



December 15, 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 November 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 November 2025, with the system operating in full long-term operational mode.

A total of 8,631,147 gallons of water were treated in the on-site groundwater treatment plant and discharged during November 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 November 2025. During November, the system recovered approximately 9 gallons of fluids, with 191 gallons of total fluids in storage, approximately 72% 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 November 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 November 2025 in the following wells near the river shoreline.

- MW-18-30
- MW-26U
- MW-38U
- PW-2L
- PW-6U
- PW-14U

Water removal from the Koppers Basin continued during November 2025 as needed to keep the basin free of standing water. A total of 266,260 gallons of water were removed from the basin during November 2025 with treatment through the Groundwater Treatment System. Visual observations during November confirmed that the basin remained free of standing water during this timeframe.

Tasks related to the September 15, 2025 *Pneumatic Pump Test Plan* conducted during November include removal of electric pumps and installation of pneumatic pumps in the following pumping wells: PW-6U (November 4), PW-3U (November 21), and PW-5U (November 26). Evaluation of the pneumatic pump performance at these locations is ongoing.

The following upland FS related field tasks were in progress during November 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 November 2025. No measurable DNAPL was present in wells MW-43F or MW-44F; 0.80 feet of DNAPL was measured within well MW-45F; 0.06 feet of DNAPL was measured within well MW-10-25; and 2.85 feet of DNAPL was measured within well MW-50F during November. The DNAPL from well MW-10-25 (0.22 gallons) was last removed on November 7, 2025 and the DNAPL from well MW-45F (0.47 gallons) was last removed on October 10, 2025. The DNAPL from well MW-50F (1.25 gallons) was last removed on November 7, 2025.

## **2. Actions Scheduled to be Taken in the Next Month**

Geotechnical borings and US Moorings/Gasco property boundary monitoring wells as described in the DEQ approved IRAM Data Gaps Investigation Work Plan, dated October 9, 2025 are scheduled for installation during December, with this work anticipated to be completed between December 8 and December 19, 2025.

Implementation of the Pneumatic Pump Test Plan will continue in December including replacement of electric pumps with pneumatic pumps at the following locations: PW-4U (completed December 4), PW-6Ub, PW-11Ub, and PW-13U. Pumping rates and hydrology observations will continue to be monitored and evaluated to inform optimization of the pneumatic pump operational parameters.

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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