



November 17, 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 October 2025. NW Natural is completing upland investigation and interim 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 October 2025, with the system operating in full long-term operational mode.

A total of 8,596,078 gallons of water were treated in the on-site groundwater treatment plant and discharged during October 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 October 2025. During October, the system recovered approximately 9 gallons of fluids, with 182 gallons of total fluids in storage, approximately 70% 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 October 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 October 2025 in the following wells near the river shoreline.

- MW-26U
- MW-27U
- MW-38U
- PW-2L
- PW-11Ub
- PW-13U
- PW-14U

Water removal from the Koppers Basin continued during October 2025 as needed to keep the basin free of standing water. A total of 61,358 gallons of water were removed from the basin during October 2025 with treatment through the Groundwater Treatment System. Visual observations during October confirmed that the basin remained free of standing water during this timeframe.

In October, Anchor QEA sourced pneumatic pump equipment and scheduled contractors in preparation for implementing NW Natural's September 15, 2025 *Test Plan to Assess Replacement of Selected HC&C System Electric Pumps with Direct Air Displacement Pumps Memorandum (Pneumatic Pump Test Plan)*.

The following upland FS related field tasks were in progress during October 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 October 2025. No measurable DNAPL was present in wells MW-43F or MW-44F; 0.60 feet of DNAPL was measured within well MW-45F; 0.98 feet of DNAPL was measured within well MW-10-25; and 3.30 feet of DNAPL was measured within well MW-50F during October. The DNAPL from well MW-10-25 (0.15 gallons) was last removed on April 2, 2024 and the DNAPL from well MW-45F (0.47 gallons) was last removed on October 10, 2025. The DNAPL from well MW-50F (0.65 gallons) was last removed on October 10, 2025.

2. Actions Scheduled to be Taken in the Next Month

Tasks related to the *Pneumatic Pump Test Plan* anticipated to occur during November include removal of the electric pump from well PW-6U with installation and operation of the replacement direct air displacement pump (completed on November 4, 2025). Evaluation of the pneumatic pump performance at that location will be conducted for a minimum of two weeks during November. Assuming the initial evaluation at PW-6U is successful, then pneumatic pumps are expected to be installed at PW-3U and PW-5U during late November.

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,



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