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Sent: Thursday, August 24, 2023 6:46 PM
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Cc: Wesley Thomas <Wesley.Thomas@deq.state.or.us>; Halah Voges <hvoges@anchorqea.com>; Rob Ede <robe@hahnenv.com>; Jen Mott <jmott@anchorqea.com>; Ariel Blanc <ablanc@anchorqea.com>
Subject: Portland Harbor Data Management Plan and Summary of Parent/Field Duplicate Averaging Methods

Hello Jennifer,

Please find attached the Portland Harbor Program Data Management Plan (DMP; Oct. 2021). NW Natural has agreed to follow the Portland Harbor RI rules for adding an appropriate qualifier when total values are based on a limited number of analytes (DEQ Comment #12 on RI/HERA Addendum Report) and would like to be consistent with the Portland Harbor DMP for other data treatment rules for the Gasco OU FS. The main difference between the data treatment rules for the RI/HERA Addendum and the Portland Harbor DMP are the methods used to averaging parent/field duplicates and the summary below highlights the noted differences.

Method Item	Portland Harbor DMP	RI Addendum	Methods same or different?
Media for which parent field duplicate averaging occurs	All media, including solids	Aqueous media (surface water and groundwater)	different
Parent and field duplicate results are both detected	Average results	Average results	same
One result is detected and the other is nondetect	Use detected result	Average results	different
Both results are nondetect	Use lower result	Use higher result	different

Please let us know if we can follow the Portland Harbor DMP for the Gasco OU Uplands FS.

We would also like to use this email exchange to memorialize the agreement reached on August 23, 2023, with regards to the TPH summing method for the Gasco OU FS. Anchor QEA (on behalf of NW Natural) will calculate TPH sums for both groundwater and soil as the sum of TPH-Gx and TPH-Dx (including both diesel range and oil-range hydrocarbons). Could DEQ acknowledge this agreement when providing a response to the proposal to use the Portland Harbor DMP?

Thanks!

Taku Fuji, Ph.D. | he/him

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