

2025-07-17_Gasco OU Check-In Meeting

Meeting Title:	Gasco OU Check-In Meeting
Date/Time:	July 17, 2025 / 10:30 - 11:30 am
Attendees:	AQ: Halah Voges, Matt Davis EE: Rob Ede DEQ: Wes Thomas
Location:	MS Teams Meeting

Meeting Notes:

- FS Comments
 - EE/AQ ask if DEQ reviewed their letter identifying FS comment topics that NW Natural would like to discuss further.
 - DEQ has not reviewed the FS comment topic letter in full. At a glance, there appear to be some topics that DEQ is not open to discussing, some that DEQ may want to resolve in a written response, and others that may not warrant an urgent discussion.
 - DEQ, EE, and AQ agree that it will be important to develop an agenda to guide the discussions and who should participate in the discussion around various topics.
 - EE asks about GEI participation in the meeting.
 - DEQ notes that the first seven topics appear to be regulatory in nature, and that we would not envision GEI participation. However, the eighth topic is more technical in nature, and GEI could participate in those topics.
 - EE believes that some of the hot spot discussions will be more technical. EE describes a meeting approach that involves more of a workshop approach for assembling alternatives within GSAs, how the alternative assembly could incorporate increasing hot spot treatment, evaluate remediation timeframes, understand what beneficial use restoration looks like, and to what extent modeling or more thorough analysis is needed. By working through those examples, we may be able to understand whether there are actual disagreements about hot spots.
 - DEQ notes that we should set appropriate expectations to those discussions. Meetings do not lend themselves well seeing the big picture, so while DEQ may be able to offer initial feedback, our ultimate approval will be based on our review of the revised FS. DEQ is not going to pre-approve any specific approach or agree that a specific approach will resolve all of the potential technical issues.
 - EE notes that NW Natural will want to document agreements reached during the meeting in writing, but understands that DEQ may not be able to fully approve specific details. EE envisions documenting the path forward in a more detailed response to comment format.
 - DEQ does not envision reviewing comment responses in advance of the Revised FS. The comment responses should be attached to the Revised FS and describe how NW Natural addressed the comment.
 - EE understands that some of the discussions may not require lengthy discussions. EE refers to Topic #4 (protection vs restoration of beneficial uses) as a potential example.
 - DEQ has not reviewed that topic in detail, but was confused by the position. The quote under that item clearly indicates that the quote applies to groundwater treatment. The barrier wall and HC&C system are containment measures, not treatment technologies. That comment may be better addressed in writing.
 - EE believes that DEQ's guidance identifies hydraulic control as groundwater treatment.
 - DEQ does not think so, but will look through the letter and our guidance in more detail.
 - EE thinks that its possible more clarification around that topic may address the issue before any meeting or that the discussion of that topic could be brief.

- DEQ believes that the agenda development also needs to consider who should participate in different topics, how much time those topics may take, and availability of different participants. DEQ believes there may be a need to separate discussions related to DEQ's interpretation of statute or policy from technical issues. DEQ believes that DOJ and DEQ management should sit in on (or potentially lead) discussions related to statute and policy, but would not be needed for the more technical discussions.
 - EE/AQ agree that a policy discussion may be appropriate, and that those discussions may need to involve legal representation. EE/AQ agree that legal representation and DEQ management do not need to be involved with more technical discussions. EE believes that discussions about how NW Natural will implement the hot spot rules are likely more technical in nature.
 - DEQ notes that given the different participants (which may include GEI), it may not be feasible to complete discussions around all of the topics in a single day. The agenda should identify blocks of topics and participants so that we can best plan the number and duration of the meeting or blocks of meetings.
 - AQ/EE will begin drafting an agenda with groups of topics, approximate discussion durations, desired attendees, and a brief synopsis. DEQ will meet with AQ and EE next week to discuss the working draft version of the agenda.
- IRAM BODR
 - DEQ is close to finalizing our comments on the Treatability Study WP, Data Gaps WP, and Segment 3 well installation work plan. We plan on approving the Segment 3 Well Installation Plan, and providing comments on the other two work plans. Comments should be finalized early next week.
 - EE asks if DEQ would be able to conditionally approve the Treatability Study WP with comments that could be resolved in a response to comment format.
 - DEQ discusses comments. DEQ believes it would be easier to resolve comments with a revision.
 - EE requests DEQ not send comments. EE would like to discuss the nature of the comments with NW Natural and assess whether a meeting to discuss the comments before DEQ sends them may be beneficial. Key items that EE would like to discuss with NW Natural are the need for Phase I testing and including a leaching reduction goal.
 - DEQ is open to discussing the comments in advance, but a revision to the Treatability Study WP may be necessary either way.
 - DEQ indicates that GEI has identified some implementation-related concerns that warrant discussion in parallel with our review of the BODR. DEQ requests a meeting for GEI to identify their concerns and talk through potential issues, and believes that this discussion could be combined with discussions related to the Treatability Study WP. EE/AQ agree.
 - IRAM ISS LOE Questions
 - How were the areal extent DNAPL impacts associated with each boring determined?
 - AQ/EE can discuss during the meeting next week.
 - How were the volumes of DNAPL soils/clean overburden calculated?
 - AQ/EE can discuss during the meeting next week.
 - What criteria were used to decide if the additional cost was reasonable? In some cases, costs >\$millions is considered reasonable. In other cases, costs of less than \$700 were considered unreasonable.
 - AQ/EE can discuss during the meeting next week.
 - B-58 - In reviewing the boring log, there appear to be 3 distinct DNAPL observations, including a 3 foot zone from 30-33.5 feet bgs, and a 2 foot zone from 35-37 feet bgs. DEQ requests checking the boring log to confirm that this location is correctly represented in the model.
 - TMA3-062216 - the model does not look like the TarGOST log. TarGOST log suggests more DNAPL.
 - AQ clarifies that the TarGOST response in the upper portions of the TarGOST log are a byproduct of pre-drilling the boring. The TarGOST response does not reflect
 - TMA2 borings - There are several borings with TMA2 in their name. DEQ asks for clarification about which boring(s) are included.
 - AQ can review and provide clarification.