

**HAHN AND ASSOCIATES, INC.**  
ENVIRONMENTAL CONSULTANTS

January 16, 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 activities conducted by NW Natural relating to historic manufactured gas plant (MGP) activities at the NW Natural Site during the month of December 2022. 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 December 2022, with the system operating in full long-term operational mode.

A total of 9,366,138 gallons of water were treated in the on-site groundwater treatment plant and discharged during December 2022 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 WBZ well locations MW-6-32 and MW-13-30 occurred during December 2022. The system recovered approximately 10 gallons of fluids in December. Recovered fluids (accumulating since tank emptying on April 28, 2022) are estimated to be between 40% and 50% DNAPL with 220 gallons of total fluids in tank storage.

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 67 gallons of DNAPL have been recovered from the T-50 sump, approximately 24 gallons of which were recovered during December 2022.

Routine quarterly monitoring activities for select Fill WBZ wells was completed during December 2022.

Baseline DNAPL removal as needed to maintain levels below the top of the well sumps was conducted by Anchor QEA during December 2022 in the following wells near the river shoreline.

- MW-16-45
- MW-18-30
- MW-26U
- MW-27U
- MW-34L
- MW-38U
- MW-PW-2L
- PW-2L

Removal of standing water from within the Koppers Basin was initiated on May 27, 2022 with the use of a temporary pump and treatment of all water through the Groundwater Treatment System. All standing water was removed from the basin by September 9, 2022 and all vegetation was manually cleared from the basin during October 2022. Water removal continued during December 2022 as needed to keep the basin free of standing water. A total of 443,139 gallons of water were removed from the basin during December 2022. Weekly manual water level measurements within select wells and piezometers adjacent to the Koppers Basin continued during December 2022.

The following upland FS related field tasks were in progress during December 2022:

- Monthly measurements of DNAPL presence at Fill WBZ wells MW-10-25, MW-43F, MW-44F, and MW-45F were conducted during December 2022. No observable DNAPL was present within wells MW-43F or MW-44F; 0.19 feet of DNAPL was present within well MW-45F; and 0.33 feet of DNAPL was present within well MW-10-25 during December. The DNAPL from wells MW-45F (0.5 gallons) and MW-10-25 (0.7 gallons) was last removed on November 18, 2022.

## **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 during January.

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

Activities related to permanent pump placement and related plumbing and controls within the former Koppers tank basin are anticipated to be complete during January. In the meantime, surface water from within the basin will be pumped out with the current temporary pumping system. Weekly manual water level measurements within the former Koppers tank basin and select adjacent wells or piezometers will continue during this timeframe.

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.

A sample of water discharging from City of Portland Outfall 22C may be collected at the discretion of the project team from the City of Portland Outfall 22C during January if storm event or baseflow sampling criteria, as specified in the DEQ-approved *Doane Creek Source Control Evaluation Workplan*, are satisfied.

### **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

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cc: Mr. Bob Wyatt, NW Natural  
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