

August 13, 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 July 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 e-mail correspondence dated July 2, 2010 (Dana Bayuk to Bob Wyatt), DEQ provided NW Natural with comments from review of the Anchor QEA, LLC memorandum entitled, "*Historical Sheen Occurrences at the Gasco/Siltronic Property Boundary and Request for Approval of Revised Containment Structure Configuration*", dated April 6, 2010. DEQ approved NW Natural's recommendation for sorbent/containment boom deployment, inspection, and maintenance, as well as the discontinuation of quarterly report sheen monitoring preparation.

In e-mail correspondence dated July 13, 2010 (Dana Bayuk to Bob Wyatt), DEQ provided clarification regarding the coordination of roles between EPA and DEQ as related to in-water, near-shore, and upland activities being completed by NW Natural as part of the *Segment 2 Capture Zone Test Plan*, as approved by EPA on January 28, 2010 and by DEQ on February 1, 2010.

NW Natural invoked dispute resolution concerning the matters stated in Dana Bayuk's June 11, 2010 e-mail concerning interim source control on July 14, 2010.

A memorandum *Capture Zone Field Test Plan Addendum* was submitted to EPA and DEQ on July 15, 2010. The memo contains a revised plan to conduct additional pump tests in Gasco Segment 2, including pumping from new pilot extraction well PW-8-37.

In e-mail correspondence dated July 16, 2010 (Dana Bayuk to Bob Wyatt), DEQ instructed NW Natural to submit responses to DEQ's March 26 *Interim Design Report* review letter by July 30, 2010.

In correspondence dated July 20, 2010 (Bob Wyatt to Jim Anderson), NW Natural provided DEQ with its position concerning the directives contained within Dana Bayuk's June 11, 2010 e-mail. This correspondence also contained NW Natural's response to DEQ March 26, 2010 comments on the November 2009 *Interim Design Report* and the December 2009 *Pilot Study Report*.

In e-mail correspondence dated July 20, 2010 (Jim Anderson to Bob Wyatt), DEQ provided a recommended process and timeline for completing the dispute resolution process.

In correspondence dated July 21, 2010 (Dana Bayuk to Bob Wyatt), DEQ provided NW Natural with comments from review of the *Capture Zone Field Test Plan Addendum-Revised Plan to Conduct Additional Pump Tests in Gasco Segment 2 to include Pumping from PW-8-37*, dated July 15, 2010. DEQ did not approve of the use of well PW-8-37 for testing, and instead required its abandonment.

In e-mail correspondence dated July 23, 2010 (Bob Wyatt to Dana Bayuk), NW Natural requested a meeting with DEQ and EPA to discuss coordination of document review and point of contact for decisions and direction between the two agencies.

In e-mail correspondence dated July 24, 2010 (Sean Sheldrake to Bob Wyatt), EPA concurred with NW Natural's July 23 request for a meeting to further discuss NW Natural concerns regarding agency coordination. The e-mail also contained EPA comments on NW Natural's July 15, 2010 *Capture Zone Field Test Plan Addendum*.

In e-mail correspondence dated July 26, 2010 (Dana Bayuk to Bob Wyatt), DEQ indicated their availability to meet with NW Natural and EPA to discuss project coordination issues.

In correspondence dated July 28, 2010 (John Edwards to Dana Bayuk), Anchor QEA, on behalf of NW Natural, provided a description of the rationale for the final design of well PW-8-37 and included the proposed plan for abandonment of this well, should DEQ continue to require that path.

In correspondence dated July 29, 2010 (Dana Bayuk to Bob Wyatt), DEQ provided conditional approval for the abandonment of well PW-8-37.

In e-mail correspondence dated July 29, 2010 (Rob Ede to Dana Bayuk), HAI, on behalf of NW Natural, submitted proposed revisions to the 2010 Groundwater Monitoring Plan for Gasco, including NW Natural monitoring activities on the Siltronic property.

## **2.0 Field Work**

Field activities related to monitoring and maintenance of the dense non-aqueous phase liquid (DNAPL) extraction system at surficial fill well locations MW-6-32 and MW-13-30 occurred during July. During July, approximately 120 gallons of DNAPL / water were pumped from wells MW-6-32 and MW-13-30 (combined). During July, MW-6-32 was programmed to pump for four 8-minute cycles per day (unchanged), while the program for well MW-13-30 was programmed to pump for one 60-minute cycle per day.

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 July 29, 2010, a total of 8,712,297 gallons of treated water have been discharged to the sanitary sewer in 2010.

Doane Creek sediment sampling activities on the BNSF property were completed on July 1, 2010 as part of NW Natural's RI activities as related to the adjacent Siltronic property. Stream gauge reinforcement, to prevent damage from debris during high flow, was completed on July 26, 2010. Surveying of sampling points within Doane Creek was initiated on July 29, 2010.

Ongoing visual sheen monitoring of the boom / sheen containment area immediately offshore of the Gasco/Siltronic property boundary consistent with a DEQ-approved monitoring and maintenance plan dated October 5, 2009 were conducted during July.

### **3.0 Anticipated Activities in August and September 2010**

Doane Creek sampling activities, part of NW Natural's RI activities as related to the Siltronic property, to be conducted during the August / September time-frame (weather pattern dependent) include the first of four planned seasonal surface water sampling events.

The Third Quarter groundwater monitoring event is scheduled to occur during the last two weeks of September, and will be as described in the July 29, 2010 submitted revisions as provided to DEQ on July 29, 2010, unless DEQ otherwise comments on the proposed changes.

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

- 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 Modification to 2010 Groundwater Monitoring Program-Gasco Site, July 29, 2010, HAI.

Should you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rob Ede", with a large, sweeping flourish extending to the right.

Rob Ede, R.G.  
Principal

[robe@hahnenv.com](mailto: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.
- Mr. John Edwards, Anchor QEA, L.L.C.
- Mr. Ben Hung, Anchor QEA, L.L.C.
- Mr. Ryan Barth, Anchor QEA, L.L.C.
- Mr. Henning Larsen, DEQ NW Region
- Mr. Tom Gainer, DEQ NW Region (electronic only)
- Mr. Tom McCue, Siltronic Corporation
- Ms. Kristine Koch, Region 10 EPA (electronic only)
- Mr. Sean Sheldrake, Region 10 EPA (electronic only)
- Mr. Rene Fuentes, Region 10 EPA (electronic only)
- Mr. Eric Blischke, Region 10 EPA (electronic only)
- Mr. Chip Humphrey, Region 10 EPA (electronic only)
- Mr. Lance Peterson, CDM, Inc. (electronic only)