REGION 10
SEATTLE, WA 98101

March 17, 2025

MEMORANDUM

SUBJECT: EPA comments on Gasco OU Feasibility Study Report
Gasco Facility, Portland, Oregon
ECSI #84
December 16, 2024

FROM: Eva DeMaria, Remedial Project Manager
Superfund and Emergency Management Division

EVA DEMARIA Digitally signed by EVA DEMARIA Date: 2025.03.17 13:01:25 -07'00'

TO: Wesley Thomas, Project Manager
Northwest Region Cleanup Program, Oregon Department of Environmental Quality

The following are the U.S. Environmental Protection Agency's (EPA's) comments on the document titled *Gasco OU Feasibility Study Report* (Report). The Report was prepared by Anchor QEA, Ede Environmental, LLC, and Sevenson Environmental Services, Inc. on behalf of NW Natural for the former Gasco Facility (site). The site is located at7900 NW St. Helens Rd. in Portland, Oregon, and is listed as Environmental Cleanup Site Information (ECSI) #84. The site is located upland of Willamette River mile 6 west, which is upland of the in-water Gasco project area within the Portland Harbor Superfund Site (PHSS). This *Feasibility Study Report* (FS Report) for the Former Gasco Manufactured Gas Plant (MGP) Operable Unit (OU) summarizes remedial investigation (RI) data that characterize environmental conditions at the Gasco OU, evaluates risk to potential receptors, updates the conceptual site model, and presents remedial action objectives (RAOs) and preliminary remediation goals (PRGs). This information informs identification and evaluation of applicable remedial technologies capable of meeting the RAOs and applies the technologies to develop eight site-wide remedial action alternatives (RAAs).

EPA understands the primary objective of the investigation was to evaluate the RAAs for protectiveness including a semi-quantitative balancing of Oregon Department of Environmental Quality (DEQ)-defined remedy selection factors (effectiveness, long-term reliability, implementability, implementation risk, and reasonableness of cost). EPA's comments are categorized as "Primary," which identify concerns that must be resolved to achieve the objective; "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the objectives; and "Matters of Style," which substantially or adversely affect the presentation of the technical information provided in the report.

Primary Comments

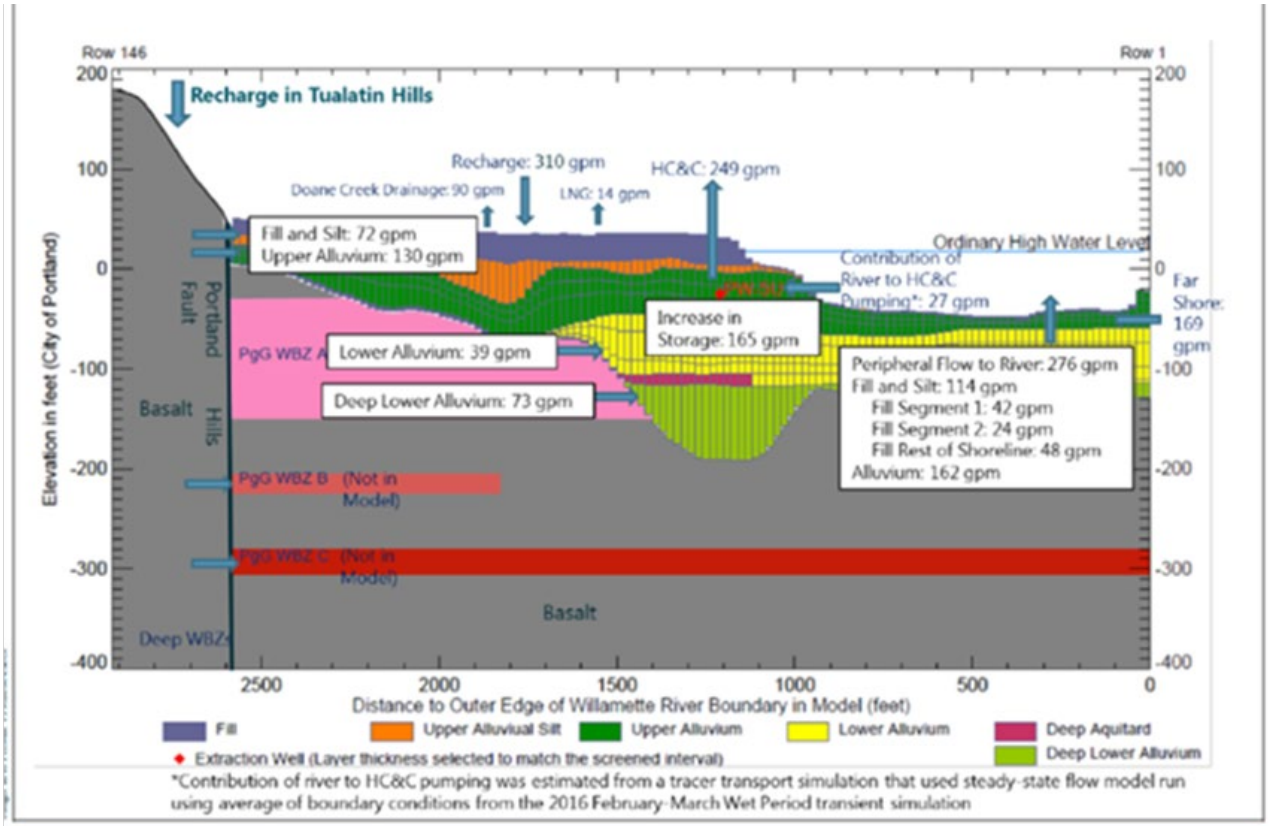
EPA did a high-level review of the Gasco OU FS Appendix E (Site-Wide Groundwater Flow Model Update and Feasibility Study Simulations) and discussed what would be most helpful to understand and verify Gasco's conclusions about calibration and their simulated barrier wall/extraction rate scenario. NW Natural should update Appendix E and include the following:

1. A table or cross section figure showing the water budget for the final calibrated model simulation. This table or cross section figure would include all elements of the inputs/outputs identified previously in the Gasco Groundwater Modeling Report calibration (**see example figure 3-26 below from an earlier NW Natural modeling report**).

2. Additional groundwater model water budget quantities added to Table E-6 to understand the full water budget input/outputs simulated under each remedial alternative. For example, adding a row to Table E-6 for precipitation recharge (which would show it be 2 gpm based on an assumed reduction of areal recharge due to added impervious surface if we've interpreted the text correctly) for alternatives 2 through 8. Without having these values either tabulated or discussed in the text, it is difficult to follow. Our interpreted reduction from 310 gpm of recharge to 2 gpm of recharge is based on one sentence on page E-17 that states "Ground-surface capping will minimize groundwater recharge (simulated as 0.5 inch per year, which is equivalent to approximately 2 gpm over the entire Gasco OU)." A row should be added for each component included in figure 3-26 below.

EPA has asked for this groundwater model budget to be provided with their simulations (in cross section, or table format) for the past 3 years. EPA is still waiting for a response to this request.

Example Water Budget in cross-section format from earlier modeling report (*Anchor QEA. February 17, 2017. Gasco Groundwater Modeling Report, NW Natural Gasco Site.)*



ANCHOR QEA

Figure 3-26
Water Budget for the 2016 February-March Wet Period Transient Simulation
Gasco Groundwater Modeling Report
NW Natural Gasco Site