

March 15, 2010

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 February 2010. 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 February 4, 2010 (Dana Bayuk to Bob Wyatt), DEQ provided comments from review of the November 17, 2009 HAI document entitled *Monitoring Well Abandonment and Replacement: MW-13-61R and MW-16-125, NW Natural Gasco Property*. DEQ requested revision and resubmittal of the November 17 document.

In correspondence dated February 8, 2010 (Rob Ede to Dana Bayuk), HAI, on behalf of NW Natural, provided DEQ with a letter summarizing the proposed NW Natural groundwater monitoring schedule for the Gasco and Siltronic properties during 2010.

*An Environmental Monitoring Report, First and Second Quarter 2009, NW Natural Gasco Facility, Portland, Oregon*, dated January 29, 2010 was submitted by HAI on behalf of NW Natural to DEQ via ftp upload on February 11, 2010.

A monthly NW Natural/DEQ project coordination meeting, established to discuss technical issues related to upland risk assessment, feasibility study, and groundwater/DNAPL source control-related activities, occurred on February 18, 2010.

In correspondence dated February 18, 2010 (Rob Ede to Dana Bayuk), HAI, on behalf of NW Natural, submitted the document: *Monitoring Well Abandonment and Replacement: MW-13-61R and MW-16-125, NW Natural Gasco Property, Revision 1*. This document was revised in response to DEQ's February 4, 2010 comment letter.

## **2.0 □ Field Work**

Field activities related to monitoring and maintenance of the dense non-aqueous phase liquid (DNAPL) extraction system at the surficial fill MW-6-32 and the MW-13-30 well locations occurred during February. During February, approximately 42 gallons of DNAPL / water was pumped from wells MW-6-32 and MW-13-30 (combined). Based on visual observations during select pumping cycles, it is estimated that approximately 50% to 75% of the liquid pumped in February from MW-13-30 was DNAPL, while approximately 60% of the liquid pumped from MW-6-32 was DNAPL. System optimization, including varying the pump duration at MW-13-30 location is ongoing in an effort to decrease the water fraction produced from that location.

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 March 1, 2010, a total of 2,437,094 gallons of treated water have been discharged to the sanitary sewer in 2010.

Site-wide groundwater elevation and DNAPL presence / thickness measurements for the first quarter 2010 at all well locations were completed on February 12, 2010, with the collection of samples from the wells (First Quarter 2010 monitoring event) being initiated on February 22 and continuing through the month of February.

Installation of the upland monitoring wells and extraction wells PW-7, 8, and 9 per the EPA approved Capture Zone Field Test plan, initiated during the last week of January, continued through the month of February.

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 February.

## **3.0 Anticipated Activities in March and April 2010**

Installation of the capture zone test extraction wells and monitoring wells was completed March 3 and development of the well screens will be completed in March. Installation of the well pumps, pipelines, and control systems per the Capture Zone Field Test plan, is anticipated to continue through the second week of March. The capture zone testing will begin after the control systems are installed and tested.

NW Natural's First Quarter 2010 groundwater monitoring event for the Gasco site and the Siltronic property will continue through the first week of March (completed March 3, 2010).

An Environmental Monitoring Report, to include groundwater elevation maps, DNAPL thickness measurements, and final laboratory data and validation reports for the third and fourth quarters of 2009 is anticipated to be available for submittal to DEQ during April.

Regularly scheduled monthly meetings with NW Natural and DEQ will occur through the indicated time-frame to discuss the status of DEQ review of the NW Natural reports and

letters listed at the end of this letter. NW Natural and DEQ are currently in the process of scheduling March meetings to discuss the status of DEQ review of the Gasco upland Risk Assessment report, Gasco upland Remedial Investigation report, and Gasco Source Control Interim Design report.

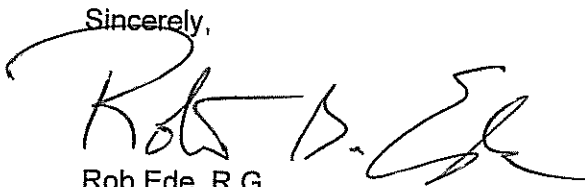
As part of NW Natural RI activities at the Siltronic property, those RP-series wells located at the Siltronic property that have not yet been sampled for RI-related COIs are scheduled to be sampled during the week of March 15, 2010 as part of the overall First Quarter 2010 site-wide monitoring event. Additionally, it is anticipated that Doane Creek soil and sediment activities will be initiated in the March or April timeframe.

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.
- Proposed Revision to Environmental Controls and Sheen Monitoring at the Gasco/Siltronic Property Boundary, October 5, 2009, Anchor QEA
- Interim Design Report for Source Control, November 6, 2009, Anchor QEA
- Plan for Monitoring Well Abandonment and Replacement (MW-13-61R and MW-16-125), Revision 1, February 18, 2010, HAI.

Should you have any questions, please contact the undersigned.

Sincerely,



Rob Ede, R.G.  
Principal

robe@hahnenv.com

c: Ms. Sandra Hart, NW Natural  
Mr. Bob Wyatt, NW Natural  
Ms. Patty Dost, Pearl Legal Group PC (electronic only)  
Mr. Carl Stivers, Anchor QEA, L.L.C.  
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Mr. Henning Larsen, DEQ NW Region  
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Mr. Tom McCue, Siltronic Corporation  
Ms. Kristine Koch, Region 10 EPA (electronic only)  
Mr. Sean Sheldrake, Region 10 EPA (electronic only)  
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