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Sent: Friday, August 25, 2023 9:39 AM

To: Wesley Thomas <Wesley.Thomas@deq.state.or.us>

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Subject: Gasco OU Uplands FS - Ecological COC/PRG Tables 1 through 5 for Discussion on August 31st

Good morning, Wes,

Please find attached the following Ecological COC/PRG Tables and a description of what has been revised to assist your reviews. The tables are provided in two separate PDFs: Ecological PRG Tables 1 and 2 and Tables 3 through 5. We'll discuss these tables during our upcoming meeting on August 31st.

1. Gasco OU Ecological Surface Soil COCs **Table 1** – No revisions were necessary, and this table is included in this package for completeness.
2. Gasco OU Ecological Surface Soil PRGs **Table 2** – Revised based on DEQ comments on draft Ecological Soil PRG Table from July 14, 2023.
 - a. Added column presenting the Ecological Soil PRG and the Ecological Soil Hot Spot Level.
 - b. Updated Portland Basin soil background values to 90th percentile values and added footnote.
 - c. Added footnote for Iron PRG.
 - d. Added corrected RBCs for bird and mammal HPAH based on DEQ provided parameters (see Note #9).
3. Gasco OU Ecological Groundwater COCs and PRGs – Source Control **Table 3** – Revised based NW Natural's legal review of framework document and draft table.
 - a. Source Control PRGs for Groundwater are based on Portland Harbor ROD Table 17 Groundwater CULs/PRGs.

- b. Table 3 only shows Gasco OU Groundwater COCs with corresponding Portland Harbor ROD Table 17 Groundwater COCs.
- c. Added reference to “Framework Document” (Wyatt 2023)
- 4. Gasco OU Ecological Groundwater COCs and PRGs – Hot Spot Evaluations **Table 4** – Revised based on NW Natural’s legal review of framework document and draft table.
 - a. Hot Spot PRGs for Groundwater based on hierarchy of sources per OAR 340-122-0115 (51) (a) through (c)
 - i. OAR 340-122-0115 (51) (a) State/federal water quality standards – prioritized OR AWQC over EPA AWQC
 - ii. OAR 340-122-0115 (51) (b) Acceptable Risk Levels for Willamette River (Portland Harbor ROD Table 17 RAO 8 CULs/PRGs)
 - iii. OAR 340-122-0115 (51) (c) Available published peer-reviewed scientific information on concentrations to have a significant adverse effect on a current or reasonably likely future beneficial use of water (DEQ and IFS PRGS/SLVs).
 - b. These PRGs are basically the same as presented to DEQ on July 28th and the main change is updating hierarchy to prioritize state/federal AWQC. The presentation sequence for the sources of PRGs has been changed to be consistent with OAR-340-122-0115 (a) through (c)
 - c. Added reference to “Framework Document” (Wyatt 2023)
- 5. Gasco OU Ecological Riverbank Seep COCs and PRGs– Source Control **Table 5** – Revised based on NW Natural’s legal review of framework document and draft table.
 - a. NW Natural’s legal review directed use Portland Harbor ROD Table 17 Surface Water CULs/PRGs as PRGs for this pathway to riverbank.
 - b. This direction is based on fact that the riverbank is in EPA’s jurisdiction.
 - c. This is a significant change from the table shown to DEQ on July 28th.
 - d. Added reference to “Framework Document” (Wyatt 2023)

Anchor QEA is also preparing the final set of Ecological COC/PRG tables for the Doane Creek media (surface soil, surface water, sediments, and Fill WBZ groundwater migration to Doane Creek) to show at the August 31st meeting and submit shortly afterwards. As there are a limited number of COCs for the Doane Creek media, we believe that the review of these tables should be straightforward.

We look forward to discussing these tables on August 31st and resolving the Ecological PRGs for the Gasco OU Uplands FS.

Thanks!

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