL are identified at these locations in the future.

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,



Rob Ede, RG

Principal

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