

2024-05-23_Gasco OU FS PM Call

Meeting Title:	Gasco OU FS PM Call
Date/Time:	May 23, 2024 / 10:30 - 11:30 am
Attendees:	AQ: Halah Voges EE: Rob Ede DEQ: Wes Thomas
Location:	WebEx Meeting

Meeting Notes:

- IRAM Concept Letter
 - DEQ received the concept letter, and we have distributed it to the TCT and to Siltronic to review in parallel with the DEQ technical team. We have received requests from interested parties to discuss questions.
 - Once we have received external feedback, DEQ will prepare a response that documents our decision about the IRAM concept and the path forward. DEQ will need to coordinate review of our decision letter internally and coordinate with DOJ before it is finalized. The decision letter will include the IRAM concept, background information, and the path forward. We will attached technical comments on SCA to the letter. The path forward will be to resolve the SCA comments in the BODR.
 - EE anticipating BODR in November timeframe. The BODR will respond to DEQ's technical comments and either resolve them or identify the future design phase where they will be resolved. The BODR will include work plans for treatability testing and additional DNAPL delineation. The BODR will also include design-level refinements of the DNAPL maps. EE notes that they would likely submit the revised DNAPL maps in advance of the BODR.
 - DEQ agrees that the design-level updated DNAPL maps are critical for the BODR, and we are happy to receive them in advance of the BODR.
- Segment 3 SCE
 - EE states that NW Natural is working through the Segment 3 source control evaluation. Based on current progress, EE anticipates it will be completed and submitted in late June. EE and AQ can provide additional information about the SCE contents during our next check in meeting.
- DNAPL modeling
 - AQ is completing the 2D DNAPL modeling work that was discussed during the May 9th technical meeting. EE/AQ agree that the 2D approach will provide the necessary information to support the FS and that more detailed modeling is unnecessary.
 - EE/AQ/DEQ discuss reconvening the technical team to discuss the work on June 6.
 - DEQ agrees, but notes that the discussions should not affect the FS schedule.
- PGE
 - PGE notified NW Natural that their plans to update the power lines at Siltronic have resumed. Construction is planned for August 2024. PGE is not planning to adjust the location of their deeper pier based on their PDI observations. Instead, PGE will modify the construction H&S plan to address H2S risks during construction. EE plans to observe the work. Groundwater encountered during the work will be treated by the groundwater treatment system consistent with the draft CMMP.
- Doane Creek sampling -
 - AQ was unable to access Doane creek for sampling due to dense vegetation. AQ is in the process of hiring a contractor to clear the vegetation, but contractor will need to have or obtain railroad H&S training before the work can begin.
- Beneficial use of ISS swell.
 - EE states that NW Natural is beginning to think about how to best manage ISS swell during the IRAM, and is considering on-site beneficial use applications. EE recognizes

- that a lot of work and analysis is needed before any decisions are needed about ISS swell management, including how swell management would integrate with other upland cleanup work. In the meantime, EE requests information about the administrative process needed for on-site beneficial use of swell.
- DEQ will coordinate with solid waste to determine if a letter of authorization or beneficial use determination would be needed.
 - Work plan for empirical evaluation of DNAPL recovery.
 - AQ indicates that they are interested in developing a work plan to conduct empirical evaluations of DNAPL mobility and recovery. The work would likely involve installing wells in areas with potentially mobile DNAPL and measuring DNAPL recovery. EE/AQ believe that the evaluation could take a long time, and would help to accelerate upland RD after the remedy is selected.
 - DEQ believes the work is premature, but will consider reviewing the proposed scope of work.
 - FS schedule
 - DEQ needs a revised schedule to extend the FS deadline, which is set as May 28th. The information in AQ's February 9, 2024 email is not sufficient.
 - AQ presented a draft schedule in our April 11, 2024 meeting.
 - The draft schedule presented in April requests an 8 month extension (to January 25, 2025) and is not acceptable to DEQ. That draft schedule included a 4 month MT3D modeling period to evaluate DNAPL dissolution that AQ/EE/DEQ had subsequently agreed is unnecessary.
 - AQ/EE note that NW Natural is doing a lot of work to complete the in-water RD, then IRAM BODR, and the FS, all in parallel.
 - DEQ believes that the FS takes priority over the IRAM BODR.
 - EE does not think that a few extra months is going to make a big difference in the overall timeline to clean up the site.
 - DEQ reiterates that the FS is our priority. We do not understand the need for an 8 month extension on a schedule that originally proposed a 6 month period to complete the FS writing. That 6 month period was preceded by a 1 year period of technical meetings, which began 1 year after DEQ approved the Interim FS. Its now been 2.5 years since the Interim FS was complete. We recognize that the Gasco OU FS is a lot of work, but NW Natural has already have 2.5 years to work on it.
 - DEQ reiterates that we need a revised schedule to extend the FS deadline, and we have yet to receive one.
 - AQ/EE will need to discuss internally and coordinate with NW Natural to review the schedule further. AQ/EE do not think they will be able to get a revised schedule by May 28th.
 - If AQ/EE cannot provide a revised schedule by May 28th, then DEQ needs to know by May 28th when AQ/EE can provide a revised schedule. We can respond to AQ's February 9th email with a deadline for submitting an acceptable revised schedule.
 - AQ/EE will follow up once they have discussed internally.