



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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September 25, 2025

sent via email

Jason Hegdahl
Cascade Corporation
2201 NE 201st Avenue
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William Cherry
The Boeing Company
P.O. Box 3707, MC 46-202
Seattle, WA 98124

RE: Annual Performance Report 1 Jan. – 31 Dec. 2024, East Multnomah County, Troutdale Sandstone Aquifer Remedy, Gresham, Oregon. ECSI #1479

Dear Mr. Hegdahl and Mr. Cherry,

The Oregon Department of Environmental Quality (DEQ) has reviewed the Annual Performance Report for calendar year 2024, for the East Multnomah County, Troutdale Sandstone Aquifer Remedy. The report is dated May 27, 2025. This report was prepared on your behalf by Geosyntec Consultants, Inc., Landau Associates, Inc. and SS Papadopulos and Associates, Inc. DEQ approves the document and the Section 6.0 *Recommendations and Future Planned Activities*.

Earlier this month, Oregon law was updated to recognize six PFAS compounds as Hazardous Substances. [Oregon Administrative Rule 340-122-0115 \(30\)](#) We look forward to meeting with you to request PFAS sampling from representative site monitoring wells to investigate for the presence of PFAS compounds in groundwater.

DEQ notes that during a project meeting on October 16, 2024, Cascade representatives pointed out that PFAS investigation work is not addressed in the joint Boeing/Cascade project remedy and have requested that DEQ keep future PFAS investigation requests and other regulatory inquiries separate between Boeing and Cascade. DEQ will do its best to keep PFAS issues separate and addressed to the individual businesses apart from other project concerns.

DEQ approves the recommended actions in Section 6.0 *Recommended Changes to Monitoring Program and Schedule Modifications* of the May 2025 document (directly quoted below):

Recommended Changes for Treatment Systems

The CTS continues to operate and maintain long-term containment of the dissolved VOC plume and provide mass removal of the dissolved VOC plume. Continued operation of wells EW-2 and EW-14 is recommended at this time. It is recommended that extraction wells currently in shutdown mode remain in shutdown mode in 2025, since VOC concentrations are compliant with MCL goals in these areas of the remedy.

The SVE system continues to remove VOC mass from the Upper TSA, and continued operation will be voluntary. Based on declining mass removal rates at the remaining five operating vapor extraction wells, shutdown and rebound testing are being evaluated. A separate work plan will be submitted to DEQ regarding changes to the SVE system operation.

Recommend Changes to Monitoring Program and Schedule Modifications

The following monitoring program and sampling schedule modifications are recommended for DEQ approval. The recommendations are for wells that meet TSA Remedy Criteria (Table 2-1). The monitoring and schedule modifications are summarized in Table 2-2 and include:

- *Decreased monitoring frequency for groundwater elevation and groundwater quality monitoring for Remedy Zone C wells VMW-G, VMW-H, and VMW-L (from quarterly to semiannually). TCE concentrations in VMW-G have been below the MCL since May 2020 and have been steadily declining to concentrations less than half of the MCL. TCE concentrations at VMW-H are either detected just above the method report limit or not detected since 2021. TCE has not been detected above the method report limit at VMW-L since it was installed in 2020. These three wells are located in an area with numerous monitoring wells, and the semiannual sampling and monitoring frequency would be sufficient to monitor low-level VOC concentrations and water levels.*

Please feel free to call me with questions.

Sincerely,



Kenneth Thiessen, RG, CEG
Northwest Region Cleanup Section
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ECSI #1479