

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

March 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 activities conducted by NW Natural relating to historic manufactured gas plant (MGP) activities at the NW Natural Site during the month of February 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 February 2023, with the system operating in full long-term operational mode.

A total of 8,740,303 gallons of water were treated in the on-site groundwater treatment plant and discharged during February 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 February 2023. The system recovered approximately 27 gallons of fluids in February. Recovered fluids (accumulating since tank emptying on April 28, 2022) are estimated to be between 50% and 60% DNAPL with 330 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 112 gallons of DNAPL have been recovered from the T-50 sump, approximately 17 gallons of which were recovered during February 2023.

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

- MW-18-30
- MW-26U

- MW-27U
- MW-38U
- MW-PW2L
- PW-2L
- PW-6U
- PW-13U
- PW-14U

Water removal from the Koppers Basin continued during February 2023 as needed to keep the basin free of standing water. A total of 798,988 gallons of water were removed from the basin during February 2023 with treatment through the Groundwater Treatment System. Weekly manual water level measurements within select wells and piezometers adjacent to the Koppers Basin were discontinued during February 2023 as approved by DEQ in correspondence dated February 22, 2023. Visual observations during February confirmed that the basin remained free of standing water during this timeframe.

Pumping tests of select Fill WBZ monitoring wells as described in the DEQ approved *Feasibility Study Comprehensive Data Gaps Work Plan* were initiated during February 2023.

Activities related to permanent pump placement (plumbing and electrical) within the former Koppers tank basin were completed by the end of February 2023. Programming and testing software to monitor and control the pump were initiated during February.

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

- Monthly measurements of DNAPL presence at Fill WBZ wells MW-10-25, MW-43F, MW-44F, and MW-45F were conducted during February 2023. No observable DNAPL was present within wells MW-43F or MW-44F; 0.57 feet of DNAPL was present within well MW-45F; and 0.71 feet of DNAPL was present within well MW-10-25 during February. 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 March.

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

Activities related to programming and testing software to monitor and control the permanent pump installed within the former Koppers tank basin will be complete

during March, allowing the surface water removal to transition from the temporary pump to the permanent pump during this timeframe (permanent pump became operational on March 13, 2023). The Koppers tank basin will continue to be visually monitored to ensure that it remains free of standing water.

Pumping tests of select Fill WBZ monitoring wells as described in the DEQ conditionally approved *Feasibility Study Comprehensive Data Gaps Work Plan*, initiated during February 2023, will be completed during March 2023.

The routine semi-annual groundwater monitoring event including select wells on the NW Natural and adjacent Siltronic properties will begin during March 2023.

Installation of replacement well PW-10Lc will begin during March 2023.

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 March 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**

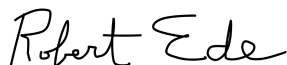
NW Natural receives test results on a regular basis as a result of routine monitoring related to groundwater quality or as specified by various permit requirements. Additionally, test results are periodically received through implementation of task-specific investigation activities resulting from agency-approved 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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