

# 2024-11-07\_Gasco OU Check-In Meeting

Meeting Title:	Gasco OU Check-In Meeting
Date/Time:	November 7, 2024 / 10:30 am - 11:30 am
Attendees:	AQ: Halah Voges EE: Rob Ede DEQ: Wes Thomas
Location:	WebEx Meeting

## Meeting Notes:

- IRAM BODR
  - EE/AQ believe that the IRAM BODR will likely be submitted towards the end of March. Previously, the goal was to submit it to DEQ at the end of January, but the NW Natural team would like to meet and get DEQ's input on certain topics, and those discussions will likely be more informed after DEQ has reviewed the FS.
- FS Review Schedule
  - EE/AQ ask if DEQ has an anticipated review timeline for the FS, recognizing that it is difficult to predict without seeing the document.
    - DEQ does not have a specific turnaround time established. The initial review will be slow until staff are back from holidays. From there, DEQ anticipates beginning higher level team discussion about the document towards the end of January, with comments developed over the next couple of months. DEQ notes that a 90 day turnaround time is not likely, but it would be nice to be able to compile feedback within 4 months.
    - Depending on the scope of our feedback, we may also opt to set up meetings with NW Natural to discuss higher-level or bigger picture topics to support our review and inform our comments. That approach could prolong our review time.
  - EE/AQ ask about which external parties DEQ anticipates reviewing the FS.
    - EPA, the TCT, Siltronic
  - EE/AQ ask if DEQ would like NW Natural to host an "orientation" meeting to go through the FS contents after DEQ receives it.
    - DEQ thinks that will be a good idea. DEQ will discuss internally and follow up. DEQ asks if NW Natural is open to other interested parties participating, like EPA?
    - EE/AQ will discuss with NW Natural and follow up.
- Segment 3 SCE
  - NW Natural team is revising the Segment 3 SCE. AQ/EE discuss DEQ's comment about calculating EPCs (consistent with the RI/HERA Addendum) to screen against Table 17 CULs. The EPC calculation approach is labor intensive, and could take several weeks to complete. AQ proposes an alternative approach that would include using ProUCL to calculate a 90 UCL of the mean. After incorporating Siltronic's groundwater data, there are sufficient data to satisfy the criteria for calculating 90 UCLs.
    - DEQ will accept a 90 UCL as an alternative to the EPC calculation approach.
  - AQ/EE also note that NW Natural is planning to include new well installation along Segment 3 in the BODR/PDI Work Plan, as requested in DEQ's comments.
- Siltronic Groundwater No Longer Contained In Determination
  - EE confirms that NW Natural is interested in pursuing a no longer contained in determination for Siltronic groundwater removed by the HC&C system along the shoreline.
    - DEQ has discussed the approach internally, and we agree that a NLCI determination is possible. NW Natural should prepare a request that includes the supporting data. DEQ cleanup will work with DEQ Haz Waste staff to prepare the determination. We can follow up with questions, as needed.
  - NW Natural plans to evaluate Siltronic groundwater holistically to delineate areas where F002 listed constituents exceed the groundwater in an excavation RBCs. EE

- notes that the NLCI determination would be focused on groundwater removed by the HC&C system, but would not cover purge water from groundwater sampling. Purge water can be evaluated on its own to determine the appropriate disposal requirements.
- EE asks about setting up a pre-meeting before submitting the NLCI request.
    - DEQ does not think a meeting is necessary after discussing the approach with Haz Waste staff.
  - BODR-Related Meeting Topics
    - EE/AQ identify a series of topics related to the BODR that the NW Natural team would like to discuss in advance of submitting the BODR. These include:
      - Treatability study work plan scope
      - Geotech data collection scope
      - Soil swell management planning, options and requirements for placing material on-site.
      - Approach for pre-characterization of soil identified for excavation. EE notes that they anticipate needing to construct a work platform for the ISS equipment to operate along the shoreline. EE/AQ currently estimate removal of ~55,000 cy of soil to construct the work platform.
      - Replacement of the HC&C system. EE/AQ note that the IRAM will require a complete replacement of the HC&C system in a new corridor. The NW Natural team would like to discuss the sequencing of that work relative to other remedial activities in the BODR.
        - Intended approach for pilot study vs initial trial phase
    - EE/AQ also acknowledge DEQ's previous requests to discuss additional data to support ISS prism refinement. EE/AQ planning to submit the ISS prism report/proposal next week. Refinement of the prisms could include additional TarGOST work. Prism refinement report next week. EE/AQ ask if DEQ would like to discuss additional data needs in December based on their review of the ISS prism report.
      - DEQ will discuss internally and we can follow up about discussions.
    - DEQ also notes that discussions related to working around outfalls may be needed in the future, although not necessarily before the BODR.
    - DEQ also notes the DNAPL observations in PW-6L that were reported during the most recent DNAPL Semiannual Report. The observation of DNAPL in PW-6L is concerning in that it is the first observation of DNAPL in the Lower Alluvium WBZ along the shoreline in this portion of the site. Previous observations were about 20 feet above the PW-6L screen and perched on interbedded silts within the Upper Alluvium. We are still thinking through the significance of this DNAPL observation internally, but we think that this observation may result in data gap identification that would be relevant to the IRAM.
      - EE/AQ can follow up with DEQ with some additional thoughts related to the PW-6L DNAPL observation. AQ currently believes that the observation is localized and anomalous. Preliminary analysis suggests that the DNAPL observation could be a result of pumping from that well and damage to the upper silt layer during well installation or installation of nearby borings. EE notes that this area is identified for deeper ISS treatment as part of the IRAM.
  - AQ is working to revise the Deep Lower Alluvium WBZ Source Control Evaluation. Submittal timeframe is still TBD.
  - AQ/EE and DEQ discuss returning to a bi-weekly meeting frequency in 2025. All acknowledge the benefit of more frequent check-ins.