



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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June 5, 2024

Bob Wyatt
NW Natural
220 NW 2nd Avenue
Portland, OR 97209

via electronic delivery (email)

**Re: Gasco Operable Unit Feasibility Study Schedule Revision
Former Gasco Manufactured Gas Plant Operable Unit
Portland, Oregon
ECSI# 84 and # 183**

Dear Mr. Wyatt:

The Oregon Department of Environmental Quality (DEQ) has prepared this letter to approve the Former Gasco Manufactured Gas Plant Operable Unit (Gasco OU) Feasibility Study (FS) schedule revision¹, consistent with Section 1.B. of the Voluntary Agreement for Remedial Investigation/Feasibility Study (DEQ No. WMCVC-NWR-94-13)², as amended^{3,4}. Anchor QEA, LLC submitted the Gasco OU FS schedule to DEQ on May 31, 2024 on behalf of NW Natural. The schedule revision updates the previously conditionally approved⁵ Gasco OU FS schedule⁶ and addresses DEQ's comments⁷ on a proposed Gasco OU FS schedule revision⁸ submitted on May 30th.

The Gasco OU FS schedule revision shows the draft Gasco OU FS will be submitted to DEQ on December 15, 2024. DEQ establishes **December 15, 2024** as the deadline for submitting the Gasco OU FS. In our opinion, NW Natural has had a reasonable amount of time to complete the draft Gasco OU FS.

Our general comments and clarifications on the revised schedule are provided below.

General Comments

- 1) The revised schedule transmittal email states that the FS alternatives will include the ISS barrier wall as presented in the *Source Control Interim Remedial Action Measure Concept and Agreement to Move into Design*⁹ (IRAM Concept) letter. DEQ acknowledges NW Natural's decision to incorporate the ISS barrier wall into the FS alternatives. DEQ's review of the draft Gasco OU FS will determine whether this approach meets our requirements. Regarding the ISS barrier wall alignment shown in the

¹ Anchor QEA. 2024. Email to Wesley Thomas (DEQ). Subject: RE: Updated FS Schedule to be provided this Friday (5/31). May 31.

² DEQ. 1994. Voluntary Agreement for Remedial Investigation/Feasibility Study. DEQ No. WMCVC-NWR-94-13. August 8.

³ DEQ. 2006. First Addendum to Voluntary Agreement for Remedial Investigation/Feasibility Study. DEQ No. WMCVC-NWR-94-13. July 19.

⁴ DEQ. 2016. Second Addendum to Voluntary Agreement for Remedial Investigation/Feasibility Study. DEQ No. WMCVC-NWR-94-13. October 11.

⁵ DEQ. 2023. Letter to Bob Wyatt (NW Natural). Regarding: Gasco Operable Unit Feasibility Study Schedule, Former Gasco Manufactured Gas Plant Operable Unit, Portland, Oregon, ECSI# 84 and #183. July 25.

⁶ Anchor QEA. 2023. Email to Wesley Thomas (DEQ). Subject: Gasco OU Upland FS Schedule. July 21.

⁷ DEQ. 2024. Email to Bob Wyatt (NW Natural) and Halah Voges (Anchor QEA). Subject: RE: Updated FS Schedule to be provided this Friday (5/31). May 30.

⁸ Anchor QEA. 2024. Email to Wesley Thomas (DEQ). Subject: RE: Updated FS Schedule to be provided this Friday (5/31). May 30.

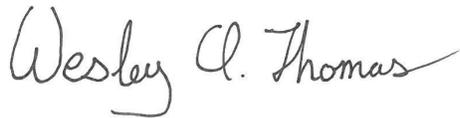
⁹ Ede Environmental, LLC. 2024. Letter to Wes Thomas (DEQ). Subject: Source Control Interim Remedial Action Measure Concept and Agreement to Move into Design, NW Natural Gasco Site, 7900 NW St. Helens Road, Portland, Oregon. May 9.

IRAM Concept letter, DEQ has not agreed to extending the wall any minimum distance onto the Siltronic property. The ISS barrier wall should not extend beyond the limit of DNAPL in the Alluvium water bearing zone (WBZ).

- 2) The revised schedule transmittal email states that the schedule assumes that NW Natural completes the FS without need for interim deliverables or requests from DEQ for additional discussions regarding FS elements. DEQ considers discussions with NW Natural related to the draft Gasco OU FS to be complete.

Please do not hesitate to contact me at (971) 263-8822 or Wesley.Thomas@deq.oregon.gov if you have any questions regarding this letter.

Sincerely,



Wesley A. Thomas
Project Manager
NWR Cleanup Section

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CC: ECSI No. 84 File
ECSI No. 183 File