

2024-07-02_Gasco OU FS PM Call

Meeting Title:	Gasco OU FS PM Call
Date/Time:	July 2, 2024 / 11:00 am - 12:00 pm
Attendees:	AQ: Halah Voges EE: Rob Ede DEQ: Wes Thomas
Location:	WebEx Meeting

Meeting Notes:

- IRAM Decision Letter
 - DEQ anticipates sending our IRAM decision letter within the next business day or two. DEQ provides a high-level overview of the decision letter. The letter will include a summary of the IRAM and the source control/removal action objectives assigned to the IRAM, a background section, and a path forward section. The path forward will be to proceed to the BODR. We plan on attaching our comments on the IRAM concept letter that EE provided in May, and to the SCA Addendum from last year.
 - EE asks about DLA SCE comments.
 - DEQ provides a summary of our comments on the DLA SCE.
 - EE/AQ ask about the nature of the source control and removal action objectives.
 - DEQ is not assigning prescriptive requirements or design criteria. The objectives will be higher level, and our letter will ask NW Natural to develop the more detailed design criteria in the BODR based on the high level objectives
 - EE/AQ ask about the schedule requirement for preparing the BODR.
 - DEQ does not plan on providing a required schedule for the BODR.
- ISS Case Studies
 - EE inquires about other sites where DEQ has overseen ISS work.
 - DEQ mentions the University of Portland site (Heidi is the PM) where deep soil mixing was done. In that case, the soil mixing had to be compatible with potential contamination but was not the remedial action. DEQ also mentions West Doane Lake and Arkema.
- Beneficial Reuse of ISS swell
 - EE follows up about administrative requirements for managing swell material on-site.
 - DEQ is able to wave the need to obtain a SW letter of authorization, but would need to ensure that the substantive requirements applied. DEQ can work with solid waste staff during submittal reviews to make sure that the requirements are documented and incorporated into our comments.
 - A CAMU would only be needed if F-listed waste was going to be placed on-site. DEQ recommends evaluating the potential for cVOC leaching post-ISS treatment, and pursuing a contained out determination, if appropriate, as an alternative to developing a CAMU.
 - DEQ notes that the biggest challenge for long-term management of ISS swell on-site will be finding an acceptable location for placement that will not interfere with other necessary cleanup work.
 - EE asks if in-water ISS swell can be stockpiled on-site while it is characterized it.
 - DEQ can follow up with the specific requirements for stockpiling in-water ISS swell, but does not anticipate an administrative prohibition.
- Doane Creek sampling
 - Sampling is scheduled to begin in July. Vegetation will be cleared the week of July 9th, and sampling is expected the week of July 15th.
- HC&C update
 - After a software update to the HC&C data logging computer, AQ discovered that pumping flowrates and water levels were not recorded for a week. The HC&C system continued to operate, and AQ is able to provide GTS influent flow data to demonstrate

that pumping was occurring at appropriate rates. AQ has fixed the software issue, and the computer is logging data again. AQ will note the error in the appropriate HC&C monitoring submittals, but wanted to notify DEQ promptly.

- DEQ flags the desire to have the new NW Region manager visit the site at the next appropriate and convenient time. Likely in 2025 when IRAM pre-design work is going on.