

2024-09-05_Gasco OU Check-In Meeting

Meeting Title:	Gasco OU Check-In Meeting
Date/Time:	September 5, 2024 / 10:30 am - 11:30 am
Attendees:	AQ: Halah Voges EE: Rob Ede DEQ: Wes Thomas
Location:	WebEx Meeting

Meeting Notes:

- Segment 3 SCE
 - EE/AQ request a status update about DEQ's review of the Segment 3 SCE.
 - DEQ is in the process of reviewing the SCE. We are also anticipating comments from Siltronic and the TCT. DEQ plans to meet with EPA to discuss the SCE and get their feedback. We also plan to meet with Siltronic before they send written comments. Ideally we would be able to provide comments on the SCE in late September or early October.
 - EE/AQ ask if DEQ has already met with Siltronic.
 - DEQ had a preliminary discussion with Siltronic. Siltronic had questions about the source control status for the Fill WBZ in Segment 3. DEQ's understanding is that the source control approach for the Fill WBZ in Segment 3 will be evaluated/addressed in the FS.
 - EE/AQ confirm that approach.
 - DEQ provides high level summary of key Segment 3 SCE observations thus far:
 - At a high level, the SCE is a simple screening. DEQ anticipates requesting additional data statistics (frequency of detection, etc.) and revising the data screening to consider each groundwater RAO separately, similar to what was done for the Deep Lower Alluvium WBZ.
 - When DEQ was reviewing the data screening, we noticed that NW Natural was not using the most current groundwater data for several of the permanent monitoring wells. The data does not appear to incorporate sampling results reported by Siltronic under the Joint Order. The more recent results appear to change a lot of the data screening results, particularly for TCE and vinyl chloride, and since those two COCs are central to the SCE, it is important for the SCE to incorporate and evaluate the most current data. DEQ asks about whether there is a process for incorporating Siltronic's EIB monitoring into the Gasco database.
 - EE/AQ indicate that the Gasco database is updated periodically, but the last time Siltronic data was incorporated was either for the RI/HERA Addendum and/or the Siltronic data gaps investigation work.
 - DEQ thinks it is important to use current data for the Segment 3 SCE. We intend to make that comment, so if there is a coordination step needed to incorporate Siltronic's data, NW Natural can begin that process now instead of waiting for our comments.
 - EE understands DEQ's observation. The Segment 3 SCE can be revised to incorporate Siltronic's data, but at the end of the day, it is important to NW Natural to get approval to extend the barrier wall. NW Natural wants to be able to get that portion of the barrier wall under design so that it can be constructed as an IRAM concurrent with the sediment remedy.
 - ◆ DEQ understands NW Natural's goal. As it stands, the Segment 3 SCE does not provide enough information to support DEQ's approval to extend the wall and will require a revision. While we understand NW Natural's desire to be able to construct this segment of the barrier wall concurrent with the sediment remedy, we don't see any reason to rush this decision and do not see that it has any impact on the design schedule. The IRAM pre-design investigation and treatability studies will take months to plan and even longer to implement. We are years away from being in a position to construct the barrier wall. DEQ believes it is important to

take the necessary time to review and consider the decision, and we do not see any impact that taking the necessary time will affect the timing and timeline for the IRAM design and construction.

- ◆ EE notes that NW Natural will make the necessary revisions to the Segment 3 SCE.
 - Furthermore, DEQ did not appreciate the footnotes NW Natural included in the Sediment Site BODR that stated NW Natural's intent to extend the barrier wall with or without DEQ's approval. DEQ has worked hard to find a path forward for the IRAM, including delaying the FS, which is our priority. NW Natural's statements in the BODR were counterproductive.
 - Getting back to the Segment 3 SCE, DEQ thinks the SCE will need to provide some additional discussion about data adequacy, particularly for the Segment 3 area, which does not include any permanent well installations. The groundwater grab sampling results are ~20 years old at this point. Given the changes in TCE and vinyl chloride concentrations since the EIB program was implemented, we no longer consider the data collected from 2001/2005 to be representative of current conditions. Perhaps NW Natural could compare the groundwater grab sample results for other COCs (like benzene) to trends in the permanent wells to evaluate whether they are still representative of current conditions for those COCs. In addition, DEQ will very likely request additional permanent monitoring wells in Segment 3. At this point, we don't know that NW Natural needs to install wells and collect data before revisiting the SCE, but the review of the SCE has highlighted the need for wells. In addition, if the wall does get extended, then these permanent wells will become important for evaluating IRAM performance, and we want to adequately characterize groundwater conditions in this location before the IRAM is constructed and the hydraulic controls become operational.
- IRAM Updates
 - EE/AQ are preparing a deliverable to support the IRAM bulk ISS treatment prism. The deliverable will include available DNAPL data and the applications of the lines of evidence described in the IRAM concept letter. EE anticipates submitting the deliverable to DEQ towards the end of September.
 - DEQ appreciates the notification that the deliverable is coming. Last time we met, DEQ brought up questions about IRAM PDI data gaps. Further delineation/mapping of DNAPL may be a data gap that needs to be filled, and we are concerned about going through the ISS prism delineation process twice. It is likely a more efficient use of resources to wait and apply the lines of evidence to finalize the ISS prisms after the IRAM PDI.
 - EE states that NW Natural is approaching the bulk ISS as an IRAM, and would like to focus additional data collection and prism refinement within the ISS prisms, once those are established (i.e., not collect information to fill data gaps outside of where DNAPL is currently mapped). NW Natural understands that DEQ may identify data needs beyond the IRAM ISS prisms, but would like to fill those data gaps when implementing the final upland remedy, even if that means doing additional work within the IRAM area of focus.
 - DEQ notes that NW Natural's desired approach creates a risk of doing the same scope of work twice. It is unclear why we would not just treat all of the DNAPL warranting treatment within the area of focus once, while the equipment is mobilized to the site.
 - EE states that is a risk NW Natural is willing to take.
 - EE suggests allowing them to submit the ISS prism deliverable, and then DEQ and the NW Natural technical team can discuss the deliverable and potential data gaps afterwards. EE thinks the evaluation would be useful for having data gaps discussions.
- ISS/CSM Case Studies
 - EE is seeking construction information related to the ISM construction that was completed at the University of Portland site.
 - DEQ will discuss internally to see if there has been any construction completion reporting with the information.
 - EE/AQ note that some of DEQ's comments on the Revised Source Control Addendum referenced conducting tomography surveys to identify subsurface debris. EE/AQ request examples of where similar approaches were taken.
 - DEQ does not recall specifically recommending tomography. DEQ will review

comments, and discuss internally.

- Feasibility Study
 - NW Natural team is continuing to make progress on the FS consistent with the approved schedule.
- Seismic Hazard Analysis Work Plan
 - DEQ appreciates the consideration NW Natural and HDR gave to our comments.
- Other document reviews
 - DEQ anticipates providing comments on the HC&C System Annual Report and the LNG Basin Interceptor Trench report within the next couple of days.
- GEI Updates
 - The new GEI project manager is Carissa Mason. Carissa is being onboarded to the project. The core GEI technical team will not change.
- PGE Infrastructure Work
 - EE states that PGE is planning to drill the new piers for the additional power transmission lines in the next week or two. EE/AQ will be coordinating with PGE over water management, and may observe portions of the work.
 - DEQ recommends that EE/AQ document the work as it may relate to upland cleanup decision making and implementation.
 - EE agrees that they are planning to observe and document the work.