

HAHN AND ASSOCIATES, INC.
ENVIRONMENTAL CONSULTANTS

September 15, 2020

Mr. Dana Bayuk
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**

Mr. Bayuk:

Hahn and Associates, Inc. (HAI) has prepared this monthly Progress Report to summarize Remedial Investigation/Feasibility Study (RI/FS) and source control-related work activities conducted by NW Natural relating to historic manufactured gas plant (MGP) activities at the NW Natural Site during the month of August 2020. NW Natural is completing upland investigation and cleanup activities at the NW Natural Site under the Voluntary Agreement No. ECVV-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 August 2020, with the system operating in full long-term operational mode.

A total of 9,411,961 gallons of water were treated in the on-site groundwater treatment plant and discharged during August 2020 with all monitoring and reporting completed in accordance with the facility's NPDES permit.

HAI field activities related to monitoring and maintenance of the dense non-aqueous phase liquid (DNAPL) extraction system at Fill WBZ well locations MW-6-32 and MW-13-30 occurred during August 2020. The system's storage tank had reached capacity during July and the extraction system was turned off July 30, 2020. The tank was emptied on August 28, 2020, at which time the system was turned back on. The tank contents were transferred to 10 55-gallon drums pending off-site transport for fuel blending in accordance with the current waste profile for these liquids. After resuming operation on August 28, 2020, the system recovered approximately 2 gallons of fluids during the balance of August.

Weekly manual water level measurements within the former Koppers tank basin and select adjacent wells and piezometers were completed during August 2020.

Baseline DNAPL removal as needed to maintain levels below the top of the well sumps was conducted by Anchor QEA during August 2020 in the following wells near the river shoreline.

- MW-26U

- MW-27U
- MW-38U
- MW-PW-2L
- PW-2L
- PW-6U

The design for the planned Fill Water Bearing Zone interceptor trench was provided to DEQ on August 13, 2020.

The design for planned extraction well PW-8Ub was provided to DEQ on August 17, 2020.

The following upland FS related field tasks were in progress during August 2020:

- Weekly measurements of DNAPL presence at Fill WBZ wells MW-43F, MW-44F, and MW-45F have been conducted since August 2017. During August, measurements recorded up to 0.02 feet of DNAPL in the base of well MW-43F (black; high viscosity appearance); 0.02 feet of DNAPL within well MW-44F (black oily sediment on probe tip); and up to 1.60 feet of DNAPL within well MW-45F (brown; low viscosity appearance).

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.

Tasks related to routine maintenance of the HC&C system and the groundwater treatment system will be conducted.

Weekly manual water level measurements within the former Koppers tank basin and select adjacent wells or piezometers will be conducted.

A DNAPL sample will be collected for laboratory DNAPL mobility assessment testing from wells MW-43F and MW-44F should measurable thicknesses / sufficient volumes be identified at these locations during this timeframe. It is estimated that a minimum thickness of 0.5 feet of DNAPL accumulation will be necessary in order to collect sufficient sample volume for the laboratory.

Routine groundwater monitoring activities as part of the Integrated Groundwater Monitoring Program will be initiated in September 2020 and will continue into October.

Construction of the Fill Water Bearing Zone interceptor trench is anticipated to start in October, pending DEQ approval.

Installation of extraction well PW-8Ub is anticipated to occur in October, pending DEQ approval.

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: Mr. Bob Wyatt, NW Natural
Ms. Patty Dost, Pearl Legal Group PC
Ms. Sarah Riddle, Pearl Legal Group PC
Mr. John Edwards, Anchor QEA, L.L.C.
Mr. Ben Hung, Coalition Environmental LLC
Mr. Ryan Barth, Anchor QEA, L.L.C.
Ms. Halah Voges, Anchor QEA, L.L.C.
Ms. Jen Mott, Anchor QEA, L.L.C.
Mr. John Renda, Anchor QEA, L.L.C.
Mr. Tim Stone, Anchor QEA, L.L.C.
Mr. Todd Thornburg, Anchor QEA, L.L.C.
Ms. Grace Weatherford, Anchor QEA, L.L.C.
Mr. Chip Byrd, Severson Environmental Services, Inc.
Mr. Henning Larsen, DEQ NW Region
Mr. Paul Seidel, DEQ NW Region
Mr. Dan Hafley, DEQ NW Region
Ms. Jennifer Peterson, DEQ NW Region
Mr. Mike Poulsen, DEQ NW Region
Mr. Myron Burr, Siltronic Corporation
Mr. Mike Murray, Maul Foster & Alongi, Inc.
Ms. Mary Benzinger, Maul Foster & Alongi, Inc.
Ms. Kelly Titkemeier, Maul Foster & Alongi, Inc.
Mr. David Rabbino, Jordan Ramis, PC
Mr. Hunter Young, Region 10 EPA
Mr. Lance Peterson, CDM, Inc.