EDE ENVIRONMENTAL

January 15, 2026

Mr. Wes Thomas
Oregon Department of Environmental Quality
Northwest Region, Portland Office
Portland Harbor Section
700 NE Multnomah Street, No. 600 EE Project No. 2708
Portland, Oregon 97232 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 December 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 December 2025, with the system operating in full long-term operational mode.

A total of 9,416,557 gallons of water were treated in the on-site groundwater treatment plant and discharged during December 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 December 2025. During December, the system recovered approximately 8 gallons of fluids, with 199 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 December 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 December 2025 in the following wells near the river shoreline.

- MW-16-45
- MW-26U
- MW-27U
- MW-38U
- MW-PW2L
- PW-2L
- PW-13U

Water removal from the Koppers Basin continued during December 2025 as needed to keep the basin free of standing water. At least 568,801 gallons of water were removed from the basin during December 2025 with treatment through the Groundwater Treatment System. The recorded water removal volume for December does not include the volume of water that may have been removed from the basin between December 9 and 17, 2025 due to a meter malfunction. The meter was replaced on December 17, 2025 and is functioning properly. Visual observations during December 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 December include removal of electric pumps and installation of pneumatic pumps in the following pumping wells: PW-4U (December 4), PW-6Ub (December 11), and PW-11Ub (December 18). A second pneumatic pump was installed in PW-6Ub on

December 18 to increase the total pumping rate at this well. Evaluation of the pneumatic pump performance at these locations is ongoing.

Geotechnical borings on the Gasco property (BW-GB-03, -04, and -05) and US Moorings/Gasco property boundary monitoring wells (MW-56U, MW-58F, and MW-59F) as described in the DEQ approved IRAM Data Gaps Investigation Work Plan, dated October 9, 2025 were installed during December.

The following upland FS related field tasks were in progress during December 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 December 2025. No measurable DNAPL was present in wells MW-43F or MW-44F; 0.83 feet of DNAPL was measured within well MW-45F; 0.06 feet of DNAPL was measured within well MW-10-25; and 3.33 feet of DNAPL was measured within well MW-50F during December. 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 (1.81 gallons) was last removed on December 3, 2025.

2. Actions Scheduled to be Taken in the Next Month

Geotechnical borings BW-GB-01 and BW-GB-02 described in the DEQ approved IRAM Data Gaps Investigation Work Plan, dated October 9, 2025 are scheduled for installation on the Siltronic property during January.

Implementation of the Pneumatic Pump Test Plan will continue in January including replacement of electric pumps with pneumatic pumps at the following locations: PW-12U, PW-13U, and PW-14U. 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

The flow meter recording the volume of water pumped from the Koppers Basin stopped working on December 9, 2025. The meter was replaced on December 17, 2025 and is fully functional. The volume of water removed from the Koppers Basin during the December 9 through 17, 2025 timeframe is unknown, though there was no interruption in removal, treatment, or measurement of this water, as combined flow, through the Main Groundwater Treatment Plant flow meter. There were no other problems of significance experienced during the previous month.

Should you have any questions, please contact the undersigned.

Sincerely,

Robert Ede

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