

# 2025-03-13\_Gasco OU Check-In Meeting

Meeting Title:	Gasco OU Check-In Meeting
Date/Time:	March 13, 2025 / 10:30 - 11:30 am
Attendees:	AQ: Halah Voges, Ryan Barth EE: Rob Ede DEQ: Wes Thomas
Location:	MS Teams Meeting

## Meeting Notes:

- Schedule
  - AQ reviews a working schedule outlining both in-water and upland work.
    - Need to balance Gasco sediment work, Gasco upland FS, and the IRAM schedule. NW Natural wants the IRAM to proceed on a schedule that will end up marrying up with the in-water design schedule.
    - AQ reviews the critical path for completing the IRAM Treatability Studies and the ISS prism refinement/DNAPL delineation PDI, and how these PDIs inform various design milestones. The schedule shows treatability study Phases I, II, and III reported in the 90% design and the ISS Delineation finalized in the 90% Design. AQ does not think that the Phase IV treatability study feeds into the 90% design or the in-water design work, but shows that the results and their use will be reported in the 100% design phase.
    - NW Natural believes that the 90% IRAM design and the Interim in-water design will necessarily feed into each other because the two designs share various engineering and contracting elements.
    - NW Natural believes the biggest critical path constraint/risk relates to the ability to negotiate the ISS treatment prisms in time for the 90% IRAM design, and that delay of the 90% IRAM design in order to negotiate the ISS treatment prisms could impact the in-water schedule.
  - When DEQ thinks about negotiations related to ISS prisms, we understand that NW Natural desires to agree on a detailed framework for determining where specific DNAPL observations require ISS treatment during the IRAM, and which specific observations can be excluded from the ISS prisms. DEQ notes that discussions around the lines of evidence to support that decision making framework was identified as a meeting topic, and that we are waiting for NW Natural to provide responses to our comments on the ISS Prism Design Basis memo and an proposed framework for applying lines of evidence. DEQ recommends scheduling the meeting as soon as possible.
    - AQ/EE/NW Natural/DEQ tentatively schedule a meeting for April 2nd.
  - DEQ notes that we will also need to meet to discuss DNAPL data gaps, and will need the 3D model to be completed to support the meeting.
    - EE/AQ suggest the week of April 14th. DEQ can't commit to a specific date/time without consulting GEI and requests AQ provide a list of available meeting times.
    - DEQ also indicates that we may have questions related to the 3D model methodology that we think would be better addressed in emails before the meeting so that the meeting can be more focused on data gaps. AQ/EE agree.
- ISS Design Basis
  - EE states that part of the IRAM design will be to remove and replace the HC&C system. The design will need to consider the new HC&C alignment and also sequence replacement of HC&C infrastructure with the result of the work. NW Natural is currently envisioning constructing new wells and pumping infrastructure first, then abandoning/removing the older infrastructure to build the ISS platform along the shoreline. The new wells would need to be located in areas where they will not interfere with the work platform or the bulk ISS treatment upgradient of the wall. NW Natural also does not want to construct a new HC&C system only to need to replace it again to accommodate the upland remedy. NW Natural desires being able to fold the new alignment into the upland remedy planning.

- DEQ is not in a position to agree to that approach. We are not comfortable with the Gasco FS recommended remedial action and anticipate the need for more intrusive work as part of the remedy. We will not consider the HC&C system as an impediment to intrusive cleanup work where we deem it necessary. We recommend waiting until NW Natural receives our comments on the FS, and then discussing how the HC&C system replacement design can plan for the upland remedial action.
      - EE suggests that there may be further discussion about what the final upland remedy could look like, and opportunities to allow flexibility. For example, we could put utilities above ground so that pumping wells are easier to work around.
    - As part of the HC&C system re-design, EE/AQ would like to evaluate use of pneumatic pumping systems. The current HC&C system has electric pumps. EE/AQ believe that pneumatic pumps may lead to less expensive long-term O&M. AQ would like to propose pilot testing of a pneumatic pumping system at PW-6U, which is not currently used for the HC&C system.
      - DEQ is comfortable with the pilot testing, and requests a brief work plan outlining the pilot testing approach and testing objectives.
- FS Review
  - DEQ has received comments from YN and the Five Tribes. We have confirmed that those parties are comfortable with us sharing their comments with NW Natural if requested.
    - EE/AQ request comments. DEQ will provide copies of the comments following the meeting.
  - DEQ is anticipating receiving Siltronic's comments soon.
    - AQ notes that NW Natural and Siltronic have been meeting more frequently to discuss cleanup work. NW Natural and Siltronic have been discussing the scope of Siltronic's FS comments and feedback on the IRAM comments provided previously. These discussions include the timing of Fab 1 demo and construction of a new warehouse.
    - DEQ also believes Siltronic is likely to comment on the impermeable cap concept. DEQ is also planning to comment along similar lines. DEQ also plans to have comments about the scope of the remedy in the area with buried spent oxide and the groundwater to surface water pathway to Doane Creek. We think that there are opportunities to consider other remedial technologies/configurations that would provide for a more sustainable remedy.
- LNG Basin Report
  - DEQ is comfortable combining the HC&C System Annual Report with the LNG Basin Report, beginning either this year (the 2024 report) or next year (the 2025 report). To facilitate a more expedited schedule moving forward, we are also comfortable reducing the frequency of the Fill WBZ monitoring wells used to assess the effects of the LNG Basin retrofit to semiannually. In the meantime, we would request a pre-submittal with some of the operational information that is typically provided in tables and appendices of the LNG Basin Report. These include Table 3 (at least the monthly volumes), Appendix A, Appendix C, and Appendix D.
  - AQ states that the 1&2Q 2024 LNG Basin report is near completion, but that they would potentially want to combine 3&4Q LNG Basin report with the 2024 HC&C System Annual Report.
  - DEQ requests that AQ/EE prepare an email request documenting the requested change (including the groundwater sampling frequency changes), the timeline to submit the 2024 Combined Annual Report, and the proposed due date for future Combined Annual Reports. DEQ can respond to the request.