

2024-03-01_Gasco OU FS PM Call

Meeting Title:	Gasco OU FS PM Call
Date/Time:	March 1, 2024 / 1:00 - 2:00 pm
Attendees:	AQ: Halah Voges HAI: Rob Ede DEQ: Wes Thomas
Location:	WebEx Meeting

Meeting Notes:

- Cyanide
 - AQ requests clarification about cyanide evaluations in the FS.
 - DEQ requests that NW Natural map and screen total, available, and free cyanide, but footnote on tables and figures that free and available cyanide are used to evaluate risk and plan the remedial actions. Total cyanide is for informational purposes.
 - DEQ requests that available and free cyanide be screened independently, similar to how NW Natural evaluated cyanide in the Deep Lower Alluvium SCE.
- IRAM/FS Path Forward
 - HAI/AQ are evaluating residual DNAPL in bulk ISS area and where we have data to further refine our understanding of DNAPL in the bulk ISS area. After a preliminary review of some of the TarGOST boring logs from the bulk ISS area, it looks like some of the areas mapped as residual DNAPL are driven by small and isolated blips in the TarGOST data that barely plots above the 5% background RE response. AQ working towards completing a more complete data screening by the end of next week, with the goal of sharing the information towards the end of March.
 - DEQ reviews previous information relevant to identifying different levels DNAPL saturations and apparent discrepancies in the DNAPL characterization lines of evidence that AQ presented during an August 10, 2023 meeting and the extent of DNAPL figures recently provided on January 29, 2023. The discrepancy highlights the need for DEQ to review the information behind the DNAPL mapping in more detail before it can be used to finely define the scope of bulk ISS treatment as part of the IRAM.
 - DEQ has also previously expressed the need to review groundwater model before we can use it to define the scope of hydraulic controls associated with the IRAM.
 - In general, I believe NW Natural and DEQ agree in concept about the scope of the IRAM. DEQ does not think the scope of each individual the IRAM elements needs to be rigidly defined (the hydraulic controls, or the characteristics of DNAPL that would warrant bulk ISS treatment) at this stage. We believe it would be more appropriate to use the IRAM BODR and the FS to move these concepts forward and provide further definition and detail. This approach would give us the opportunity to meet as technical teams to work through performance standards and develop the necessary lines of evidence for the bulk ISS work without stalling on the FS or the IRAM BODR schedule.
 - The next step should be to prepare the brief memo that conceptually outlines the revised IRAM. Ideally that could be prepared in the next few weeks. For the bulk ISS area, we recommend just saying that bulk ISS treatment of DNAPL will be performed. While that is being reviewed by DEQ and stakeholders, we should be preparing a revised schedule for the FS. We should discuss which deliverable (IRAM BODR/FS) will contain certain information needed to support both documents, or whether some of this information will be provided in a preceding deliverable.
 - HAI will discuss that approach with NW Natural. HAI/AQ anticipate some concern moving forward with the IRAM concept without refining the criteria for DNAPL treatment. If the threshold for treatment is left undefined, there could be a significant range in the potential scope and cost of the IRAM. NW Natural may not want to move forward until we have at least had the opportunity to screen the available DNAPL data and discuss those data with DEQ. HAI hopes that the data screening process would at least confirm the scale of the proposed IRAM.

- HAI/AQ/DEQ discuss a meeting the first week of April to discuss the DNAPL results. HAI/AQ anticipate another in-person meeting with the same attendees that attended the previous two meetings. We can confirm attendees and the scope of the meeting during our next bi-weekly check-in.
- Segment 3 Source Control Evaluation
 - AQ is working through the Segment 3 Source Control Evaluation in parallel with the DNAPL evaluation. AQ has completed a data screening against ROD Table 17 CULs, but is also planning on evaluating groundwater on a flux basis.
 - HAI/AQ would like to discuss the preliminary results with DEQ during our April meeting with the goal of discussing how the SCE results will inform the FS alternatives.
- Doane Creek Site visit
 - DEQ needs to have BNSF training before the site visit. The training is about 2 hours.
 - AQ is planning to flag the sample locations in March and clear any vegetation necessary to provide access to the creek. AQ planning to sample in early to mid April. Ideally DEQ could visit the site to walk Doane Creek in between the flagging and sampling. May be a good opportunity to piggyback the site visit with the in-person meeting.
- FS alternatives
 - HAI asks if DEQ has given any more thought to Alternative 7 for the Tar Ponds and other areas with accessible DNAPL.
 - DEQ is bound by Statute and Rule. DEQ has not given it any more specific thought.
 - HAI/AQ will just use their best judgement to present an alternative that they believe meet DEQ's requirements.