



March 16, 2026

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 February 2026. 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 February 2026, with the system operating in full long-term operational mode.

A total of 8,999,699 gallons of water were treated in the on-site groundwater treatment plant and discharged during February 2026 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 February 2026. During February, the system recovered approximately 8 gallons of fluids, with 217 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 February 2026. 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 February 2026 in the following wells near the river shoreline.

- MW-18-30
- MW-26U
- MW-27U
- MW-38U
- MW-PW2L
- PW-2L
- PW-6L

Water removal from the Koppers Basin continued during February 2026 as needed to keep the basin free of standing water. A total of 834,349 gallons of water were removed from the basin during February 2026 with treatment through the Groundwater Treatment System. Visual observations during February 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 February include removal of electric pumps and installation of pneumatic pumps in the following pumping wells: PW-6L (February 5) and PW-3L (February 12). Evaluation of the pneumatic pump performance at these locations is ongoing. Pneumatic pump installation has been completed at the eleven pumping wells identified in the *Pneumatic Pump Test Plan*. Pumping rates, maintenance intervals, and hydrology

observations will continue to be monitored and evaluated to inform optimization and suitability of pneumatic pumping as an alternative system design element.

Boring ISSUTS-005 (Siltronic property) described in the DEQ approved *IRAM ISS Bench Scale Treatability Study Work Plan*, dated October 9, was installed during February (installation completed February 5, 2026).

Boring installations as described in the January 2026 *Revised IRAM ISS Prism Refinement Work Plan* were initiated on the Gasco property during February.

US Moorings/Gasco property boundary monitoring well MW-57F as described in the DEQ approved *IRAM Data Gaps Investigation Work Plan*, dated October 9, 2025 was installed during February.

In February, NW Natural evaluated the regulatory requirements for removal of brush and trees from the former tar pond area. This evaluation indicated that trees greater than 12-inches in diameter at breast height are regulated by the City of Portland. Anchor QEA identified and marked approximately fifty trees that meet this criterion in the former tar pond area, several of which were identified as in poor health.

The following upland FS related field tasks were in progress during February 2026:

- Monthly measurements of DNAPL presence at Fill WBZ wells MW-10-25, MW-43F, MW-44F, MW-45F, and MW-50F were conducted during February 2026. No measurable DNAPL was present in wells MW-43F or MW-44F; 0.88 feet of DNAPL was measured within well MW-45F; 0.17 feet of DNAPL was measured within well MW-10-25; and 3.45 feet of DNAPL was measured within well MW-50F during February. 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 (2.54 gallons) was last removed on February 26, 2026.

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

Boring installations as described in the January 2026 *Revised IRAM ISS Prism Refinement Work Plan*, initiated during February 2026, will continue through March 2026.

Segment 3 monitoring well installation (MW-54U, MW-54L, MW-55U, and MW-55L) as described in the October 10, 2025 *Segment 3 Well Installation Work Plan*, are anticipated to be installed on the Siltronic property during March 2026.

The routine semi-annual groundwater monitoring event including select wells on the NW Natural and adjacent Siltronic properties will occur during March 2026.

In March, NW Natural will perform selective mowing and cutting of grass, weeds, brush, and small trees/saplings that are exempt from City of Portland tree permitting requirements. To avoid disturbance and rutting of the ground surface, this work will be completed when dry weather and stable ground surface conditions permit. NW Natural will engage with the City of Portland in March/April to confirm the requirements for removal of each of the specific trees identified as potentially requiring a City of Portland tree removal permit.

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,



Rob Ede, RG

Principal

[rede@EdeEnvironmental.com](mailto:red@EdeEnvironmental.com)

cc: Bob Wyatt, NW Natural  
Patty Dost, Pearl Legal Group PC  
Heather Doherty, Pearl Legal Group PC  
John Edwards, Anchor QEA  
Ben Hung, Coalition Environmental LLC  
Ryan Barth, Anchor QEA  
Halah Voges, Anchor QEA  
Jen Mott, Anchor QEA  
John Renda, Anchor QEA  
Tim Stone, Anchor QEA  
Chip Byrd, Severson Environmental Services, Inc.  
Mike Crystal, Severson Environmental Services, Inc.  
Amanda Wozab, DEQ NW Region  
Dan Hafley, DEQ NW Region  
Amber Lutey, DEQ NW Region  
Heidi Nelson, DEQ NW Region  
Samantha Hopman, Siltronic Corporation  
Rachel Brown, Siltronic Corporation  
Sage Ertman, Siltronic Corporation  
Audrey Hackett, Maul Foster Alongi, Inc.  
Courtney Savoie, Maul Foster Alongi, Inc.  
Mike Murray, Maul Foster Alongi, Inc.

Devra Slaughter, Jordan Ramis, PC

David Rabbino, Jordan Ramis, PC

Hunter Young, Region 10 EPA

Lance Peterson, CDM, Inc.