

2025-01-16_Gasco OU Check-In Meeting

Meeting Title:	Gasco OU Check-In Meeting
Date/Time:	January 16, 2025 / 10:30 - 11:30 am
Attendees:	AQ: Halah Voges EE: Rob Ede DEQ: Wes Thomas
Location:	MS Teams Meeting

Meeting Notes:

- Feasibility Study
 - AQ/EE provide meeting dates/times for the Gasco FS 'orientation meeting.' AQ believes that the meeting will be 90 minutes.
 - DEQ will coordinate team availability and follow up with a preferred date and time.
 - AQ/EE ask if there are any specific topics DEQ would like to focus on.
 - DEQ suggests focusing on the 'back half' of the FS and help link where the key supporting information is provided in the appendices.
- DNAPL Recovery Investigation Work Plan
 - EE states that NW Natural is close to finalizing a "DNAPL Recovery Investigation Work Plan." The work plan will include installation of a series of wells in the Fill, Upper Alluvium, and Lower Alluvium WBZs in areas that the FS maps DNAPL as potentially mobile or transitional. The purpose of the investigation is to get more empirical information about DNAPL mobility in these areas. Since DNAPL entry into the wells may take time, NW Natural is interested in proactively collecting this information to potentially support the work in the Feasibility Study and be poised for remedial design. EE believes that the work plan will be submitted at the end of the month.
 - DEQ was not aware that the work plan was coming. We will need to think more about the proposed investigation and can follow up with questions or comments when we understand more. DEQ asks EE to clarify the purpose or goals of the investigation. Does NW Natural intend to use the information to update a future revision of the FS? Or is this work intended to inform remedial design work?
 - EE states that NW Natural doesn't necessarily want to roll the new information into a revised FS. The information is more intended for design work. The FS contemplates DNAPL recovery in many of the areas identified in the work plan. EE states that the work plan will include a summary of the purpose and objectives of the work.
- ISS Design Basis
 - DEQ is working through comments, and is hoping to provide written feedback soon. Our key high-level takeaways are:
 - DEQ does not believe the DNAPL in the nearshore area of interest has been adequately delineated to define the ISS prisms. We plan on providing some examples in our comments and will request a meeting to discuss these further. Ultimately we believe it is premature to define the ISS prisms until data gaps have been filled.
 - DEQ does not believe that the IDW interpolations provide a reliable basis for the ISS design prisms, and we believe that more detailed 3D mapping is necessary for the design.
 - DEQ believes that other engineering or design factors are also relevant to the ISS prism design. As an example, DEQ notes the 'pin holes' of areas with no ISS treatment surrounded by areas that will be treated. It is unlikely that these 'pin holes' are practical to construct and could create challenges with hydraulic control performance.
 - DEQ does not believe the DNAPL mobility classes developed for the FS are relevant to delineating ISS prisms.
 - Ultimately, we are not in a position to exclude any of the existing DNAPL observations at this time. We recommend revisiting the LOE approach once data gaps have been filled.

- DEQ expresses an intent to provide the comments and then anticipates follow up meetings with EE/AQ to discuss data gaps and ISS prism delineation methods further after our comments have been reviewed.
 - EE expresses an interest in meeting before DEQ sends comments. EE/AQ believe it would be more efficient to discuss DEQ's feedback as soon as possible as they work on the IRAM BODR.
 - DEQ agrees that a meeting to discuss our feedback will be important, but does not understand what advantage delaying comments provides. We think it will be important and more efficient for AQ/EE to have reviewed our comments before we meet so that we can more easily identify meeting topics and determine resolution.
 - Our understanding is that the IRAM BODR will include a pre-design investigation to fill those data gaps. Therefore, we do not believe it is possible for DEQ to approve the ISS prisms in advance of the IRAM BODR.
- EE notes that AQ/EE have already made significant progress on the IRAM BODR, and express concern that DEQ's comments on the ISS prism design may require re-work or cause delay in the submittal timeline. EE states that NW Natural would be open to splitting the IRAM BODR into two phases so that the barrier wall design can move forward while we discuss the other IRAM elements. NW Natural could time the implementation of the bulk ISS work with the upland remedy.
 - DEQ is not interested in dividing the IRAM into phases or delaying implementation of the ISS element. We consider the IRAM a 'package deal.'
- EE/AQ note that NW Natural was intending to get DEQ's approval on the ISS prisms before submitting the IRAM BODR. NW Natural is not interested in expanding the ISS prisms beyond their current footprint. NW Natural can perform any additional work for DNAPL that is missed as part of the final remedy.
 - DEQ intends for the IRAM to address DNAPL within the nearshore area of interest completely. We understand that filling data gaps could expand or shrink the ISS prisms, and that there are cost implications for NW Natural if the ISS prisms expand. We want to make sure that our expectations for treating DNAPL completely within the nearshore area of interest as part of the IRAM are clear upfront. We remain open to using a lines of evidence approach to identify DNAPL observations that may not warrant treatment, but that evaluation can only take place after data gaps are filled.
- EE/AQ understand DEQ's perspective. EE notes the need to discuss these topics further.