

2025-05-08_Gasco OU Check-In Meeting

Meeting Title:	Gasco OU Check-In Meeting
Date/Time:	May 8, 2025 / 10:30 - 11:30 am
Attendees:	AQ: Halah Voges EE: Rob Ede DEQ: Wes Thomas
Location:	MS Teams Meeting

Meeting Notes:

- AQ asks about DEQ's review on various deliverables
 - DLA SCE: DEQ is still reviewing. DEQ is prioritizing review of the Gasco OU FS and anticipating receiving the IRAM BODR. DEQ does not anticipate feedback on the document since we have already reviewed two previous drafts.
 - DNAPL Recovery Well Installation Work Plan: DEQ has not reviewed the work plan yet, and has been prioritizing review of the Gasco OU FS.
 - LNG Basin Trench Report: DEQ has received the report and it is in our queue for review. DEQ plans on approving the requested changes to the groundwater monitoring schedule and reporting approach. Ideally, DEQ could provide the approval along with any other comments on the report all at once, but can provide separately if needed
 - AQ requests DEQ approval of the groundwater monitoring schedule and reporting approach by the end of May.
 - Doane Creek Data Report: DEQ has received the report and it is being reviewed. DEQ is not expecting to provide significant feedback, and we understand that the results will be incorporated into the next draft of the Gasco OU FS.
 - AQ notes that the Doane Creek SCE is underway and plans to submit it in late June/early July.
- IRAM BODR and ISS Prism Refinement Work Plan
 - NW Natural is planning to submit the IRAM BODR tomorrow (May 9th), and will submit the ISS Prism Refinement Work Plan separately in another few weeks. AQ/EE would like to schedule an additional discussion with DEQ to review the LOE approach for ISS prism refinement before submitting the work plan.
 - The BODR will include the remaining PDI elements, including Segment 3 well installation, additional shallow monitoring wells near the US Moorings property boundary, treatability testing, and geotechnical investigations.
 - AQ plans to submit the 3D DNAPL model along with the ISS Prism Refinement Work Plan.
- Gasco OU FS
 - DEQ anticipates that comments will be completed within the next 4 or 5 weeks.
 - EE asks if the comments will include a specified timeframe for resubmitting the FS.
 - DEQ is providing a deadline. We have not settled on the timeframe yet, but anticipate on the order of 6-12 months.
 - AQ asks if that time includes opportunities to meet with DEQ about topics.
 - DEQ responds that NW Natural is free to use that time as they see fit. We are happy to meet and discuss comments, if needed. Our goal is for our comments to provide clear direction. We also want to make sure that any discussions are productive. Many of the topics that we plan to comment on have already been discussed.
 - EE/AQ note the anticipated revision timeframe and ask if DEQ anticipates significant rework.
 - DEQ believes that some of our comments on bigger topics, such as hot spots, will change the way technologies are screened and remedial alternatives are assembled. Our goal is to give NW Natural a reasonable amount of time to address those ripple effects, while also making sure the work continues to progress.

- Integration of IRAM with Upland Remedy
 - EE asks if there are opportunities to coordinate upland remedy planning with the IRAM. For example, it will be costly to replace the HC&C system as part of the IRAM, and more expensive to have to replace it again as part of a final remedy. Ideally, the IRAM design can anticipate the upland remedy in a way that would allow the HC&C system to only be installed once. However, the IRAM and HC&C system replacement planning will need to be approved before the ROD for the upland remedy.
 - DEQ thinks there may be opportunities to try to align the IRAM with future remedial action planning, but it will be difficult. DEQ cannot guarantee that outcome.
 - AQ understands that DEQ cannot eliminate the risk of re-work, but NW Natural is interested in trying to minimize that risk to the extent possible.
 - DEQ is open to open dialogue about how to integrate the IRAM with other upland remedy planning. The biggest uncertainty will be to what extent hot spots are removed and/or treated, and how well the revised FS establishes the feasible limit for hot spot treatment. The closer we are on that issue, the closer we may be able to integrate the IRAM and the future final remedial action.

- ISS Swell Management/Beneficial Reuse
 - DEQ asks if the BODR will discuss ISS swell materials management options. We have started conversations internally to discuss options for beneficial reuse, but it would be helpful to support those discussions with a specific request or proposal from NW Natural.
 - EE states that the BODR will have a materials management flow chart, but does not specifically include the proposal to place ISS swell in the Centerline AST basins.
 - DEQ will continue internal discussions and keep AQ/EE informed about potential challenges or red flags.