

2025-10-23_Gasco OU Check-In Meeting

Meeting Title:	Gasco OU Check-In Meeting
Date/Time:	October 23, 2025 / 10:30 - 11:30 am
Attendees:	AQ: Halah Voges, Ryan Barth EE: Rob Ede DEQ: Wes Thomas
Location:	MS Teams Meeting

Meeting Notes:

- TSWP
 - DEQ is completing our review over the next few days. We plan to provide comments early next week. At this point in time, DEQ anticipates the most significant comment will be to clarify how bentonite will be incorporated into the grout mix design testing to be representative of conditions during full scale construction.
 - EE anticipates providing a revised TSWP that addresses DEQ's comments quickly.
- 2024 HC&C Annual Report and DLA SCE
 - NW Natural received DEQ's comments. EE and AQ are preparing responses to comments and revising the 2024 HC&C Annual Report. AQ is also making adjustments to some of the pumping rates to improve hydraulic gradients where they were previously within the transducer margin of error. EE and AQ also acknowledge that the IRAM design will include revising the HC&C system alignment. The design will consider opportunities to improve upward gradients where needed.
 - EE believes that the DLA SCE comments primarily requested clarifying edits. NW Natural can make those edits. AQ asks about DEQ's comment about the need to complete the DLA flux evaluation focused on the stranded wedge below the in-river ISS treated sediments.
 - DEQ's comment was intended to clarify expectations based on NW Natural's response to a previous comment. That shouldn't require a revision to the report itself.
- Segment 3 SCE
 - DEQ is still reviewing the Segment 3 SCE. We have prioritized deliverables that affect the field schedule critical path. We also need to do a more in-depth evaluation to inform our decisions with respect to Segment 3.
 - EE states that NWN has been discussing the Segment 3 barrier wall extension with Siltronic in the meantime. Siltronic requested that further discussions take place with legal support. NW Natural external counsel reached out to DOJ to discuss further.
 - DEQ notes that we have not briefed DOJ about the topic. We plan to complete our technical evaluation first, and then engage DOJ as needed.
- Upland Disposal of In-River ISS Swell
 - EE notes DEQ's recent comments on the IRAM BODR, which indicate that DEQ is unable to waive permitting requirements to place In-River ISS swell (solid waste) in an upland disposal cell. NW Natural's external counsel recently reached out to DOJ to discuss that requirement further.
 - DEQ clarifies that we have not briefed DOJ about that particular issue.
 - EE states that NW Natural's external counsel would like to discuss the topic with DOJ before NW Natural discusses disposal with EPA. NW Natural still believes there is an ability to waive permitting requirements for disposal of in-river ISS swell in the uplands without a permit.
 - DEQ is not supportive of that approach. As a matter of policy, we don't believe DEQ can waive the permits for wastes generated as part of the CERCLA action. DEQ would not be supportive of EPA waiving permitting requirements.
 - EE asks why DEQ would not be supportive of a permit waiver process for in-river ISS swell, if DEQ is comfortable with waiving permits for upland waste streams.
 - DEQ recommends including a broader group of DEQ personnel to discuss that topic. Our position is based on the discussions and direction we have received from the

- DEQ materials management (solid waste) staff and management. DEQ believes that a meeting with the DEQ Materials Management program would be beneficial (as stated by our comments) for establishing the path forward. We also question whether the Portland Harbor ROD would allow EPA to waive the disposal facility permit. Our understanding is that the ROD requires disposal of sediment in a permitted disposal facility. Permitting the tank basins as landfills would satisfy that requirement.
- AQ notes that one concern is the schedule for getting the basins permitted. In the past they have heard it could take 18 months.
 - DEQ believes that many sites do take about 18 months, but most of that time is spent conducting the required site characterization. NW Natural has likely already collected enough information to complete that step, and so it may be shorter.
 - EE will discuss the best path forward internally and then follow up with DEQ regarding next step.
- HC&C Corridor Work Plan
 - EE states that NW Natural continues to prepare a work plan to delineate potential hot spots within the proposed HC&C system corridor and characterize conditions in the Centerline tank basin.
 - Doane Creek SCE
 - NW Natural would like to incorporate the revised or corrected cleanup levels in EPA's Errata 4 into the SCE. Submittal of the SCE is now delayed until January.
 - Dissolution modeling
 - AQ is continuing to work on the dissolution modeling to support the FS. EE asks if DEQ has identified other COCs that should be included in that evaluation.
 - DEQ is still considering that question. However, when we do meet to discuss the dissolution modeling, DEQ requests that naphthalene isoconcentration maps to support the discussion. The FS did not present naphthalene maps.
 - AQ can provide those.
 - DEQ would also like to potentially discuss expanding the IRAM based on the DNAPL dissolution concepts. We noticed that lower alluvium WBZ impacts along the shoreline that are impairing the aquatic life beneficial use could potentially be addressed by expanding the DNAPL treatment "area of influence." DEQ may ask for some additional TarGOST data in this area.
 - Data Screening Update
 - AQ has compiled the information DEQ requested. The information is now in client review, and AQ anticipates submitting the information soon.
 - LNG Electrical Equipment Foundation
 - DEQ is still reviewing and we hope to follow up soon.
 - Tar Pond Vegetation
 - NW Natural is planning to begin removing vegetation to prepare for future work. The clearing would primarily consist of cutting down trees and shrubs. No earth disturbing is planned.
 - FS RAA Meeting
 - Meeting proposed for Nov 20th between 12:30 - 2:30