



Oregon

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July 30, 2025

Bob Wyatt
NW Natural
220 NW 2nd Avenue
Portland, OR 97209

via electronic delivery (email)

**Re: DEQ's Reply to NW Natural's Topics for Discussion to Resolve DEQ Comments on the Gasco OU – Feasibility Study Report
Former Gasco Manufactured Gas Plant Operable Unit
Portland, Oregon
ECSI# 84 and # 183**

Dear Bob Wyatt:

The Oregon Department of Environmental Quality (DEQ) has prepared this letter in response to the *NW Natural's Topics for Discussion to Resolve DEQ Comments on the Gasco OU – Feasibility Study Report*¹ letter (FS Comment Discussion Topics letter). Anchor QEA transmitted the FS Comment Discussion Topics letter on NW Natural's behalf. The FS Comment Discussion Topics letter relates to some of our comments² on the *Feasibility Study Report*³ (draft Gasco OU FS) for the Former Gasco Manufactured Gas Plant Operable Unit (Gasco OU). The draft Gasco OU FS was prepared under the Voluntary Agreement for Remedial Investigation/Feasibility Study, as amended^{4,5,6} (Cleanup Agreement).

The FS Comment Discussion Topics letter identifies and requests discussion of four disagreements (Topics #1-4) and four topics for clarification (Topics #4-8). DEQ agrees to meet with NW Natural to discuss certain topics. We believe that the meeting should focus primarily on Topics #2, #3, and #4, which NW Natural identifies as disagreements. Some of the proposed topics are not open to discussion. Most of the other topics appear to request informal feedback about NW Natural's approach for incorporating information requested by our Gasco OU FS comments. DEQ is open to meeting with NW Natural to provide preliminary feedback related to these topics; however, these discussions: 1) are secondary to resolving disagreement topics #2 through #4 listed in the FS Comment Discussion Topics letter, 2) may be better discussed at in separate meetings, and 3) should not delay the Revised Gasco OU FS schedule.

¹ Anchor QEA. 2025. Letter to Wesley Thomas (DEQ), Re: NW Natural's Topics for Discussion to Resolve DEQ Comments on the Gasco OU – Feasibility Study Report. July 16.

² DEQ. 2025. Letter to Bob Wyatt (NW Natural), Re: DEQ Comments on the Gasco OU – Feasibility Study Report, Former Gasco Manufactured Gas Plant Operable Unit, Portland, Oregon, ECSI #84 and #183. June 5.

³ Anchor QEA, Ede Environmental, Severson Environmental Services. 2024. Feasibility Study Report, Gasco OU, ECSI No. 84. Prepared for NW Natural. December 16.

⁴ DEQ. 1994. Voluntary Agreement for Remedial Investigation/Feasibility Study. DEQ No. WMCVC-NWR-94-13. August 8.

⁵ DEQ. 2006. First Addendum to Voluntary Agreement for Remedial Investigation/Feasibility Study. DEQ No. WMCVC-NWR-94-13. July 19.

⁶ DEQ. 2016. Second Addendum to Voluntary Agreement for Remedial Investigation/Feasibility Study. DEQ No. WMCVC-NWR-94-13. October 11.

Discussion Topics Not Open to Discussion

The following topics are not open to discussion.

Topic #1. Interim Removal Action Measure design and implementation schedule.

This topic does not relate to NW Natural's ability to resolve our comments on the draft Gasco OU FS.

For clarification, the barrier wall is an element of an upland action overseen by DEQ. The purpose of the IRAM is not to incorporate the barrier wall design into the interim sediment remedy design. Neither EPA nor DEQ have agreed with NW Natural's position that the barrier wall is part of the in-water remedy overseen by EPA or shared concerns related to delays in the in-water work based on the IRAM approval status. DEQ is not responsible for the sediment remedy schedule.

Topic 7. FS Revision Schedule.

DEQ appreciates the level of effort required to address our comments on the draft Gasco OU FS. We note that the Cleanup Agreement defaults to a 30-day deadline to revise the FS. DEQ did not believe 30 days was a reasonable timeframe for NW Natural to correct the deficiencies identified in our comments.

Therefore, DEQ established an alternative deadline approximately 10 months from the date of our comments, as allowed by Section II.A.2(d) of the Cleanup Agreement. We believe that 10 months is a reasonable timeframe to address our comments. As noted in the FS Comment Discussion Topics letter, the schedule can be modified by mutual agreement between DEQ and NW Natural. Please know that DEQ will require further justification to consider or agree to a schedule modification. We do not believe we can meaningfully discuss or consider schedule modifications at this time.

Previously Settled Discussion Topic

DEQ considers the following topic to have been previously discussed and settled.

Topic #5. FS Alternative Assembly by Geographical Sub Area⁷.

Evaluating remedial alternatives on a GSA-specific and site-wide basis was a requirement of our conditional approval⁸ of the *Interim Feasibility Study*⁹ (Interim FS). Interim FS Comment #204 establishes the expectation for remedial alternative evaluations on a GSA-specific basis followed by a site-wide basis. Several of the other Interim FS Comments (and comment responses/replies) collectively establish the understanding regarding the organization of the Gasco OU FS around GSAs, including but not necessarily limited to, comments #96, #188, #198, #199, #200, #202a, and #203. DEQ has discussed this approach with NW Natural on several occasions. NW Natural has had several years to contemplate how to assemble and evaluate remedial alternatives on a GSA-specific and site-wide basis, and we consider discussions related to this topic complete.

Other Requests for Clarification

The following discussions represent requests for informal DEQ feedback. We question whether additional discussion of some of these topics is necessary.

⁷ We interpret of the last paragraph of Topic #3 (Hot Spots of Contamination) to also request DEQ's input about evaluating hot spots on a GSA-specific and site-wide basis. DEQ does not interpret the last paragraph of Topic #3 to represent a disagreement, but rather a request for feedback about NW Natural's proposed approach.

⁸ DEQ. 2021. Letter to: Bob Wyatt (NW Natural), Regarding: DEQ's Final Replies to the Draft Interim Feasibility Study Response to Comments, Former Gasco Manufactured Gas Plant Operable Unit, Portland, Oregon, ECSI#84. November 18.

⁹ Anchor QEA, LLC. 2018. Draft *Interim Feasibility Study*. Gasco OU. Prepared for NW Natural. November 18 (final content received January 11, 2019).

Topic #6. Demolition of Siltronic Fab 1.

On March 14, 2025, Maul Foster Alongi sent a letter¹⁰ to DEQ and NW Natural in response to the draft Gasco OU FS. In the letter, Siltronic described their plans and estimated timeline for demolishing the Fab 1 building. Based on Siltronic's letter, we consider it reasonably likely that the Fab 1 building will be demolished. While the timeline for demolishing the Fab 1 building is not firm, DEQ believes that Siltronic's letter provides a sufficient basis for Gasco OU FS planning.

We understand that the exact extent of contamination beneath the Fab 1 building may require refinement. However, DEQ considers it reasonable to assume that the nature of potential contamination beneath the Fab 1 building is similar to contamination in the surrounding area. We do not believe that the need to better define the extent of contamination below the Fab 1 building footprint is different than other areas across the Gasco OU. As we commented on the draft Gasco OU FS, the interpolations of contamination across the Gasco OU FS are uncertain, and additional pre-design investigations will be necessary to determine the final layouts, boundaries, and configurations of remedial technologies¹¹. For the Gasco OU FS, NW Natural can make reasonable assumptions about the extent of contamination below Fab 1 based on the interpolations of contamination already presented in the draft Gasco OU FS. We do not believe DEQ feedback about NW Natural's approach for discussing remedial action implementation sequencing that considers future demolition of the Fab 1 building is necessary.

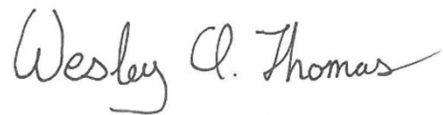
If NW Natural has questions regarding the status of Fab 1 building demolition plans, we recommend that you meet with Siltronic to better understand their plans for demolishing Fab 1.

Topic #8. Miscellaneous technical topics

DEQ is open to meeting with NW Natural to provide informal feedback regarding NW Natural's proposed or anticipated approaches related to these topics. Meetings seeking informal DEQ feedback related to these topics should be preceded by a detailed agenda describing the topic and key questions for DEQ's input to facilitate productive conversations. DEQ notes that a meeting format does not provide an opportunity for us to conduct detailed review of NW Natural's work, and our feedback will be conceptual in nature. Approval of NW Natural's work will be based on our review of the Revised FS.

We look forward to productive discussions to resolve NW Natural's disagreements with our Gasco OU FS comments. Please do not hesitate to contact me at (971) 263-8822 or Wesley.Thomas@deq.oregon.gov if you have any questions regarding this letter.

Sincerely,



Wesley A. Thomas
Project Manager
NWR Cleanup Section

EC: Dan Hafley, DEQ

¹⁰ Maul Foster Alongi. 2025. Letter to Wes Thomas (DEQ) and Bob Wyatt (NW Natural), Re: Siltronic Corporation Comments in Response to NWN's GOU Feasibility Study. March 14.

¹¹ Refer to General Comment #6.

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Steven Brown, Anchor QEA
Kendra Skellenger, Anchor QEA
Jen Mott, Anchor QEA
Rob Ede, Ede Environmental, Inc.
Mike Crystal, Severson Environmental Services, Inc.

CC: ECSI No. 84 File
ECSI No. 183 File