



The Greenbrier Companies
One Centerpointe Drive, Suite 200
Lake Oswego, Oregon 97035
503.684.7000
503.684.7553
www.gbrx.com

November 15, 2025

SENT VIA EMAIL

Rebecca Digiustino
Oregon Department of Environmental Quality
Northwest Region Cleanup Program
700 NE Multnomah St, Suite 600
Portland, OR 97232

**Subject: Progress Report for Groundwater and Stormwater Source Control
Activities – September/October 2025
Gunderson Marine & Iron Facility
4350 NW Front Avenue, Portland, Oregon (Facility)**

Dear Ms. Digiustino,

The purpose of this letter is to provide the Oregon Department of Environmental Quality (DEQ) with the bi-monthly source control progress report for the above-referenced Facility, which was formerly owned and operated by Gunderson LLC (Gunderson) as a barge- and railcar-manufacturing facility. This letter is submitted in accordance with the DEQ Consent Order No. LQVC – NWR-13-02. This progress report includes the following for July and August 2025:

- 1) Actions performed;
- 2) Actions scheduled for the next two-month reporting period;
- 3) Data generated; and
- 4) Problems experienced and resolution.

The following describes source control activities conducted by Gunderson during the reporting period. As noted in Gunderson's October 3, 2023 letter to DEQ outlining the division of source control responsibilities for the Facility, the current Facility owner and operator, OGM Properties LLC and Gunderson Marine LLC doing business as Gunderson Marine & Iron (Gunderson Marine), respectively, are responsible for continued best management practices and operation and maintenance for implemented stormwater and riverbank source control measures. Gunderson Marine is also responsible for Facility compliance with the National Pollutant Discharge Elimination System General Industrial Stormwater Discharge Permit No. 1200-Z and the associated stormwater monitoring.

1. ACTIONS PERFORMED

- a) The September 15, 2025 Progress Report for Groundwater and Stormwater Source Control Activities – July/August 2025 was submitted to DEQ.
- b) Stormwater Source Control:

- i) The Supplemental Stormwater Source Control Evaluation—Dioxin and Furan Congeners letter report was submitted to DEQ on September 17, 2025. DEQ approved the report in an October 6, 2025 letter. DEQ's letter included concurrence that additional stormwater sampling or stormwater source control measures are not warranted at this time and that the final stormwater source control decision will not be issued until groundwater source control has been demonstrated. As such, no additional stormwater source control tasks are required or planned by Gunderson at the Facility.
- c) Groundwater Source Control:
 - i) The Work Plan for Stormwater Infiltration Feature INF 2-3 Decommissioning was submitted to DEQ on September 30, 2025. DEQ provided comments, with which EPA concurred, on the work plan in an October 28, 2025 letter, and revisions to the work plan are in progress.
 - ii) Continued implementation of the Well MW-74 Area Investigation Work Plan was conducted in September and October. Work completed included a camera survey and assessment of catch basins and roof drains on October 28, 2025. The camera survey results indicate that two catch basins (CB-377-D and CB-377-G) at the Facility previously believed to discharge to active outfall WR-377 actually discharge to decommissioned outfall WR-377B. Next steps are listed below.
 - iii) The MW-82 Area Supplemental Investigation Work Plan was submitted to DEQ on September 2, 2025. The Work Plan was implemented September 22 through October 17, 2025 following DEQ approval of the Work Plan on September 10, 2025.
 - iv) The third quarter 2025 groundwater monitoring event was conducted on September 18, 2025.
 - v) The Second Quarter 2025 Groundwater Monitoring Report was submitted to DEQ on September 30, 2025.

2. ACTIONS SCHEDULED FOR NEXT REPORTING PERIOD (NOVEMBER AND DECEMBER 2025)

- a) Stormwater Source Control: None. See Section 1.b, above.
- b) Groundwater Source Control:
 - i) Submittal of the Work Plan for Additional MW-82 Area Monitoring Well Installation in November. Following receipt of the soil and groundwater results of the September-October 2025 supplemental MW-82 area investigation, installation of an additional monitoring well is proposed east of well MW-94. The work plan will include a request for an extension to the November 30, 2025 deadline for the Revised MW-82 Area Investigation Report, so that the results of this additional monitoring well installation and soil and groundwater sampling may be included in the report. Following DEQ approval, the work plan will be implemented.
 - ii) Continued implementation of the Well MW-74 Area Investigation Work Plan, including stormwater improvements to the WR-377B stormwater system. As noted above, the results of an October 28, 2025 camera survey indicate that two catch basins at the Facility previously believed to be discharging to active outfall WR-377 are actually discharging to the pipe to decommissioned outfall WR-377B. Coordination with the facility is needed to reroute these catch basins to an active outfall and the WR-377B pipe will then be plugged.
 - iii) Submittal of the Revised Work Plan for Stormwater Infiltration Feature INF 2-3 Decommissioning in November. Coordination with OGM/Gunderson Marine will continue.

November 14, 2025

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- iv) Submittal of the Third Quarter 2025 Groundwater Monitoring Report to DEQ by December 31, 2025.
- v) Completion of the fourth quarter 2025 groundwater monitoring event in December 2025.

3. SAMPLING, TEST RESULTS, AND ANY OTHER DATA GENERATED DURING SEPTEMBER AND OCTOBER 2025

- Groundwater monitoring data from the third quarter 2025 monitoring event.
- Soil and groundwater data from September/October 2025 supplemental MW-82 area investigation.

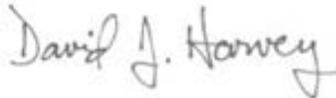
4. PROBLEMS EXPERIENCED AND RESOLUTION

- Gunderson continues to experience challenges identifying connections to the WR-377B stormwater pipe and identifying a suitable access location for plugging the pipe. As noted above, following a camera survey on October 28, 2025, Gunderson Marine must first redirect two catch basins to an active outfall before the WR-377B pipe can be plugged. Gunderson coordination with Gunderson Marine is ongoing.

CLOSING

If you have any questions, please call me at (503) 595-3805.

Sincerely,



David J. Harvey
Senior Director Environmental
The Greenbrier Companies

Copy (via email only):

Dan Hafley, DEQ
David Lacey, DEQ
Jack Isselmann, The Greenbrier Companies
Stephanie HeldtSheller, The Greenbrier Companies
Jeanette Schuster, Tonkon Torp
Kirsten White, GeoEngineers, Inc.
Chris Breemer, GeoEngineers, Inc.

GUNDERSON

MARINE

Document No 101.1875.17
 Issue Date 07/01/2019
 Rev. 1
 Page 1 of 1
 Prepared By Phillip Kolander
 Approved By David Harvey

DOCUMENT: Health, Safety and Environment
 TITLE: Gunderson River Bank Erosion Inspection Form

Inspectors Name Phillip Kolander Date 9/29/25

Precipitation in the last 24 hours(inches) 0

Unusual River Conditions (eg – flood stage)? NO

AREA 1 RIVERBANK		Observations, Effectiveness, and Corrective Actions Ordered
North/Northwest of Ways 2 Bldg		
Filter Strip	Is the filter strip intact and continuous?	YES
	Are there signs of concentrated overbank sheet flow?	NO
AREA 2 RIVERBANK		
North/Northwest of Wonder Bldg		
Riverbank Armoring	Are there visible signs of erosion (e.g., accumulation of soil, channelization)?	NO
	Are there signs of coir fabric deterioration?	NO
	Are there signs of rock/armoring movement?	NO
Filter Strip	Is the filter strip intact and continuous?	YES
	Are there signs of concentrated overbank sheet flow?	NO
Launch Ways		
Wattles	Are the wattle structures deteriorating?	NO
	Are the wattles buried or damaged?	NO
	Is sediment >1/2 the height of the wattle structure?	NO
	Is there evidence of sediment getting around or under the wattle barrier?	NO
Launch Ways	Is there accumulation of soil on the bulkhead?	NO
	Are there signs of armoring deterioration between Ways 1-3?	NO
Sandbags at Bulkhead	Is the sandbag structure deteriorating?	NO
	Is the cover over the sandbags deteriorating?	NO
SCHNITZER ASD YARD (AREA 3) RIVERBANK		
	Is coir fabric coverage continuous?	YES
	Is there visible coir fabric tenting?	NO
	Are there visible signs of erosion (e.g., accumulation of soil, channelization, scarps)?	NO
	Is plastic cover intact underneath south end of Outfitting Dock?	YES
	Is toe of coir fabric adequately staked/armored?	YES

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INSPECTION 9/18/25

GUNDERSON MARINE

Document No 101.1875.13
 Issue Date 07/18/2019
 Rev. 1.0
 Page 1 of 2
 Prepared By Phillip Kolander
 Approved By Soren Hill

DOCUMENT:	Health, Safety and Environment
TITLE:	Bio D Silt Check Inspection Form
SITE:	Gunderson Portland, OR

Visual Wattle Inspection Form

Inspectors Name Phillip Kolander Date 9/18/25

Signature Phillip Kolander Title ENVU TECH

Do the Wattles/ Launch way meet all the Success Criteria for being functional?
 Note: ✓ = yes "..." = functioning but needs attention "0" = Needs repair / replace

Wattles	Upper	Middle	Lower	Minimum of 1	Comments
				functional?	
Ways 1		✓	✓	✓	
Ways 2		✓	✓	✓	
Ways 3	✓	✓		✓	
Ways 4		✓	✓	✓	
Ways 5		✓	✓	✓	
Ways 6		✓	✓	✓	
Ways 7		✓	✓	✓	
Ways 8		✓	✓	✓	
Ways 9		✓	✓	✓	
Ways 10		✓	✓	✓	
Ways 11		✓	✓	✓	
Ways 12		✓	✓	✓	
Ways 13		✓	✓	✓	
Ways 14		✓	✓	✓	
Ways 15	✓	✓		✓	
Ways 16	✓	✓	✓	✓	
Ways 17	✓	✓	✓	✓	
Ways 18		✓	✓	✓	
Ways 19	✓	✓	✓	✓	
Ways 20	✓	✓		✓	
Ways 21	✓	✓	✓	✓	
Ways 22	✓	✓		✓	
Ways 23		✓	✓	✓	
Ways 24		✓	✓	✓	
Ways 25		✓	✓	✓	
Ways 26		✓	✓	✓	
Ways 27		✓	✓	✓	
Ways 28					concrete
Ways 29					concrete
Ways 30					concrete
Ways 31		✓	✓	✓	

NO PROBLEMS FOUND
 DURING WATTLE INSPECTION

GUNDERSON MARINE

Document No 101.1875.17
 Issue Date 07/01/2019
 Rev. 1
 Page 1 of 1
 Prepared By Phillip Kolander
 Approved By David Harvey

DOCUMENT: Health, Safety and Environment
 TITLE: Gundersen River Bank Erosion Inspection Form

Inspectors Name Phillip Kolander Date 10/24/25

Precipitation in the last 24 hours(inches) .1

Unusual River Conditions (eg – flood stage)? NO

Observations, Effectiveness, and Corrective Actions Ordered		
AREA 1 RIVERBANK		
North/Northwest of Ways 2 Bldg		
Filter Strip	Is the filter strip intact and continuous?	YES
	Are there signs of concentrated overbank sheet flow?	NO
AREA 2 RIVERBANK		
North/Northwest of Wonder Bldg		
Riverbank Armoring	Are there visible signs of erosion (e.g., accumulation of soil, channelization)?	NO
	Are there signs of coir fabric deterioration?	NO
	Are there signs of rock/armoring movement?	NO
Filter Strip	Is the filter strip intact and continuous?	YES
	Are there signs of concentrated overbank sheet flow?	NO
Launch Ways		
Wattles	Are the wattle structures deteriorating?	NO
	Are the wattles buried or damaged?	NO
	Is sediment >1/2 the height of the wattle structure?	NO
	Is there evidence of sediment getting around or under the wattle barrier?	NO
} 10/16 INSPECTION		
Launch Ways	Is there accumulation of soil on the bulkhead?	NO
	Are there signs of armoring deterioration between Ways 1-3?	NO
Sandbags at Bulkhead	Is the sandbag structure deteriorating?	NO
	Is the cover over the sandbags deteriorating?	NO
SCHNITZER ASD YARD (AREA 3) RIVERBANK		
	Is coir fabric coverage continuous?	YES
	Is there visible coir fabric tenting?	NO
	Are there visible signs of erosion (e.g., accumulation of soil, channelization, scarps)?	NO
	Is plastic cover intact underneath south end of Outfitting Dock?	YES
	Is toe of coir fabric adequately staked/armored?	YES



Document No 101.1875.13
 Issue Date 07/18/2019
 Rev. 1.0
 Page 1 of 2
 Prepared By Phillip Kolander
 Approved By Soren Hill

DOCUMENT:	Health, Safety and Environment
TITLE:	Bio D Silt Check Inspection Form
SITE:	Gundersen Portland, OR

Visual Wattle Inspection Form

Inspectors Name Phillip Kolander Date 10/16/25

Signature Phillip Kolander Title ENVIRONMENTAL

Do the Wattles/ Launch way meet all the Success Criteria for being functional?
 Note: ✓ = yes "—" = functioning but needs attention "0" = Needs repair / replace

Wattles	Upper	Middle	Lower	Minimum of 1	Comments
				functional?	
Ways 1		✓	✓	✓	
Ways 2		✓	✓	✓	
Ways 3	✓	✓		✓	
Ways 4		✓	✓	✓	
Ways 5		✓	✓	✓	
Ways 6		✓	✓	✓	
Ways 7		✓	✓	✓	
Ways 8		✓	✓	✓	
Ways 9		✓	✓	✓	
Ways 10		✓	✓	✓	
Ways 11		✓	✓	✓	NO PROBLEM FOUND INSPECTION WITH FOTH CONSULTANT
Ways 12		✓	✓	✓	
Ways 13		✓	✓	✓	
Ways 14		✓	✓	✓	
Ways 15	✓	✓	✓	✓	
Ways 16		✓	✓	✓	
Ways 17	✓	✓		✓	
Ways 18		✓	✓	✓	
Ways 19		✓	✓	✓	
Ways 20	✓	✓		✓	
Ways 21		✓	✓	✓	
Ways 22	✓	✓		✓	
Ways 23		✓	✓	✓	
Ways 24		✓	✓	✓	
Ways 25		✓	✓	✓	
Ways 26		✓	✓	✓	
Ways 27		✓	✓	✓	
Ways 28					concrete
Ways 29					concrete
Ways 30					concrete
Ways 31		✓	✓	✓	