

MEMORANDUM | October 31, 2025

TO Wes Thomas and David Lacey, Oregon Department of Environmental Quality (DEQ)

FROM Peter Shanahan, HydroAnalysis LLC (HALLC); Jennifer Hart and Gail Fricano, Industrial Economics, Inc. (IEC)

SUBJECT Five Tribe review of “IRAM ISS Prism Refinement Work Plan,” dated September 30, 2025

This memorandum, submitted on behalf of the Five Tribes,¹ reviews the *IRAM [Interim Removal Action Measure] ISS [In Situ Stabilization and Solidification] Prism Refinement Work Plan* (Work Plan) prepared by Anchor QEA on behalf of NW Natural (Anchor QEA 2025).

Comments

1. The IRAM ISS prisms are defined by previously collected field data including soil borings, dense nonaqueous phase liquid (DNAPL) entry into wells, and prior Tar-Specific Green Optical Screening Tool (TarGOST) borings. The Work Plan proposes supplementing those data with additional borings in areas where gaps exist and in a few locations where prior field data are ambiguous. The proposed boring locations and additional step-outs appear reasonable and should provide good coverage within the prisms.
2. Currently, the IRAM ISS prisms extend approximately 75 feet inland from the proposed location of the ISS barrier wall to the current location of the existing hydraulic control and containment (HC&C) system. However, based on the maps of dense nonaqueous phase liquid (DNAPL) distribution provided in Figures 3a-3g, DNAPL extends much farther inland and in every depth zone characterized from the surface to below the base of the Fill Water Bearing Zone. We are concerned that DNAPL in these areas has the potential to migrate to the Deep Lower Alluvium and potentially to the Willamette River. We recommend NW Natural address this concern by describing how DNAPL upland of the IRAM ISS prisms and not remediated by the IRAM will be controlled by future remedial actions.

References

Anchor QEA. 2025. IRAM ISS Prism Refinement Work Plan, Gasco OU. Prepared for NW Natural. September 30.

¹ The five tribes are the Confederated Tribes of the Grand Ronde Community of Oregon, the Nez Perce Tribe, the Confederated Tribes of Siletz Indians, the Confederated Tribes of the Umatilla Indian Reservation, and the Confederated Tribes of the Warm Springs Reservation of Oregon.
