

2025-02-27_Gasco OU Check-In Meeting

Meeting Title:	Gasco OU Check-In Meeting
Date/Time:	February 27, 2025 / 10:30 - 11:30 am
Attendees:	AQ: Halah Voges, Ryan Barth EE: Rob Ede DEQ: Wes Thomas
Location:	MS Teams Meeting

Meeting Notes:

- ISS Design Basis
 - NW Natural is digesting DEQ's comments and is planning to provide comment responses. NW Natural agrees that developing a 3D DNAPL model is critical for completing the DNAPL prism delineation process and for identifying potential DNAPL data gaps. AQ is in the process of developing the model, but it will take time before it is developed to the point where it can be shared or used to support data gap discussions. While NW Natural agrees that the 3D model is an important design tool, there is some concern that the time necessary to develop it, support data gaps discussions, and then fill those data gaps could prolong the overall IRAM design schedule. NW Natural believes that schedule delay could potentially affect their ability to complete the in-water Interim Design within the current schedule, since the ISS barrier wall design needs to be advanced far enough along to inform some of the in-water work. NW Natural wants to align the upland and in-water design schedules. NW Natural also wants to be in a position to implement in-water remedial action as early/soon as possible.
 - DEQ acknowledges NW Natural's concerns. We think that a lot of the IRAM design can progress independent of finalizing the ISS prisms. It is important for us to be on the same page with respect to the level of detail that the upland design will have at different design milestones. That said, DEQ does not anticipate separating the ISS wall and the bulk ISS designs entirely. DEQ is comfortable with uncertainty around the final delineation of the ISS prisms, as long as the BODR outlines the process that will be used to delineate the ISS prisms, and when the design should have the information necessary to support the ISS prism design development.
 - EE/AQ acknowledge that approach. AQ has removed the DNAPL delineation work plan from the BODR, but the BODR will still describe the ISS prism design process and how the design will be completed in later design phases. NW Natural would like the BODR to include the lines of evidence for determining whether specific DNAPL observations can be excluded in the BODR. The BODR will include the work plans for the bulk of the pre-design investigation work, and then the ISS prism delineation work plan will follow shortly after the BODR.
 - DEQ will work with NW Natural as much as possible to keep the upland IRAM design moving forward without unduly prolonging the in-water design schedule. However we can't guarantee that we will avoid schedule implications entirely. There may be situations where schedule pinch points become unavoidable. In those cases, we will work as proactively as we can with NW Natural to resolve issues.
 - EE/AQ summarize general timeframes for next steps related to IRAM:
 - IRAM Design Basis RTCs and proposed lines of evidence for delineating ISS prisms - Mid-March. Follow up with ~90 minute meeting to discuss LOEs with the goal of solidifying direction for BODR. Meeting could be in-person.
 - 3-D model to support data gaps discussions - mid-to-late-March. ~2-2.5 hour discussion of data gaps to inform development of DNAPL delineation work plan.
 - IRAM BODR - currently scheduled for end of May.
- FS Review
 - DEQ review of the FS is ongoing. DEQ is not currently able to speak to any specific comments, but are making headway with our review and working towards fleshing out some of our more significant and broad comments.
 - DEQ is currently digging deeper into the technology screening information in the FS and considering how well the RAU framework works to support the

- technology screening and remedial alternative development steps.
 - DEQ anticipates having comments related to hot spots, the rubric used to score the different balancing factors, along with other topics.
- We have received some preliminary comments from EPA about the groundwater modeling appendix that we plan to attach to our comments.
- We are expecting to receive comments from other TCT members by the end of this week, and anticipate comments from Siltronic in early March.
- EE/AQ ask if TCT comments will be available for NW Natural to review.
 - DEQ can probably share the comments in advance of our own.
- EE/AQ ask about general timeline for DEQ comments.
 - DEQ is still months away from finalizing comments.
- DNAPL Recovery Investigation Work Plan
 - EE asks if DEQ has reviewed the DNAPL Recovery Investigation Work Plan, and notes the long lead-time to collect the information described in the work plan.
 - DEQ wants to get further on reviewing FS before we review the work plan.
- LNG Basin Report
 - During our previous meeting, EE/AQ and DEQ discussed combining the Annual HC&C System Report with the Semiannual LNG Basin Report into a single Annual Report. DEQ requested more information about the general timeframe work preparing and submitting an Annual Report and opportunities to optimize the delivery schedule to be as early in the year as possible.
 - AQ follows up that the Annual Report could be submitted ~ April 30th each year, if Fill WBZ sampling was reduced to semiannually. Sampling is currently quarterly and was increased in response to observed increasing concentrations as part of the LNG retrofit work.
 - DEQ will consider the request further and we can continue to discuss the option to combine the reports into a single Annual Report.
- Site Visit
 - DEQ request a site visit
 - EE/AQ acknowledge and suggest the potential value in scheduling the site visit to coincide with the IRAM RTC and lines of evidence discussion.