



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region Portland Office

700 NE Multnomah Street, Suite 600

Portland, OR 97232-4100

(503) 229-5263

FAX (503) 229-6945

TTY (503) 229-5471

November 20, 2015

Also Sent Via E-mail

Myron Burr
Siltronic Corporation
7200 NW Front Avenue, M/S 30
Portland, OR 97210

Mr. Robert J. Wyatt
NW Natural
220 N.W. Second Avenue
Portland, OR 97209

**Re: Completion of the Siltronic Site and Gasco Site Remedial Investigation/Feasibility Studies by Siltronic Corporation and NW Natural
Portland, Oregon
ECSI Nos. 183 and 84**

Dear Myron and Bob.

On October 8, 2014, Siltronic Corporation (Siltronic), NW Natural, and the Department of Environmental Quality (DEQ) met to review and discuss the status of the cleanup work being conducted on the northern portion of the Siltronic Site. The northern portion of the Siltronic Site, also referred to as the "Allen Tract" encompasses contamination associated with NW Natural's historic manufactured gas plant (MGP) operations and Siltronic's former solvent use areas.

DEQ convened the October 2014 meeting to discuss the status and direction of ongoing site investigations of the Siltronic Site in the context of existing agreements and orders with NW Natural and Siltronic and the priorities for uplands project work. During the meeting we informed you that DEQ considers the contamination in the northern portion of the Siltronic Site to be a high priority for uplands cleanup. With the goal of expediting remedial action planning, DEQ proposed that Siltronic and NW Natural jointly develop an integrated approach to achieve this outcome. We also indicated that in the absence of a joint proposal from NW Natural and Siltronic, DEQ would develop an approach consistent with our goal.¹

As of late this summer, DEQ understands that the companies were unable to develop a joint approach. Instead, each company developed separate proposals. On September 2 and October 21, 2015, DEQ met with Siltronic and NW Natural respectively, to discuss each company's proposal. DEQ's goals for

¹ DEQ's preliminary approach for prioritizing remedial action planning for the northern portion of the Siltronic Site is presented in the draft Uplands Programmatic Sequencing plan dated June 24, 2015.

these discussions were to ensure we understood each company's proposal for completing existing work (leading up to a Record of Decision), prior to deciding who will perform it. In addition to reviewing each proposal, DEQ stated that an ancillary goal was to consider who would be implementing remedies.

Based on our goal of expediting remedial action planning for the northern portion of the Siltronic Site, and our consideration of the information provided by the companies in September and October, DEQ has decided that:

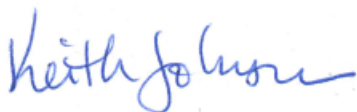
- NW Natural will be responsible for completing a remedial investigation (RI) and human health and ecological risk assessment (HERA) of the northern portion of the Siltronic Site (i.e., the "Allen Tract"), inclusive of MGP and non-MGP contamination; and integrating the results of the RI and HERA into the Gasco Site Feasibility Study. For clarification, the existing Gasco Site Feasibility Study efforts between NW Natural and DEQ will be expanded to include the northern portion of the Siltronic Site. The work will be conducted under DEQ Voluntary Agreement No. WMCVC-NWR-94-13 (dated August 8, 1994 as amended July 19, 2006 by Addendum #1) which will be revised to reflect DEQ's decision.
- Siltronic will be responsible for completing a comprehensive RI/FS and source control evaluation of their property south of the Allen Tract, inclusive of all contamination regardless of source; under a new consent order that DEQ will prepare.
- DEQ Order No. ECVN-NWR-00-27 dated October 4, 2000 (the "Joint Order") will remain in effect for ongoing interim source control efforts in the northern portion of the Siltronic Site.

Final remedial actions for the work NW Natural will conduct will be evaluated and selected under NW Natural's expanded RI/FS efforts on these two properties.

DEQ's decisions achieve the goal of expediting remedial action planning for the most heavily contaminated portion of the Siltronic Site given available information, site conditions, and the current status and direction of uplands project work. DEQ will be scheduling meetings to further discuss and develop a schedule for implementing our decisions.

DEQ appreciates and acknowledges the work completed by Siltronic and NW Natural on the Siltronic Site. Please contact me with questions regarding this letter.

Sincerely,



Keith Johnson
Program Manager
DEQ NW Region Cleanup Program

Myron Burr and Bob Wyatt
November 20, 2015
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Cc: Dana Bayuk, DEQ
Nina Deconcini, DEQ
Gary Vrooman, ODOJ
William Earle, Davis Rothwell Earle and Xochihua
Ilene Gaekwad, Davis Rothwell Earle and Xochihua
Patty Dost, Pearl Legal Group
Ben Hung, Anchor QEA, LLC
James Peale, Maul Foster Alongi
ECSI No. 84 File
ECSI No. 183 File