

# 2025-09-11\_Gasco OU Check-In Meeting

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

## Meeting Notes:

- IRAM BODR Review Status
  - EE/AQ ask for an update on DEQ's review of the IRAM BODR.
    - DEQ responds that comments are still a few weeks away.
  - DEQ discusses a likely comment about the basis for the proposed Fill WBZ hydraulic control performance standards. DEQ's comments on the Revised Source Control Addendum requested more information justifying the proposed performance standard of controlling mounding. It does not appear that the comment was addressed, and the performance standards or the basis for them remain unclear.
    - AQ mentions the need to avoid drawing down the Fill WBZ such that settlement could occur and damage buildings.
      - DEQ responds that we understand that need, although the Fill WBZ appears to approach the upper silt unit seasonally, and pumping would likely not result in much additional dewatering. DEQ believes that any settlement has likely already occurred.
      - EE states that some of the preliminary geotechnical evaluations that have been performed support DEQ's hypothesis.
    - AQ asks for an example of other performance standards that could apply to the Fill WBZ.
      - DEQ responds that alternative performance standards could include completely dewatering the Fill WBZ along the shoreline, or creating inward gradients when the river elevations are higher than groundwater.
      - DEQ also notes that the barrier wall in the Fill WBZ is the most susceptible to degradation from freeze/thaw, which should be considered in the development of hydraulic performance standards.
- Scheduling Future Meetings
  - EE and AQ would like to move forward with scheduling additional meetings to discuss FS-related topics. These include data screening, groundwater hot spot restoration, and GSA-specific alternatives.
    - DEQ asks if EE/AQ have particular dates/times in mind for those meetings?
    - EE replies that there are no specific dates/times in mind, but wanted to confirm those are the correct meeting topics.
    - DEQ clarifies that NW Natural should decide on the topics. DEQ has not requested these meetings. Rather, we have agreed to provide informal feedback if requested.
    - EE will follow up with date/time options.
- Doane Creek SCE
  - EE states that NW Natural expects to submit the Doane Creek SCE in mid-October. NW Natural does not anticipate the need for additional source control measures within the Doane Creek drainage basin.
- HC&C System Corridor
  - EE states that NW Natural would like for the re-aligned HC&C system constructed during the IRAM to represent a final alignment. NW Natural hopes to avoid needing to re-locate the HC&C system again in the future. NW Natural is considering additional measures that can be taken now as part of the IRAM to ensure that the HC&C system does not need realignment in the future. These could include excavation of the top

12/20 feet before installing the pumping wells to remove the human health direct contact hot spots.

- DEQ appreciates the thought NW Natural is giving this topic. While we understand NW Natural's desire to install the realigned HC&C system in a permanent manner, DEQ cannot guarantee that additional work to treat hot spots along the new HC&C alignment will not be necessary.
  - EE understands that there may be portions of the HC&C system that need to be tweaked to accommodate future cleanup, NW Natural us just trying to avoid wholesale changes. EE hopes that as the FS and IRAM move forward the scope of future cleanup as it relates to the HC&C system alignment will become clearer.
- FS Comment Meeting
    - EE is planning to provide DEQ with a summary of 'agreements' reached during the meeting. EE will also provide slides used to support the meeting discussion.
    - DEQ will review the agreements and can also provide meeting slides.
- NLCI Determination for Purge Groundwater
    - NW Natural is getting ready to complete a groundwater sampling event. Some of the wells are in areas with TCE and breakdown product concentrations less than the occupational use RBCs. What requirements apply to the handling and disposal of this groundwater.
      - DEQ responds that NW Natural should complete a hazardous waste determination on the groundwater. If you conclude that it contains F002 listed waste, but has low concentration, DEQ can work with NW Natural to prepare a NLCI Determination.
    - EE asks if the existing NLCI Determination for the HC&C system needs an amendment for a well replacement.
      - DEQ does not require a NLCI Determination Amendment to replace an existing well, but would require one to realign the system to add a new well to a new location.