

2024-12-06_Gasco OU Check-In Meeting

Meeting Title:	Gasco OU Check-In Meeting
Date/Time:	December 6, 2024 / 11:00 am - 12:00 am
Attendees:	AQ: Halah Voges EE: Rob Ede DEQ: Wes Thomas
Location:	WebEx Meeting

Meeting Notes:

- Portland Harbor cyanide performance monitoring
 - During previous meetings, DEQ and NW Natural have discussed the basis for complying with the Portland Harbor groundwater cleanup level for cyanide. EE/AQ ask how that has been documented?
 - DEQ notes that NW Natural has proposed compliance on a free cyanide basis in previous deliverables, and neither EPA nor DEQ have disapproved that basis. Further, EPA has documented compliance at the Gasco and Siltronic OUs on a free cyanide basis in their comments on deliverables for other project areas. DEQ refer to EPA's recent comments on the RM 7Wb BODR comments.
 - DEQ recommends NW Natural reach out to EPA to discuss further documentation.
- Feasibility Study
 - EE/AQ indicate that the forthcoming FS will include an appendix (Appendix T) that will present a range of costs for the IRAM. Since the IRAM has not yet been designed, the cost estimates include some different scenarios that include different components or aspects that may or may not ultimately get included in the design. NW Natural selected what they believe is the most likely scenario as the cost basis, but recognizes that the approach may change over the course of the design, and that the costs may be changed accordingly.
 - DEQ notes the information. DEQ can follow up with the NW Natural team with specific questions about the cost estimating after we have reviewed the information.
- DNAPL Semiannual Monitoring Report Letter
 - NW Natural received DEQ's comments on the most recent DNAPL semiannual monitoring report.
 - EE/AQ indicate that they have more recent information about DNAPL entry into PW-6L. AQ pumped the DNAPL from the well sump in September, and since then have only observed trace-levels of DNAPL enter the well screen.
 - DEQ understands that NW Natural/EE/AQ have more information than DEQ about ongoing DNAPL entry, and our letter was in response to DNAPL entry observed at the very end of the reporting period. The objective of our letter was to convey the significance of the DNAPL observation, regardless of the amount of DNAPL entry to the well. We also wanted to express a sense of urgency to address this specific DNAPL migration with the upcoming IRAM, and to address the risk of DNAPL downward migration on a site-wide basis in the future remedial action.
 - NW Natural planning to respond to the letter, and respond specifically to the part of the letter that interprets the DNAPL observation in PW-6L as movement of a significant DNAPL mass.
 - DEQ acknowledges NW Natural's plans to respond. However, we believe that a significant mass of DNAPL would be required for it to migrate 20 feet vertically, meaning it would be occupying water-wet pore space with enough saturation to be mobile over a fairly large vertical distance. DEQ acknowledges that at a site like Gasco 'significant DNAPL mass' may be a relative term. Whether the DNAPL migrated via a tortuous path or a preferential path created by a nearby boring is less important to DEQ. What is important to DEQ is that it is addressed.
- DNAPL Evaluation and ISS Prism Design Basis
 - EE/AQ propose a meeting in early January to discuss potential data gaps for DNAPL delineation.

- DEQ agrees that early January would be the right timeline and does not believe it is too soon to start scheduling a meeting.
 - EE/AQ discuss a 90 min meeting.
 - DEQ has not yet completed a detailed review, but believes that understanding the DNAPL data in 3-dimensions will be helpful for understanding potential data gaps. Previously, EE/AQ mentioned potentially developing an EVS model with DNAPL information that could accompany the FS. DEQ acknowledges that there was not a requirement to develop a 3D model, but asks if that will be part of the FS deliverable. A tool like that would be useful for evaluating data gaps.
 - AQ was not planning to submit an EVS model as part of the FS. EE/AQ acknowledge the value of a model for supporting design.
- FS roll out meeting
 - NW Natural is comfortable with EPA attending the meeting.
 - DEQ does plan on providing comments during the meeting, even if we have had the FS for a few weeks. The goal of the meeting is to help with orienting the DEQ team to the content. If we have substantive comments, we can set up separate discussions.
 - EE/AQ anticipate an hour-long walk through.
- Recurring Check In Meetings
 - EE/AQ will reset the meeting frequency to bi-weekly, beginning in January.
- Deliverables
 - EE/AQ discuss revisions to the 2023 HCC Annual Report and request making the revisions to the 2024 document instead of revising the 2023 report.
 - DEQ notes that the 2024 report would not likely be submitted until July or August 2025, leaving a lot of time with our comments unresolved. DEQ suggests providing a RTC. We can review the RTC and then decide on next steps.
 - EE/AQ will provide an RTC.
 - AQ/EE also working on a revised Deep Lower Alluvium WBZ SCE, and a revised Segment 3 SCE. The DLA SCE will come first.
 - Doane Creek SCE schedule is not set, but will likely be submitted in mid-2025.