

October 15, 2009

Mr. Dana Bayuk  
Oregon Department of Environmental Quality  
Northwest Region, Portland Office  
Portland Harbor Section  
2020 SW Fourth Avenue, Suite 400  
Portland Oregon 97201-4987

HAI Project No. 2708  
DEQ ECSI File No. 84

**SUBJECT: Progress Report, NW Natural Gasco Property, 7900 NW St. Helens Avenue, Portland, Oregon**

Dear Mr. Bayuk:

Hahn and Associates, Inc. (HAI) has prepared this monthly Progress Report summarizing Remedial Investigation/Feasibility Study (RI/FS) and source control-related work activities conducted by NW Natural that have occurred relating to the Gasco property during the month of September 2009. NW Natural is completing upland investigatory activities at the subject property under the Voluntary Agreement No. ECVC-WMCVC-NWR-94-13 between NW Natural and the Oregon Department of Environmental Quality (DEQ).

**1.0 Communications and Document Submittals**

In correspondence dated September 1, 2009 (Tim Stone to Dana Bayuk), Anchor QEA, on behalf of NW Natural, provided the Visual Offshore Sheen Report documenting observed conditions offshore of the up-river portion of the Gasco property for the Second Quarter 2009.

In correspondence dated September 2, 2009 (Rob Ede to Dana Bayuk), HAI, on behalf of NW Natural, submitted the Environmental Monitoring Report for the Third and Fourth Quarters 2008, dated August 10, 2009.

In correspondence dated September 8, 2009 (Rob Ede to Dana Bayuk), HAI, on behalf of NW Natural, provided supplemental information to DEQ regarding the proposed automated DNAPL recovery at the MW-13-30 well location. The supplemental information was requested by DEQ in correspondence dated August 14, 2009 (Dana Bayuk to Rob Ede).

During a telephone conference on September 10, 2009 (Dana Bayuk to David Gillingham), DEQ provided verbal approval to proceed with the sampling of Gasco property stormwater outfall WR-107, subject to DEQ's receipt of a written response and confirmation that sampling will conform to the November 2007 Stormwater Pathway Work Plan, as well as DEQ's January 7, 2009 and September 14, 2009 comment letters.

In correspondence dated September 14, 2009 (Dana Bayuk to Bob Wyatt), DEQ provided comments generated from review of the October 2008 Anchor QEA document

entitled *Catch Basin Sediment Sampling Report and Stormwater Sampling Recommendations, NW Natural, Former Gasco Manufactured Gas Plant Site*. DEQ requested that the Report be revised and specific responses be provided, where requested, as per comments in its September 14, 2009 letter.

Representatives of NW Natural and DEQ met on September 15, 2009 to discuss on-going upland source control items including the planning and design of a vertical barrier, as well as groundwater treatment system discharge limitations, monitoring parameters, and permitting issues.

In correspondence dated September 24, 2009 (Dana Bayuk to Bob Wyatt), DEQ provided comments and direction regarding the content and schedule for the Source Control Measure (SCM) Interim Design Report (IDR) for shoreline segments 1 and 2. In this correspondence, DEQ directed NW Natural to submit the IDR on or before November 7, 2009.

In correspondence dated September 30, 2009 (Dana Bayuk to Tim Stone), DEQ provided comments from review of a September 2, 2009 Anchor QEA Investigation-Derived Waste disposal request concerning soil cuttings generated as part of geotechnical investigation work near the Gasco shoreline. In its comments, DEQ requested follow-up testing for leachable lead be conducted, and that several other changes/additions to the disposal request document be made.

In correspondence dated September 30, 2009 (Dana Bayuk to John Edwards), DEQ provided comments on Section 3.3 of the Anchor QEA September 2009 document "Capture Zone Field Test Plan" as was provided to EPA on behalf of NW Natural in accordance with an EPA Order. Specifically, DEQ requested supplemental information concerning the planned construction design of proposed off-shore piezometers. An expedited review was provided in effort to allow the field work to proceed in the current in-water work window that ends October 31, 2009.

## **2.0 □ Field Work**

Sevenson Environmental Services and Anchor QEA concluded pilot groundwater treatment system testing in late August, with plant dismantling and decontamination concluding in early September.

Field activities related to monitoring and maintenance of the dense non-aqueous phase liquid (DNAPL) extraction system at the surficial fill MW-6-32 well location occurred during September. Approximately 18 gallons of DNAPL / water was pumped from well MW-6-32 during September. Based on visual observations during select pumping cycles, it is estimated that between approximately 25 to 80% of the liquid pumped in September was DNAPL.

Discharge of treated water (groundwater from the LNG containment basin) to the City of Portland sanitary sewer was initiated on March 16, 2007 under Temporary Wastewater Discharge Permit 500.022 (expires February 15, 2012). Results of NW Natural's effluent sampling are provided to BES in Discharge Monitoring Reports that are submitted for any month that effluent sampling occurs – which is at least every other month in

accordance with the permit. As of September 29, 2009, a total of 6,023,812 gallons of treated water have been discharged to the sanitary sewer in 2009.

Efforts to access RP-series wells located at the Siltronic property during the third quarter as described in the RI Workplan were conducted but access was not received during the September timeframe.

Ongoing visual sheen monitoring, consistent with a DEQ-approved monitoring plan, of the boom / sheen containment area immediately offshore of the Gasco/Siltronic property boundary were conducted during September.

### **3.0 Anticipated Activities in October and November 2009**

Meetings with NW Natural and DEQ will occur through October and November 2009 as needed to expedite discussions and resolution of issues concerning design of groundwater/DNAPL source control, as well as other project related items such as upland risk assessment and feasibility study activities.

NW Natural will conduct stormwater sampling for the WR-107 outfall in accordance with the October 23, 2008 *Draft Source Control Data Gaps Catch Basin Sediment Sampling Report* and as per DEQ's September 14, 2009 letter during the indicated time-frame – weather dependent. Further, efforts are being made to resolve the discharge location of the single existing catch basin in the Koppers Leasehold area that does not reportedly drain to the Koppers stormwater tankfarm for discharge to the City of Portland sanitary sewer system. If it is determined that this catch basin does discharge to Doane Creek, it is NW Natural's intent to sample this discharge during the same storm events that WR-107 will be sampled.

Revisions to the *Catch Basin Sediment Sampling Report and Stormwater Sampling Recommendations, NW Natural, dated October 2008*, as requested by DEQ in their September 14, 2009 correspondence, will be completed during the specified time-frame.

An Environmental Monitoring Report, to include groundwater elevation maps, DNAPL thickness measurements, and final laboratory data and validation reports for the first and second quarters of 2009 will be submitted to DEQ in November 2009.

Remedial Investigation activities anticipated to be conducted by NW Natural at the Siltronic property during the specified time-frame (access agreement executed in September) include the initiation of Doane Creek sampling-related activities including shallow soil sampling, sediment sampling, and stormwater sampling activities.

A work plan describing the proposed abandonment of wells MW-13-61R and MW-16-125 is anticipated to be provided to DEQ for review during this timeframe.

Efforts to access RP-series wells located at the Siltronic property for groundwater monitoring activities as described in the RI Workplan will continue in the fourth quarter 2009 since access issues were not resolved during the third quarter.

Automated DNAPL recovery will be initiated at the MW-13-30 location during the specified time-frame, assuming receipt of approval from DEQ of the September 8, 2009 design plans.

The following activities in support of groundwater source control are in progress.

- Anchor QEA is preparing the source control Interim Design Report, to be submitted to the DEQ on or before November 7, 2009.
- Anchor QEA is preparing a technical response to the October 8, 2009 letter from DEQ and EPA regarding the Segment 2 Capture Zone Test Plan. Assuming that the technical issues are resolved, the installation of the offshore piezometers will begin in October, 2009.

The following reports and work plans on the Site have been submitted to DEQ for review and comment.

- Revised Baseline Ecological and Human Health Risk Assessment Report, December 2004, Anchor Environmental, LLC.
- Remedial Investigation Report, NW Natural – Gasco Facility, 7900 NW St. Helens Road, Portland, Oregon, April 30, 2007, Hahn and Associates, Inc.
- Source Control Evaluation Report, "Segment 3" Siltronic Property Related to NW Natural "Gasco" Site, February 19, 2009, Anchor QEA.
- Evaluation of potential method produced biases associated with available cyanide method OIA-1677, August 14, 2009, Anchor QEA.
- Supplemental Information, Automated DNAPL Recovery, Incorporation of Well MW-13-30 to Current System, NW Natural Facility, September 8, 2009, Hahn and Associates, Inc.

Should you have any questions, please contact the undersigned.

Sincerely,



Rob Ede, R.G.  
Principal

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c: Ms. Sandra Hart, NW Natural  
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