

2025-05-22_Gasco OU Check-In Meeting

Meeting Title:	Gasco OU Check-In Meeting
Date/Time:	May 22, 2025 / 10:30 - 11:30 am
Attendees:	AQ: Halah Voges, Ryan Barth EE: Rob Ede DEQ: Wes Thomas
Location:	MS Teams Meeting

Meeting Notes:

- LNG Basin/Koppers Basin Memo
 - EE acknowledges receipt of DEQ's approval to combine the LNG/Koppers Basin Memo with the HC&C System Annual Report and reduce the sampling frequency for Fill WBZ wells.
- IRAM BODR
 - DEQ has distributed the IRAM BODR to our team and external interested parties (EPA, TCT) and we are beginning our review.
 - EE expresses an interest in having DEQ expedite review of some of PDI work plans, which were included as appendices to the IRAM BODR.
- IRAM Schedule Elements
 - NW Natural's team has been working through the IRAM schedule and sequence relative to the in-water Gasco Sediments Site work. NW Natural would like to be in a position to begin in-water work at the beginning of the 2028 in-water work window (July 1, 2028). Before the in-water construction can begin, a number of preparation tasks that relate to the IRAM need to be complete, including the removal of the Centerline ASTs, construction of a material processing pad, HC&C system relocation and start up, Tar Ponds GSA clearing (NW Natural plans to use the Former Tar Ponds GSA as an ISS support area), and work platform excavation at the top of the riverbank. Ideally, the ISS barrier wall would begin in advance of the in-water work. Some of these items could occur in parallel with in-water work, but AQ believes the HC&C system relocation must be complete before the riverbank work platform can be complete, and that the HC&C system relocation could take up to 18 months to complete.
 - EE/AQ are working through the IRAM and in-water schedules to understand how the work may be sequenced to accomplish the July 1, 2028 in-water construction start goal. DEQ's approval of the IRAM design is a critical milestone. NW Natural will not be able to begin any upland prep work without an approved IRAM design. EE indicates that the IRAM BODR proposes a design progression that moves from the BODR to a Preliminary Design Report (50% Design), and Interim Design Report (90% Design), and Final Design (100%). EE asks about potential DEQ review timeframes for these design milestones. EE indicates that their working schedule assumes 60 day reviews.
 - DEQ believes that 90-day review periods are likely more realistic. Review timeframes may vary.
 - EE asks if DEQ will complete the IRAM BODR review by the end of June/early July.
 - DEQ believes that the beginning of August is more realistic.
 - EE asks if DEQ could expedite review of the Treatability Testing PDI Work Plan since that work requires the longest lead-time, and has the greatest effect on the design schedule critical path.
 - AQ states that the forthcoming DNAPL Delineation PDI Work Plan will also have a bigger impact on schedule, and asks if DEQ can expedite review of that work plan.
 - AQ notes that the DNAPL Delineation PDI Work Plan will be submitted after a final discussion with DEQ about the DNAPL lines of evidence for delineating ISS prisms. AQ would like to target early June for that meeting.
 - DEQ recommends scheduling that meeting now if AQ would like to target early June. Schedules are already becoming difficult. AQ/EE/DEQ identify 3 potential meeting options. AQ/EE will confirm the best option based on team availability.
 - DEQ will try to expedite work plans over the main IRAM BODR at NW Natural's

request.

- Reuse of ISS Swell
 - EE/AQ follow up on previous discussions about ISS swell placement in the Centerline AST basins. EE notes that DEQ believes that will be administratively and potentially legally challenging to place ISS-treated sediment swell in the uplands. EE asks if DEQ can expand on the potential challenges.
 - DEQ states that we have ongoing internal discussions to discuss the administrative and legal requirements. Based on what has been discussed so far, NW Natural may need to have the AST basis permitted as a disposal facility before placing in-water ISS swell. For upland swell, DEQ cleanup can waive permitting requirements as long as ARARs are followed. DEQ will need to continue internal discussions, discussions with EPA, and ODOJ before we can provide direction to NW Natural.
 - EE asks about potential technical challenges associated with using the AST basins for managing ISS swell (from in-water or uplands)
 - DEQ would need to think through potential technical challenges more, but some initial technical challenges would include: 1) treating MGP residuals within the AST basins and berms, addressing potential leaching to groundwater risks, and ensuring that the treated material does not have a hazardous characteristic.
 - DEQ notes that additional technical challenges would apply to the in-water ISS swell based on 1) the bulking/mixing of surface water into the stabilized sediment when it is dredged, and 2) based on lessons learned during the pilot study (sediment required multiple rounds of additional stabilization to address the benzene toxicity hazardous characteristic).
 - EE/AQ indicate that NW Natural is thinking through the logistics for ISS swell material handling and processing and trying to anticipate potential material testing needs before placement.
 - DEQ recognizes benefit of using the basins for ISS swell, whether that includes in-water swell or upland swell. On-site placement of ISS swell has a significant financial benefit and presents a more sustainable/green option.
- Gasco OU FS Review
 - DEQ is finalizing comments and estimates completing our comments in about 2 weeks.
 - EE requests the opportunity to review DEQ's general comments on the FS during our next check-in meeting, before DEQ sends the comments.
 - DEQ is comfortable reviewing the general comments during our next check-in meeting. At a high level, our most significant comments relate to hot spot treatment. DEQ believes that RAA 6 does not provide enough treatment, and the draft FS only provides two other potential RAAs (RAA 7 and RAA 8). The FS does not fully evaluate RAA 8, leaving RAA 7. DEQ believes the revisions to the FS should focus on providing more RAAs between RAA 6 and RAA 8 to support DEQ's remedy selection.
- Segment 3 SCE
 - EE/AQ note that the revised Segment 3 SCE is nearly complete, and NW Natural is planning to submit it within the coming weeks.