

HAHN AND ASSOCIATES, INC.
ENVIRONMENTAL CONSULTANTS

December 15, 2014

Mr. Dana Bayuk
Oregon Department of Environmental Quality
Northwest Region, Portland Office
Portland Harbor Section
2020 SW Fourth Avenue, Suite 400
Portland Oregon 97201-4987

HAI Project No. 2708
DEQ ECSI File No. 84

**SUBJECT: Progress Report, NW Natural Site, 7900 NW St. Helens Avenue and
7200 NW Front Avenue, Portland, Oregon**

Dear Mr. Bayuk:

Hahn and Associates, Inc. (HAI) has prepared this monthly Progress Report summarizing Remedial Investigation/Feasibility Study (RI/FS) and source control-related work activities conducted by NW Natural relating to historic manufactured gas plant (MGP) activities at the NW Natural Site during the month of November 2014. NW Natural is completing upland investigatory 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).

1.0 Communications and Document Submittals

In correspondence dated November 6, 2014 (Dana Bayuk to Ben Hung), DEQ provided approval for NW Natural to proceed with finalization of the *Revised Gasco Upland Human and Ecological Risk Assessment (HERA) Report*, subject to several clarifying comments.

A teleconference with representatives of DEQ and NW Natural was conducted on November 12, 2014 to discuss clarifying comments and issues as related to finalizing the *Gasco Upland HERA Report*.

In correspondence dated November 14, 2014 (Dana Bayuk to Ben Hung and Taku Fuji) DEQ provided a summary of agreements reached during the November 12, 2014 teleconference related to the finalization of the *Revised Gasco Upland HERA Report*.

A meeting with representatives of DEQ, NW Natural, and Siltronic occurred on November 17, 2014 to discuss the development of documents related to HC&C model calibration and Phase 1 testing.

2.0 Field Work

Monitoring well installation activities as described within the *2014 Final SAP and QAPP for the Fill Water-Bearing Zone (WBZ)* were completed during November 2014.

HAI field activities related to monitoring and maintenance of the dense non-aqueous phase liquid (DNAPL) extraction system at surficial fill well locations MW-6-32 and MW-13-30 occurred during November. The system recovered approximately 55 gallons of fluids in November, primarily DNAPL.

Tasks related to optimization of the hydraulic control and containment (HC&C) system and the wastewater treatment system (continued operation and testing) were conducted in November 2014.

Baseline DNAPL removal as needed to maintain at levels below the top of the well sumps was conducted by Anchor QEA during November 2014 in the following wells near the river shoreline.

- MW-18-30
- MW-26U
- MW-27U
- MW-34U
- MW-38U
- MW-PW-2L
- PW-2L
- WS-14-161

On March 31, 2014 NW Natural discontinued discharges of treated groundwater to the sanitary sewer (Industrial Wastewater Discharge Permit 500.022). All water is now directed to NW Natural's on-site wastewater treatment plant and discharged to the Willamette River consistent with National Pollutant Discharge Elimination System (NPDES) Permit No. 103061 (expires August 31, 2018). Results from NW Natural's NPDES effluent sampling are provided to DEQ in Discharge Monitoring Reports that are submitted on a monthly basis in accordance with the permit. As of November 30, 2014 a total of 82,792,830 gallons of treated water were discharged under the NPDES permit.

3.0 Anticipated Activities December 2014 and January 2015

NW Natural and DEQ technical working group communications and meetings are anticipated to occur as needed during December 2014 and January 2015 to discuss ongoing project tasks, including DEQ-requested revisions to the Gasco HERA document.

The *HC&C Model Calibration and Validation Report* and the *HC&C Phase 1 Testing Report* are in preparation.

Fill monitoring wells installed in November 2014 will be developed.

Initiation of supplemental Doane Creek investigation activities remains contingent upon receipt of DEQ confirmation that the analyte list and screening levels are suitable for the Siltronic MGP Human Health and Ecological Risk Assessment. Legal access agreements with the off-site property owner (Burlington Northern Railroad) will also be necessary prior to initiation of field activities.

Transport and recycling of the oil-water mixture originating from the TCE CMMA at the Siltronic property will be scheduled following further discussion with DEQ. DEQ provided feedback regarding this item in a letter dated September 4, 2014. NW Natural and Siltronic are discussing the matter.

The following reports and work plans for the Site have been submitted to DEQ through the date of this progress report. Unless otherwise noted, NW Natural has not received DEQ comments on these documents.

- NW Natural's June 5, 2014 request (Rob Ede to Dana Bayuk) requesting concurrence of a final proposed analyte list and screening levels for use in the Doane Creek-related FSP being conducted as part of the Siltronic property RI.
- *Response to DEQ Request for Supplemental Information on Location of Former Industrial Use Supply Well, Mult 802, NW Natural Gasco Property*, transmitted by HAI (Rob Ede to Dana Bayuk), dated August 13, 2014.

Should you have any questions, please contact the undersigned.

Sincerely,



Rob Ede, R.G.
Principal

robe@hahnenv.com

- c: Mr. Bob Wyatt, NW Natural (electronic only)
Ms. Patty Dost, Pearl Legal Group PC (electronic only)
Ms. Sarah Riddle, Pearl Legal Group PC (electronic only)
Mr. Carl Stivers, Anchor QEA, L.L.C. (electronic only)
Mr. John Edwards, Anchor QEA, L.L.C. (electronic only)
Mr. Ben Hung, Anchor QEA, L.L.C. (electronic only)
Mr. Ryan Barth, Anchor QEA, L.L.C. (electronic only)
Mr. Henning Larsen, DEQ NW Region (electronic only)
Mr. Tom Gainer, DEQ NW Region (electronic only)
Mr. Keith Johnson, DEQ NW Region (electronic only)
Mr. Myron Burr, Siltronic Corporation (electronic only)
Ms. Kristine Koch, Region 10 EPA (electronic only)
Mr. Sean Sheldrake, Region 10 EPA (electronic only)
Mr. Rene Fuentes, Region 10 EPA (electronic only)
Mr. Lance Peterson, CDM, Inc. (electronic only)