

2025-10-09_Gasco OU Check-In Meeting

Meeting Title:	Gasco OU Check-In Meeting
Date/Time:	October 9, 2025 / 10:30 - 11:30 am
Attendees:	AQ: Halah Voges, Matt Davis, Ryan Barth EE: Rob Ede DEQ: Wes Thomas
Location:	MS Teams Meeting

Meeting Notes:

- Revisit discussion from DNAPL Dissolution Modeling.
 - AQ is evaluating groundwater concentrations downgradient from DNAPL to see if they can establish a way to estimate how much DNAPL treatment would be necessary to restore beneficial use scenarios. Conceptually, that evaluation is more straight forward for isolated DNAPL observations, but becomes more difficult in areas like the Tar Ponds, where groundwater is more significantly contaminated, DNAPL distributions are less certain, and where treatment would change groundwater flow paths, potentially significantly. That kind of evaluation would require a complex 3D model.
 - DEQ clarifies that 1) the discussion from yesterday's meeting was conceptual in nature, and was largely an off the cuff reaction to information that AQ provided in the meeting, and 2) we agree that the evaluation is likely very complicated for an area like the Tar ponds. If NW Natural were to pursue a remedial alternative that involved treating all DNAPL necessary to restore beneficial use, we would anticipate that the detailed modeling and site characterization needed to support the modeling would occur in RD, and then we would need to establish performance criteria for monitoring progress. That said, NW Natural would need to do enough analysis in the FS to feel confident that the approach would be viable. DEQ further clarifies that the idea does not necessarily represent DEQ's preferred remedy or one that we had considered prior to yesterday's meeting. In addition, DEQ has not considered or determined whether it would be a viable alternative. DEQ also acknowledges that a lot more thought would be required, including how to immobilize mobile DNAPL in areas further from the beneficial use scenario receptors so that potential DNAPL movement in the future doesn't change the calculus. Conceptually the benefit of that approach, if viable is that it relies less on engineering controls while potentially reducing the scope of hot spot treatment.
 - EE follows up about beneficial use discussions and asks if DEQ is expecting the FS to evaluate both the aquatic life beneficial use and occupational use scenarios on smaller spatial scales? AQ questions whether the occupational scenario can be evaluated on smaller spatial scales.
 - DEQ does not see that the occupational use scenario is any different than the aquatic life scenario. There two relevant water bearing zones (Deep lower alluvium, and lower alluvium) that each have different qualities, and are separated by a silt layer that AQ describes as an aquitard. We also have a small DNAPL footprint in the lower alluvium. It seems that beneficial use restoration feasibility should consider beneficial use restoration on smaller scales.
 - AQ believes that it will be difficult to mitigate exacerbation of contamination if a well point was installed in the Lower Alluvium, even if it was set far back from DNAPL.
 - DEQ asks how that is different than the HC&C system pumping wells in the Lower Alluvium in the FAMM/Spent Oxide GSA. DEQ does not believe we have seen those pumping wells result in contaminant migration to previously unimpacted areas.
 - EE and AQ note that they are working on developing RAAs for the former Tar Ponds GSAs, including different treatment volumes and costs. EE states that the DNAPL dissolution meeting may change the way they think about those alternatives. EE/AQ may want to discuss those concepts further.
 - AQ comments that they are still not sure how to qualitatively assess where groundwater may be feasibly restored. The more complex the evaluation, the more

time they will need to complete it.

- Schedule
 - EE/AQ believe NW Natural will need more time to complete the FS than the current schedule allows. NW Natural wants to be comfortable that the RAAs for each GSA and the approach for developing site-wide alternatives is acceptable to DEQ before NW Natural can move forward.
 - DEQ is not open to discussing the schedule at this point in time. Based on the FS comment meeting, we do not know whether NW Natural will be able to provide an approvable FS.
 - EE states that NW Natural would like to adopt an agree to disagree approach to some of DEQ's comments with the understanding that they can still give DEQ an approvable FS. NW Natural wants to give DEQ an approvable FS, and that is why NW Natural wants to get DEQ buy-in to the approach.
 - DEQ has agreed to provide feedback on these concepts. But we believe our comments are clear. While we understand and appreciate discussions about NW Natural's approach to addressing our comments, we have not required the meetings. We are participating at NW Natural's request. Ultimately NW Natural is responsible for managing the schedule.
 - EE understands that DEQ's comments provide some direction, but states that they also provide a lot of leeway when it comes to the specific approach to developing and evaluating alternatives.
 - DEQ confirms that we have agreed to meet with NW Natural and provide feedback. That said, NW Natural will have had 10 months to revise the FS. There are still 6 months before the deadline. DEQ carefully considered the deadline for the revised FS, and we concluded that 10 months was reasonable and appropriate.
 - AQ/EE state that the FS requires a lot of work and that work takes time. EE states that NW Natural wants to complete the FS as soon as possible, but that there is not currently enough time. NW Natural plans to request an extension and will provide the information needed to justify it.
- GW modeling report
 - AQ/EE state that the revisions to the Groundwater modeling report are ongoing. The groundwater model is another critical path item for the Gasco FS.
- BODR appendices
 - AQ plans to submit the revised IRAM pre-design work plans this week.
 - DEQ confirms that review of the IRAM pre-design work plans is the highest priority.
- HC&C Corridor Work Plan
 - NW Natural is preparing a work plan to delineate potential hot spots within the proposed HC&C system corridor and characterize conditions in the Centerline tank basin. EE anticipates that work plan in November.
- Next RAA Meeting
 - EE/AQ propose either Wednesday October 29th or November 6th for the next meeting. DEQ will review availability and follow up.
 - DEQ requests meeting materials to review a week in advance to make the meeting more productive.
- IRAM BODR Comments
 - EE/AQ request clarification about DEQ's comments about HC&C performance criteria.
 - DEQ clarifies that the current criteria proposes upward gradients, "to the extent practical". DEQ's comments emphasize that the design needs to accomplish the necessary upward gradients.