

2025-04-10_Gasco OU Check-In Meeting

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

Meeting Notes:

- DEQ informs AQ and EE about cyberattack. DEQ staff do not currently have laptop computers and the timeline for re-issuing computers is uncertain. DEQ staff currently working via smartphones.
 - AQ suggests hosting next week's DNAPL data gaps meeting at the AQ offices so that DEQ staff can better participate.
- Centerline Tanks.
 - NW Natural has informed DEQ of intent to remove the existing petroleum ASTs on the Gasco Site. NW Natural is considering using the existing AST basins for ISS swell placement. The north basin has an estimated capacity of 24,000 cy and the south basin has an estimated capacity of 79,000 cy. NW Natural believes that placing the ISS swell in the basins is an opportunity to beneficially reuse swell generated during the IRAM and sediment remedy and presents a cost savings measure, since ISS swell would otherwise be transported to a Subtitle C landfill for disposal as non-hazardous waste.
 - DEQ understands that placement of ISS swell in basins presents an opportunity for cost savings and reduced implementation risk. DEQ will need to coordinate internally to discuss the approach. First impression is that other work may be needed to allow ISS swell placement during the IRAM. These include removal/treatment of hot spots within or adjacent to the basins that would become less accessible after they are filled; reviewing the material types and development of acceptance criteria (DEQ may need to develop both chemical and physical acceptance criteria). If legally and administratively feasible, DEQ would also need to determine the engineering requirements for placement, including the potential use of liners before placing materials, dewatering measures (wick drains, sumps), and others. Must be completed in a way that doesn't contribute to risk or make cleanup work more difficult to implement.
 - EE notes that ideally, the swell would be placed in the basins as soon as it is generated. The most cost-effective approach would be to work the material, as needed, in the basins themselves, instead of in a separate staging area. The first ISS swell would come from the wall and the riverbank. NW Natural would need to review the sequencing of the ISS work to develop the plan further.
 - EE also thinks that there are other opportunities to beneficially reuse swell at the site, including building up the grade of the site. EE estimates another 100,000 cy of capacity for beneficially reusing swell.
 - EE states that the construction work could begin as early as June 2027, and would need to understand the requirements for using the basins well in advance.
 - DEQ notes that the request will require a lot of coordination and planning, and could take a long time to fully develop and approve the concept.
 - EE notes that NW Natural is also planning some sampling during AST removals. There are some indications of contamination related to use of the ASTs. EE thinks the work could include test pitting and potentially some limited soil removal.
 - AQ/EE recommend a meeting in the future to work through sequencing and planning for AST removals.
- Feasibility Study
 - DEQ's review of the FS is ongoing. At a high-level, the FS does not identify the feasible extent of hot spot removal/treatment, and does not recommend an alternative that addresses hot spots. DEQ is not supportive of RAA-4.

- The evaluation of groundwater dissolution is flawed, and DEQ believes that DNAPL treatment will translate directly to the ability to restore groundwater hot spots within a reasonable timeframe.
- The remedy will need to remove/treat all accessible human health direct contact hot spots. Those hot spots do not represent the feasible limit of hot spot treatment but would necessarily be included in what DEQ would consider the 'minimum' hot spot treatment. RAA-6 is the first alternative that addresses human health direct contact hot spots.
- In order to determine the feasible limit for hot spot treatment, NW Natural will need to develop remedial alternatives that include a gradation of hot spot removal/treatment, beginning with RAA-6 through RAA-8.
- IRAM BODR
 - AQ/EE are planning to submit the IRAM BODR the second week of May
- LNG Basin/Trench Semiannual Monitoring Report
 - The forthcoming report includes a proposal to combine the report into Annual Reports in the future. The report also proposes a reduction in sampling frequency (from quarterly to semiannual), and submission of interim operational data.
- HC&C System RTCs
 - DEQ is planning on responding to close the loop on the comments and RTCs.
- Next check-in meeting
 - Next meeting cancelled due to schedule conflicts.