

HAHN AND ASSOCIATES, INC.
ENVIRONMENTAL CONSULTANTS

November 15, 2023

Mr. Wes Thomas
Oregon Department of Environmental Quality
Northwest Region, Portland Office
Portland Harbor Section
700 NE Multnomah Street, #600
Portland, Oregon 97232

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. Thomas,

Hahn and Associates, Inc. (HAI) 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 October 2023. NW Natural is completing upland investigation and 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**

Tasks related to maintenance of the HC&C system and the groundwater treatment system were conducted during October 2023, with the system operating in full long-term operational mode.

A total of 8,254,875 gallons of water were treated in the on-site groundwater treatment plant and discharged during October 2023 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 October 2023. The tank reached capacity during late July and the auto shut-off feature was enabled until the tank contents could be removed for disposal. Recovered liquids were transferred from the storage tank to ten 55-gallon drums for off-site transport and disposal (fuel blending) on October 4, 2023, with the system turned back on and DNAPL recovery resuming at that time. Based on observations during the emptying of the tank, it was estimated that the recovered fluids were approximately 75% DNAPL. The system recovered approximately 15 gallons of fluids in October, estimated to be approximately 75% 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 354 gallons of DNAPL have been recovered from the T-50 sump. No measurable DNAPL was recovered from T-50 during October due to malfunction of the DNAPL pump. During this timeframe, DNAPL entering T-50 accumulates within the sump, with any DNAPL above the top of the sump being

captured by the total fluids pump and sent to the NW Natural pre-treatment system for management with the pumped groundwater. A replacement DNAPL pump as well as several back-up pumps to be maintained in on-site inventory were ordered during October.

Baseline DNAPL removal as needed to maintain levels below the top of the well sumps was conducted by Anchor QEA during October 2023 in the following wells near the river shoreline.

- MW-26U
- MW-27U
- MW-38U
- PW-2L
- PW-6U
- PW-13U
- PW-14U

Water removal from the Koppers Basin continued during October 2023 as needed to keep the basin free of standing water. A total of 116,583 gallons of water were removed from the basin during October 2023 with treatment through the Groundwater Treatment System. Visual observations during October confirmed that the basin remained free of standing water during this timeframe.

Groundwater extraction wells PW-10U and PW-10Lb were decommissioned during the week of October 2, 2023.

The following upland FS related field tasks were in progress during October 2023:

- Monthly measurements of DNAPL presence at Fill WBZ wells MW-10-25, MW-43F, MW-44F, and MW-45F were conducted during October 2023. No measurable DNAPL was present in wells MW-43F or MW-44F; 1.49 feet of DNAPL was measured within well MW-45F; and 1.11 feet of DNAPL was measured within well MW-10-25 during October. The DNAPL from well MW-45F (0.25 gallons) was last removed on July 18, 2023. The DNAPL from MW-10-25 (0.7 gallons) was last removed on November 18, 2022.
- A sample of water discharging from City of Portland Outfall 22C was collected by the project team on October 16, 2023 during a storm event that achieved sampling criteria as specified in the DEQ-approved *Doane Creek Source Control Evaluation Workplan* (updated criteria as approved March 20, 2023). With collection of the October 16, 2023 sample, the outfall sampling scope of work, as included within the DEQ-approved workplan, has now been satisfied.

2. ACTIONS SCHEDULED TO BE TAKEN IN THE NEXT MONTH

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.

The collection of soil embankment samples and surface sediment samples from Doane Creek as described in the January 25, 2023 *Feasibility Study Comprehensive Data Gaps Work Plan*, conditionally approved by DEQ in correspondence dated February 13, 2023, will be completed pending execution of access agreements with BNSF and Portland and Western Railroads.

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. LABORATORY TEST RESULTS RECEIVED DURING THE PREVIOUS MONTH

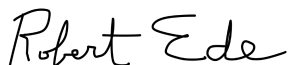
NW Natural receives test results on a regular basis as a result of routine monitoring related to groundwater quality or as specified by various permit requirements. Additionally, test results are periodically received through implementation of task-specific investigation activities resulting from agency-approved work plans. These data are provided to DEQ or the permitting authority (if different than DEQ) in accordance with previously approved formats and schedules.

4. 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, R.G.
Principal

robe@hahnenv.com

cc: Bob Wyatt, NW Natural
Patty Dost, Pearl Legal Group PC
John Edwards, Anchor QEA, L.L.C.

Ben Hung, Coalition Environmental LLC
Ryan Barth, Anchor QEA, L.L.C.
Halah Voges, Anchor QEA, L.L.C.
Jen Mott, Anchor QEA, L.L.C.
John Renda, Anchor QEA, L.L.C.
Tim Stone, Anchor QEA, L.L.C.
Todd Thornburg, Anchor QEA, L.L.C.
Chip Byrd, Severson Environmental Services, Inc.
Mike Crystal, Severson Environmental Services, Inc.
Paul Seidel, DEQ NW Region
Dan Hafley, DEQ NW Region
Amber Lutey, DEQ NW Region
Heidi Nelson, DEQ NW Region
Traci Parker, Siltronic Corporation
Elizabeth Bingold, 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.