2024-10-03_Gasco OU Check-In Meeting

Meeting Title:	Gasco OU Check-In Meeting
Date/Time:	October 3, 2024 / 10:30 am - 11:30 am
Attendees:	EE: Rob Ede DEQ: Wes Thomas
Location:	WebEx Meeting

Meeting Notes:

- Segment 3 SCE
  - DEQ plans to provide comments within the next few days.
  - EE asks about the nature of the comments and whether it will include a conditional approval.
    - DEQ acknowleges that NW Natural is seeking approval to extend the wall and ideally would like conditional approval to extend the wall, pending revisions to the SCE. At this point in time, DEQ would like to have a revision of the SCE before we approve incorporating the extended wall into the design.
    - DEQ notes that we would not be asking for a revision of the SCE if we did not think there was a viable path forward.
    - DEQ provides a brief overview of the nature of the comments.

- IRAM Updates
  - EE discusses the current status of IRAM planning. NW Natural team are thinking about how and when to set up a meeting with DEQ to discuss potential IRAM data gaps, the scope of the pre-design investigation, and the treatability study. There may be value in additional discussion about the approach to a field pilot study.
  - DEQ agrees that these are topics that it would be good to discuss as a team. We do not have pressing concerns, but would like to think about the timing for initiating these discussions so that our team is ready to engage.
  - EE notes that NW Natural is still working on a deliverable that provides the basis for the proposed ISS prisms. The timeframe for submitting the evaluation is uncertain, but it should be a good deliverable to get those conversations stated.
  - EE also indicates that there are other topics that NW Natural is starting to think through, and will want to have discussions with DEQ about. The biggest one is the potential for beneficially reusing ISS treated sediments and upland soils on-site. It is a benefit to NW Natural to try to manage material on-site, if possible. EE recognizes that some of the key issues are 1) the compatability with the upland site remedy, and 2) thinking through whether and how material could be managed during the interim period between upland remedy implementation and the final placement of treated materials on site.
    - DEQ agrees that these are critical items for us to discuss. It will be good for us to have those conversations after we have the chance to review the FS, so that we can understand whether the FS-recommended remedial alternative aligns with our expectations.
    - EE agrees that it would be good to discuss beneficial reuse after DEQ has an understanding about NW Natural's recommended remedial action.
  - NW Natural is also thinking through the best overall approach between a field pilot study versus an initial trial phase preceding full scale construction. NW Natural will evaluate both options and propose a path forward in the BODR.

- NLCI Updates
  - DEQ recently updated the No-Longer Contained-In Determination (NLCI) Guidance. The revised guidance recommends alternative risk-based thresholds for informing NLCI determinations to construction worker risk scenarios, as opposed to occupational risk scenarios (or MCLs for groundwater)
  - NW Natural may be interested in pursuing a NLCI determination for groundwater pumped to the Siltronic pre-treatment plant (which contains low-level F002 constituents), but its not clear if an ongoing waste stream is eligible for a NLCI determination.

- EE provides a summary of the Siltronic pre-treatment plant characteristics.
  - Max daily flow over the past 5 years was 213 gpm, with an average daily flow of 64 gpm
  - The purpose of the Siltronic pre-treatment plant is to remove F002 constituents before groundwater flows to the main groundwater treatment system (GTS).
  - NW Natural has been applying the derived from rule for all of the residuals waste streams associated with the HC&C system, and it is important that the Siltronic pre-treatment plant removes the F002 constituents, otherwise residuals from the main GTS would receive F002 waste codes (assuming the derived from rule).
  - NW Natural routinely collects influent chemistry data and does waste characterization sampling for all of the Siltronic pre-treatment plan residuals before they are disposed.
    - Groundwater influent was below MCLs, except for vinyl chloride. With the change to the groundwater in an excavation risk-based concentration, all of the F002 constituents are well below the NLCI threshold.
    - EE believes that the residuals generated at the Siltronic pre-treatment plant (e.g., spent vapor phase activated carbon) are also below applicable construction worker RBCs, but can review the available data to confirm.
  - EE asks if there is an opportunity to obtain a NLCI determination for the groundwater, and what would that look like? Would there be conditional requirements for sampling? Is there a mechanism by which the derived from rule no longer applies as long as sample results are below the construction worker RBCs?
- DEQ will discuss internally with our hazardous waste staff and follow up. It may be good to try to set up a consultation meeting with NW Natural and DEQ (cleanup and hazardous waste) to walk through some of these questions together and determine the viability of a NLCI determination.