



# Oregon

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November 27, 2024

Bob Wyatt  
NW Natural  
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Portland, OR 97209

*via electronic delivery (email)*

**Re: DEQ Response to the DNAPL Monitoring Semiannual Summary Report (January 1 through June 30, 2024)  
Former Gasco Manufactured Gas Plant Operable Unit  
Portland, Oregon  
ECSI# 84 and #183**

Bob Wyatt:

The Oregon Department of Environmental Quality (DEQ) reviewed the *DNAPL Monitoring Semiannual Summary Report (July 1 through December 31, 2021)*<sup>1</sup> (DNAPL Monitoring Report) submitted by Anchor QEA on behalf of NW Natural. The DNAPL Monitoring Report was prepared under the Voluntary Agreement for Remedial Investigation/Feasibility Study, as amended<sup>2,3,4</sup>.

The DNAPL monitoring program at the former Gasco Manufactured Gas Plant Operable Unit (Gasco OU) is intended to assess whether removal action objectives (RAOs) for groundwater source control are being achieved. The RAOs for groundwater source control are to prevent migration of contaminated groundwater from the uplands to the Willamette River along shoreline Segments 1 and 2 in a manner that minimizes dense nonaqueous phase liquid (DNAPL) mobilization. The DNAPL Monitoring Report presents the results of the DNAPL monitoring program at the Gasco OU between January 1 through June 30, 2024 to assess the potential for DNAPL migration as a result of HC&C system operation.

The DNAPL Monitoring Report indicates that DNAPL entry was detected in PW-6L on June 24, 2024. As shown on Figure 3a of the DNAPL Monitoring Report, DNAPL had not previously been observed in the Lower Alluvium Water Bearing Zone (WBZ) along the Gasco OU shoreline near PW-6L. The top of the PW-6L well screen is approximately 20 feet below the deepest previous DNAPL observation in nearby borings, suggesting that a considerable mass of DNAPL may have migrated to the Lower Alluvium WBZ in this area. Given the observation, it does not appear that maintaining upward vertical gradients along the shoreline is sufficient for meeting groundwater source control RAOs near PW-6L. These observations highlight: 1) the urgency and importance of the in-situ stabilization (ISS) treatment of DNAPL in a zone along the shoreline as part of a recently approved<sup>5</sup> interim removal action measure

<sup>1</sup> Anchor QEA. 2024. DNAPL Monitoring Semiannual Summary Report (January 1 through June 30, 2024). NW Natural Gasco Site. ECSI No. 84. Prepared for NW Natural. September 17.

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

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

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

<sup>5</sup> DEQ. 2024. Letter to Bob Wyatt (NW Natural), Regarding: Gasco OU Interim Removal Action Decision, Former Gasco Manufactured Gas Plant Operable Unit, Portland, Oregon, ECSI #84 and #183. July 3.

November 27, 2024

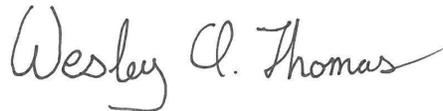
Page 2

(IRAM); and 2) the need to remove and/or treat DNAPL to the extent feasible across the Gasco OU as part of the future remedial action.

DEQ has recently received the *Gasco OU – IRAM ISS Prism Design Basis*<sup>6</sup> (ISS Prism Report). We will consider the DNAPL observation at PW-6L during our review of the ISS Prism Report, and during future discussions related to IRAM data gaps and the scope of the IRAM pre-design investigation.

Please contact me at (971) 263-8822 or [Wesley.Thomas@deq.oregon.gov](mailto:Wesley.Thomas@deq.oregon.gov) if you have questions regarding this letter.

Sincerely,



Wesley A. Thomas, P.E.  
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ECSI No. 84 File

ECSI No. 183 File

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<sup>6</sup> Anchor QEA. 2024. Gasco OU – IRAM ISS Prism Design Basis. NW Natural Gasco Site. ECSI No. 84. Prepared for NW Natural. September 17.