

ECSI No. 84 September 2023 NW Natural Gasco Site



# DNAPL Monitoring Semiannual Summary Report (January 1 through June 30, 2023)

Prepared for NW Natural

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Prepared for NW Natural 220 NW Second Avenue Portland, Oregon 97209 Prepared by
Anchor QEA, LLC
6720 S Macadam Avenue, Suite 300
Portland, Oregon 97219

# **CERTIFICATION STATEMENT**

The material and data in this report were prepared under the supervision and direction of the undersigned.



Expires January 1, 2024

Matthew G. Wilson, RG, LHG Anchor QEA, LLC

September 29, 2023

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## **ABBREVIATIONS**

CDR Revised Groundwater Source Control Construction Design Report

DEQ Oregon Department of Environmental Quality

DNAPL dense nonaqueous phase liquid

EPA U.S. Environmental Protection Agency
HC&C hydraulic control and containment
LNAPL light nonaqueous phase liquid

NAPL nonaqueous phase liquid

Siltronic Siltronic Corporation
Site NW Natural Gasco site

TarGOST Tar-Specific Green Optical Screening Tool

TMA TarGOST monitoring area

WBZ water-bearing zone

### 1 Introduction

This report presents the results of the dense nonaqueous phase liquid (DNAPL) monitoring program implemented by Anchor QEA, LLC, at the NW Natural Gasco site (Site) in Portland, Oregon. DNAPL monitoring has occurred prior to and during testing and subsequent full-time operation of the groundwater hydraulic control and containment (HC&C) system over 13 semiannual reporting periods since April 29, 2013.

As outlined in the *Revised Groundwater Source Control Construction Design Report* (CDR) (Anchor QEA 2012), the DNAPL monitoring program was implemented at the request of the Oregon Department of Environmental Quality (DEQ) to evaluate whether operation of the HC&C system at the Site could potentially mobilize DNAPL from the former effluent management areas on the NW Natural and Siltronic Corporation (Siltronic) properties. To address DEQ's request, Anchor QEA has implemented a DNAPL monitoring program that includes the following four tasks:

- Well Monitoring. The presence or absence of DNAPL and, where applicable, the rates of DNAPL entry and removal are monitored at 75 wells located along the Site shoreline of the Willamette River.
- Tar-Specific Green Optical Screening Tool (TarGOST) Borings near Pumping Wells.

  TarGOST borings have been advanced on multiple occasions near six pumping wells selected by DEQ with known DNAPL presence in the subsurface to assess possible changes in DNAPL distribution.
- TarGOST Monitoring Area (TMA) Borings. TarGOST borings have been advanced on multiple occasions in three 10-foot-by-10-foot-square monitoring areas (TMAs) near the edges of known DNAPL boundaries to assess possible changes in DNAPL distribution in areas that have had no previous historical detections of DNAPL.
- **Oil-Water Separator Monitoring.** DNAPL pulled into pumping wells and recovered in oil-water separators is monitored, recorded, and removed.

In the current reporting period, Anchor QEA conducted the following monitoring activities:

- Monitoring for the presence or absence and, where applicable, the amount of DNAPL in the wells in the DNAPL monitoring program
- Calculating the rate of DNAPL entry into wells and the volume of DNAPL removed
- Monitoring the volume and rate of DNAPL accumulation in oil-water separators

The DNAPL monitoring program was initiated before startup of the HC&C system to characterize baseline conditions. Monitoring the rate of DNAPL entry into wells and the volume of DNAPL removed began on April 29, 2013, 6 months before interim operation of the HC&C system began and continues to the present. Interim operation and testing of the HC&C system began on September 23, 2013, and

continued until May 14, 2015. Full-time, full-scale operation of the HC&C system began on May 14, 2015, and continues to the present.

Five TarGOST boring events have been completed on the following dates:

- Baseline TarGOST borings near the pumping wells were completed in April 2012 and August 2013. Baseline TarGOST borings at the three TMAs were completed in August 2013.
- Follow-up TarGOST events near the pumping wells and TMA TarGOST borings were completed in the following months:
  - June 2014
  - November 2015
  - June 2016
  - March 2022

The HC&C system objective is to prevent migration of contaminated groundwater from the uplands to the Willamette River in the Upper and Lower Alluvium water-bearing zones (WBZs) in a manner that minimizes DNAPL mobilization associated with system operations. The system was also designed to recover and manage any DNAPL captured during system operation. Performance monitoring completed to date indicates the system is meeting these objectives. DNAPL monitoring data collected since 2013 in accordance with the DEQ-approved DNAPL monitoring program presented in the CDR (Anchor QEA 2012) show that, incidental to its operation, the HC&C system has not caused DNAPL movement in the nearshore area except near pumping wells where DNAPL entry is occurring, and the HC&C system is capturing that DNAPL in the immediate vicinity of these pumping wells.

# 2 Well Monitoring

#### 2.1 DNAPL Occurrence

The nearshore DNAPL monitoring program includes gauging and, where applicable, DNAPL removal at 75 wells and piezometers (hereafter collectively referred to as "wells"). See Table 1 for a list of the wells in the DNAPL monitoring program. The locations of the wells in the DNAPL monitoring program are shown in Figure 1.

In this report, "DNAPL zone" indicates stratigraphic intervals in which DNAPL was visually identified during well installation and the screened interval of wells where DNAPL was not observed during well installation but later entered the well. In the Alluvium WBZs, the term "DNAPL" refers only to fluid and does not include manufactured gas plant residuals described as tar, solid tar, and/or semisolid tar based on field observations. These terms are restricted to the Fill WBZ. The term "weathered DNAPL" is used for observations of tar-like material below the base of the Fill WBZ.

Table 1 lists wells that had DNAPL observations during well installation, wells that have had DNAPL entry through the well screen, and wells where DNAPL has been removed from the well sumps designed specifically for that intended purpose. DNAPL entry or removal at a given well listed in Table 1 applies to any point in the monitoring history of the well, not only the current reporting period.

DNAPL was observed during drilling and well installation activities at 55 of the 75 nearshore locations where wells are monitored as part of this program; measurable DNAPL has entered and accumulated in 20 of the 75 wells. These 20 wells are screened as follows:

- Sixteen are screened in the Upper Alluvium WBZ: DW-6U, DW-11U, DW-14U, MW-16-45, MW-26U, MW-27U, MW-30U, MW-37U, MW-38U, PW-1-80, PW-3-85, PW-6U, PW-11U, PW11Ub, PW-13U, and PW-14U.
- Three are screened in the Lower Alluvium WBZ: PW-2L, MW-PW2L, and MW-34L.
- One is screened in the Fill WBZ: MW-18-30.

Of the 20 wells with DNAPL entry, DNAPL was not observed within the screened interval (including filter pack) during drilling and well installation activities at six wells (MW-27U, MW-30U, PW-11U, PW-11Ub, PW-13U, and PW-14U). DNAPL began entering these wells after well installation.

Figure 2 shows the 20 nearshore wells where DNAPL has been detected and summarizes the calculated DNAPL entry rates in gallons per month for each of these wells for the current reporting period. Table 2 lists the DNAPL thickness and volume measurements and DNAPL entry and removal volumes during the current reporting period at the wells where DNAPL has been detected. A comprehensive electronic version of Table 2 including all data collected since the DNAPL monitoring

program began is included via FTP site upload as Appendix A. Table 3 lists the total volume of DNAPL entry into or removed from each well and the average DNAPL entry rates for each reporting period. The depth intervals of DNAPL observations during drilling and well installation activities are shown in cross section in Figures 3a and 3b. Figures 3a and 3b also highlight the nearshore wells where DNAPL has been detected.

The 20 wells with detected DNAPL are monitored according to the schedule in Table 1 to measure the DNAPL thickness in each well. DNAPL has been removed via dedicated DNAPL pumps from 14 of the 20 wells at the frequency necessary to keep the DNAPL below the top of the well sump. DNAPL has been removed on a one-time basis from four wells (DW-6U, DW-11U, PW-3-85, and PW-11U) for DNAPL testing and characterization, but not because the volume of DNAPL in the well approached the well sump capacity. DNAPL has not been removed from one well, MW-37U, because the thickness of DNAPL through June 30, 2023, has not approached the capacity of the well sump.

# 2.2 DNAPL Entering Wells

### 2.2.1 DNAPL Entering Nearshore Wells

Table 3 lists the DNAPL entry rates for the 20 nearshore wells with measurable DNAPL entry in the DNAPL monitoring program. Table 3 also presents the changes over time in the total DNAPL entry rates and in the percentage of the total DNAPL entry that occurs into nearshore non-pumping wells and pumping wells. During the current reporting period, approximately 7% of all DNAPL entry was into non-pumping wells. The remaining approximately 93% of DNAPL entry was into pumping wells.

As shown in Table 3 and Figure 2, in the current reporting period, 10 of the 20 nearshore wells had DNAPL entry rates of less than 0.1 gallon per month, three wells had DNAPL entry rates between 0.1 and 0.5 gallon per month, and six wells had DNAPL entry rates between 0.5 and 5 gallons per month. One nearshore well, PW-2L, had a DNAPL entry rate greater than 5 gallons per month.

Figure 4a shows DNAPL entry rates in gallons per month as time-series plots for 11 non-pumping wells that have had measurable DNAPL entry; wells DW-11U, MW-30U, MW-37U, PW-3-85, and PW11U are excluded because of near-zero (less than 0.05 gallon per month) or zero average DNAPL entry. Figure 4b shows the average DNAPL entry rates in gallons per month as time-series plots for five pumping wells that have had measurable DNAPL entry. Operation of pumping well PW-11Ub began on March 4, 2022, and replaced PW-11U as an active pumping well; pumping was terminated at PW-11U on March 28, 2022. Since that time, PW-11U has been considered a non-pumping well.

Pumping well PW-2L is excluded from Figure 4b to provide greater resolution of the DNAPL entry rates at the remaining pumping wells. Moreover, DNAPL was continuously removed from the PW-2L well sump via automatic pumping from November 2017 through July 2020, and the entry rate could not be directly measured during that time. Therefore, the DNAPL removal rate and the groundwater

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pumping rate from PW-2L are shown separately in Figure 4c, with the assumption that the DNAPL entry and removal rates are approximately equal.

Figures 5a and 5b show the total combined DNAPL entry rates for the non-pumping wells and pumping wells (PW-2L excluded), respectively. Figures 6a and 6b show the total combined cumulative volume of DNAPL entry into the non-pumping wells and pumping wells (PW-2L excluded), respectively. Figures 7a and 7b show the total combined monthly DNAPL entry volume for the non-pumping and pumping wells (PW-2L excluded), respectively. Figure 7c shows the average monthly volume of DNAPL removed from pumping well PW-2L. PW-2L was excluded from Figures 5b, 6b, and 7b to improve the graphing resolution on these figures.

The DNAPL entry rates and monthly and cumulative volumes of DNAPL entry into each individual well since DNAPL monitoring began in April 2013, or since each well was installed, are presented in Appendices B and C.

Wells MW-38U, MW-PW2L, PW-1-80, and PW-2L have had time periods during the DNAPL monitoring program when DNAPL was either continuously removed via an automated removal system or DNAPL was manually removed without thickness measurements. During those time periods, it was not possible to directly measure the DNAPL entry rates into the wells, as explained in previous reports.

The data on the plots in Figures 4a and 5a and the plots in Appendices B and C show that the DNAPL entry and removal rates are approximately equal based on the long-term record of the majority of wells where entry and removal data have been detailed.

# 2.2.2 DNAPL Entry Rate Trend Analysis

As shown in Table 3, DNAPL entry rates generally increased after startup of the HC&C system and the beginning of monitoring. The reporting period with the highest average DNAPL entry rate for a given well, group of wells, or total value is highlighted in blue in Table 3. The historical maximum DNAPL entry rate in two wells, PW-11Ub and PW-14U, occurred in the current reporting period, and the DNAPL entry rate in a third well, PW-11U, was highest within the last 4 years of monitoring (2020 to 2023). With regard to wells PW-11Ub and PW-14U (highest rates during current reporting period), well PW-11Ub was recently installed in March 2022, is still equilibrating, and has not been monitored for a sufficient time to allow for trend interpretation. With regard to well PW-14U, the DNAPL entry rate at this well spiked during spring 2023; however, its DNAPL entry rate subsequently decreased to within historical ranges after the spike subsided (Figure 4b). The remaining wells being evaluated had their peak DNAPL entry rate in 2019 or earlier. For these remaining wells, after the peak DNAPL entry rate was observed, the DNAPL entry rates decreased or remained approximately stable.

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A Mann-Kendall trend analysis was performed in the second half of 2022 (July 1 through December 31, 2022) following U.S. Environmental Protection Agency (EPA) QA/G-9S (EPA 2006) statistical guidance to classify each well as having either a decreasing or stable DNAPL entry rate trend since its peak DNAPL entry rate through 2022. Further trend analyses via Mann-Kendall will be repeated after the completion of each calendar year of data collection. The results through 2022 are summarized in the following text.

DNAPL entry rate trends for individual wells for the period after the peak DNAPL entry rate (including the peak value) were evaluated with the Mann-Kendall Test. Datasets with a significant (alpha = 0.05) monotonic trend were classified as "decreasing," and those without a significant trend were classified as "stable." The trend analysis results for data through December 31, 2022, are summarized in Table 4.

In summary, since the observed peak DNAPL entry rate through December 31, 2022, DNAPL entry rates are low, have remained stable, or have decreased in all nearshore non-pumping wells and pumping wells. Greater than half of the non-pumping wells (9 of 14) and pumping wells (3 of 4) have statistically significant decreasing DNAPL entry rate trends after the peak. Two wells, MW-37U and PW-11Ub, lacked sufficient data to complete the trend analysis.

The next DNAPL entry rate trend analysis is scheduled to be completed in the DNAPL monitoring semiannual report covering the period from July 1 to December 31, 2023, and will include trend analysis of all data through December 31, 2023.

# 2.2.3 DNAPL Removal Rates from MW-6-32 and MW-13-30

Table 3 shows the approximate volume of DNAPL removed from wells MW-6-32 and MW-13-30, where DNAPL is being removed by Hahn and Associates, Inc., on behalf of NW Natural. MW-6-32 and MW-13-30 are not part of the DNAPL monitoring program, are not located near the river shoreline, and are screened in the Fill WBZ. MW-6-32 and MW-13-30 are plumbed together and routine in-well measurement of DNAPL is not possible, given the configuration of the DNAPL recovery system; DNAPL observations from these wells are based on the combined removal volumes measured in a 550-gallon storage tank. These are the only inland locations where measurable DNAPL had been recovered on a routine basis until installation of the T-50 trench in 2020 as described in Section 2.2.4, and their DNAPL removal rates are provided for completeness and for comparison versus those observed at nearshore wells.

As shown in Table 3, based on the data collected in specific reporting periods, the highest DNAPL entry rates for these two wells combined occurred in this reporting period. Generally, lower DNAPL entry rates had been observed since 2018; however, since July 2022, the DNAPL removal rate from these two wells has increased to a historical maximum of 18.9 gallons per month in the current reporting period. This is approximately 35% greater than the historical average of 14.1 gallons per

month for these two wells and represents the second consecutive reporting period of greater than average entry rates after six consecutive reporting periods with DNAPL removal rates below its historical average. The increase in DNAPL entry and removal from these two wells has occurred concurrently with operation of the nearby T-50 interceptor trench beginning in March 2021. The locations of wells MW-6-32 and MW-13-30 in relation to the T-50 trench are shown in Figure 1. The MW-6-32 and MW-13-30 system removes DNAPL via pumping on a controlled schedule. Recent system maintenance has allowed more consistent and effective pumping operations (including increased frequency and duration of pumping) in order to further enhance the rate of DNAPL recovery. Because the T-50 trench collects DNAPL (discussed in Section 2.2.4), it is possible that the trench is drawing DNAPL toward it, and that may be contributing to the increased rate of DNAPL removal at wells MW-6-32 and MW-13-30. More information on the T-50 interceptor trench is provided in Section 2.2.4.

The DNAPL removal rates from these two wells, which are located upland of the Willamette River shoreline, have been consistently greater than the DNAPL entry rates at all the nearshore wells of the HC&C system except for pumping well PW-2L.

# 2.2.4 DNAPL Removal Rates from Fill WBZ Interceptor Trenches

Two Fill WBZ interceptor trenches (T-50 and T-100) were installed in late 2020/early 2021 and began full-time operation on March 11, 2021. The trenches were installed to control Fill WBZ groundwater in the central part of the site near the LNG Basin. As required in the Fill WBZ Trench Design (Anchor QEA 2020), the sumps in the trenches were monitored for DNAPL entry weekly for the first month of operation and then moved to a monthly schedule.

DNAPL was first detected in the T-50 trench sump on August 3, 2022, and the monitoring of DNAPL entry into the sump was returned to a weekly monitoring schedule. The amount of DNAPL removed and the DNAPL entry rate for the current reporting period are shown in Figure 2 and presented in Table 3. During the current reporting period, the T-50 trench had a higher average DNAPL entry (or removal) rate (33.2 gallons per month) than any of the wells listed in Table 3.

As of June 30, 2023, no measurable DNAPL has been detected in the T-100 sump since operation began.

# 2.2.5 Normalized DNAPL Entry Rates

To evaluate the effect that groundwater pumping rates may have on DNAPL entry at a given shoreline area pumping well or non-pumping well, DNAPL entry rates were normalized to groundwater pumping rates on a well-by-well basis. The DNAPL entry rates were normalized by calculating the ratio of the DNAPL entry rate (gallons per month) to the nearby groundwater pumping rate at extraction wells (gallons per minute). For each pumping well, the groundwater

pumping rate at that same well was used in calculating the normalized DNAPL entry rates. For each non-pumping well, the combined pumping rates of nearby extraction wells were used. The DNAPL entry rates and groundwater pumping rates that were used for this evaluation are presented in Appendix B, and the normalized DNAPL entry rates are presented graphically in Appendix D.

A change in normalized DNAPL entry rate may indicate a commensurate change in DNAPL transmissivity in the formation connected to the screened interval of the well. DNAPL transmissivity depends on the DNAPL physical properties, the soil physical properties, the DNAPL saturation within the strata from which DNAPL enters a given well, and the thickness of those DNAPL-containing depth interval(s). DNAPL saturation is the fraction of soil pore space filled with DNAPL. The DNAPL and soil physical properties at a given depth and location are expected to be constant. Therefore, if the normalized DNAPL entry rate increases, that suggests the DNAPL saturation within those strata, and/or the thickness of the DNAPL-containing interval(s), has increased. Alternatively, if the normalized DNAPL entry rate decreases, that suggests the DNAPL saturation within those strata, and/or the thickness of the DNAPL-containing interval(s), has decreased.

#### 2.2.5.1 Pumping Wells

Temporal trends in normalized DNAPL entry rates at pumping wells can be summarized as follows:

- General increase, then variable: PW-6U, PW-13U
- General decrease, then increase: PW-14U
- Variable (increases and decreases): PW-2L, PW-11Ub

For a given pumping well, the normalized DNAPL entry rate (and therefore the DNAPL transmissivity) may increase if nearby mobile DNAPL migrates toward the pumping well, as may occur due to the enhanced hydraulic gradient toward the pumping well caused by groundwater extraction. However, the converse may occur if DNAPL was already present at the pumping well location and the DNAPL was depleted over time due to entry into the pumping well. A combination of these factors may produce variable changes in normalized DNAPL entry rates over time. All three of these types of trends were observed in the pumping well datasets, as summarized in the previous bullet list. At well PW-14U, the normalized DNAPL entry rate reached a peak around 2017 to 2018 and then decreased.

#### 2.2.5.2 Non-Pumping Wells

Temporal trends in *normalized DNAPL entry rates* at non-pumping wells can be summarized as follows:

- Relatively steady: DW-6U, DW-11U, DW-14U, MW-16-45, MW-18-30, MW-26U, MW-27U
- General decrease over time: MW-34L, PW-11U
- General decrease and then increase: MW-38U, MW-PW2L
- Variable (increases and decreases): MW-30U
- Negligible rate: MW-37U, PW-1-80, PW-3-85

At non-pumping wells, the hydraulic gradients related to groundwater pumping are not as strong as they are at the pumping wells, so little or no DNAPL movement may occur. Consistent with this interpretation, half of the non-pumping monitoring wells exhibited relatively steady normalized DNAPL entry rates, regardless of groundwater pumping rate changes. Where DNAPL was already present at a non-pumping monitoring well location, and it migrated toward a groundwater pumping well, then the normalized DNAPL entry rate at the non-pumping well may decrease; this type of trend was observed at three of the non-pumping monitoring wells (MW-34L, MW-38U, and MW-PW2L). At two of those wells (MW-38U and MW-PW2L), the normalized DNAPL entry rate later increased despite a decrease in the pumping rates of adjacent pumping wells. At the other non-pumping monitoring wells, the normalized DNAPL entry rates were variable or negligible (near zero).

Future DNAPL monitoring reports will present updated charts of normalized DNAPL entry rates so that additional changes can be assessed as specific well-by-well pumping rates change over time.

# 2.3 General Effects of HC&C System Operation on DNAPL Entry Rates

In addition to the detailed, non-normalized DNAPL entry rate trend analyses discussed previously, Table 5 summarizes the average DNAPL entry rates for three general time periods relative to HC&C system operations, as follows:

- Prior to HC&C system startup (April 29, 2013, to September 23, 2013)
- HC&C interim operation and testing period (September 23, 2013, to May 14, 2015)
- Full-time, full-scale operation of the HC&C system (May 14, 2015, to the present)

On average, as of June 30, 2023, approximately 92% of the DNAPL entry during full-time, full-scale operation of the HC&C system occurs at pumping wells, and approximately 77% of the total DNAPL entry into nearshore wells occurs at pumping well PW-2L (Table 5). Similarly, during the current reporting period, 93% of total DNAPL entry was observed in the pumping wells (Table 3).

Based on the data listed in Table 5, general differences between DNAPL entry rates between the period prior to system startup and the full-time, full-scale HC&C system operation can be summarized in the following general categories:

- **No Pre-Startup Data.** Four non-pumping wells (DW-6U, DW-11U, DW-14, and MW-PW2L) and one pumping well (PW-11Ub) were installed after startup of the HC&C system. Thus, the datasets for these wells cannot be used to evaluate changes in DNAPL entry between the period before system startup and during full-scale operation.
- Consistent Near-Zero DNAPL Entry. Non-pumping wells MW-30U, MW-37U, and PW-3-85 have had near-zero DNAPL entry (less than 0.1 gallon per month) throughout the entire historical monitoring period. PW-11U has had near-zero DNAPL entry since it was replaced

- with PW-11Ub and pumping ceased. These wells are excluded from the subsequent listed categories.
- **Lower DNAPL Entry Rate During Full-Scale Operation.** This category includes four non-pumping wells (MW-16-45, MW-18-30, MW-34L, and PW-1-80).
- **Higher DNAPL Entry Rate During Full-Scale Operation.** This category includes four pumping wells (PW-6U, PW-13U, PW-14U, and PW-2L) and three non-pumping wells (MW-26U, MW-27U, and MW-38U).

It is important to note that these categories only compare average DNAPL entry rates for extended periods of time and do not indicate recent trends in DNAPL entry rates over a shorter duration. For example, within the last category (Higher DNAPL Entry Rate During Full-Scale Operation), three of the four pumping wells (PW-6U, PW-14U, and PW-2L) and two of the three non-pumping wells (MW-26U and MW-38U) have statistically significant decreasing DNAPL entry rate trends (according to the trend analysis conducted on data through 2022) following the peak DNAPL entry rate. Thus, although the average DNAPL entry rates have been higher during full-scale operation than prior to system startup, the DNAPL entry rates are decreasing at these wells. The other two wells in that category have stable trends following the peak DNAPL entry rate. In addition, as discussed in Section 2.2.2, all of the wells in the monitoring program are past the peak DNAPL entry rate, which occurred several years ago for most of the wells, except PW-11Ub, which lacks significant monitoring time for peak DNAPL entry rate assessment.

A generally decreasing DNAPL entry rate following an earlier increase to a peak entry rate is consistent with common observations during nonaqueous phase liquid (NAPL) recovery programs. Although the HC&C system was not designed primarily to recover DNAPL, DNAPL is being incidentally removed by the system's extraction wells and at nearby non-pumping wells during system operation. Following the peak DNAPL entry rate at a given well, DNAPL removal has continued. DNAPL removal causes the following parameters to decrease in the surrounding soil:

- DNAPL volume
- DNAPL saturation
- DNAPL relative permeability
- DNAPL transmissivity

Consequently, the DNAPL entry rate ultimately declines with time as DNAPL is removed. Based on the common observation of declining DNAPL or light nonaqueous phase liquid (LNAPL) recovery rates over time, multiple methods of "decline curve" analysis have been developed (API 2001; ITRC 2009a, 2009b; CH2MHill 2010; EPRI 2015; MassDEP 2016).

The observation of higher average DNAPL entry rates at four of five pumping wells during full-scale operation than prior to system startup, combined with the general decreasing or stable trend in "post-

peak" DNAPL entry rates (Section 2.2.2 and Appendix B), indicates that the pumping wells are capturing nearby mobile DNAPL. These data, along with the HC&C system monitoring data that show that the system has reversed the groundwater hydraulic gradient consistent with the design (i.e., producing a hydraulic gradient from the Willamette River toward the upland), indicate that DNAPL is being captured in the vicinity of the pumping wells in the shoreline upland area.

#### 2.4 Shoreline Piezometers

Three clusters of piezometers (PZ6s, PZ7s, and PZ9s) located on the Willamette River shoreline downgradient of known upland DNAPL zones are included in the DNAPL monitoring program (Figure 1). Each piezometer cluster includes at least four piezometers, with at least one piezometer screened in each identified WBZ (Fill WBZ, Upper Alluvium WBZ, Lower Alluvium WBZ, and Deep Lower Alluvium WBZ). These piezometer clusters effectively act as "sentinel wells" to monitor for the presence of DNAPL at multiple depths along the Willamette River shoreline. The piezometers have been monitored for the presence of DNAPL since the DNAPL monitoring program began in April 2013 and are currently monitored semiannually. DNAPL has not been detected in any of the shoreline piezometers.

# 3 TarGOST Monitoring

The DNAPL TarGOST monitoring program has been completed. Refer to the *DNAPL Monitoring Semiannual Summary Report (July 1 through December 31, 2022)* (Anchor QEA 2023) for the most recent information regarding TarGOST monitoring.

# 4 Monitoring of Oil-Water Separators

Oil-water separators designed to recover DNAPL collected by the HC&C system were installed as part of the groundwater source control treatment system. The HC&C system has three oil-water separators: one in the NW Natural pretreatment plant, one in the NW Natural pretreatment plant expansion, and one in the Siltronic pretreatment plant. The DNAPL quantity collected in each oil-water separator is observed and recorded during routine treatment system monitoring. Note that the quantity of DNAPL removed from the oil-water separators is reported in pounds, and volumes are estimated. The following assumptions have been made to convert pounds of solid material removed from the separators to gallons of DNAPL:

- The porosity of solid material in oil-water separators is 40%.
- All pore space between solid particles is occupied by DNAPL.
- The average DNAPL specific gravity is 1.07.
- The weight of DNAPL = weight of water multiplied by the DNAPL specific gravity = 8.34 pounds/gallon\*1.07 = 8.92 pounds/gallon.

Prior to 2022, the volume of DNAPL captured in the oil-water separators was estimated as described previously. The cumulative DNAPL volume estimates for the NW Natural and Siltronic oil-water separators are shown in Figures 8 and 9. As explained in the following text, in 2022 the oil-water separators began using a different technology for DNAPL separation. As it is not possible to accurately determine the volume of DNAPL removed using the new coalescing filter media, the graphs in Figures 8 and 9 do not show an increase in cumulative DNAPL removed during 2022.

As of 2022, the oil-water separators were equipped with polypropylene plates (12 inches by 12 inches by 2 inches in size) containing oil-adsorbing coalescing filter media to capture DNAPL incidentally removed during operation of the HC&C system. The amount of DNAPL captured by these plates is not able to be determined. On September 26, 2022, 5,000 pounds of these plates were removed from the NW Natural and Siltronic pretreatment oil-water separators. The number of plates removed from each oil-water separator is indeterminant, and the total amount (volume or mass) of DNAPL captured in each plate cannot be estimated. Based on the inability to estimate or approximate the amount of DNAPL captured by the oil-water separators, Anchor QEA recommends that monitoring of oil-water separators for DNAPL volume be suspended indefinitely.

## 4.1 NW Natural Pretreatment Oil-Water Separator

According to data provided by Sevenson Environmental Services, Inc., the following volumes of DNAPL were removed from the NW Natural pretreatment oil-water separator prior to and including the current reporting period:

- Approximately 500 gallons from the beginning of interim operations and testing in September 2013 to October 13, 2016
- Approximately 233 gallons from October 13, 2016, to November 30, 2017
- Approximately 280 gallons from November 30, 2017, to December 31, 2020
- An indeterminant number of coalescing filter media plates containing an indeterminant amount of DNAPL were removed from the NW Natural pretreatment oil-water separator on September 26, 2022.

To date, no DNAPL has been removed from the NW Natural pretreatment plant expansion oil-water separator.

Figure 8 shows the DNAPL accumulation rate and approximate cumulative volume of DNAPL measured in the NW Natural oil-water separator prior to and including the current reporting period.

# 4.2 Siltronic Pretreatment Oil-Water Separator

According to data provided by Sevenson Environmental Services, the following volumes of DNAPL were removed from the Siltronic pretreatment oil-water separator prior to and including the current reporting period:

- Approximately 160 gallons from the beginning of interim operations and testing in September 2013 to October 13, 2016
- Approximately 664 gallons from October 13, 2016, to November 30, 2017
- Approximately 80 gallons from November 30, 2017, to December 31, 2020
- An indeterminant number of coalescing filter media plates containing an indeterminant amount of DNAPL were removed from the Siltronic pretreatment oil-water separator on September 26, 2022.

Figure 9 shows the DNAPL accumulation rate and approximate cumulative volume of DNAPL measured in the Siltronic oil-water separator prior to and including the current reporting period.

# 5 Summary of Findings

Most of the wells in the monitoring program are past their peak DNAPL entry rate, which occurred several years ago. However, peak DNAPL entry rates occurred during the current reporting period at the following DNAPL monitoring program locations:

- Extraction well PW-11Ub
- Extraction well PW-14U

PW-11Ub is a new well that was installed in 2022 and has not been monitored for sufficient time to establish a trend. The peak DNAPL entry rate at PW-14U was caused by a spike in DNAPL entry rates during the current reporting period. After the spike, entry rates at PW-14U declined to historical averages.

For the remaining locations, since their observed peak DNAPL entry rate, DNAPL entry rates have been low, remained stable, or decreased in most non-pumping nearshore monitoring wells and nearshore pumping wells. DNAPL entry rates normalized to groundwater pumping rates vary for the pumping wells but are steady or decreasing for most of the non-pumping wells.

The total combined DNAPL entry rate into the non-pumping wells has been lower during full-time, full-scale operation of the HC&C system than it was prior to system startup and interim operations and testing except at wells MW-26U, MW-27U, and MW-38U. In contrast, as expected, the DNAPL entry rates at the pumping wells increased after startup of the HC&C system.

DNAPL monitoring data collected since 2013 in accordance with the DEQ-approved DNAPL monitoring program presented in the CDR (Anchor QEA 2012) show that, incidental to its operation, the HC&C system is capturing DNAPL from the shoreline upland area in the immediate vicinity of the pumping wells. DNAPL has never been detected in any of the piezometers screened in multiple depth intervals along the Willamette River shoreline downgradient of known upland DNAPL zones, and active DNAPL migration from the uplands to the Willamette River has not been documented or visually observed. The findings of this report show that the HC&C system is operating successfully as designed, meeting the design objective of controlling contaminated groundwater in the Upper and Lower Alluvium WBZs from migrating to the Willamette River while minimizing DNAPL mobilization associated with system operations.

### 6 Recommendations

As described in Section 2.1 and shown in Table 1, the wells in the DNAPL monitoring program are monitored at different frequencies based on the measured rate of DNAPL entry at each well. Table 6 shows the proposed schedule for future DNAPL monitoring. For wells with historical DNAPL detections, the monitoring frequency is proposed to remain as shown in Table 1, with the following exceptions.

For four locations, due to the estimated amount of time for their sumps to fill to 60% of their capacity (a conservative volume limit for routine DNAPL removal) at their current DNAPL entry rate (averaged over the previous calendar year), it is proposed to change the monitoring frequency of these locations to the frequency shown in the following table:

Location ID	Current Monitoring Frequency	Average DNAPL Entry Rate in the Past Year (gallons per month)	Sump Capacity (gallons)	Estimated Time to Fill Sump to 60% Capacity	Proposed Monitoring Frequency
DW-14U	Quarterly	0.26	7.35	28 months	Semiannually
MW-16-45	Monthly	0.08	0.44	5.5 months	Quarterly
PW-11Ub	Weekly	0.89	7.35	8 months	Monthly
T-100	Monthly	0.00	26.4	Never	Quarterly

These changes are proposed with the understanding that the monitoring frequency will be increased as necessary if conditions warrant and that changes to the agreed-upon monitoring frequency will only be made with approval from DEQ. If a new DNAPL detection is made in any well on the quarterly or semiannual monitoring list, or if the rate of DNAPL entry at a location appears to be increasing to a rate that would approach the capacity of the sump between monitoring measurement events, the monitoring frequency of that location will be increased to the next highest frequency (e.g., quarterly to monthly or monthly to weekly) until the rate of DNAPL entry can be assessed, and the monitoring frequency moving forward will be adjusted at that time.

With DEQ approval, the proposed DNAPL monitoring schedule shown in Table 6 will be implemented.

# 7 Reporting Schedule

DNAPL Monitoring Summary Reports will continue to be provided on a semiannual basis. The next report will cover the monitoring period from July 1 through December 31, 2023, and is due to DEQ on or before March 31, 2024.

## 8 References

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- Anchor QEA, 2022. *DNAPL Monitoring Semiannual Summary Report (January 1 through June 30, 2022)*. Prepared for NW Natural. October 14, 2022.
- Anchor QEA, 2023. *DNAPL Monitoring Semiannual Summary Report (July 1 through December 31, 2022)*. Prepared for NW Natural. March 31, 2023.
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- CH2MHill, 2010. Alternate End Point for DNAPL Recovery Systems Union Pacific Railroad Former Tie Treating Plant, The Dalles, Oregon. Technical memorandum prepared for the Oregon Department of Environmental Quality. August 24, 2010.
- DEQ (Oregon Department of Environmental Quality), 2012. Letter to: Mr. Robert J. Wyatt,
  NW Natural. Regarding: Revised Groundwater Source Control Measures Construction Design
  Report, Shoreline Segments 1 and 2, NW Natural Property and the Northern Portion of the
  Siltronic Corporation Property, Portland, Oregon, ECSI Nos. 84 and 183. From: Dana Bayuk,
  Project Manager, NW Region Cleanup Section. August 9, 2012.
- DEQ, 2017. Letter to: Mr. Robert J. Wyatt, NW Natural. Regarding: 2016 DNAPL Monitoring Report, NW Natural "Gasco Site" and Northern Portion of the Siltronic Site, Portland, Oregon, ECSI No. 84. From: Dana Bayuk, Project Manager, NW Region Cleanup Section. October 26, 2017.
- DEQ, 2020. Letter to: Mr. Robert J. Wyatt, NW Natural. Regarding: January through June 2019 DNAPL Monitoring Summary, NW Natural "Former Gasco Manufactured Gas Plant Operable Unit," Portland, Oregon, ECSI No. 84. From: Dana Bayuk, Project Manager, NW Region Cleanup Section. March 4, 2020.
- DEQ, 2022. Letter to: Bob Wyatt, NW Natural. Regarding: Revised Upland Feasibility Study DNAPL
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- EPRI (Electric Power Research Institute), 2015. *Generic Work Plan to Assess Dense Non-Aqueous Phase Liquid Mobility in the Subsurface at Manufactured Gas Plant Sites*. Document No. 3002006708.
- ITRC (Interstate Technology & Regulatory Council), 2009a. LNAPL Training Part 2: LNAPL

  Characterization and Recoverability Improved Analysis (Slide Deck). Prepared by ITRC

  LNAPLs Team. December 2009.
- ITRC, 2009b. Evaluating LNAPL Remedial Technologies for Achieving Project Goals. Prepared by ITRC LNAPLs Team. December 2009.
- MassDEP (Massachusetts Department of Environmental Protection), 2016. *Light Nonaqueous Phase Liquids (LNAPL) and the MCP: Guidance for Site Assessment and Closure, Policy #WSC-16-450.* February 2016.

# **Tables**

Table 1

DNAPL Monitoring Program

Well ID	Unit	Weekly	Monthly	ring Freque	Semi- Annually	DNAPL Visibly Observed During Drilling Activities?	DNAPL in Well Screen Zone When Constructed (Including Filter Pack)?	DNAPL Entry into Well? <sup>1</sup>	DNAPL Removed from Well Sump? <sup>1,2</sup>
MW-3-26	Surficial Fill				Х	Yes	No	No	-
MW-3-56	Upper Alluvium				Х	Yes	No	No	
MW-4-35	Fill/Upper Alluvium				Х	No	No	No	
MW-4-57	Upper Alluvium				Х	No	No	No	
MW-4-101	Lower Alluvium				Х	No	No	No	
MW-5-32	Fill/Upper Alluvium				Х	No	No	No	
MW-5-100	Upper Alluvium				Х	No	No	No	
MW-5-175	Deep Alluvium				Х	No	No	No	
MW-16-45	Upper Alluvium		Х			Yes	Yes	Yes	Yes
MW-16-65	Upper Alluvium				Х	Yes	No	No	
MW-18-30	Surficial Fill		Х			Yes	Yes	Yes	Yes
MW-18-125	Lower Alluvium				Х	Yes	No	No	
MW-18-180	Deep Alluvium				Х	Yes	No	No	
MW-19-22	Surficial Fill				Х	Yes	No	No	
MW-19-125	Lower Alluvium				Х	Yes	No	No	
MW-19-180	Deep Alluvium				Х	Yes	No	No	
MW-20-120	Lower Alluvium				Х	Yes	No	No	
MW-24-70	Upper Alluvium				Х	Yes	No	No	
MW-24-130	Lower Alluvium				Х	Yes	No	No	
MW-26U	Upper Alluvium	Х				Yes	Yes	Yes	Yes
MW-27L	Lower Alluvium				Х	Yes	No	No	
MW-27U	Upper Alluvium		Х			Yes	No	Yes	Yes
MW-28L	Lower Alluvium				Х	Yes	No	No	
MW-28U	Upper Alluvium				Х	Yes	No	No	
MW-29U	Upper Alluvium				Х	No	No	No	
MW-30U	Upper Alluvium				Х	Yes	No	Yes	Yes
MW-31L	Lower Alluvium				Х	Yes	No	No	
MW-31U	Upper Alluvium				Х	Yes	No	No	
MW-32U	Upper Alluvium				Х	Yes	No	No	
MW-33U	Upper Alluvium				Х	Yes	No	No	
MW-34L	Lower Alluvium			Х		Yes	Yes	Yes	Yes
MW-34U	Upper Alluvium				Х	Yes	No	No	
MW-35U	Upper Alluvium				Х	No	No	No	
MW-36U	Upper Alluvium				Х	No	No	No	
MW-37U	Upper Alluvium				Х	Yes	Yes	Yes	No
MW-38U	Upper Alluvium	Х				Yes	Yes	Yes	Yes
MW-42F	Surficial Fill				Х	No	No	No	
MW-PW2L	Lower Alluvium		Х			Yes	Yes	Yes	Yes
WS-21-112	Lower Alluvium				Х	NA <sup>3</sup>	No	No	
WS-47-183	Lower Alluvium				Х	Yes	No	No	
OW-2F	Surficial Fill				Х	Yes	No	No	
OW-5F	Surficial Fill				Х	Yes	No	No	
PW-1-80	Upper Alluvium				Х	Yes	Yes	Yes	Yes
PW-2L	Lower Alluvium	Х				Yes	Yes	Yes	Yes
PW-2U	Upper Alluvium				Х	Yes	No	No	
PW-3-85	Upper Alluvium				Х	NA <sup>3</sup>	NA <sup>3</sup>	Yes	Yes <sup>4</sup>

**Table 1 DNAPL Monitoring Program** 

		DN	APL Monito	ring Freque	ncv	DNAPL	DNAPL in		
Well ID	Unit	Weekly	Monthly	Quarterly	Semi- Annually	Visibly Observed During Drilling Activities?	Well Screen Zone When Constructed (Including Filter Pack)?	DNAPL Entry into Well? <sup>1</sup>	DNAPL Removed from Well Sump? <sup>1,2</sup>
PW-3-118	Lower Alluvium			,	Х	NA <sup>3</sup>	NA <sup>3</sup>	No	
PW-3U	Upper Alluvium				Х	No	No	No	
PW-4L	Lower Alluvium				Х	Yes	No	No	
PW-4U	Upper Alluvium				Х	Yes	No	No	
PW-5L	Lower Alluvium				Х	Yes	No	No	
PW-5U	Upper Alluvium				Х	Yes	No	No	
PW-6L	Lower Alluvium				Х	Yes	No	No	
PW-6U	Upper Alluvium		Х			Yes	Yes	Yes	Yes
PW-11U	Upper Alluvium				Х	Yes	No	Yes	Yes <sup>4</sup>
PW-11Ub	Upper Alluvium	Х				Yes	No	Yes	Yes
PW-12U	Upper Alluvium				Х	Yes	No	No	
PW-13U	Upper Alluvium		Х			Yes	No	Yes	Yes
PW-14U	Upper Alluvium		Х			Yes	No	Yes	Yes
DW-6U	Upper Alluvium				Х	Yes	Yes	Yes	Yes <sup>4</sup>
DW-11U	Upper Alluvium				Х	Yes	Yes	Yes	Yes <sup>4</sup>
DW-14U	Upper Alluvium			Χ		Yes	Yes	Yes	Yes
PZ6-5	Surficial Fill				Х	No	No	No	
PZ6-50	Upper Alluvium				Χ	No	No	No	
PZ6-115	Lower Alluvium				Х	No	No	No	
PZ6-150	Deep Alluvium				Χ	No	No	No	
PZ7-5	Surficial Fill				Χ	No	No	No	
PZ7-50	Upper Alluvium				Χ	Yes	No	No	
PZ7-100	Lower Alluvium				Х	Yes	No	No	
PZ7-150	Deep Alluvium				Х	Yes	No	No	
PZ9-5	Surficial Fill				Х	No	No	No	
PZ9-50	Upper Alluvium				Х	Yes	No	No	
PZ9-75	Deep Alluvium				Х	Yes	No	No	
PZ9-110	Deep Alluvium				Χ	Yes	No	No	
PZ9-150	Deep Alluvium				Х	Yes	No	No	
T-100 <sup>5</sup>	Surficial Fill		Х			NA	NA	No	
T-50 <sup>6</sup>	Surficial Fill	Х				NA	NA	Yes	Yes
	Totals	5	8	2	62	55	13	20	19

#### Notes:

- 1. DNAPL entry and removal applies to any point during the monitoring history of the well, not only the current reporting period.
- 2. DNAPL removed on an as-needed basis when the level of DNAPL approaches the top of the well sump.
- 3. No data; no boring log exists.
- 4. DNAPL removed on a one-time basis for testing and characterization.
- 5. T-100 is the 100-foot primary Fill Water Bearing Zone trench.
- $6.\,T\text{--}50$  is the 50-foot secondary Fill Water Bearing Zone trench.

DNAPL: dense nonaqueous phase liquid, specifically oil and/or semisolid tar

NA: not available

Table 2
DNAPL Accumulation and Removal Volumes (January 1 through June 30, 2023)

Well ID	Date and Time	Sump Length (feet)	Sump Volume (gallons)	Depth to Bottom of Well (feet TOC)	Depth to Top of DNAPL (feet TOC)	DNAPL Thickness (feet)	Volume of DNAPL in Well Sump (gallons)	Volume of DNAPL Removed Between DNAPL Storage Container Measurement Events (gallons)	Cumulative Volume of DNAPL Entry into Well (gallons)	Cumulative Volume of DNAPL Removed (gallons)	Removal Activity
DW-6U	6/27/23 14:20	5.0	7.4	56.42	53.14	3.28	4.82	(galions)	8.9	3.0	
DW 00	0/21/23 14.20	5.0	7.1	30.42	33.14	3.20	4.02		0.5	5.0	
DW-11U	6/27/23 15:30	5.0	7.4	41.90	41.76	0.14	0.40		1.1	0.1	
	0,21,201000						1				
DW-14U	3/28/23 10:40	5.0	7.4	54.77	51.54	3.23	4.75		40.4	27.4	
DW-14U	4/3/23 10:45	5.0	7.4	54.77	51.41	3.36	4.94		40.6	27.4	Some DNAPL Removed <sup>1</sup>
DW-14U	4/4/23 8:45	5.0	7.4	54.77	53.22	1.55	2.28	2.30	40.6	29.7	Some DNAPL removed
DW-14U	4/5/23 10:20	5.0	7.4	54.77	53.67	1.10	1.62		40.6	29.7	
DW-14U	4/10/23 11:29	5.0	7.4	54.77	53.55	1.22	1.79		40.6	29.7	
DW-14U	4/17/23 11:21	5.0	7.4	54.77	54.21	0.56	0.82		40.6	29.7	
DW-14U	5/26/23 13:20	5.0	7.4	54.77	53.54	1.23	1.81		40.8	29.7	
DW-14U	6/27/23 13:25	5.0	7.4	54.77	53.02	1.75	2.57		41.6	29.7	
MW-16-45	1/31/23 13:20	2.5	0.4	50.60	50.33	0.27	0.04		12.9	10.3	
MW-16-45	2/28/23 10:38	2.5	0.4	50.60	49.94	0.66	0.11		13.0	10.3	
MW-16-45	3/28/23 10:05	2.5	0.4	50.60	49.67	0.93	0.15		13.0	10.3	
MW-16-45	4/25/23 8:55	2.5	0.4	50.60	49.37	1.23	0.20		13.1	10.3	
MW-16-45	5/30/23 14:00	2.5	0.4	50.60	47.71	2.89	0.47		13.4	10.3	
MW-16-45	6/2/23 15:20	2.5	0.4	50.60	NM	NM	NM	0.87	13.4	11.2	All DNAPL Removed
MW-16-45	6/27/23 15:00	2.5	0.4	50.60	50.44	0.16	0.03		13.4	11.2	
MW-18-30	1/31/23 10:20	1.0	0.2	32.97	32.33	0.64	0.10		8.9	7.5	
MW-18-30	2/6/23 11:17	1.0	0.2	32.97	32.22	0.75	0.12		8.9	7.5	All DNAPL Removed <sup>1</sup>
MW-18-30	2/28/23 10:00	1.0	0.2	32.97	32.49	0.48	0.08		9.0	7.5	
MW-18-30	3/6/23 11:02	1.0	0.2	32.97	32.42	0.55	0.09		9.0	7.5	
MW-18-30	3/13/23 12:40	1.0	0.2	32.97	32.28	0.69	0.11		9.0	7.5	All DNAPL Removed <sup>1</sup>
MW-18-30	3/27/23 14:15	1.0	0.2	32.97	32.59	0.38	0.06		9.1	7.5	
MW-18-30	4/25/23 11:02	1.0	0.2	32.97	32.37	0.60	0.10		9.1	7.5	All DNAPL Removed <sup>1</sup>
MW-18-30	5/16/23 9:40	1.0	0.2	32.97	32.39	0.58	0.09	1.65	9.2	9.1	All DNAPL Removed <sup>1</sup>
MW-18-30	5/30/23 13:25	1.0	0.2	32.97	32.84	0.13	0.02		9.2	9.1	
MW-18-30	6/27/23 14:40	1.0	0.2	32.97	32.61	0.36	0.06		9.3	9.1	
MW-26U	1/3/23 13:37	3.0	0.5	54.65	53.71	0.94	0.15		79.9	74.4	
MW-26U	1/9/23 12:55	3.0	0.5	54.65	53.24	1.41	0.23		79.9	74.4	
MW-26U	1/16/23 11:34	3.0	0.5	54.65	52.82	1.83	0.30		80.0	74.4	All DNAPL Removed <sup>1</sup>
MW-26U	1/23/23 11:10	3.0	0.5	54.65	53.45	1.20	0.20		80.2	74.4	
MW-26U	1/30/23 14:40	3.0	0.5	54.65	52.90	1.75	0.29		80.3	74.4	All DNAPL Removed <sup>1</sup>
MW-26U	2/6/23 11:10	3.0	0.5	54.65	53.10	1.55	0.25		80.5	74.4	All DNAPL Removed <sup>1</sup>
MW-26U	2/13/23 13:41	3.0	0.5	54.65	53.29	1.36	0.22		80.8	74.4	
MW-26U	2/20/23 10:58	3.0	0.5	54.65	52.64	2.01	0.33		80.9	74.4	All DNAPL Removed <sup>1</sup>
MW-26U	2/27/23 11:46	3.0	0.5	54.65	52.88	1.77	0.29		81.2	74.4	All DNAPL Removed <sup>1</sup>
MW-26U	3/6/23 11:15	3.0	0.5	54.65	53.54	1.11	0.18		81.3	74.4	
MW-26U	3/13/23 12:25	3.0	0.5	54.65	52.72	1.93	0.31		81.5	74.4	All DNAPL Removed <sup>1</sup>
MW-26U	3/20/23 11:40	3.0	0.5	54.65	53.49	1.16	0.19		81.7	74.4	
MW-26U	3/28/23 9:20	3.0	0.5	54.65	52.90	1.75	0.29		81.8	74.4	All DNAPL Removed <sup>1</sup>
MW-26U	4/3/23 11:50	3.0	0.5	54.65	52.44	2.21	0.36		82.1	74.4	All DNAPL Removed <sup>1</sup>

Table 2
DNAPL Accumulation and Removal Volumes (January 1 through June 30, 2023)

Well ID	Date and Time	Sump Length (feet)	Sump Volume (gallons)	Depth to Bottom of Well (feet TOC)	Depth to Top of DNAPL (feet TOC)	DNAPL Thickness (feet)	Volume of DNAPL in Well Sump (gallons)	Volume of DNAPL Removed Between DNAPL Storage Container Measurement Events (gallons)	Cumulative Volume of DNAPL Entry into Well (gallons)	Cumulative Volume of DNAPL Removed (gallons)	Removal Activity
MW-26U	4/10/23 11:37	3.0	0.5	54.65	53.38	1.27	0.21		82.3	74.4	
MW-26U	4/17/23 11:15	3.0	0.5	54.65	52.94	1.71	0.28		82.4	74.4	
MW-26U	4/18/23 11:02	3.0	0.5	54.65	52.89	1.76	0.29		82.4	74.4	All DNAPL Removed <sup>1</sup>
MW-26U	4/25/23 10:16	3.0	0.5	54.65	53.69	0.96	0.16		82.6	74.4	
MW-26U	5/1/23 13:20	3.0	0.5	54.65	53.30	1.35	0.22		82.6	74.4	
MW-26U	5/8/23 11:51	3.0	0.5	54.65	53.05	1.60	0.26		82.7	74.4	All DNAPL Removed <sup>1</sup>
MW-26U	5/15/23 14:15	3.0	0.5	54.65	53.78	0.87	0.14		82.8	74.4	
MW-26U	5/22/23 15:10	3.0	0.5	54.65	53.59	1.06	0.17		82.8	74.4	
MW-26U	5/30/23 13:31	3.0	0.5	54.65	53.30	1.35	0.22		82.9	74.4	
MW-26U	6/5/23 14:14	3.0	0.5	54.65	53.00	1.65	0.27		82.9	74.4	
MW-26U	6/7/23 14:00	3.0	0.5	54.65	52.94	1.71	0.28	14.05	82.9	81.6	All DNAPL Removed
MW-26U	6/12/23 14:24	3.0	0.5	54.65	54.11	0.54	0.09		83.0	81.6	
MW-26U	6/19/23 11:50	3.0	0.5	54.65	54.28	0.37	0.06		83.0	81.6	
MW-26U	6/26/23 13:50	3.0	0.5	54.65	53.52	1.13	0.18		83.1	81.6	
200	0,20,25 15.50	3.0		3 7.03	33.32	1.13	3.10		55.1	51.5	
MW-27U	1/31/23 9:55	3.0	0.5	81.60	79.10	2.50	0.41		32.9	29.7	All DNAPL Removed <sup>1</sup>
MW-27U	2/28/23 9:25	3.0	0.5	81.60	78.51	3.09	0.50		33.4	29.7	All DNAPL Removed <sup>1</sup>
MW-27U	3/13/23 11:45	3.0	0.5	81.60	80.15	1.45	0.24		33.6	29.7	
MW-27U	3/20/23 11:21	3.0	0.5	81.60	79.06	2.54	0.41		33.8	29.7	All DNAPL Removed <sup>1</sup>
MW-27U	3/27/23 14:33	3.0	0.5	81.60	80.37	1.23	0.20		34.0	29.7	
MW-27U	4/4/23 11:58	3.0	0.5	81.60	79.56	2.04	0.20		34.1	29.7	
MW-27U	4/5/23 10:25	3.0	0.5	81.60	79.45	2.15	0.35		34.1	29.7	All DNAPL Removed <sup>1</sup>
MW-27U	4/10/23 11:22	3.0	0.5	81.60	80.51	1.09	0.33		34.3	29.7	All DNAFL Removed
MW-27U	4/17/23 11:04	3.0	0.5	81.60	80.81	0.79	0.13		34.3	29.7	
MW-27U	4/25/23 9:55	3.0	0.5	81.60	79.73	1.87	0.13		34.4	29.7	All DNAPL Removed <sup>1</sup>
MW-27U	5/1/23 11:59	3.0	0.5	81.60	80.53	1.07	0.30		34.4	29.7	
	5/8/23 11:38	3.0	0.5	81.60					34.4	29.7	
MW-27U			0.5		80.46	1.14	0.19				
MW-27U	5/15/23 13:48	3.0		81.60	80.73	0.87	0.14		34.6	29.7	
MW-27U	5/22/23 11:40	3.0	0.5	81.60	80.50	1.10 1.26	0.18		34.6	29.7 29.7	
MW-27U	5/26/23 13:27 6/5/23 14:04	3.0	0.5 0.5	81.60 81.60	80.34 80.22	1.26	0.21		34.7	29.7	
MW-27U							0.22	 2 E1	34.7		All DNADI Removed
MW-27U	6/6/23 10:10 6/19/23 11:27	3.0	0.5	81.60	NM	NM	0.22	3.51	34.7	33.3	All DNAPL Removed
MW-27U		3.0	0.5	81.60	80.71	0.89	0.15		34.8	33.3	<del></del>
MW-27U	6/26/23 14:02	3.0	0.5	81.60	80.58	1.02	0.17		34.8	33.3	
NAVA 2011	2/27/22 10:50	2.0	0.5	FF 00	E2.00	2.00	0.22	<u> </u>	2.4	1.0	
MW-30U	3/27/23 10:59	3.0	0.5	55.98	53.98	2.00	0.33		2.4	1.0	
MW-30U	6/27/23 12:50	3.0	0.5	55.98	53.29	2.69	0.44		2.5	1.0	
M/M/ 2.41	2 /27 /22 14:27	2.0	0.5	115 45	114.27	1.00	0.10		10.6	F 7	
MW-34L	3/27/23 14:27	3.0	0.5	115.45	114.37	1.08	0.18		10.6	5.7	
MW-34L	6/27/23 11:40	3.0	0.5	115.45	113.54	1.91	0.31		10.7	5.7	
NANA/ 2711	6/27/22 12:10	2.0	٥٢	FF 00	FF 40	0.21	0.05		0.1	0.0	
MW-37U	6/27/23 13:10	3.0	0.5	55.80	55.49	0.31	0.05		0.1	0.0	
NAVA 2011	1/2/22 12 25	3.0	٥٢	CC 15	CE 17	0.00	0.16	<u> </u>	101.3	02.4	
MW-38U	1/3/23 13:25	3.0	0.5	66.15	65.17	0.98	0.16		101.3	92.4	All DNADL D
MW-38U MW-38U	1/9/23 15:05	3.0	0.5 0.5	66.15 66.15	63.99 64.98	2.16 1.17	0.35 0.19		101.5 101.7	92.4 92.4	All DNAPL Removed <sup>1</sup>

Table 2
DNAPL Accumulation and Removal Volumes (January 1 through June 30, 2023)

		Sump	Sump	Depth to Bottom	Depth to Top of	DNAPL	Volume of	Volume of DNAPL Removed Between DNAPL Storage	Cumulative Volume of	Cumulative Volume of	
		Length	Volume	of Well	DNAPL	Thickness		Container Measurement Events		DNAPL Removed	
Well ID	Date and Time	(feet)	(gallons)	(feet TOC)	(feet TOC)	(feet)	Sump (gallons)	(gallons)	(gallons)	(gallons)	Removal Activity
MW-38U	1/23/23 11:55	3.0	0.5	66.15	64.07	2.08	0.34		101.9	92.4	All DNAPL Removed <sup>1</sup>
MW-38U	1/30/23 13:55	3.0	0.5	66.15	64.55	1.60	0.26		102.1	92.4	All DNAPL Removed <sup>1</sup>
MW-38U	2/6/23 11:25	3.0	0.5	66.15	65.11	1.04	0.17		102.0	92.4	
MW-38U	2/13/23 13:20	3.0	0.5	66.15	64.24	1.91	0.31		102.2	92.4	All DNAPL Removed <sup>1</sup>
MW-38U	2/20/23 13:50	3.0	0.5	66.15	65.29	0.86	0.14		102.3	92.4	
MW-38U	2/27/23 11:34	3.0	0.5	66.15	64.30	1.85	0.30		102.5	92.4	All DNAPL Removed <sup>1</sup>
MW-38U	3/6/23 11:35	3.0	0.5	66.15	65.34	0.81	0.13		102.6	92.4	
MW-38U	3/13/23 11:17	3.0	0.5	66.15	64.40	1.75	0.29		102.9	92.4	All DNAPL Removed <sup>1</sup>
MW-38U	3/20/23 11:07	3.0	0.5	66.15	65.29	0.86	0.14		102.8	92.4	
MW-38U	3/27/23 11:09	3.0	0.5	66.15	64.68	1.47	0.24		102.9	92.4	All DNAPL Removed <sup>1</sup>
MW-38U	4/3/23 13:40	3.0	0.5	66.15	65.41	0.74	0.12		103.0	92.4	
MW-38U	4/10/23 11:02	3.0	0.5	66.15	64.52	1.63	0.27		103.1	92.4	All DNAPL Removed <sup>1</sup>
MW-38U	4/17/23 10:55	3.0	0.5	66.15	65.03	1.12	0.18		103.3	92.4	
MW-38U	4/24/23 11:50	3.0	0.5	66.15	64.44	1.71	0.28		103.4	92.4	All DNAPL Removed <sup>1</sup>
MW-38U	5/1/23 11:39	3.0	0.5	66.15	65.29	0.86	0.14		103.5	92.4	
MW-38U	5/8/23 10:58	3.0	0.5	66.15	64.45	1.70	0.28		103.7	92.4	All DNAPL Removed <sup>1</sup>
MW-38U	5/15/23 13:35	3.0	0.5	66.15	65.02	1.13	0.18		103.9	92.4	
MW-38U	5/23/23 11:03	3.0	0.5	66.15	64.39	1.76	0.29		104.0	92.4	All DNAPL Removed <sup>1</sup>
MW-38U	5/30/23 13:40	3.0	0.5	66.15	64.63	1.52	0.25		104.2	92.4	
MW-38U	5/31/23 11:30	3.0	0.5	66.15	NM	NM	NM	7.99	104.2	100.4	All DNAPL Removed
MW-38U	6/5/23 13:39	3.0	0.5	66.15	65.21	0.94	0.15		104.4	100.4	
MW-38U	6/12/23 13:29	3.0	0.5	66.15	64.49	1.66	0.27		104.5	100.4	All DNAPL Removed <sup>1</sup>
MW-38U	6/19/23 14:21	3.0	0.5	66.15	65.08	1.07	0.17		104.7	100.4	
MW-38U	6/26/23 16:01	3.0	0.5	66.15	64.61	1.54	0.25		104.7	100.4	
MW-38U	6/27/23 9:12	3.0	0.5	66.15	NM	NM	NM		104.7	100.4	All DNAPL Removed <sup>1</sup>
MW-PW2L	1/30/23 15:40	5.0	0.9	147.45	144.72	2.73	0.44		117.9	101.1	
MW-PW2L	2/3/23 9:04	5.0	0.9	147.45	144.71	2.74	0.45		117.9	101.1	All DNAPL Removed <sup>1</sup>
MW-PW2L	2/27/23 8:55	5.0	0.9	147.45	145.17	2.28	0.37		118.3	101.1	
MW-PW2L	3/29/23 9:20	5.0	0.9	147.45	143.60	3.85	0.63		118.6	101.1	All DNAPL Removed <sup>1</sup>
MW-PW2L	4/26/23 9:43	5.0	0.9	147.45	144.84	2.61	0.43		119.0	101.1	
MW-PW2L	5/15/23 9:50	5.0	0.9	147.45	143.20	4.25	0.69		119.3	101.1	
MW-PW2L	5/17/23 12:20	5.0	0.9	147.45	143.20	4.25	0.69		119.3	101.1	All DNAPL Removed <sup>1</sup>
MW-PW2L	5/26/23 9:20	5.0	0.9	147.45	147.02	0.43	0.07		119.3	101.1	741
MW-PW2L	6/26/23 9:20	5.0	0.9	147.45	144.47	2.98	0.49	7.17	119.7	108.3	All DNAPL Removed
	0, 20, 20 3.20	5.0	0.5		1	2.50	0.13				, 2 . v
PW-1-80	6/27/23 9:50	2.5	3.7	84.95	NM			0.00		50.9	liquids removed; oily water
	5,21,25 3.50		5	3 1.55	1,		1	0.00		30.3	qu.as removed, only water
PW-2L	1/3/23 9:15	5.0	7.4	147.80	144.94	2.86	4.20			3214.0	Some DNAPL Removed <sup>1</sup>
PW-2L	1/6/23 8:50	5.0	7.4	147.80	144.57	3.23	4.75			3214.0	Some DNAPL Removed <sup>1</sup>
PW-2L	1/9/23 9:11	5.0	7.4	147.80	146.44	1.36	2.00			3214.0	Some DNAPL Removed <sup>1</sup>
PW-2L	1/11/23 9:05	5.0	7.4	147.80	144.98	2.82	4.15			3214.0	Some DNAPL Removed <sup>1</sup>
PW-2L	1/13/23 8:50	5.0	7.4	147.80	145.24	2.56	3.76			3214.0	Some DNAPL Removed <sup>1</sup>
PW-2L	1/16/23 8:50	5.0	7.4	147.80	144.78	3.02	4.44			3214.0	Some DNAPL Removed <sup>1</sup>
PW-2L	1/18/23 8:59	5.0	7.4	147.80	145.17	2.63	3.87			3214.0	Some DNAPL Removed <sup>1</sup>
PW-2L	1/20/23 8:59	5.0	7.4	147.80	144.91	2.89	4.25			3214.0	Some DNAPL Removed <sup>1</sup>

Table 2
DNAPL Accumulation and Removal Volumes (January 1 through June 30, 2023)

W-II IS	Data 17	Sump Length	Sump Volume	Depth to Bottom of Well	Depth to Top of DNAPL	DNAPL Thickness		Volume of DNAPL Removed Between DNAPL Storage Container Measurement Events	1	DNAPL Removed	D
Well ID	Date and Time	(feet)	(gallons)	(feet TOC)	(feet TOC)	(feet)	Sump (gallons)	(gallons)	(gallons)	(gallons)	Removal Activity
PW-2L	1/23/23 8:50	5.0	7.4	147.80	144.52	3.28	4.82			3214.0	Some DNAPL Removed <sup>1</sup>
PW-2L	1/25/23 9:15	5.0	7.4	147.80	145.02	2.78	4.09			3214.0	Some DNAPL Removed <sup>1</sup>
PW-2L	1/27/23 8:55	5.0	7.4	147.80	145.11	2.69	3.95	33.46		3247.5	Some DNAPL Removed
PW-2L	1/30/23 8:33	5.0	7.4	147.80	144.74	3.06	4.50			3247.5	Some DNAPL Removed <sup>1</sup>
PW-2L	2/1/23 8:50	5.0	7.4	147.80	145.29	2.51	3.69			3247.5	Some DNAPL Removed <sup>1</sup>
PW-2L	2/3/23 8:50	5.0	7.4 7.4	147.80	145.31 144.65	2.49	3.66			3247.5	Some DNAPL Removed <sup>1</sup>
PW-2L PW-2L	2/6/23 8:00 2/8/23 8:50	5.0 5.0	<b>!</b>	147.80 147.80	144.65	3.15 2.36	4.63 3.47			3247.5 3247.5	Some DNAPL Removed <sup>1</sup> Some DNAPL Removed <sup>1</sup>
			7.4								
PW-2L	2/10/23 8:40	5.0	7.4	147.80	144.90	2.90	4.26			3247.5	Some DNAPL Removed <sup>1</sup>
PW-2L	2/13/23 8:30	5.0	7.4	147.80	144.31	3.49	5.13			3247.5	Some DNAPL Removed <sup>1</sup>
PW-2L	2/15/23 8:50	5.0	7.4	147.80	145.62	2.18	3.20			3247.5	Some DNAPL Removed <sup>1</sup>
PW-2L	2/17/23 8:59	5.0	7.4	147.80	145.34	2.46	3.62			3247.5	Some DNAPL Removed <sup>1</sup>
PW-2L	2/20/23 9:15	5.0	7.4	147.80	145.01	2.79	4.10			3247.5	Some DNAPL Removed <sup>1</sup>
PW-2L	2/22/23 8:45	5.0	7.4	147.80	145.07	2.73	4.01			3247.5	Some DNAPL Removed <sup>1</sup>
PW-2L	2/27/23 8:35	5.0	7.4	147.80	143.81	3.99	5.87			3247.5	Some DNAPL Removed <sup>1</sup>
PW-2L	3/1/23 9:05	5.0	7.4	147.80	145.17	2.63	3.87	32.84		3280.3	Some DNAPL Removed
PW-2L	3/2/23 9:00	5.0	7.4	147.80	145.89	1.91	2.81			3280.3	Some DNAPL Removed <sup>1</sup>
PW-2L	3/6/23 8:15	5.0	7.4	147.80	144.81	2.99	4.40			3280.3	Some DNAPL Removed <sup>1</sup>
PW-2L	3/8/23 8:40	5.0	7.4	147.80	145.19	2.61	3.84			3280.3	Some DNAPL Removed <sup>1</sup>
PW-2L	3/10/23 8:50	5.0	7.4	147.80	145.37	2.43	3.57			3280.3	Some DNAPL Removed <sup>1</sup>
PW-2L	3/13/23 8:55	5.0	7.4	147.80	144.87	2.93	4.31			3280.3	Some DNAPL Removed <sup>1</sup>
PW-2L	3/15/23 9:30	5.0	7.4	147.80	145.29	2.51	3.69			3280.3	Some DNAPL Removed <sup>1</sup>
PW-2L	3/17/23 8:59	5.0	7.4	147.80	145.37	2.43	3.57			3280.3	Some DNAPL Removed <sup>1</sup>
PW-2L	3/20/23 9:10	5.0	7.4	147.80	144.81	2.99	4.40			3280.3	Some DNAPL Removed <sup>1</sup>
PW-2L	3/22/23 9:25	5.0	7.4	147.80	145.32	2.48	3.65			3280.3	Some DNAPL Removed <sup>1</sup>
PW-2L	3/24/23 8:50	5.0	7.4	147.80	145.09	2.71	3.98			3280.3	Some DNAPL Removed <sup>1</sup>
PW-2L	3/27/23 8:35	5.0	7.4	147.80	144.34	3.46	5.09	19.83		3300.2	Some DNAPL Removed
PW-2L	3/29/23 9:29	5.0	7.4	147.80	145.36	2.44	3.59			3300.2	Some DNAPL Removed <sup>1</sup>
PW-2L	4/5/23 8:50	5.0	7.4	147.80	145.31	2.49	3.66			3300.2	Some DNAPL Removed <sup>1</sup>
PW-2L	4/7/23 9:00	5.0	7.4	147.80	145.31	2.49	3.66	12.81		3313.0	Some DNAPL Removed
PW-2L	4/10/23 8:35	5.0	7.4	147.80	144.81	2.99	4.40			3313.0	Some DNAPL Removed <sup>1</sup>
PW-2L	4/12/23 8:50	5.0	7.4	147.80	146.14	1.66	2.44			3313.0	Some DNAPL Removed <sup>1</sup>
PW-2L	4/14/23 8:52	5.0	7.4	147.80	144.90	2.90	4.26			3313.0	Some DNAPL Removed <sup>1</sup>
PW-2L	4/17/23 8:52	5.0	7.4	147.80	145.07	2.73	4.01			3313.0	Some DNAPL Removed <sup>1</sup>
PW-2L	4/19/23 9:20	5.0	7.4	147.80	145.90	1.90	2.79			3313.0	Some DNAPL Removed <sup>1</sup>
PW-2L	4/24/23 8:52	5.0	7.4	147.80	144.05	3.75	5.51			3313.0	Some DNAPL Removed <sup>1</sup>
PW-2L	4/26/23 9:40	5.0	7.4	147.80	145.82	1.98	2.91	17.56		3330.5	Some DNAPL Removed
PW-2L	4/28/23 9:35	5.0	7.4	147.80	145.73	2.07	3.04			3330.5	Some DNAPL Removed <sup>1</sup>
PW-2L	5/1/23 8:50	5.0	7.4	147.80	145.82	1.98	2.91			3330.5	
PW-2L	5/3/23 8:51	5.0	7.4	147.80	144.27	3.53	5.19			3330.5	Some DNAPL Removed <sup>1</sup>
PW-2L	5/5/23 9:20	5.0	7.4	147.80	146.17	1.63	2.40			3330.5	Some DNAPL Removed <sup>1</sup>
PW-2L	5/8/23 8:50	5.0	7.4	147.80	144.47	3.33	4.90			3330.5	Some DNAPL Removed <sup>1</sup>
PW-2L	5/10/23 9:50	5.0	7.4	147.80	145.75	2.05	3.01			3330.5	Some DNAPL Removed <sup>1</sup>
PW-2L	5/12/23 9:15	5.0	7.4	147.80	146.09	1.71	2.51			3330.5	Some DNAPL Removed <sup>1</sup>
PW-2L	5/15/23 10:04	5.0	7.4	147.80	144.21	3.59	5.28			3330.5	Some DNAPL Removed <sup>1</sup>
PW-2L	5/17/23 10:00	5.0	7.4	147.80	145.99	1.81	2.66			3330.5	Some DNAPL Removed <sup>1</sup>

Table 2
DNAPL Accumulation and Removal Volumes (January 1 through June 30, 2023)

Well ID	Date and Time	Sump Length (feet)	Sump Volume (gallons)	Depth to Bottom of Well (feet TOC)	Depth to Top of DNAPL (feet TOC)	DNAPL Thickness (feet)	Volume of DNAPL in Well Sump (gallons)	Volume of DNAPL Removed Between DNAPL Storage Container Measurement Events (gallons)	Cumulative Volume of DNAPL Entry into Well (gallons)	Cumulative Volume of DNAPL Removed (gallons)	Removal Activity
PW-2L	5/19/23 9:00	5.0	7.4	147.80	145.70	2.10	3.09			3330.5	Some DNAPL Removed <sup>1</sup>
PW-2L	5/22/23 8:55	5.0	7.4	147.80	145.72	2.08	3.06			3330.5	Some DNAPL Removed <sup>1</sup>
PW-2L	5/24/23 10:30	5.0	7.4	147.80	145.77	2.03	2.98			3330.5	
PW-2L	5/26/23 8:59	5.0	7.4	147.80	144.94	2.86	4.20	25.20		3355.7	Some DNAPL Removed
PW-2L	5/31/23 9:17	5.0	7.4	147.80	NM	NM	NM			3355.7	Some DNAPL Removed <sup>1</sup>
PW-2L	6/2/23 8:50	5.0	7.4	147.80	146.27	1.53	2.25			3355.7	
PW-2L	6/5/23 9:20	5.0	7.4	147.80	144.71	3.09	4.54			3355.7	Some DNAPL Removed <sup>1</sup>
PW-2L	6/7/23 9:20	5.0	7.4	147.80	145.44	2.36	3.47			3355.7	Some DNAPL Removed <sup>1</sup>
PW-2L	6/9/23 10:10	5.0	7.4	147.80	146.21	1.59	2.34			3355.7	Some DNAPL Removed <sup>1</sup>
PW-2L	6/12/23 9:55	5.0	7.4	147.80	144.77	3.03	4.45			3355.7	Some DNAPL Removed <sup>1</sup>
PW-2L	6/19/23 9:20	5.0	7.4	147.80	145.93	1.87	2.75			3355.7	
PW-2L	6/21/23 9:05	5.0	7.4	147.80	144.81	2.99	4.40			3355.7	All DNAPL Removed <sup>1</sup>
PW-2L	6/23/23 9:14	5.0	7.4	147.80	146.24	1.56	2.29			3355.7	
PW-2L	6/26/23 9:10	5.0	7.4	147.80	144.74	3.06	4.50			3355.7	Some DNAPL Removed <sup>1</sup>
PW-2L	6/30/23 13:45	5.0	7.4	147.80	NM	NM	4.30 NM			3355.7	All DNAPL Removed <sup>1</sup>
1 VV-CL	0/30/23 13.73	3.0	,.,	147.00	14141	14141	INIVI			3333.1	All DIVALE NETHOVEG
PW-3-85	6/27/23 15:45	10.0	26.1	92.50	90.03	2.47	3.63		2.4	0.65	
F W-3-03	0/21/23 13.43	10.0	20.1	92.50	90.03	2.41	3.03		2.4	0.03	
PW-6U	1/31/23 13:40	5.0	7.4	72.13	69.48	2.65	3.90		246.3	200.3	
PW-6U	2/28/23 10:50	5.0	7.4	72.13	68.67	3.46	5.09		247.5	200.3	Some DNAPL Removed <sup>1</sup>
PW-6U	3/1/23 11:40	5.0	7.4	72.13	70.70	1.43	2.10		247.5	200.3	Some DNAPL Removed <sup>1</sup>
PW-6U	3/2/23 10:20	5.0	7.4	72.13	71.11	1.43	1.50		247.5	200.3	Some DNAPL Removed <sup>1</sup>
PW-6U	3/7/23 14:01	5.0	7.4	72.13	71.41	0.72	1.06		247.5	200.3	Some DNAFL Removed
PW-6U	3/28/23 10:20	5.0	7.4	72.13	70.24	1.89	2.78		249.3	200.3	
PW-6U	4/25/23 9:25	5.0	7.4	72.13	69.94	2.19	3.22		249.7	200.3	<del></del>
		5.0	7.4		1						
PW-6U	5/30/23 14:10 5/31/23 15:40		7.4	72.13	67.70 NM	4.43	6.51		253.0	200.3	Comp DNADI Domested 1
PW-6U		5.0		72.13	+ +	NM	NM		253.0	200.3	Some DNAPL Removed <sup>1</sup>
PW-6U	6/2/23 14:25	5.0	7.4	72.13	NM 70.05	NM 2.00	NM 2.06		253.0	200.3	Some DNAPL Removed <sup>1</sup>
PW-6U	6/8/23 10:45	5.0	7.4	72.13	70.05	2.08	3.06		253.0	200.3	All DNADI
PW-6U	6/20/23 17:00	5.0	7.4	72.13	NM	NM 2.01	NM	8.67	253.0	209.0	All DNAPL removed
PW-6U	6/27/23 15:10	5.0	7.4	72.13	70.12	2.01	2.95		255.9	209.0	
DW 4411	6 107 102 44 20			70.65	70.24	2.24	2.40			1.0	
PW-11U	6/27/23 11:30	5.0	7.4	72.65	70.34	2.31	3.40		5.7	1.0	
DW 44111	1 (2 (22 12 05			72.67	72.60	0.00	111		7.4	6.3	
PW-11Ub	1/3/23 13:05	5.0	7.4	73.67	72.69	0.98	1.44		7.1	6.3	<del></del>
PW-11Ub	1/9/23 13:20	5.0	7.4	73.67	72.52	1.15	1.69		7.3	6.3	
PW-11Ub	1/16/23 10:53	5.0	7.4	73.67	72.49	1.18	1.73		7.4	6.3	
PW-11Ub	1/23/23 11:17	5.0	7.4	73.67	72.34	1.33	1.96		7.6	6.3	<del></del>
PW-11Ub	1/30/23 14:20	5.0	7.4	73.67	72.18	1.49	2.19		7.8	6.3	<del></del>
PW-11Ub	2/6/23 11:35	5.0	7.4	73.67	72.03	1.64	2.41		8.0	6.3	
PW-11Ub	2/13/23 13:10	5.0	7.4	73.67	71.89	1.78	2.62		8.2	6.3	
PW-11Ub	2/20/23 11:37	5.0	7.4	73.67	71.74	1.93	2.84		8.5	6.3	
PW-11Ub	2/27/23 11:09	5.0	7.4	73.67	71.52	2.15	3.16		8.8	6.3	
PW-11Ub	3/6/23 11:49	5.0	7.4	73.67	71.39	2.28	3.35		9.0	6.3	
PW-11Ub	3/13/23 11:10	5.0	7.4	73.67	71.31	2.36	3.47		9.1	6.3	
PW-11Ub	3/20/23 10:50	5.0	7.4	73.67	71.23	2.44	3.59		9.2	6.3	

Table 2
DNAPL Accumulation and Removal Volumes (January 1 through June 30, 2023)

Well ID	Date and Time	Sump Length (feet)	Sump Volume (gallons)	Depth to Bottom of Well (feet TOC)	Depth to Top of DNAPL (feet TOC)	DNAPL Thickness (feet)	Volume of DNAPL in Well Sump (gallons)	Volume of DNAPL Removed Between DNAPL Storage Container Measurement Events (gallons)	Cumulative Volume of DNAPL Entry into Well (gallons)	Cumulative Volume of DNAPL Removed (gallons)	Removal Activity
PW-11Ub	3/27/23 10:42	5.0	7.4	73.67	71.04	2.63	3.87		9.5	6.3	
PW-11Ub	4/3/23 14:10	5.0	7.4	73.67	70.37	3.30	4.85		10.5	6.3	Some DNAPL Removed <sup>1</sup>
PW-11Ub	4/4/23 9:45	5.0	7.4	73.67	71.77	1.90	2.79		10.5	6.3	Some DNAPL Removed <sup>1</sup>
PW-11Ub	4/5/23 10:00	5.0	7.4	73.67	73.00	0.67	0.98		10.5	6.3	Some DNAPL Removed <sup>1</sup>
PW-11Ub	4/5/23 15:20	5.0	7.4	73.67	73.23	0.44	0.65		10.5	6.3	
PW-11Ub	4/10/23 10:50	5.0	7.4	73.67	72.98	0.69	1.01		10.8	6.3	
PW-11Ub	4/17/23 10:41	5.0	7.4	73.67	73.04	0.63	0.93		10.7	6.3	
PW-11Ub	4/24/23 11:22	5.0	7.4	73.67	72.74	0.93	1.37		11.2	6.3	
PW-11Ub	5/1/23 11:05	5.0	7.4	73.67	72.61	1.06	1.56		11.4	6.3	
PW-11Ub	5/8/23 10:41	5.0	7.4	73.67	72.47	1.20	1.76		11.6	6.3	
PW-11Ub	5/15/23 13:20	5.0	7.4	73.67	72.31	1.36	2.00		11.8	6.3	
PW-11Ub	5/22/23 10:50	5.0	7.4	73.67	72.22	1.45	2.13		12.0	6.3	
PW-11Ub	5/31/23 11:20	5.0	7.4	73.67	72.08	1.59	2.34		12.2	6.3	
PW-11Ub	6/2/23 14:05	5.0	7.4	73.67	NM	NM	NM		12.2	6.3	All DNAPL Removed <sup>1</sup>
PW-11Ub	6/5/23 13:27	5.0	7.4	73.67	ND	0.00	0.00		12.2	6.3	
PW-11Ub	6/12/23 13:12	5.0	7.4	73.67	73.19	0.48	0.71		12.2	6.3	
PW-11Ub	6/19/23 14:05	5.0	7.4	73.67	73.21	0.46	0.68		12.8	6.3	
PW-11Ub	6/22/23 17:00	5.0	7.4	73.67	NM	NM	NM	19.41	12.8	25.8	All DNAPL Removed
PW-11Ub	6/26/23 11:57	5.0	7.4	73.67	73.67	0.00	0.00		12.8	25.8	
PW-13U	1/31/23 10:55	5.0	7.4	80.05	77.54	2.51	3.69		171.4	161.9	
PW-13U	2/28/23 11:15	5.0	7.4	80.05	76.63	3.42	5.03		172.7	161.9	Some DNAPL Removed <sup>1</sup>
PW-13U	3/1/23 11:05	5.0	7.4	80.05	78.34	1.71	2.51		172.7	161.9	All DNAPL Removed <sup>1</sup>
PW-13U	3/27/23 11:50	5.0	7.4	80.05	77.95	2.10	3.09		175.8	161.9	
PW-13U	4/24/23 11:35	5.0	7.4	80.05	76.92	3.13	4.60		177.3	161.9	All DNAPL Removed <sup>1</sup>
PW-13U	5/30/23 13:49	5.0	7.4	80.05	77.00	3.05	4.48		181.8	161.9	
PW-13U	6/2/23 11:30	5.0	7.4	80.05	NM	NM	NM		181.8	161.9	Some DNAPL Removed <sup>1</sup>
PW-13U	6/7/23 16:40	5.0	7.4	80.05	77.97	2.08	3.06		181.8	161.9	Some DNAPL Removed <sup>1</sup>
PW-13U	6/8/23 14:35	0.6	0.9	80.05	NM	NM	NM	8.05	181.8	169.9	All DNAPL removed
PW-13U	6/26/23 11:34	0.6	0.9	80.05	77.72	2.33	3.43		181.8	169.9	
PW-14U	1/31/23 10:09	5.0	7.4	75.45	72.63	2.82	4.15		47.7	29.2	All DNAPL Removed <sup>1</sup>
PW-14U	2/28/23 9:45	5.0	7.4	75.45	72.11	3.34	4.91		52.6	29.2	Some DNAPL Removed <sup>1</sup>
PW-14U	3/1/23 11:15	5.0	7.4	75.45	74.31	1.14	1.68		52.6	29.2	Some DNAPL Removed <sup>1</sup>
PW-14U	3/2/23 10:30	5.0	7.4	75.45	73.95	1.50	2.21		52.6	29.2	Some DNAPL Removed <sup>1</sup>
PW-14U	3/7/23 14:20	5.0	7.4	75.45	74.27	1.18	1.73		52.6	29.2	
PW-14U	3/13/23 11:58	5.0	7.4	75.45	73.02	2.43	3.57		54.4	29.2	
PW-14U	3/20/23 11:51	5.0	7.4	75.45	72.49	2.96	4.35		55.2	29.2	Some DNAPL Removed <sup>1</sup>
PW-14U	3/20/23 16:00	5.0	7.4	75.45	73.92	1.53	2.25		55.2	29.2	
PW-14U	3/27/23 14:37	5.0	7.4	75.45	72.60	2.85	4.19		57.1	29.2	
PW-14U	4/4/23 10:40	5.0	7.4	75.45	72.34	3.11	4.57		57.5	29.2	
PW-14U	4/5/23 11:10	5.0	7.4	75.45	72.23	3.22	4.73		57.7	29.2	Some DNAPL Removed <sup>1</sup>
PW-14U	4/5/23 15:40	5.0	7.4	75.45	73.21	2.24	3.29		57.7	29.2	Some DNAPL Removed <sup>1</sup>
PW-14U	4/10/23 11:50	5.0	7.4	75.45	73.73	1.72	2.53		57.7	29.2	
PW-14U	4/17/23 11:35	5.0	7.4	75.45	73.57	1.88	2.76		57.9	29.2	
PW-14U	4/24/23 13:53	5.0	7.4	75.45	73.04	2.41	3.54		58.7	29.2	

DNAPL Monitoring Semiannual Summary Report (January 1 through June 30, 2023) NW Natural Gasco Site

Table 2
DNAPL Accumulation and Removal Volumes (January 1 through June 30, 2023)

		Sump Length	Sump Volume	Depth to Bottom of Well	Depth to Top of DNAPL		Volume of DNAPL in Well	Volume of DNAPL Removed Between DNAPL Storage Container Measurement Events		Cumulative Volume of DNAPL Removed	
Well ID	Date and Time	(feet)	(gallons)	(feet TOC)	(feet TOC)	(feet)	Sump (gallons)	(gallons)	(gallons)	(gallons)	Removal Activity
PW-14U	5/1/23 11:20	5.0	7.4	75.45	72.87	2.58	3.79		58.9	29.2	
PW-14U	5/8/23 11:45	5.0	7.4	75.45	72.74	2.71	3.98		59.1	29.2	
PW-14U	5/15/23 13:58	5.0	7.4	75.45	72.58	2.87	4.22		59.4	29.2	
PW-14U	5/22/23 15:20	5.0	7.4	75.45	72.34	3.11	4.57		59.7	29.2	
PW-14U	5/23/23 9:10	5.0	7.4	75.45	72.34	3.11	4.57		59.7	29.2	Some DNAPL Removed <sup>1</sup>
PW-14U	5/24/23 11:20	5.0	7.4	75.45	72.81	2.64	3.88	7.23	59.7	36.4	Some DNAPL Removed
PW-14U	5/26/23 13:40	5.0	7.4	75.45	74.34	1.11	1.63		59.7	36.4	
PW-14U	6/5/23 13:47	5.0	7.4	75.45	73.98	1.47	2.16		60.3	36.4	
PW-14U	6/19/23 11:39	5.0	7.4	75.45	73.58	1.87	2.75		60.8	36.4	
PW-14U	6/27/23 13:30	5.0	7.4	75.45	73.44	2.01	2.95		61.0	36.4	

#### Notes:

False positive or false negative reading; not included in volume calculations

- 1. Removal volumes were not measured after each removal event. In order to obtain more accurate removal measurements, removed DNAPL was stored in a container and measured when a significant amount of DNAPL had accumulated.
- 2. Measurement of volume of DNAPL entry into well not available

DNAPL: dense nonaqueous phase liquid, specifically oil and/or semisolid tar

ND: not detected

NM: not measured

TOC: top of casing

Table 3
DNAPL Entry and Removal Rates and Volumes

	Date of First DNAPL Detection		Average DNAPL Entry Rate and/or Removal Rate (gallons per month)														
Well ID		` <b>J</b>	Reporting Period														
			Total	1	2	3	4	5	6	7	8	9	10	11	12	13	14
			Average During Entire Monitoring Period	Beginning of Monitoring to 12/31/2014						7/1/2019 to 12/31/2019					1/1/2022 to 6/30/2022		1/1/2023 to
		8.9	0.08	0.11	0.09	0.17	0.11	0.05	0.09	0.05	0.03	0.08	0.05	0.07	0.02	0.02	0.06
DW-6U	1/21/2014 1/21/2014	1.1	0.08	0.11 0.03	0.09	0.17	0.11	0.03	0.09	0.03	0.03	0.08	0.05	0.07	0.02	0.02	0.06
DW-11U	2/11/2014	41.6	0.36	0.03	0.51	0.48	0.39	0.02	0.38	0.01	0.40	0.00	0.00	0.35	0.02	0.00	0.30
DW-14U	4/29/2013	13.4	0.36	0.28	0.10	0.46	0.39	0.43	0.38	0.21	0.40	0.26	0.10	0.33	0.28	0.22	0.30
MW-16-45	4/29/2013	9.3	0.10	0.12	0.10	0.16	0.12	0.14	0.08	0.10	0.06	0.06	0.06	0.08	0.11	0.07	0.08
MW-18-30		83.1	0.64	0.11	0.08	0.04	0.09	0.05	0.69	0.05	0.07	0.04	0.07	0.05	0.10	0.69	0.08
MW-26U MW-27U	5/6/2013 11/6/2013	34.8	0.64	0.39	0.89	0.81	0.38	0.81	0.69	0.76	0.53	0.78	0.74	0.75	0.57	0.89	0.58
	8/3/2015	2.5	0.02	0.10	0.33	0.39	0.32	0.29	0.21	0.45	0.22	0.02	0.22	0.23	0.02	0.38	0.40
MW-30U MW-34L	4/29/2013	10.7	0.02	0.00	0.01	0.02	0.04	0.03	0.04	0.08	0.02	0.02	0.04	0.02	0.02	0.02	0.02
MW-37U	11/3/2014	0.1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.07	0.00	0.00	0.00	0.00	0.00	0.00
PW-3-85	4/29/2013	2.4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PW-6U <sup>1</sup>	10/14/2013	255.9	1.91	0.04	0.74	2.75	2.74	4.53	3.82	3.20	3.26	3.73	2.69	3.45	4.34	2.22	1.76
PW-11U	11/6/2013	5.7	0.05	0.06	0.04	0.11	0.00	0.00	0.00	0.01	0.16	0.00	0.00	0.00	0.00	0.00	0.05
PW11Ub <sup>1,7</sup>	4/27/2022	12.8	0.86												0.74	0.79	0.99
PW-13U <sup>1</sup>	5/4/2015	181.8	1.44	0.00	0.88	1.97	1.78	2.04	2.92	2.11	2.50	1.89	2.25	1.91	2.61	2.06	1.87
PW-14U <sup>1</sup>	7/7/2014	61.0	0.49	0.12	0.34	0.90	1.07	0.73	0.59	0.21	0.15	0.40	0.17	0.42	0.26	0.50	2.71
DNAPL Entry Rate Calcu			ļ	!		0.50	1.07	0.73	0.55	0.2.	0.13	0.10	0.17	0.12	0.20	0.50	2.7 1
MW-38U <sup>2</sup>	4/29/2013	104.7	0.83	1.81	1.12	0.78	1.25	0.30	0.16	0.22	0.13	0.30	0.21	0.56	0.60	0.66	0.59
MW-PW2L <sup>3</sup>	2/10/2014	119.7	1.06	3.38	1.85	0.63	0.55	0.50	0.42	0.34	0.19	0.29	0.14	0.19	0.28	0.39	0.38
DNAPL Entry Rate Calcu				2,00													
PW-1-80 <sup>4</sup>	4/29/2013	50.9	0.18	1.11	0.03	0.00	0.00	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PW-2L <sup>1</sup>	4/29/2013	3355.7	27.2	18.1	4.9	63.8	46.4	52.5	50.2	37.7	30.5	30.9	33.0	36.4	42.6	27.0	28.8
DNAPL Entry Rate of Lo	cations not in DNAF	L Monitoring Progra	ım	!													
MW-6-32 and MW-13-30 Combined <sup>5</sup>	8/8/2000	3882.0	14.1	14.6	16.3	0.0	16.4	17.9	13.6	9.2	13.3	8.8	11.2	9.7	9.7	14.5	18.9
T-50 Trench Sump <sup>6</sup>	8/3/2022	261.0	23.8													14.82	33.17
, , , , , , , , , , , , , , , , , , ,	Total		35.6	25.9	12.1	73.1	55.4	62.6	59.8	45.6	38.3	39.1	39.8	44.6	52.9	35.1	38.7
Non-Pumping Wells Total			3.8	7.5	5.1	3.6	3.4	2.8	2.3	2.3	1.7	2.2	1.7	2.4	2.4	2.6	2.6
			31.9	18.3	6.9	69.5	52.0	59.8	57.5	43.2	36.6	36.9	38.1	42.2	50.5	32.6	36.1
			89.4	70.8	57.6	95.1	93.9	95.5	96.2	94.9	95.5	94.4	95.7	94.6	95.5	92.7	93.3
Non-Pumping Wells Percentage of Total			10.6	29.2	42.4	4.9	6.1	4.5	3.8	5.1	4.5	5.6	4.3	5.4	4.5	7.3	6.7
ramping wens	ge or rotar		10.0	23.2		1.5	J. 1	1.5	3.0	5.1	1.5	3.0	1.5	5. 1	1.5	, .5	Ü.,

## Table 3

## **DNAPL Entry and Removal Rates and Volumes**

### Notes:

- 1. Denotes pumping well.
- 2. DNAPL volume removed from well used in lieu of accumulation volume from March 10, 2014, to September 11, 2015, and January 22, 2016, to March 12, 2018.
- 3. DNAPL volume removed from well used in lieu of accumulation volume from March 15, 2014, to December 4, 2014.
- 4. DNAPL volume removed from well used in lieu of accumulation volume from March 2, 2015, to present.
- 5. DNAPL removal system offline for entire year of 2017. These two wells are not included in totals or percentages because they are not part of the DNAPL monitoring program.
- 6. DNAPL entry into trench is monitored but not included in totals or percentages because it is not part of the DNAPL monitoring program.
- 7. PW-11Ub was not in operation for sufficient time to determine highest average DNAPL entry rate.

Blue shading indicates reporting period with highest average DNAPL entry rate for each well, group of wells, or total. This excludes MW-37U, which has had an average DNAPL entry rate of 0.00 gallon per month in each reporting period.

---: not applicable

DNAPL: dense nonaqueous phase liquid or "oil"

Table 4
DNAPL Entry Rate Trend Analysis Results Through December 31, 2022

Well Type	DNAPL Entry Rate Trend via Mann Kendall	Well ID	DNAPL Entry Rate in Reporting Period 13 (July 1 through December 31, 2021) (Gallons per Month)	Peak DNAPL Entry Rate Moving Average through December 31, 2022 (Gallons per Month)	Peak DNAPL Entry Date
		DW-14U	0.22	0.74	Second Quarter 2017
		MW-16-45	0.07	0.16	Fourth Quarter 2017
		MW-26U	0.69	1.08	Third Quarter 2015
		PW-11U	0.00	0.13	Second Quarter 2017
	Decreasing	MW-34L	0.07	0.13	Second Quarter 2013
		MW-38U	0.66	2.54	First Quarter 2015
		MW-PW2L	0.39	3.74	First Quarter 2014
Non Dumping		PW-1-80	0.00	2.74	Second Quarter 2013
Non-Pumping		PW-3-85	0.00	0.06	Second Quarter 2014
	Stable	DW-11U	0.00	0.03	Third Quarter 2015
		MW-27U	0.38	0.39	Third Quarter 2016
		DW-6U	0.02	0.18	Fourth Quarter 2017
		MW-18-30	0.06	0.15	Second Quarter 2013
		MW-30U	0.02	0.05	Second Quarter 2018
	Insufficient data to perform analysis	MW-37U	0.00	0.03	Second Quarter 2014
	Decreasing	PW-14U	0.50	1.13	Third Quarter 2017
		PW-2L	27.0	58.57	Fourth Quarter 2017
Dumning		PW-6U	2.22	3.64	Second Quarter 2020
Pumping	Stable	PW-13U	2.06	2.71	First Quarter 2019
	Insufficient data to perform analysis	PW-11Ub	0.79	0.78	Second Quarter 2022

Note:

DNAPL: dense nonaqueous phase liquid

DNAPL Monitoring Semiannual Summary Report (January 1 through June 30, 2023) NW Natural Gasco Site

Table 5
DNAPL Entry Rates During Different Operational Periods of the HC&C System

	HC&C System Operation Period					
	Prior to Startup (beginning of monitoring until 9/23/2013)	Interim Operation and Testing Period (9/23/2013 through 5/14/2015)	Full-Time, Full-Scale Operation (5/14/2015 through 6/30/2023)			
Well ID	Average DNAPL Entry Rate (gallons per month)					
<b>DNAPL Entry Rate Calculated from Measuremen</b>	nts in Well					
DW-6U	NA	0.12	0.07			
DW-11U	NA	0.03	0.01			
DW-14U	NA	0.33	0.37			
MW-16-45	0.18	0.10	0.09			
MW-18-30	0.13	0.11	0.07			
MW-26U	0.01	0.57	0.74			
MW-27U	0.00	0.14	0.32			
MW-30U	0.00	0.00	0.03			
MW-34L	0.13	0.10	0.08			
MW-37U	0.00	0.00	0.00			
PW-3-85	0.03	0.00	0.00			
PW-6U <sup>1</sup>	0.00	0.10	2.60			
PW-11U	0.00	0.09	0.04			
PW-11Ub <sup>1</sup>	NA	NA	0.86			
PW-13U <sup>1</sup>	0.00	0.02	1.86			
PW-14U <sup>1</sup>	0.00	0.22	0.58			
DNAPL Entry Rate Calculated from Combination	of Accumulation in Well and Vol	ume Removed from Well				
MW-38U <sup>2</sup>	0.46	1.98	0.62			
MW-PW2L <sup>3</sup>	NA	3.30	0.70			
PW-1-80 <sup>4</sup>	3.11	0.46	0.01			
DNAPL Entry Rate Calculated from Volume Ren	oved from Well					
PW-2L <sup>1</sup>	5.97	16.49	0.97			
Total	10.01	24.17	9.96			
Non-Pumping Wells Total	4.04	7.25	3.10			
Pumping Wells Total	5.97	16.92	6.86			
Pumping Wells Percentage of Total	59.6	70.0	68.9			
Non-Pumping Wells Percentage of Total	40.4	30.0	31.1			

### Table 5

## **DNAPL Entry Rates During Different Operational Periods of the HC&C System**

#### Notes:

- 1. Denotes pumping well.
- 2. DNAPL volume removed from well used in lieu of accumulation volume from March 10, 2014, to September 11, 2015, and January 22, 2016, to March 12, 2018.
- 3. DNAPL volume removed from well used in lieu of accumulation volume from March 15, 2014, to December 4, 2014.
- 4. DNAPL volume removed from well used in lieu of accumulation volume from March 2, 2015, to present.

DNAPL: dense nonaqueous phase liquid or "oil"

HC&C: hydraulic control and containment

NA: not available; well was not installed during testing period

Table 6
Proposed DNAPL Monitoring Program

		Proposed DNAPL Monitoring Frequency			
Well ID	Water Bearing Unit	Weekly	Monthly	Quarterly	Semiannually
MW-3-26	Surficial Fill				Х
MW-3-56	Upper Alluvium				Х
MW-4-35	Fill/Upper Alluvium				Х
MW-4-57	Upper Alluvium				Х
MW-4-101	Lower Alluvium				Х
MW-5-32	Fill/Upper Alluvium				Х
MW-5-100	Upper Alluvium				Х
MW-5-175	Deep Alluvium				Х
MW-16-45	Upper Alluvium			Х	
MW-16-65	Upper Alluvium				Х
MW-18-30	Surficial Fill		Х		
MW-18-125	Lower Alluvium				Х
MW-18-180	Deep Alluvium				Х
MW-19-22	Surficial Fill				Х
MW-19-125	Lower Alluvium				Х
MW-19-180	Deep Alluvium				Х
MW-20-120	Lower Alluvium				Х
MW-24-70	Upper Alluvium				Х
MW-24-130	Lower Alluvium				Х
MW-26U	Upper Alluvium	Х			
MW-27L	Lower Alluvium				Х
MW-27U	Upper Alluvium		Х		
MW-28L	Lower Alluvium				Х
MW-28U	Upper Alluvium				Х
MW-29U	Upper Alluvium				Х
MW-30U	Upper Alluvium				Х
MW-31L	Lower Alluvium				Х
MW-31U	Upper Alluvium				Х
MW-32U	Upper Alluvium				Х
MW-33U	Upper Alluvium				Х
MW-34L	Lower Alluvium			Х	
MW-34U	Upper Alluvium				Х
MW-35U	Upper Alluvium				X
MW-36U	Upper Alluvium				Х
MW-37U	Upper Alluvium				X
MW-38U	Upper Alluvium	Х			
MW-42F	Surficial Fill				Х
MW-PW2L	Lower Alluvium		Х		†
WS-21-112	Lower Alluvium		<u> </u>	1	Х
WS-47-183	Lower Alluvium		†	1	X
OW-2F	Surficial Fill				X
OW-5F	Surficial Fill				X
PW-1-80	Upper Alluvium				X
PW-2L	Lower Alluvium	Х			^
PW-2U	Upper Alluvium				X
PW-3-85	Upper Alluvium				X

Table 6
Proposed DNAPL Monitoring Program

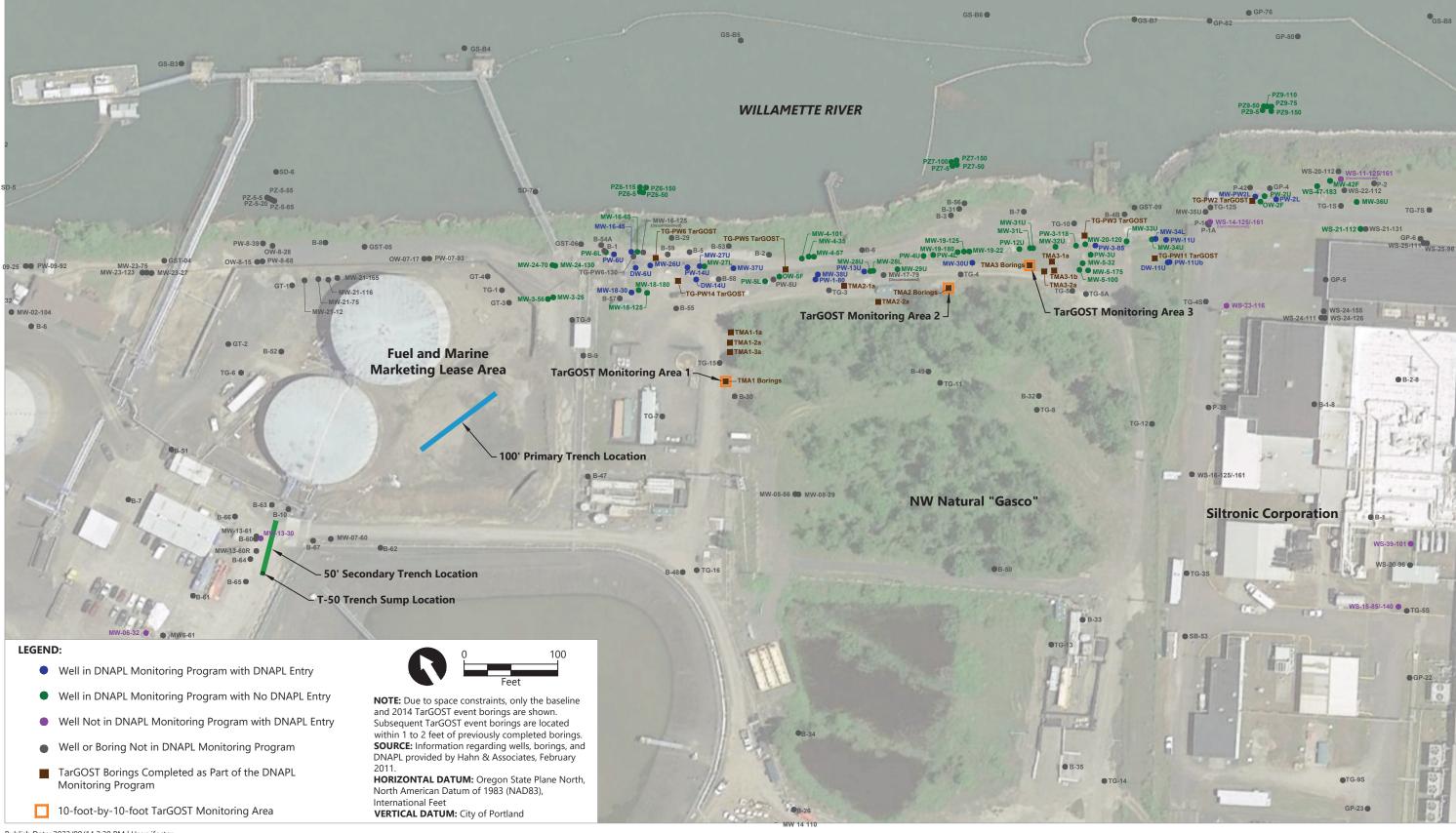
		Proposed DNAPL Monitoring Frequency			
Well ID	Water Bearing Unit	Weekly	Monthly	Quarterly	Semiannually
PW-3-118	Lower Alluvium				Х
PW-3U	Upper Alluvium				Х
PW-4L	Lower Alluvium				Х
PW-4U	Upper Alluvium				Х
PW-5L	Lower Alluvium				Х
PW-5U	Upper Alluvium				Х
PW-6L	Lower Alluvium				Х
PW-6U	Upper Alluvium		Х		
PW-11U	Upper Alluvium				Х
PW-11Ub	Upper Alluvium		Х		
PW-12U	Upper Alluvium				Х
PW-13U	Upper Alluvium		Х		
PW-14U	Upper Alluvium		Х		
DW-6U	Upper Alluvium				Х
DW-11U	Upper Alluvium				Х
DW-14U	Upper Alluvium				Х
PZ6-5	Surficial Fill				Х
PZ6-50	Upper Alluvium				Х
PZ6-115	Lower Alluvium				Х
PZ6-150	Deep Alluvium				Х
PZ7-5	Surficial Fill				Х
PZ7-50	Upper Alluvium				Х
PZ7-100	Lower Alluvium				Х
PZ7-150	Deep Alluvium				Х
PZ9-5	Surficial Fill				Х
PZ9-50	Upper Alluvium				Х
PZ9-75	Deep Alluvium				Х
PZ9-110	Deep Alluvium				Х
PZ9-150	Deep Alluvium				Х
T-100 <sup>1</sup>	Surficial Fill			Х	
T-50 <sup>2</sup>	Surficial Fill	Χ			
	Totals	4	7	3	63

### Notes:

2. T-50 is the 50-foot secondary Fill Water Bearing Zone interceptor trench. DNAPL: dense nonaqueous phase liquid, specifically oil and/or semisolid tar

<sup>1.</sup> T-100 is the 100-foot primary Fill Water Bearing Zone interceptor trench.

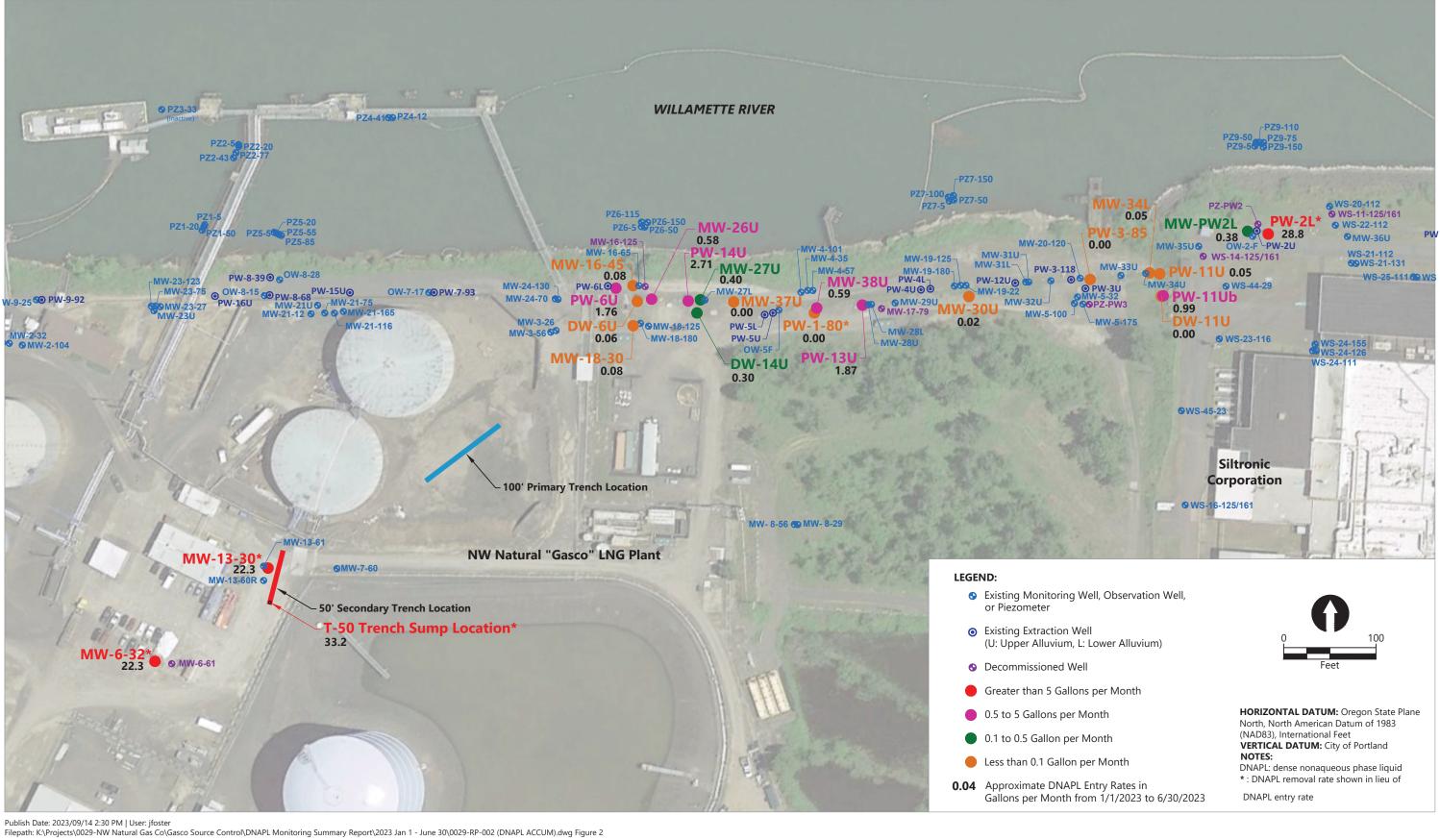
## Figures



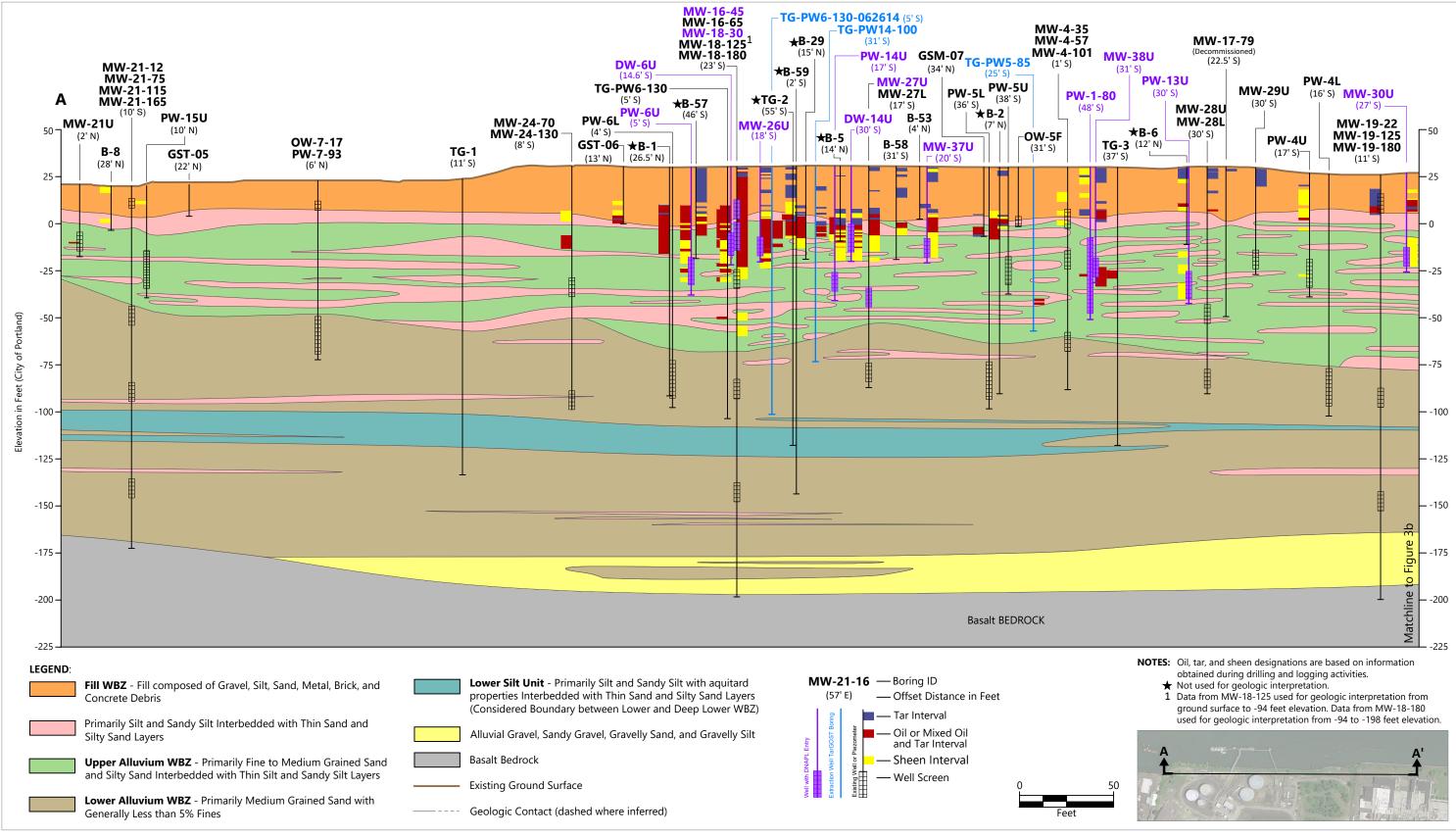
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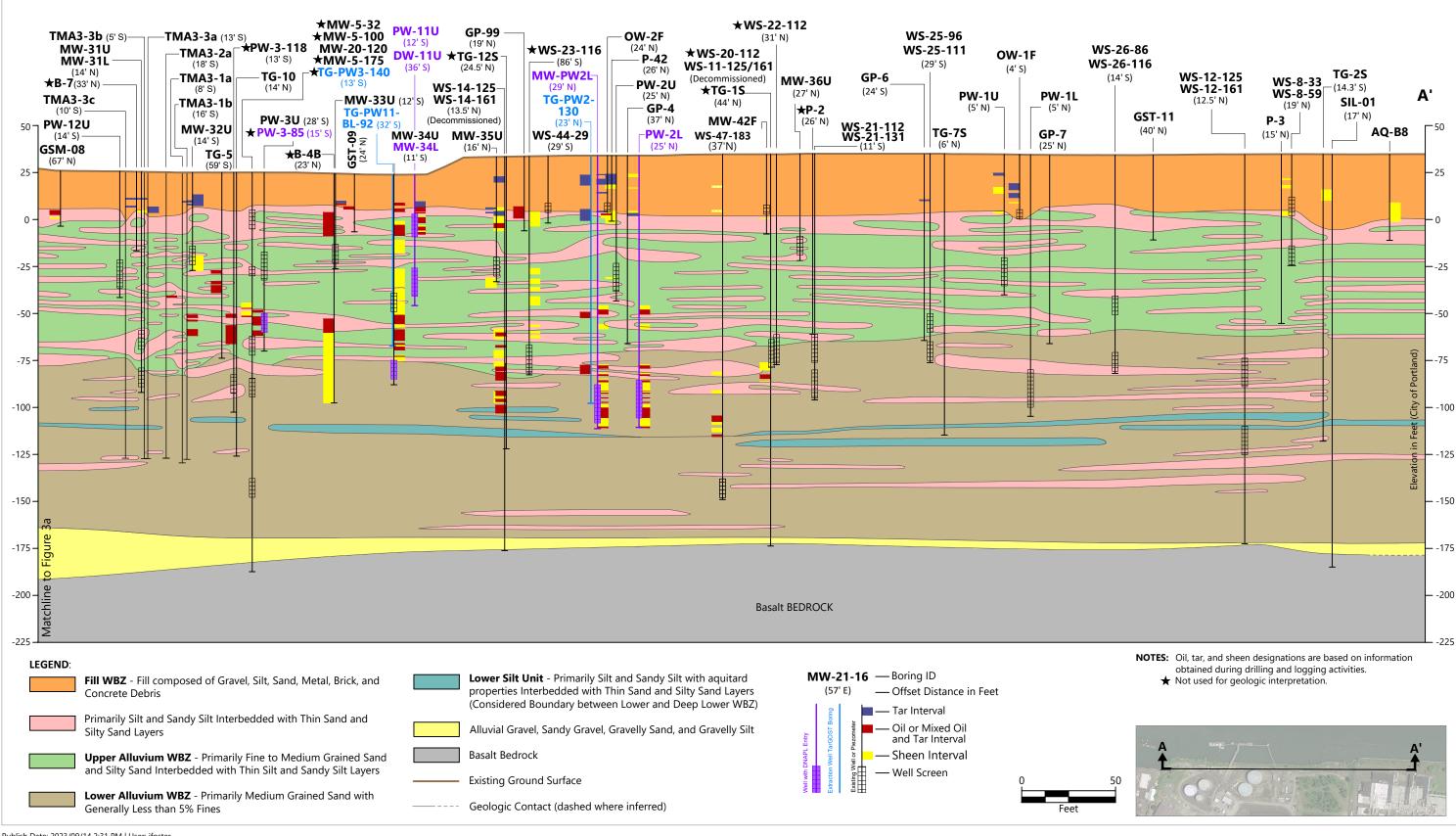




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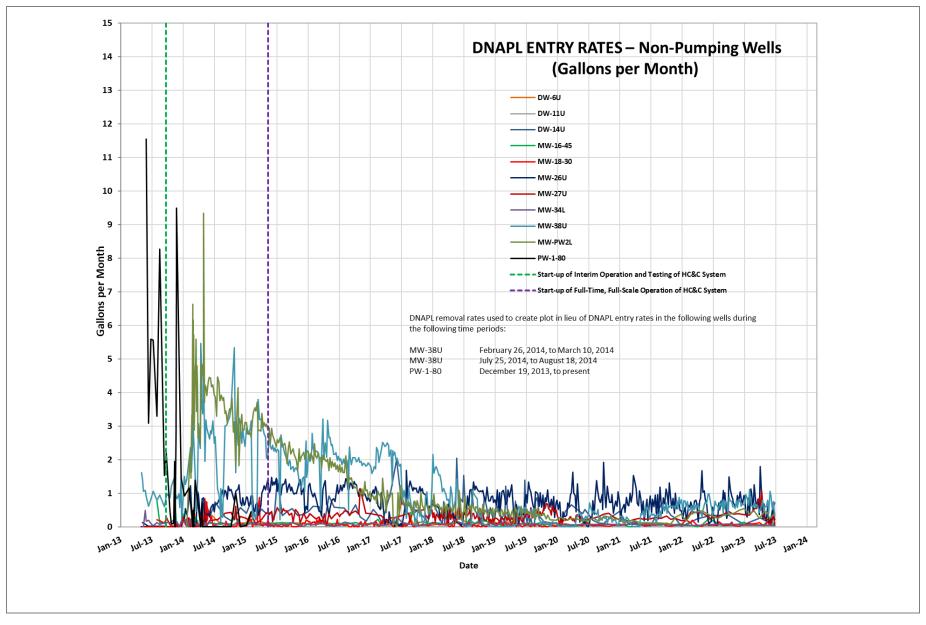




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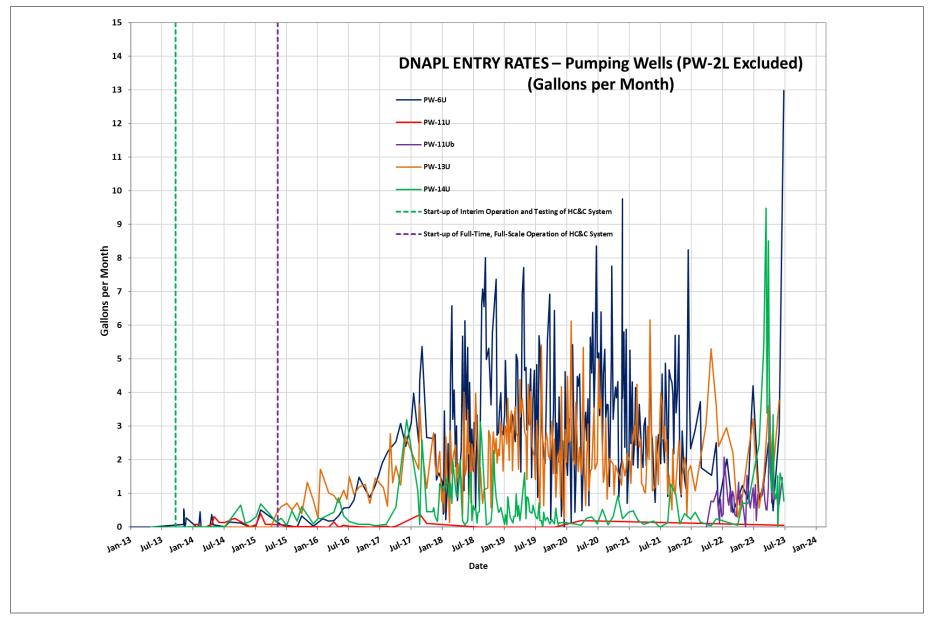
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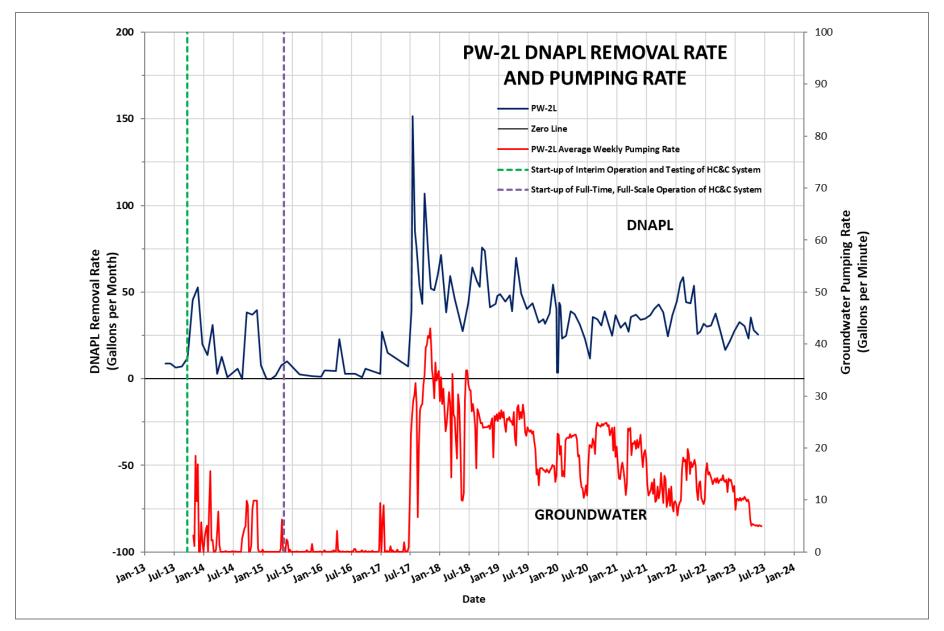
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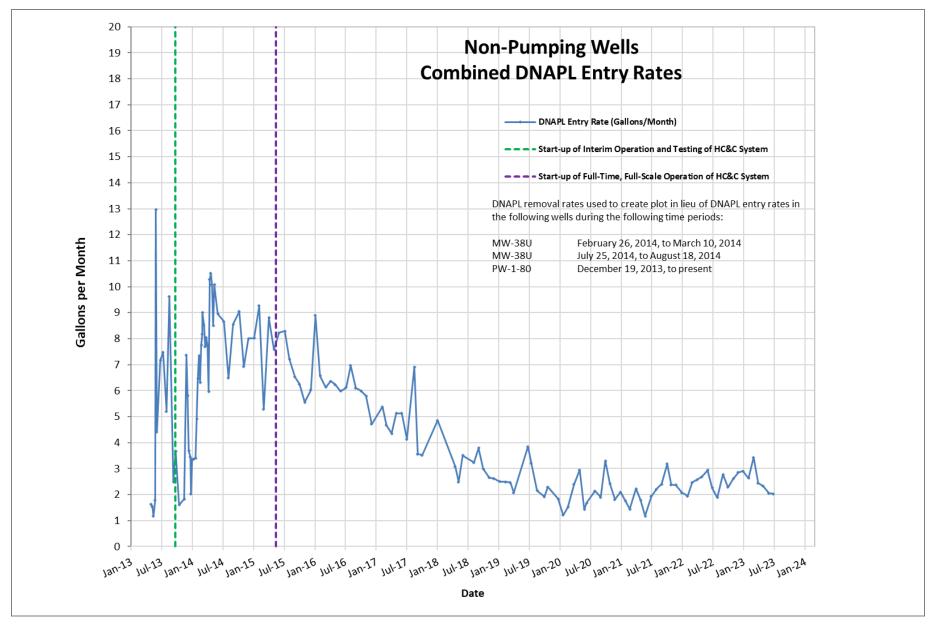
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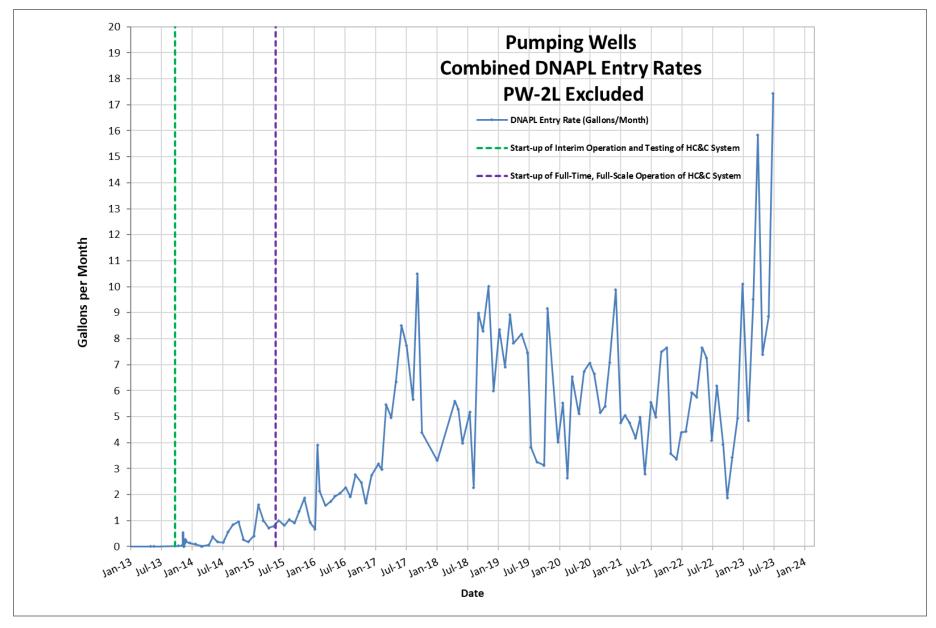
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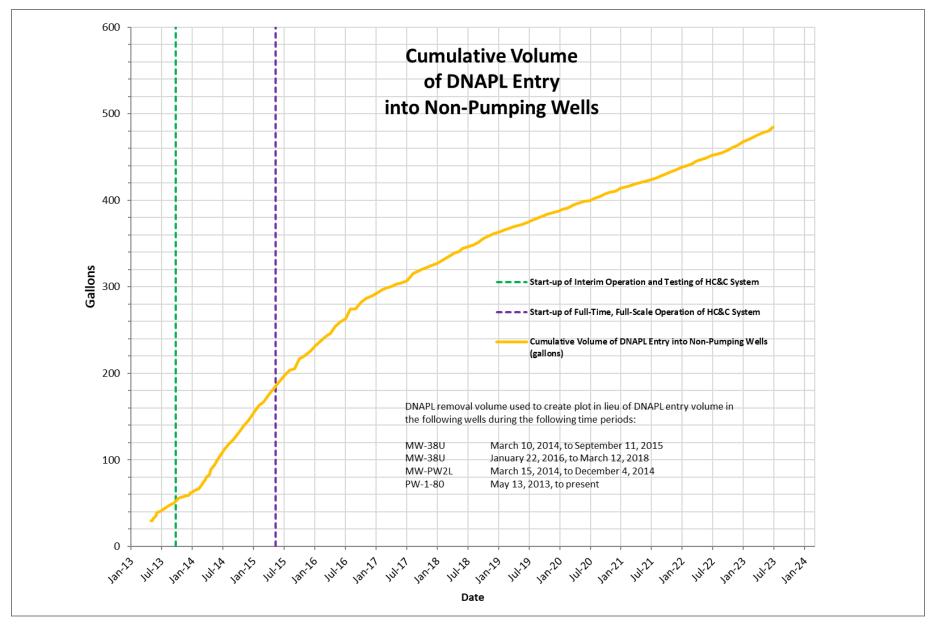
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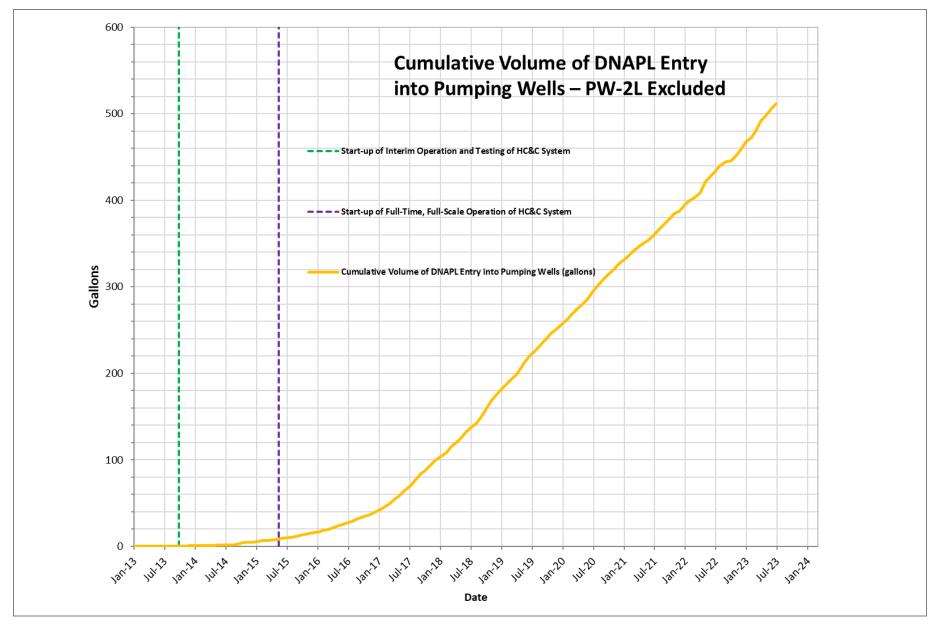
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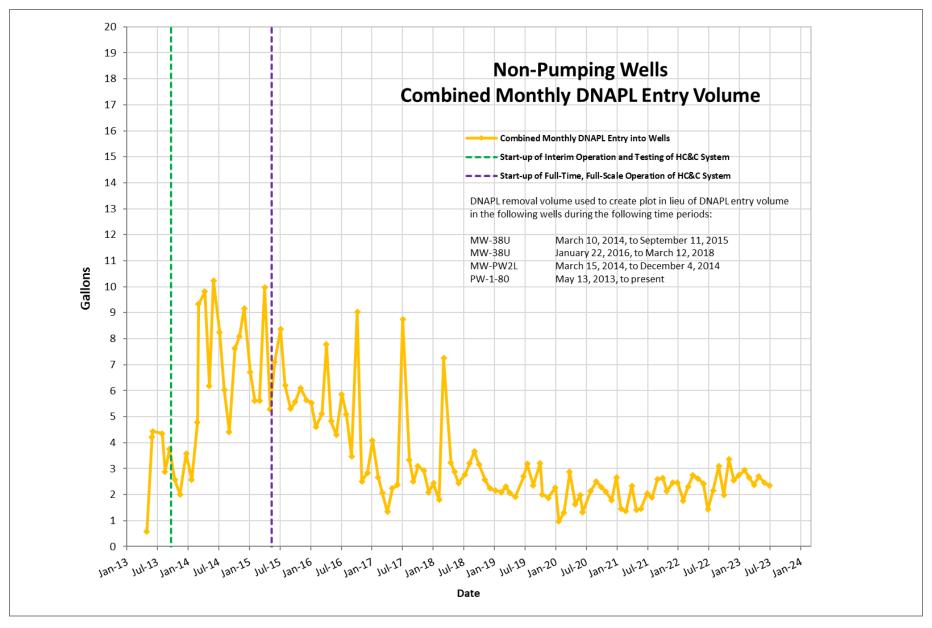
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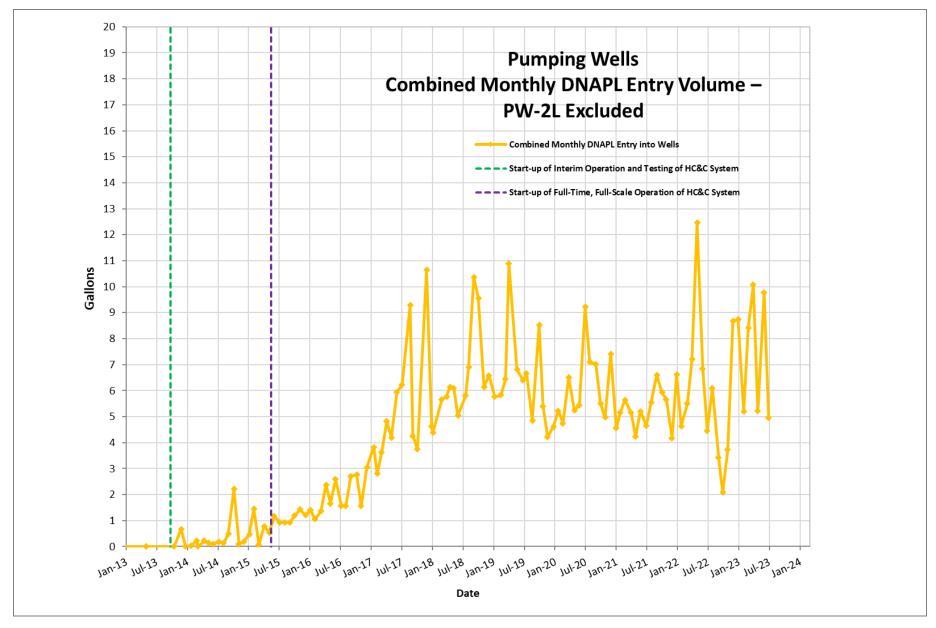
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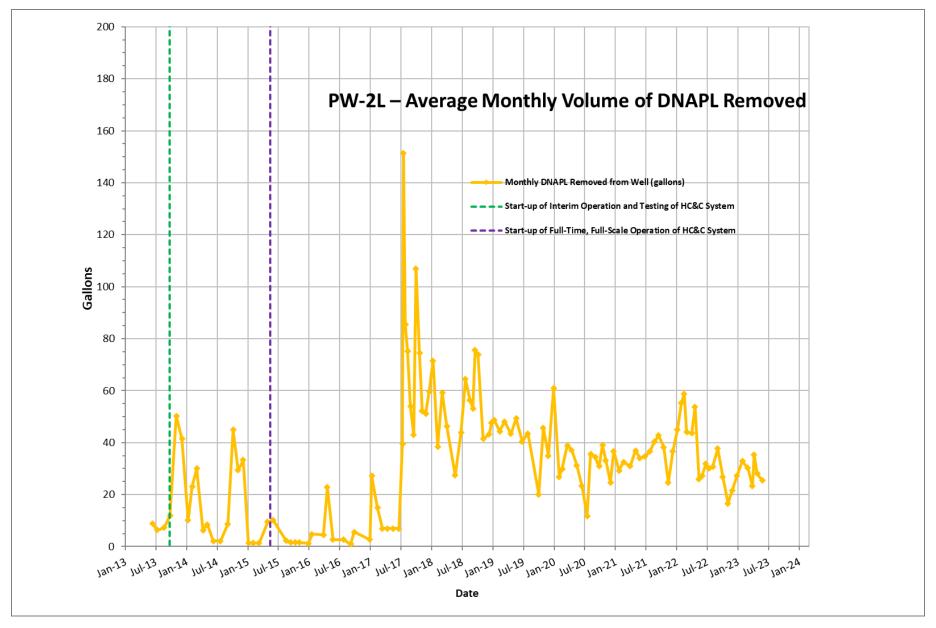
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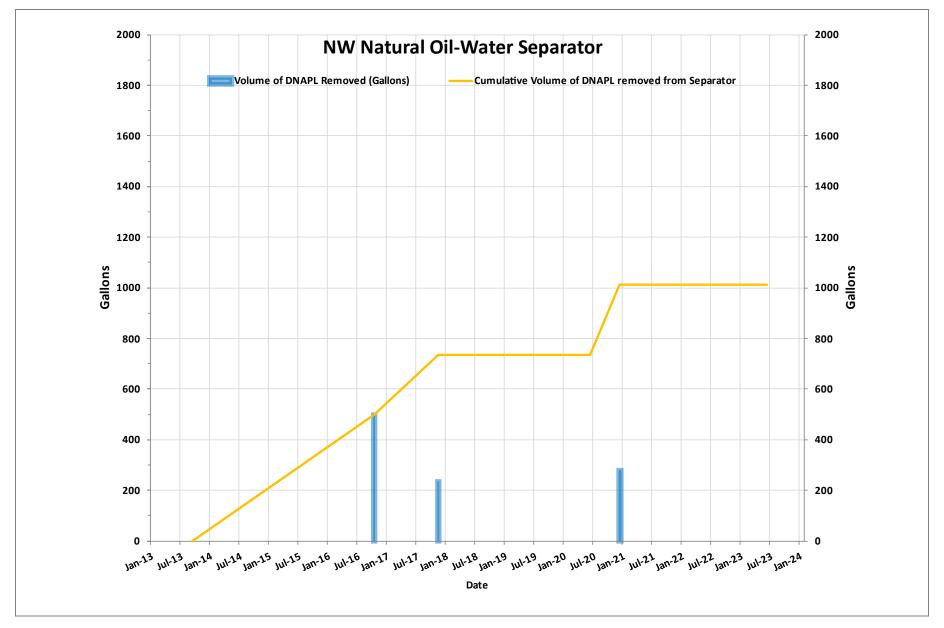
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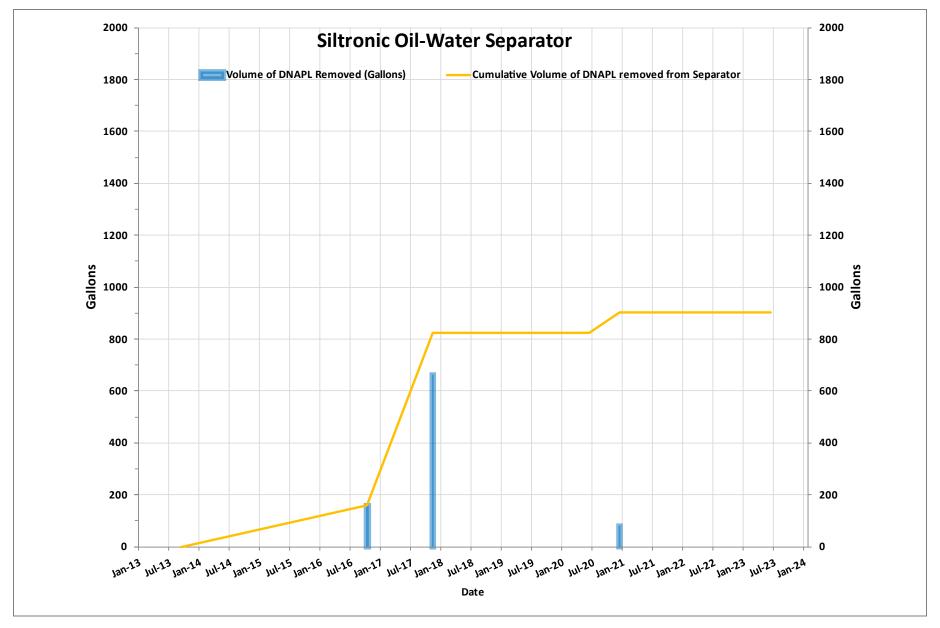
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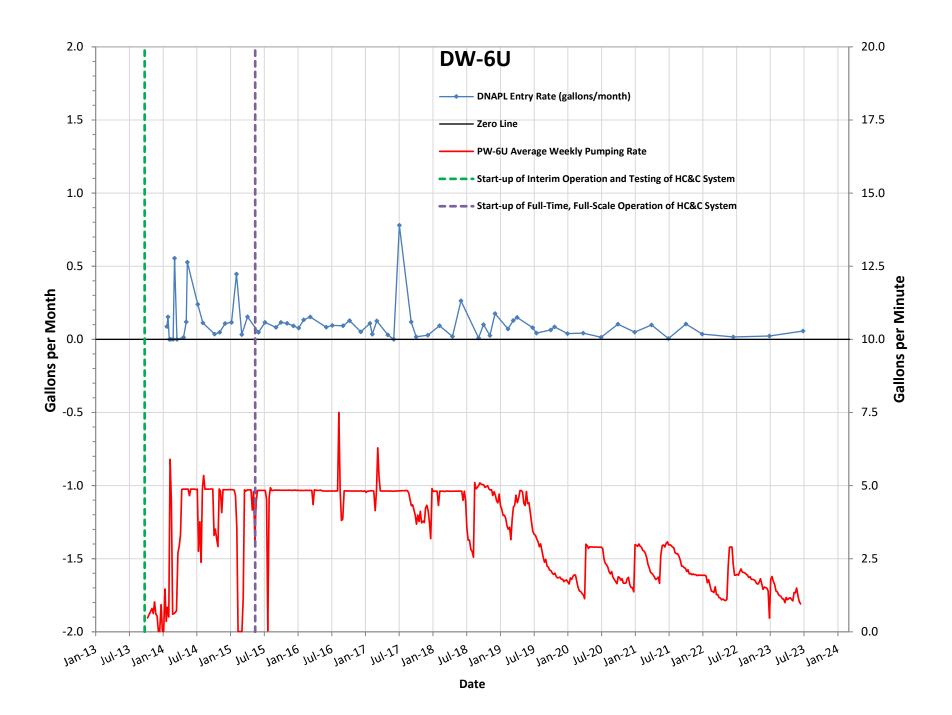
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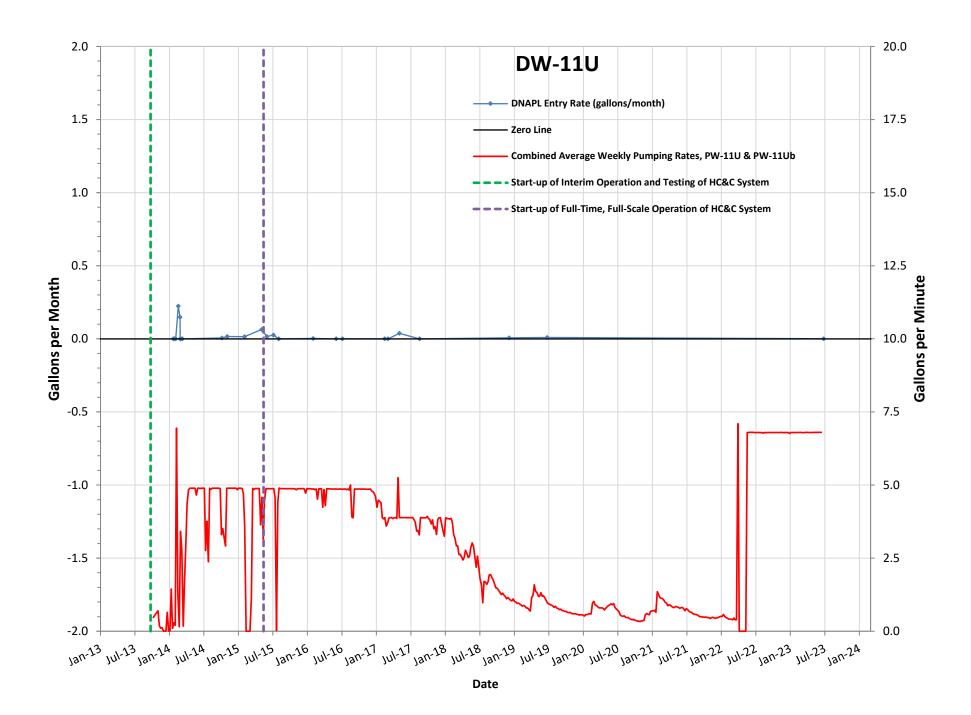


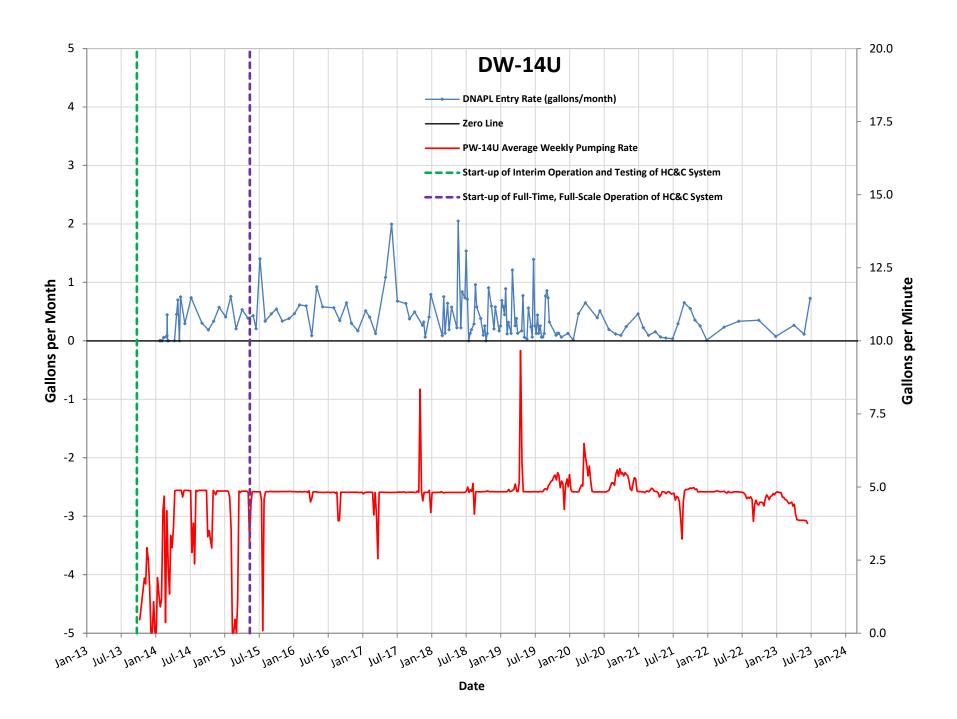
# Appendix A Comprehensive Table 2

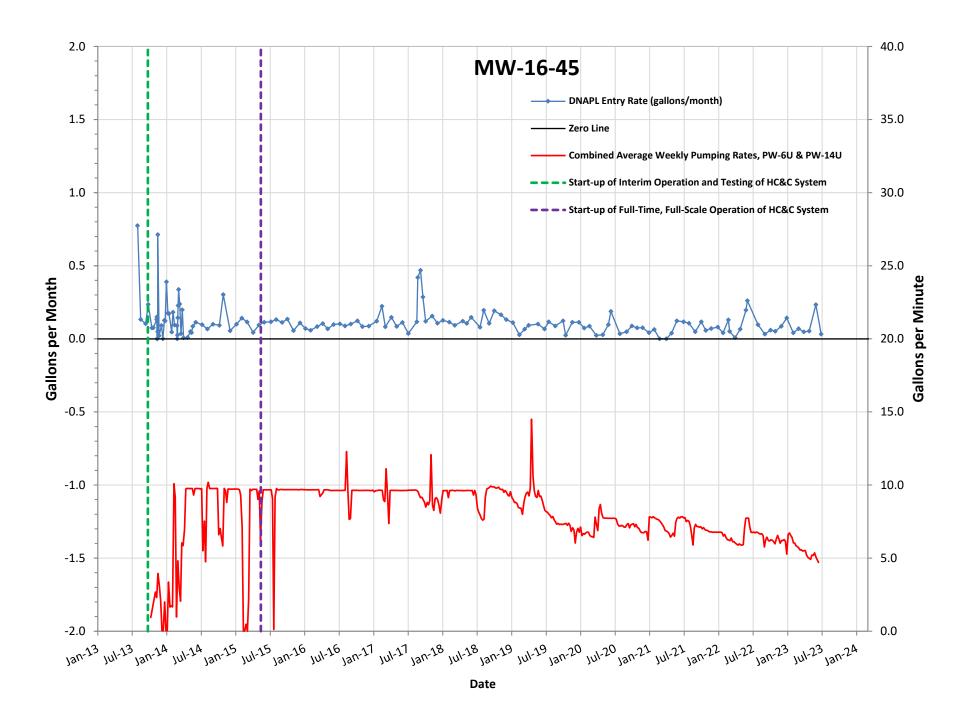
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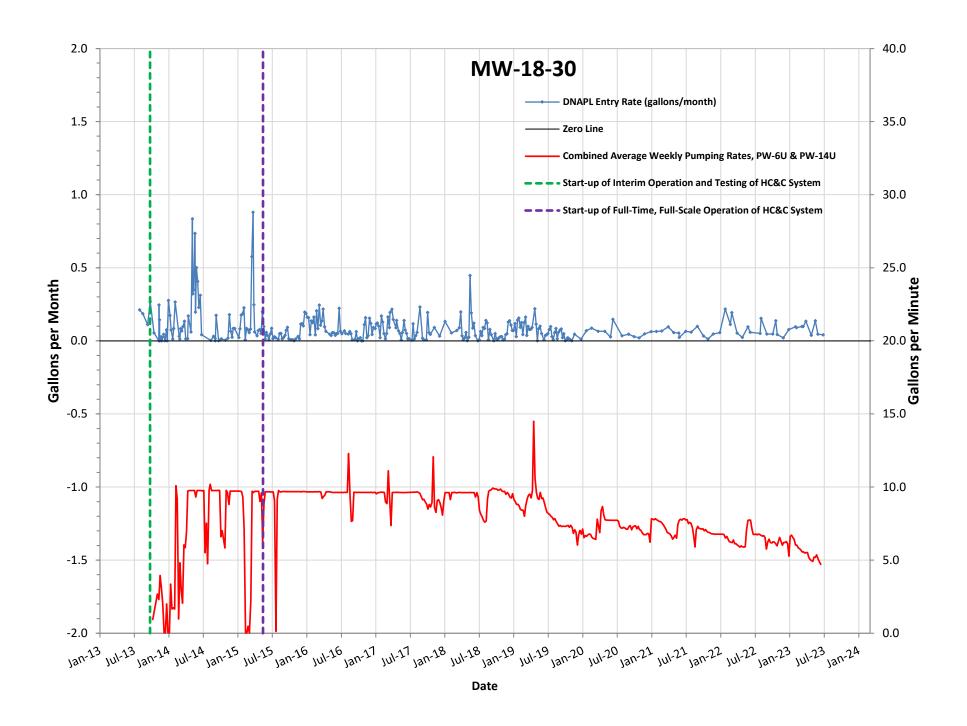
# Appendix B Time-Series Plots – DNAPL Entry Rates

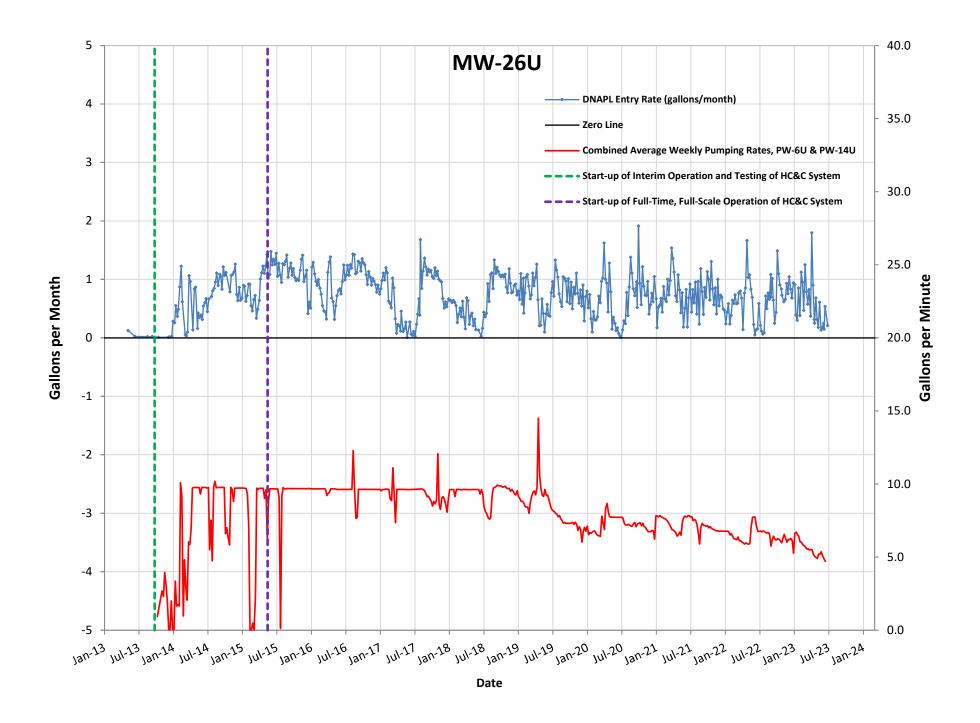


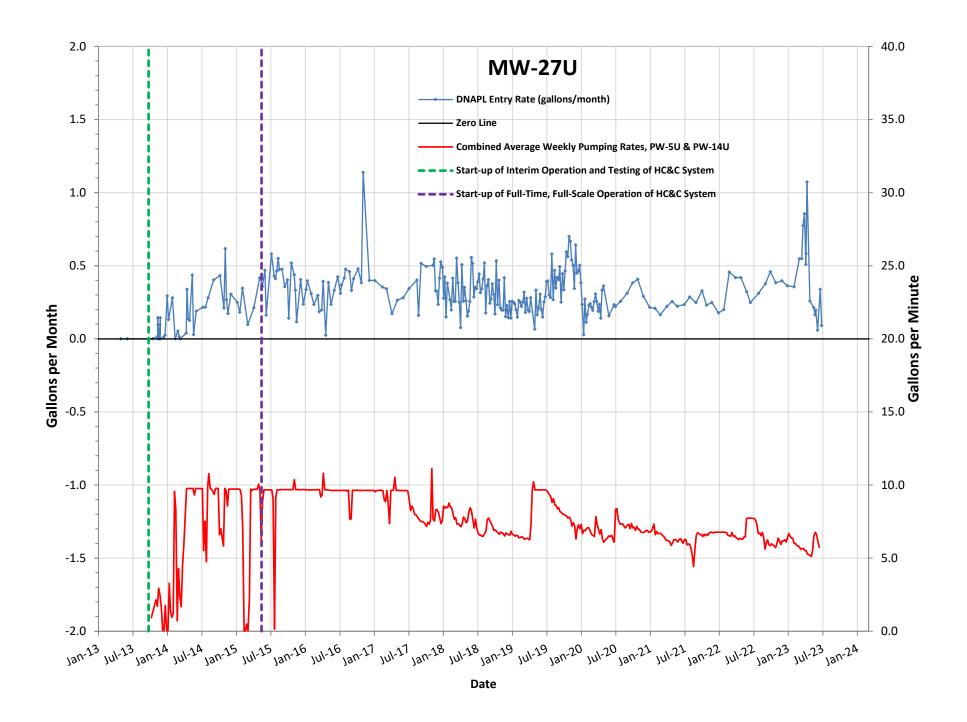


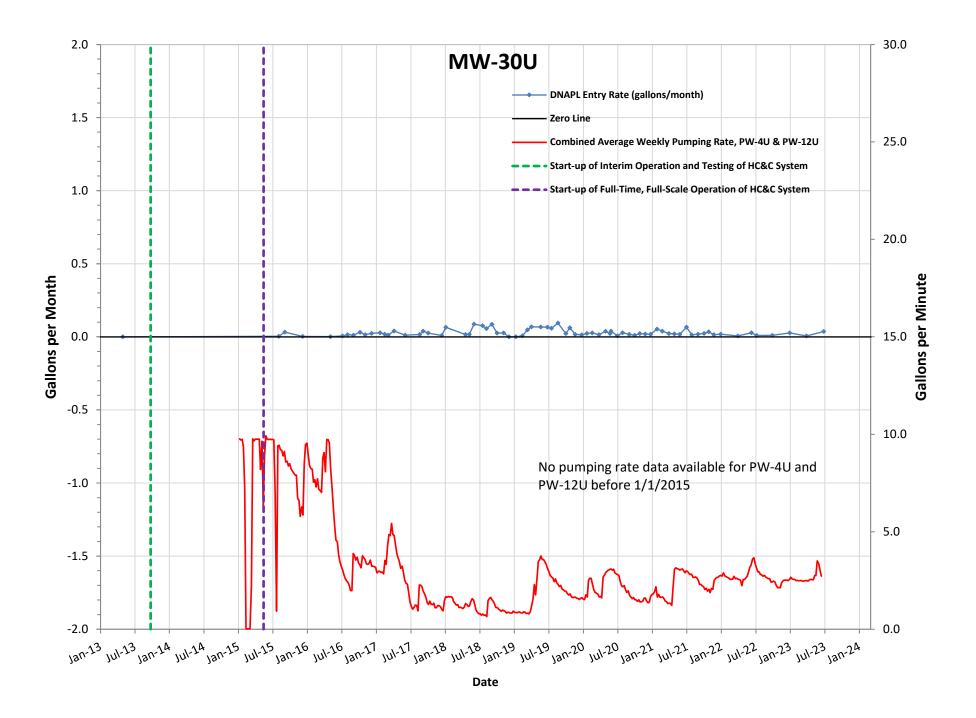


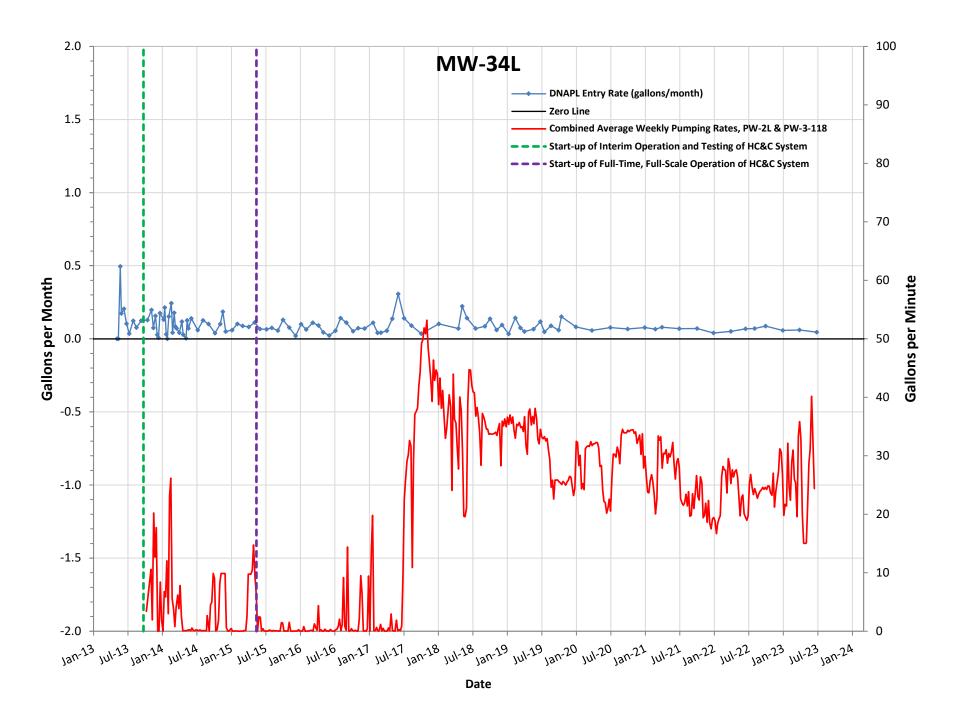


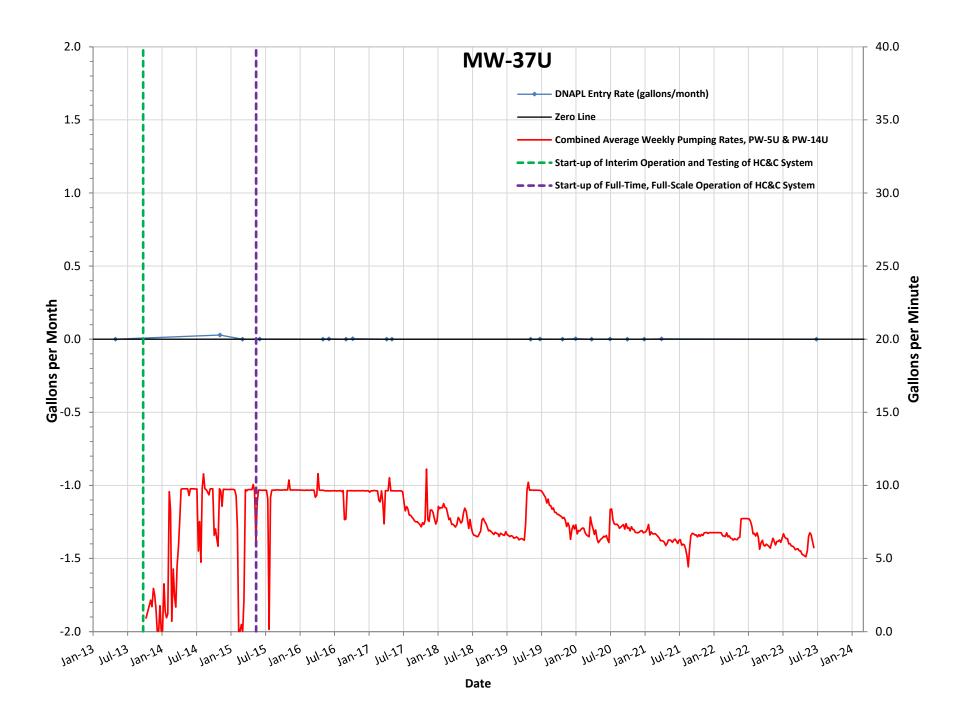


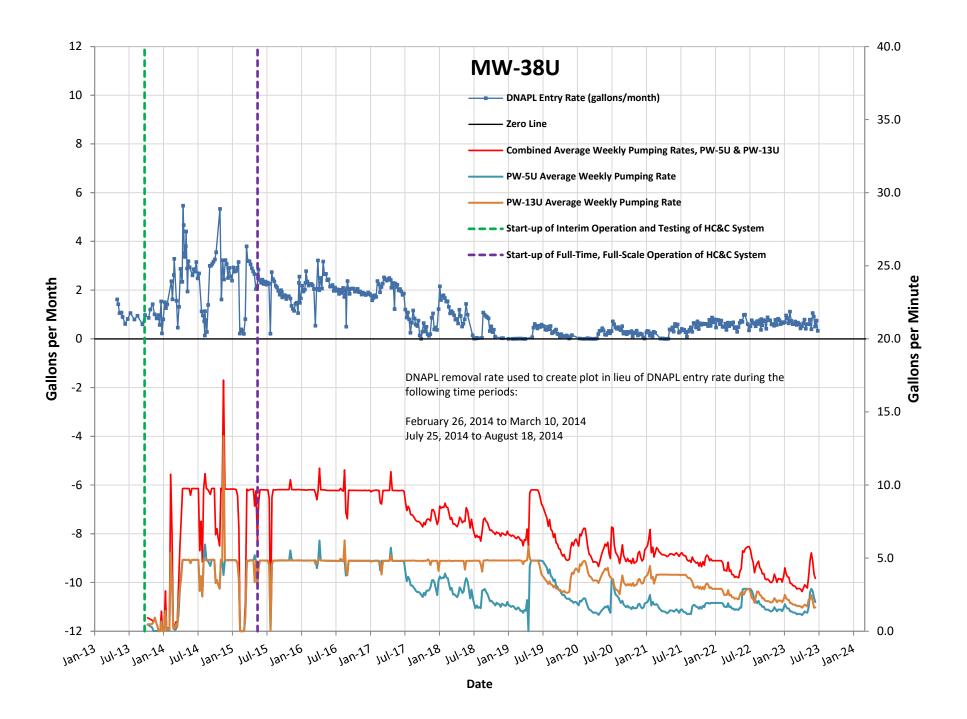


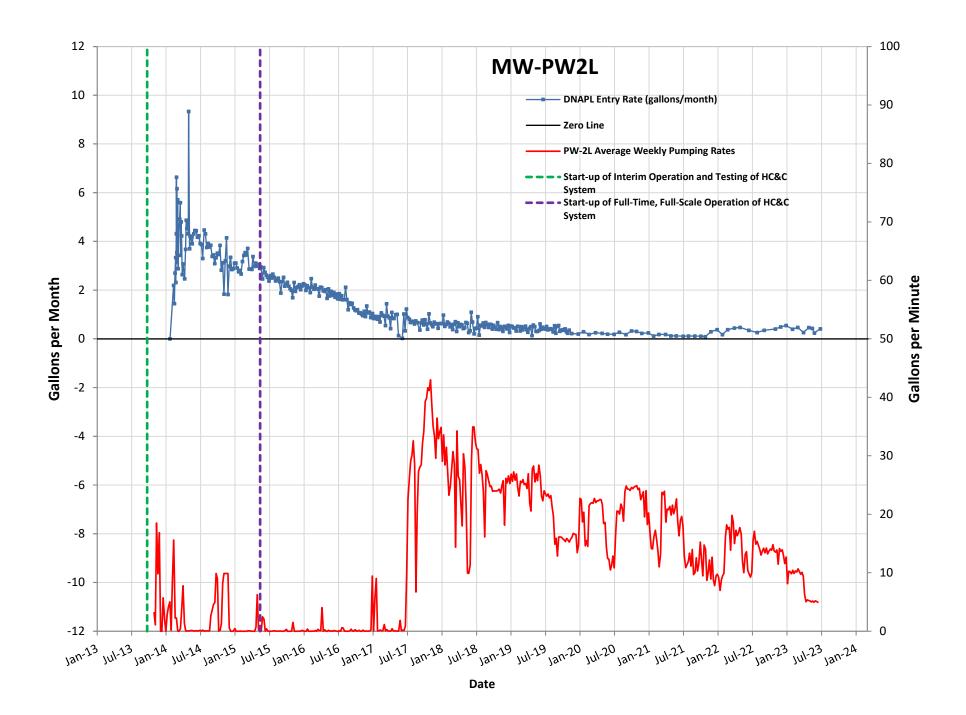


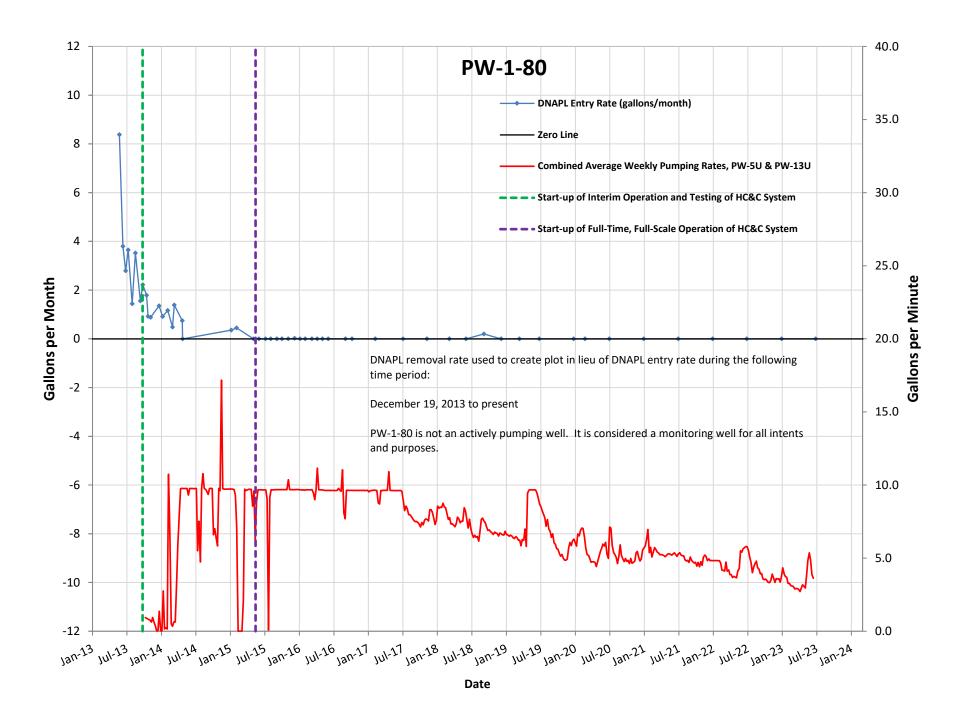


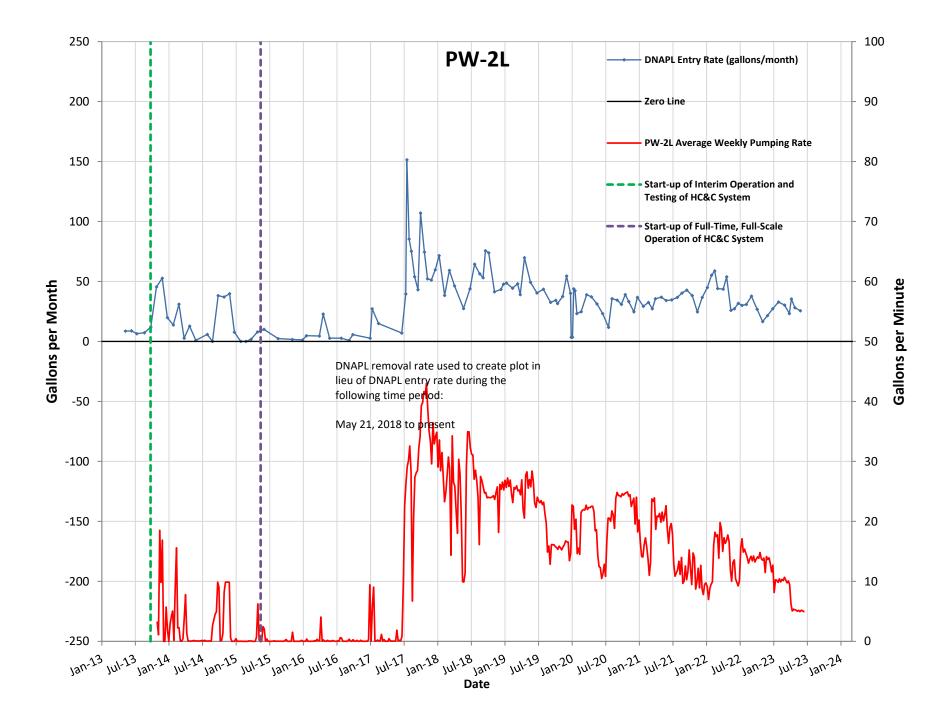


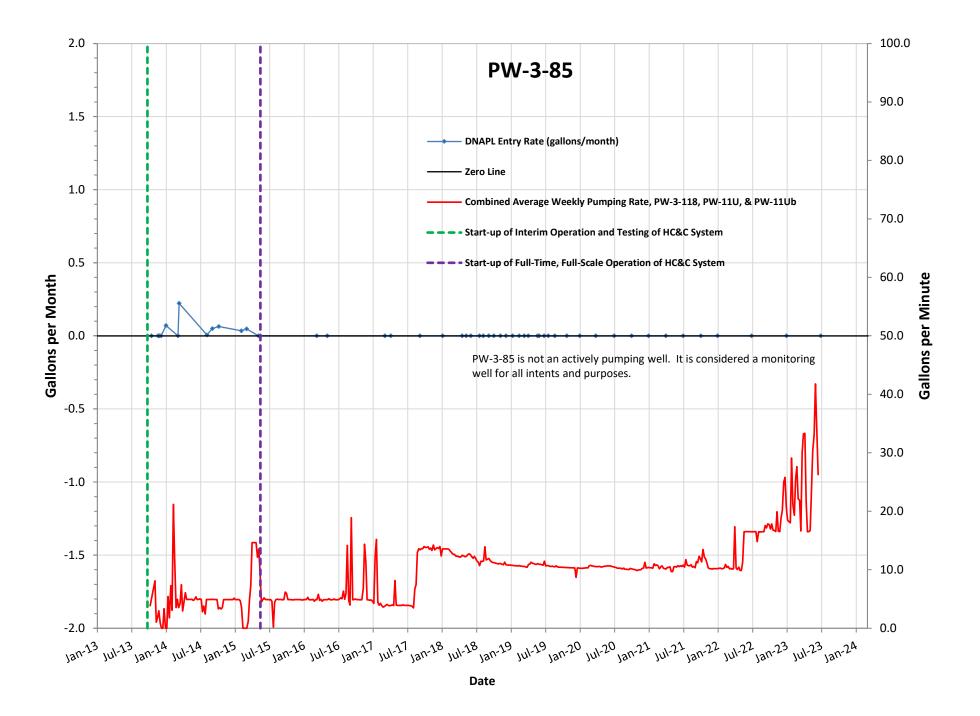


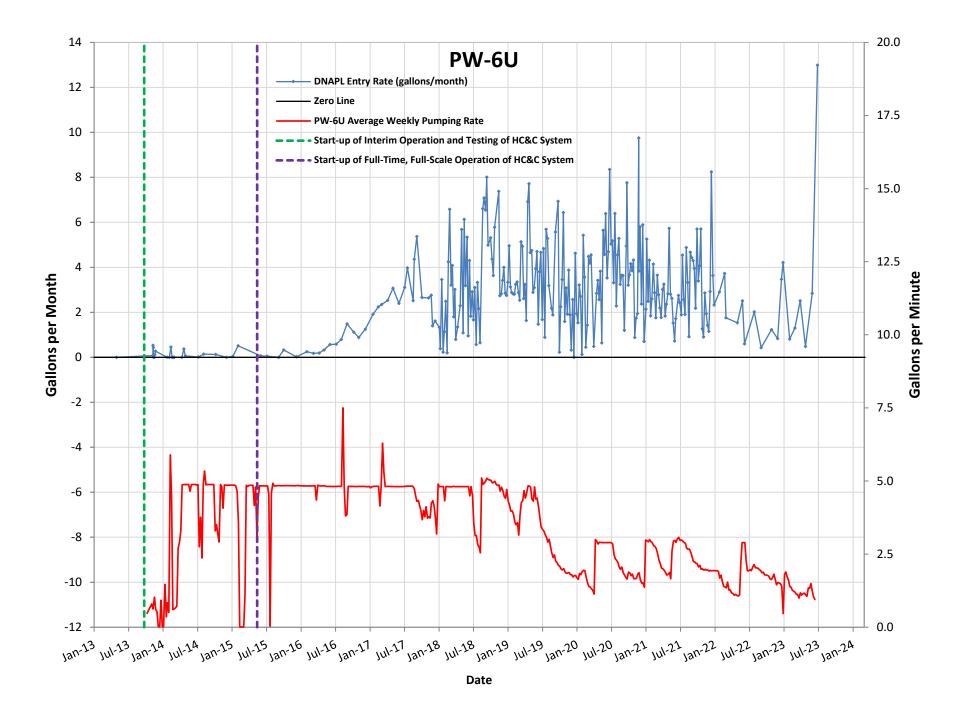


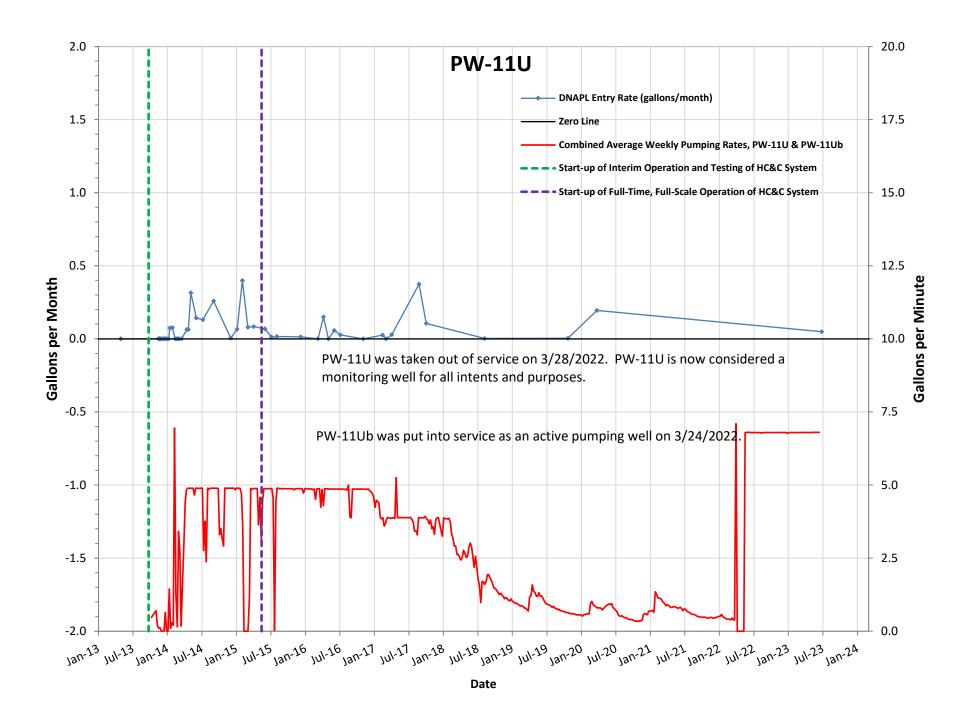


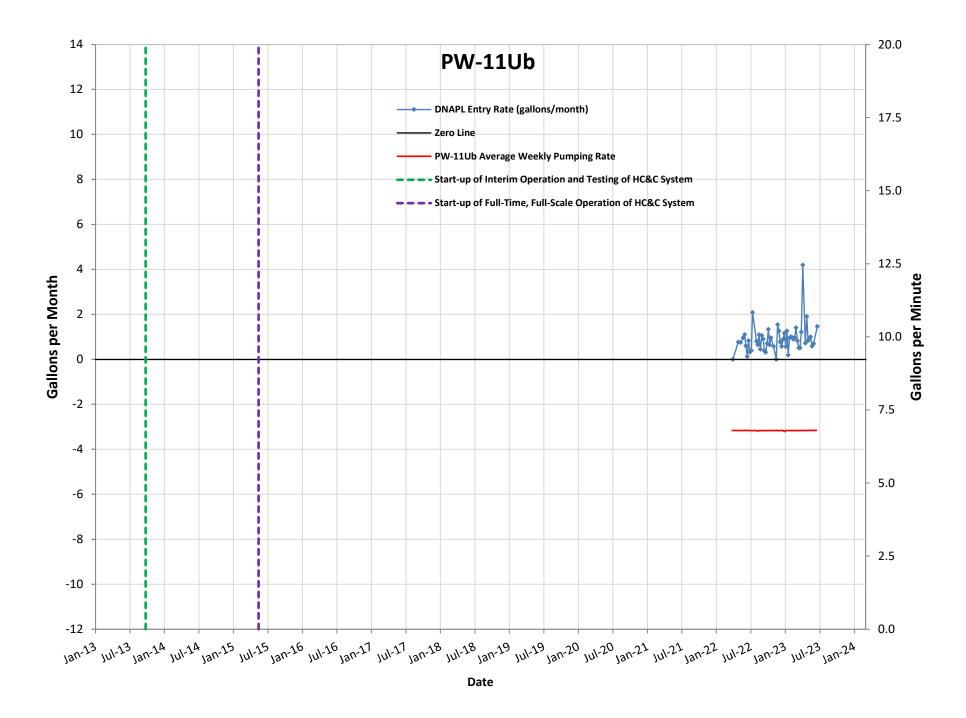


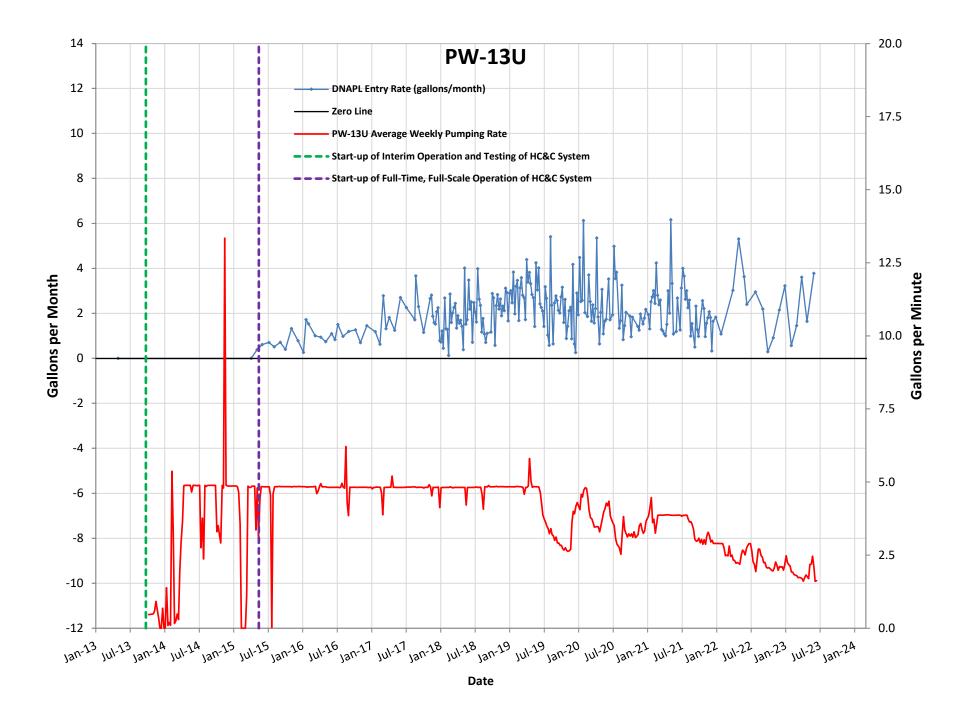


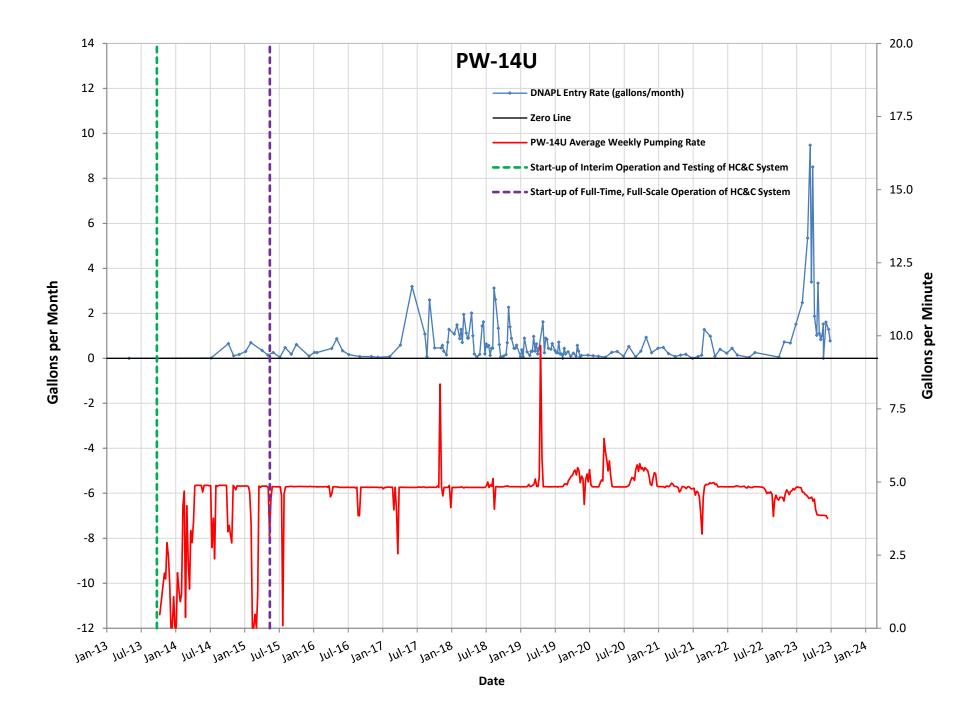


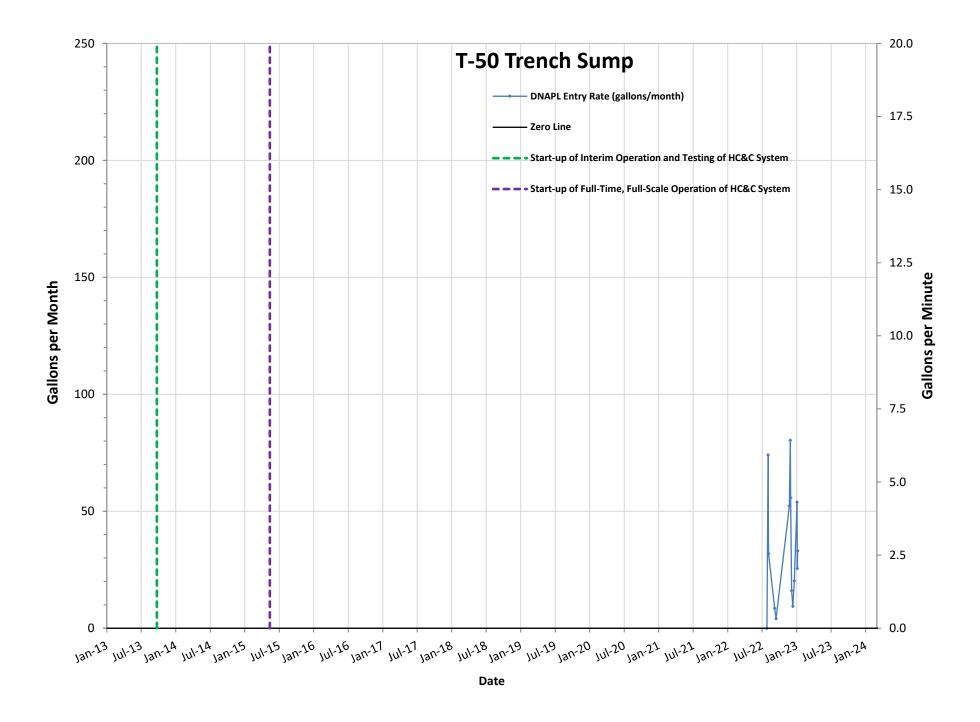


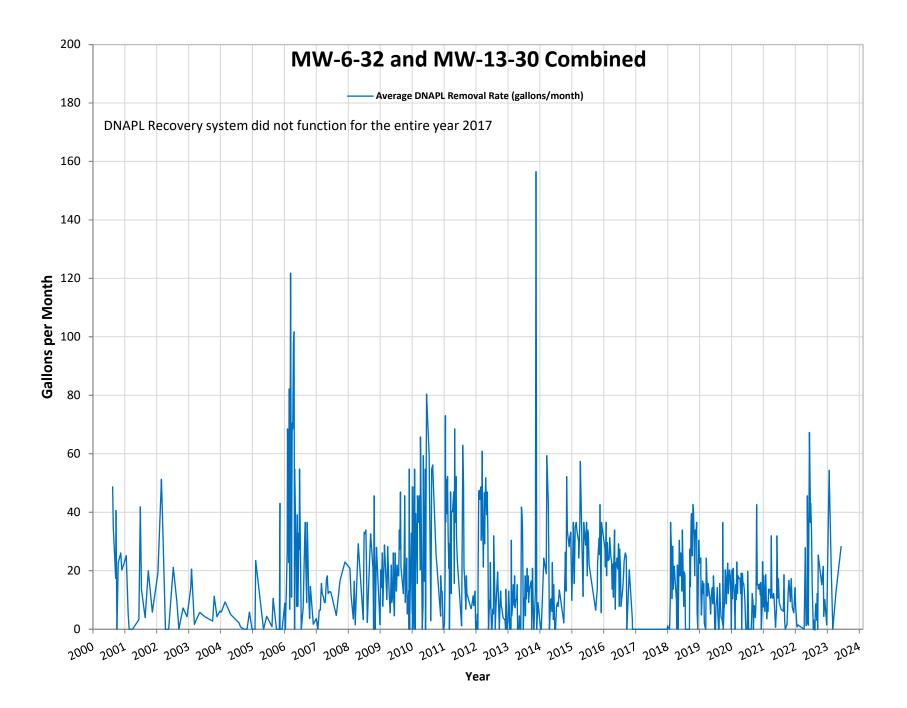




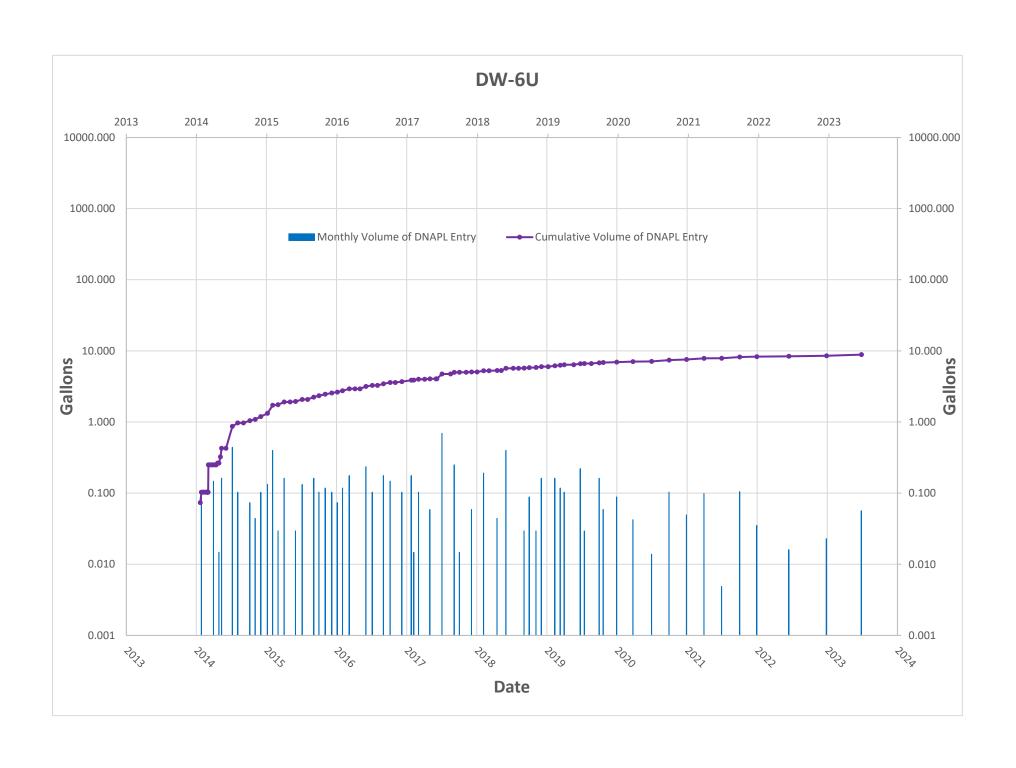


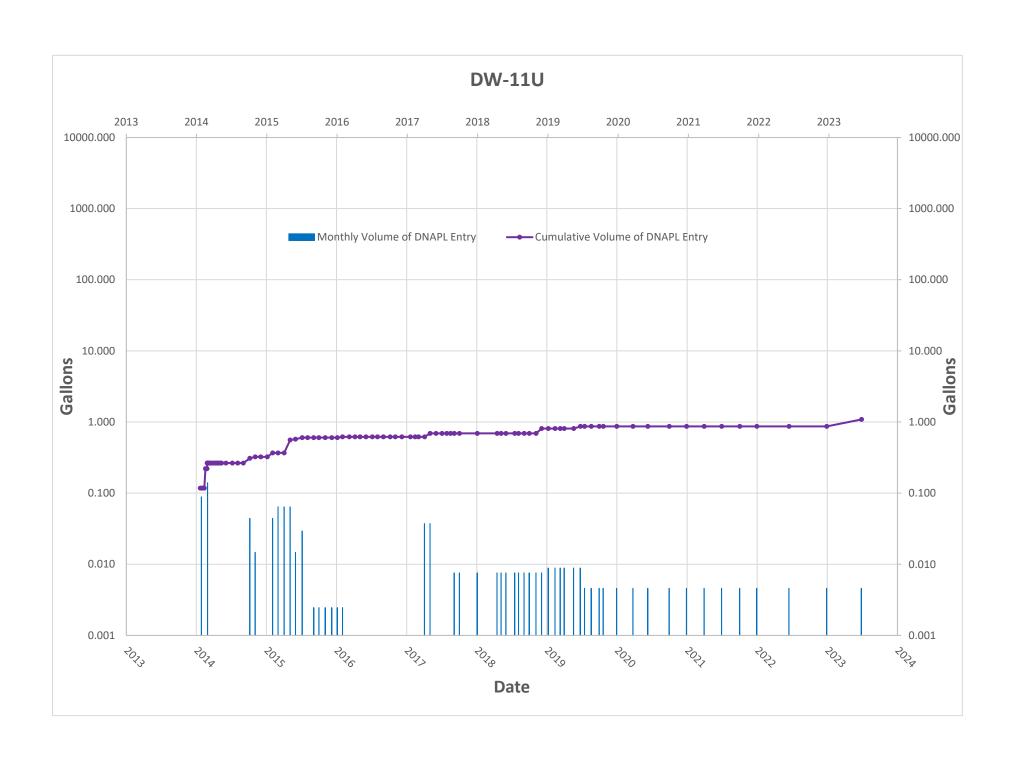


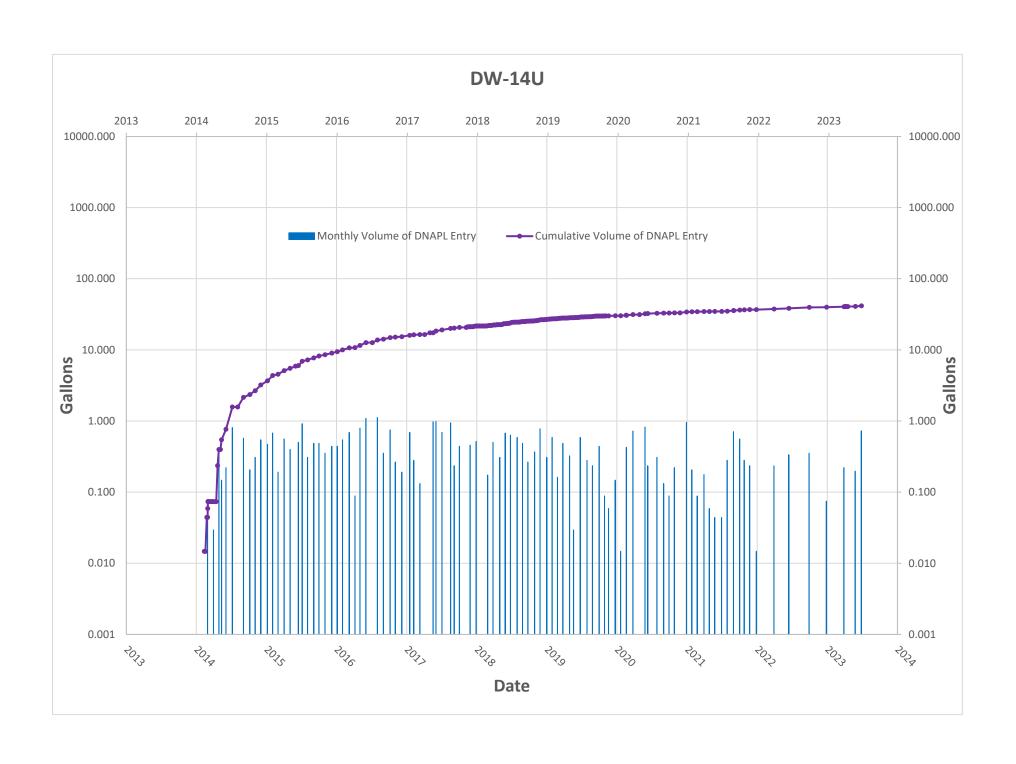


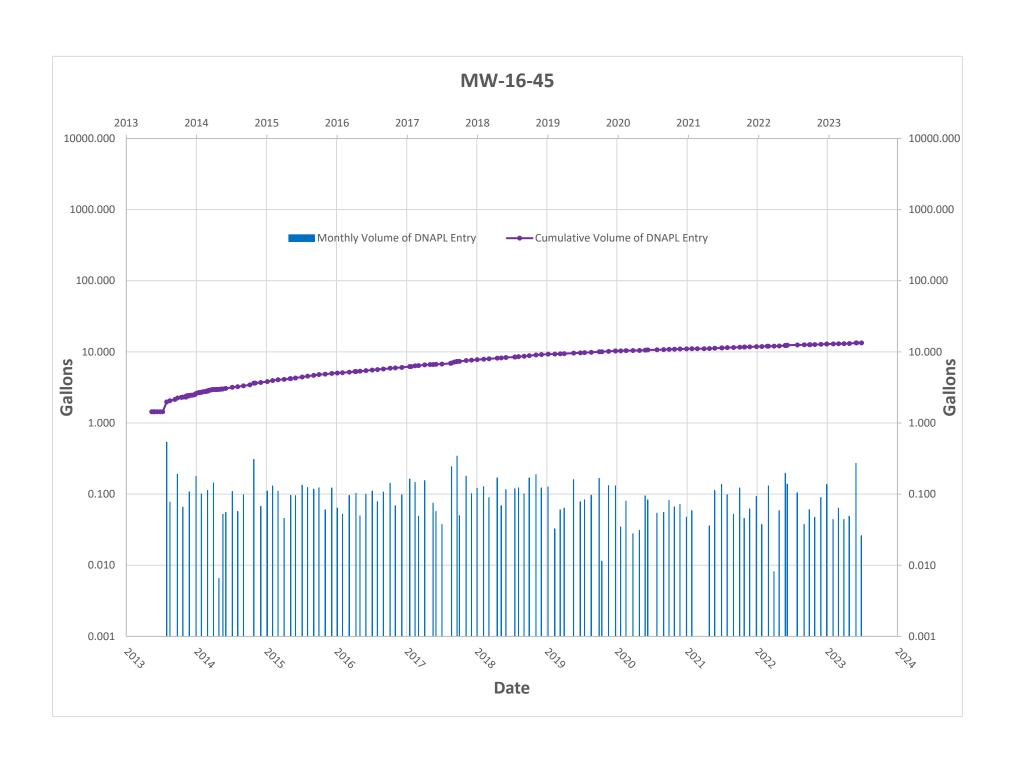


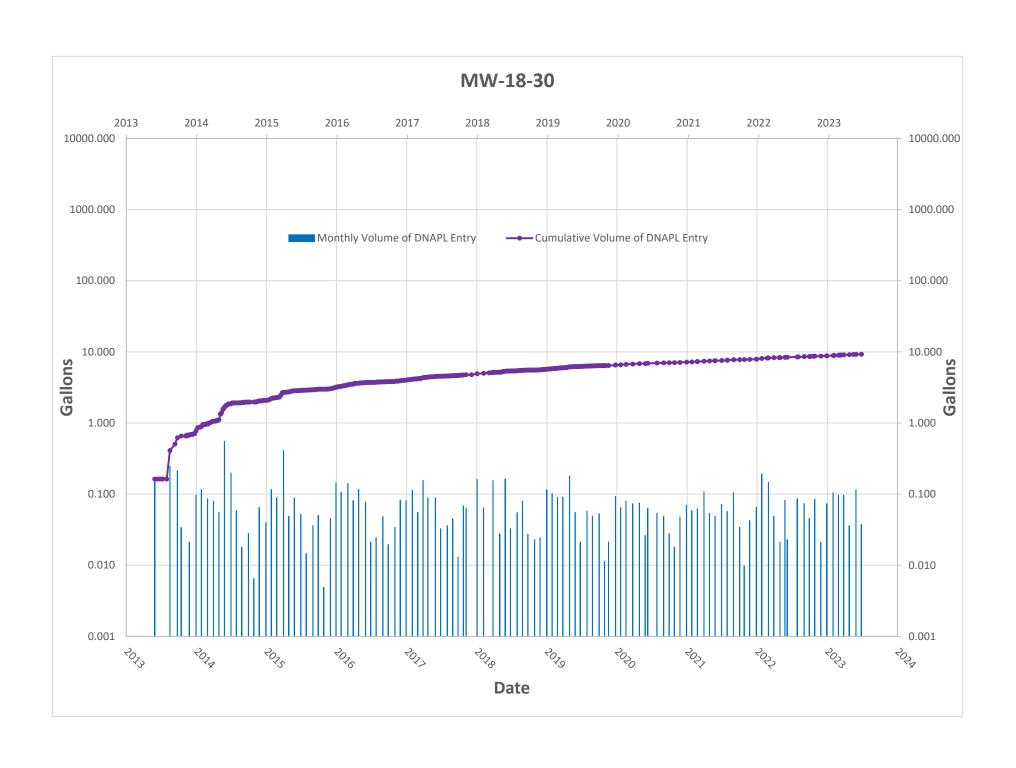
Appendix C
Time-Series Plots – Monthly and
Cumulative Volume of DNAPL Entry into
Wells

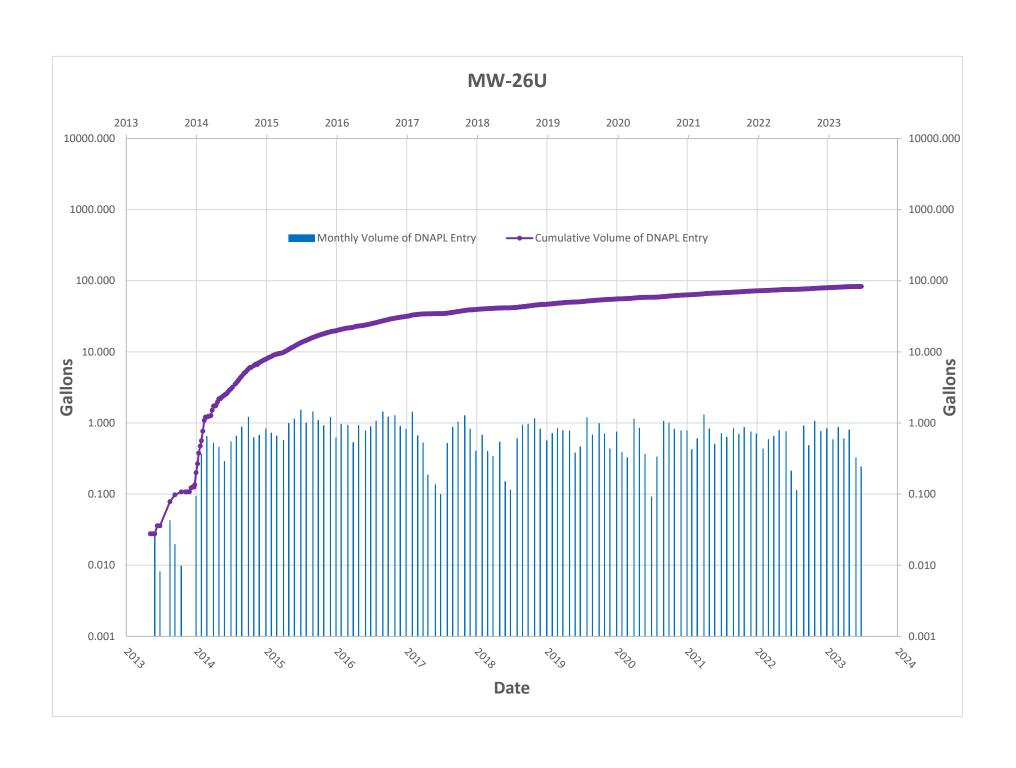


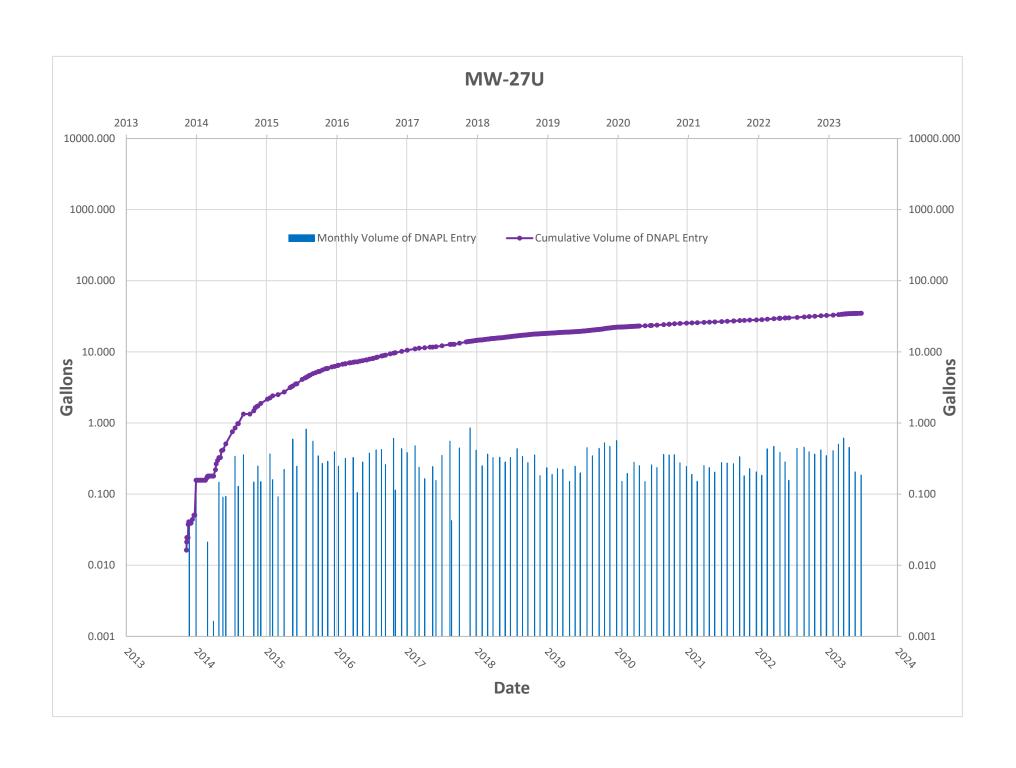


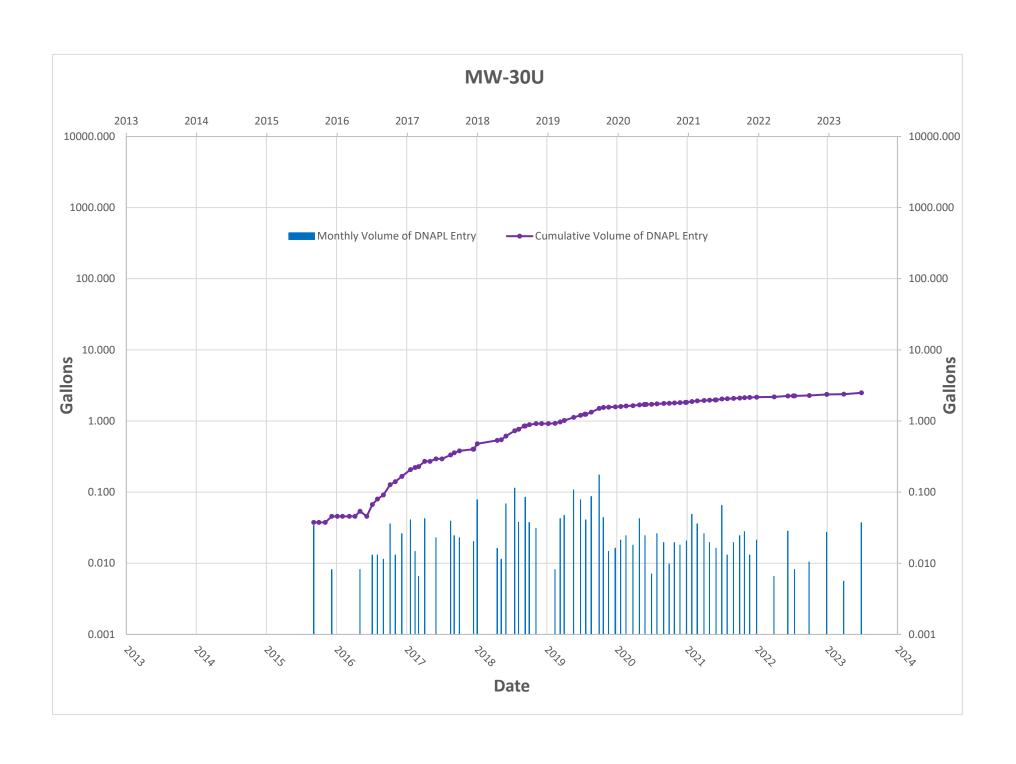


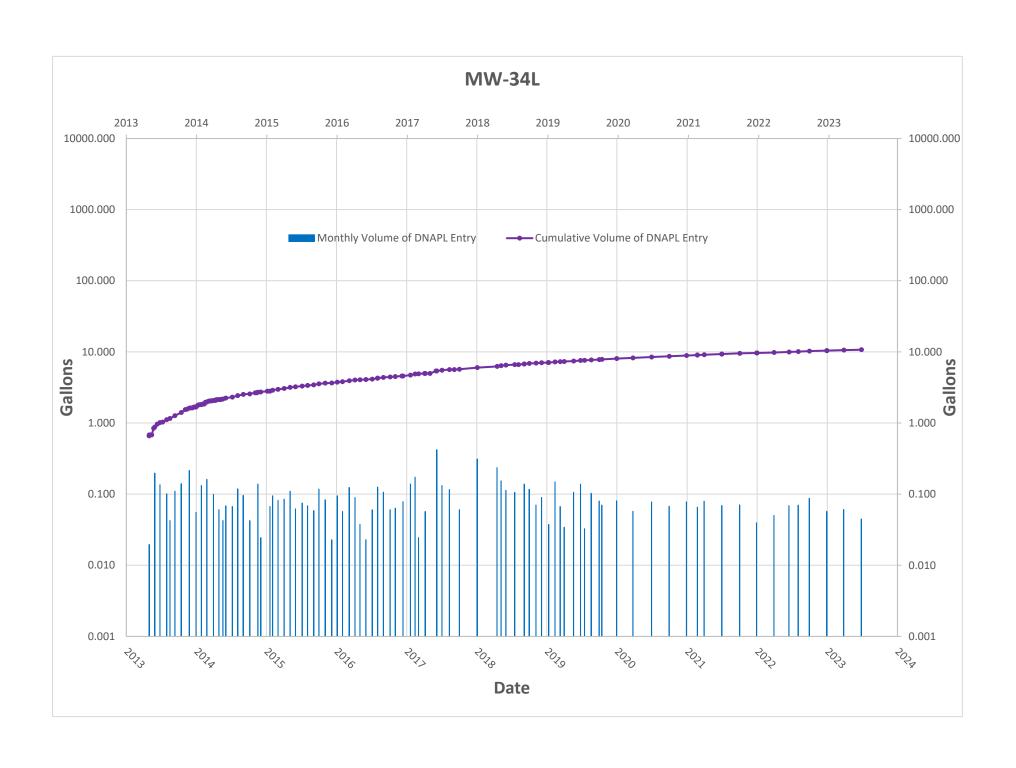


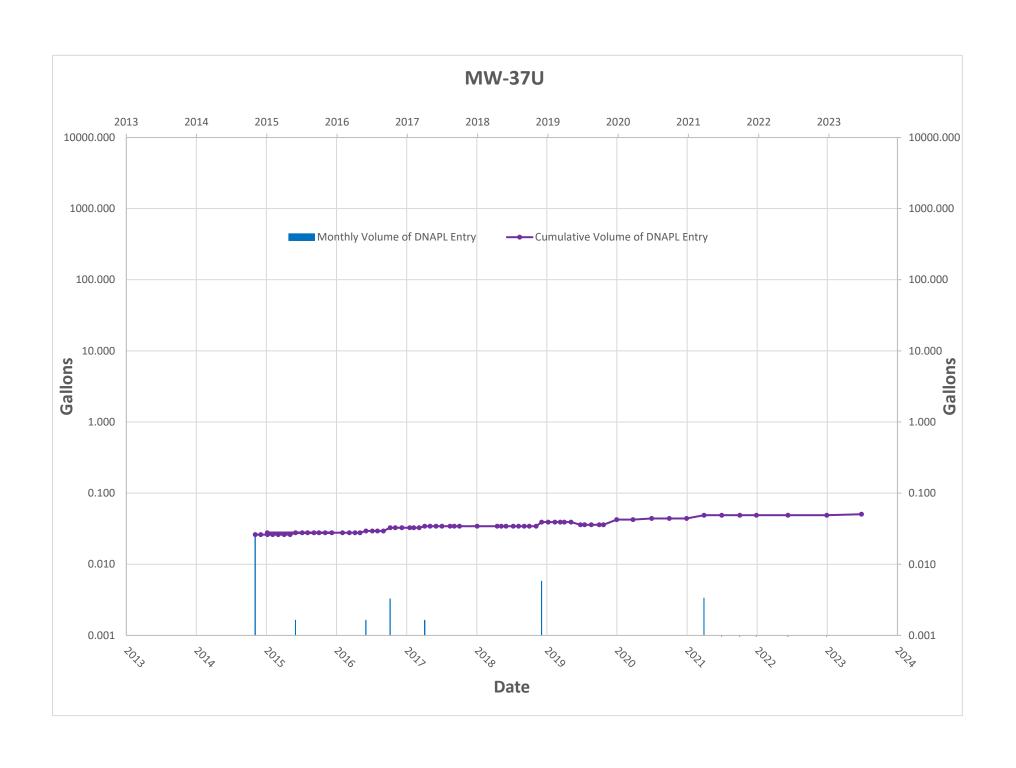


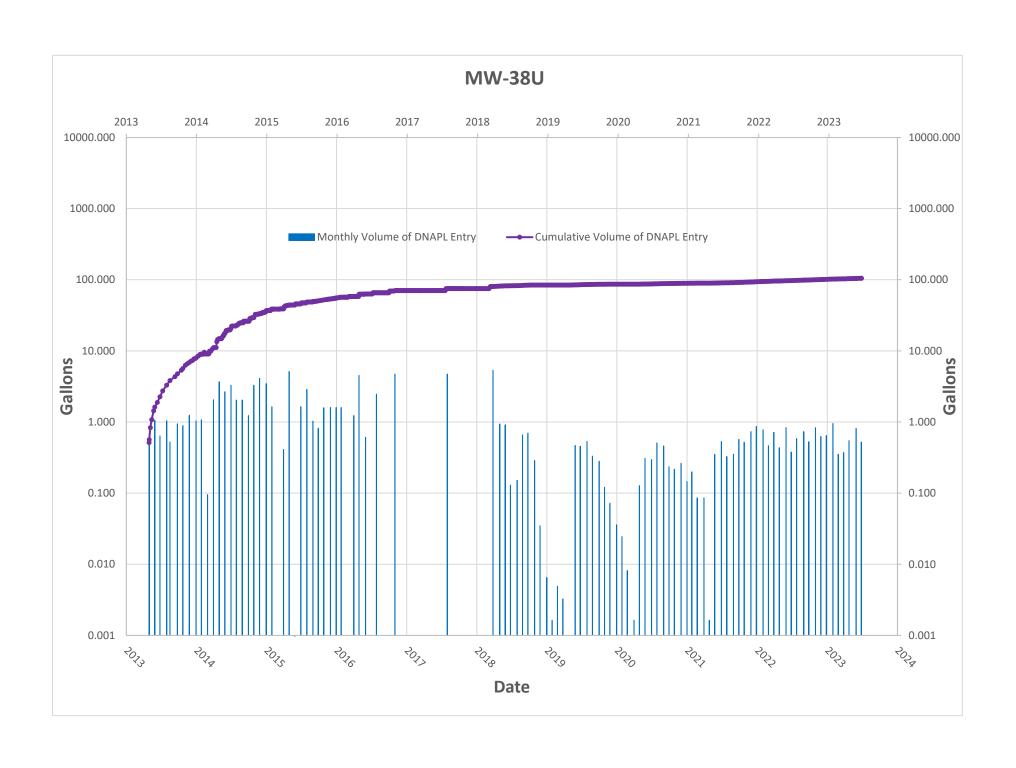


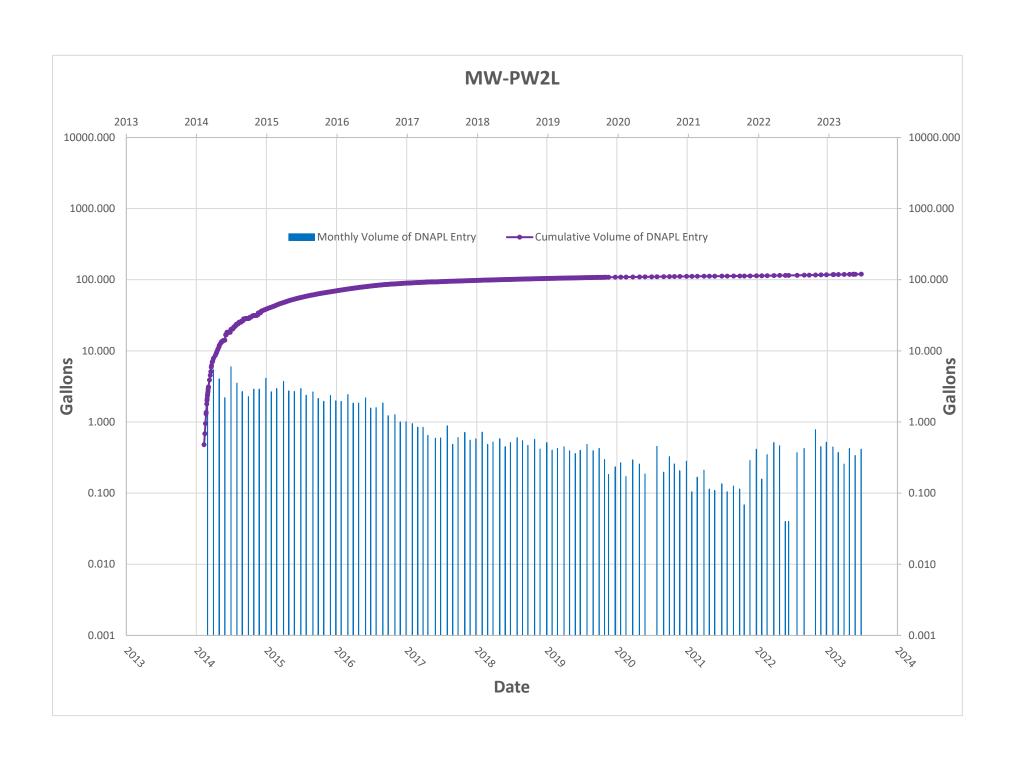


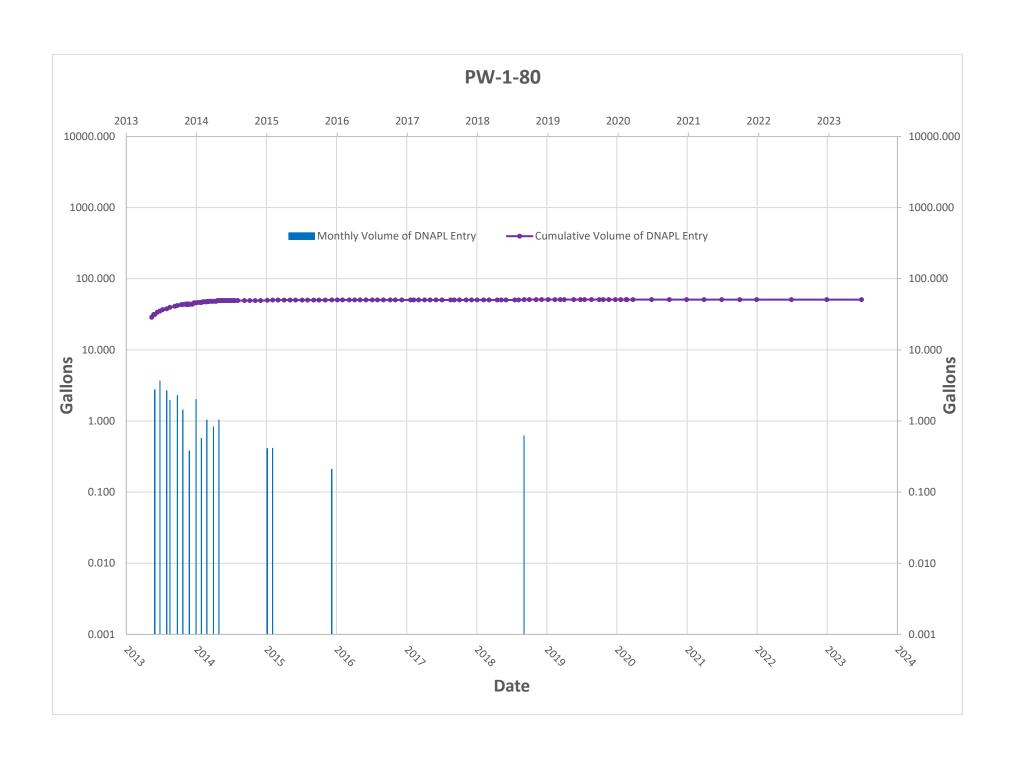


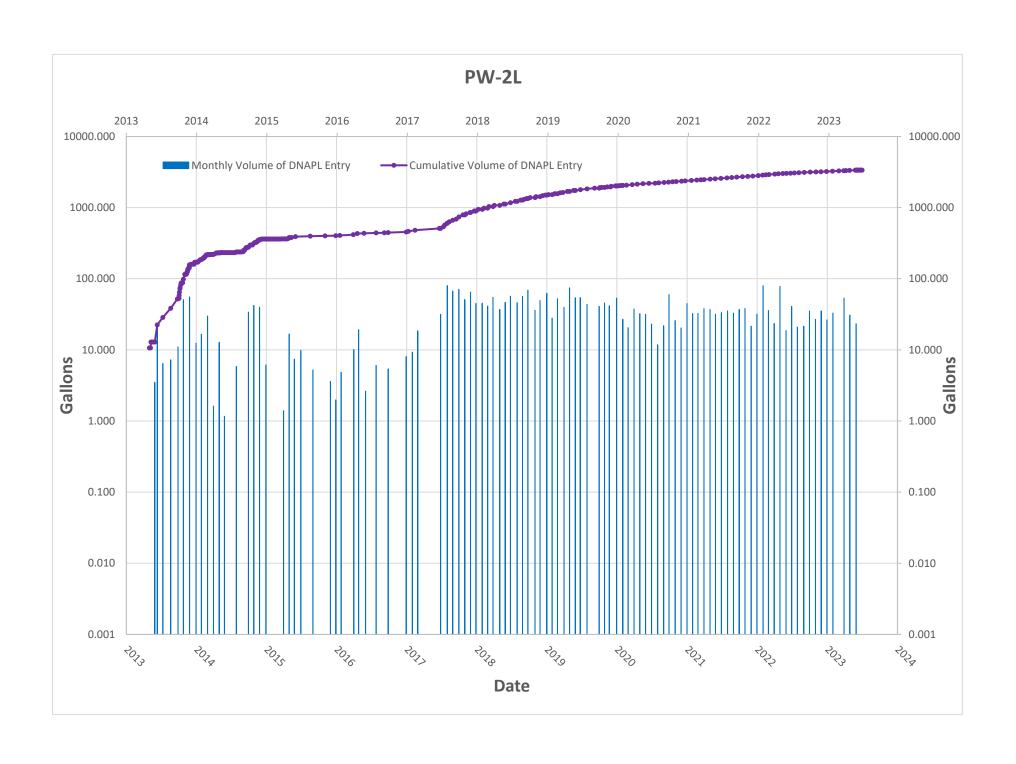


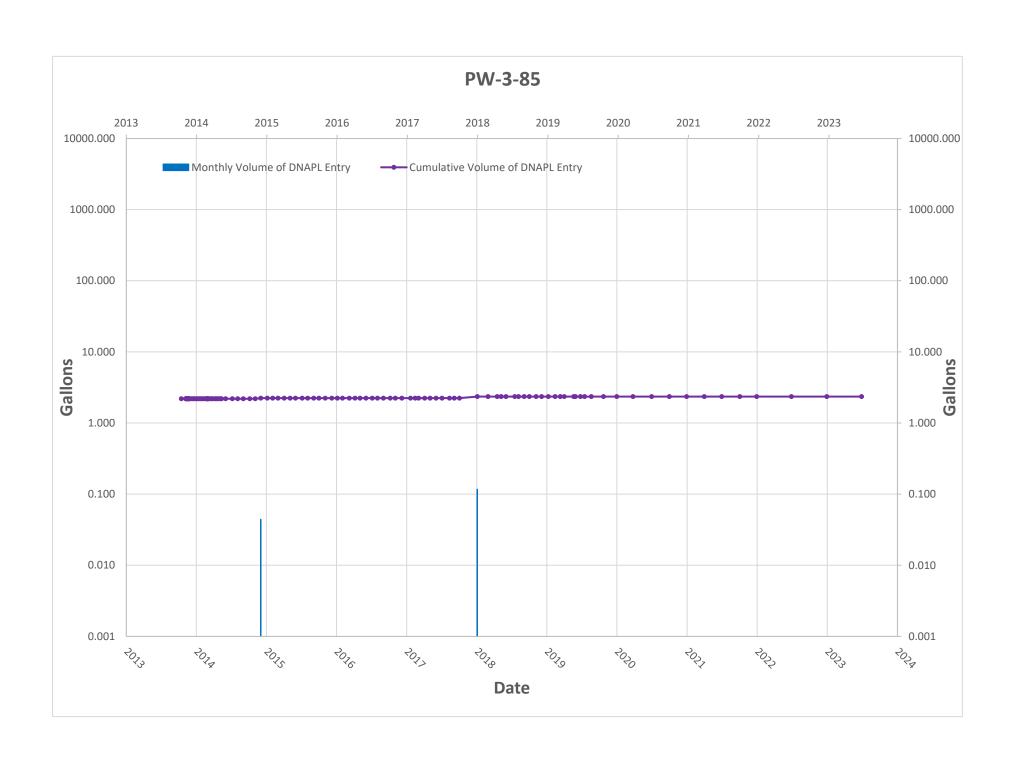


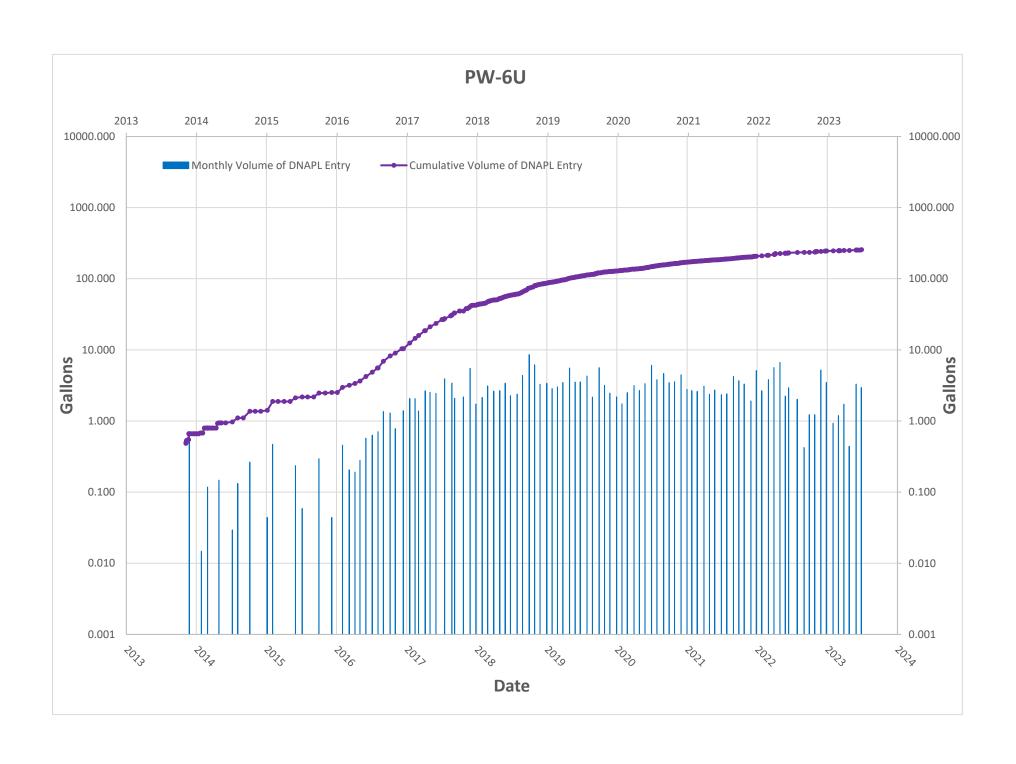


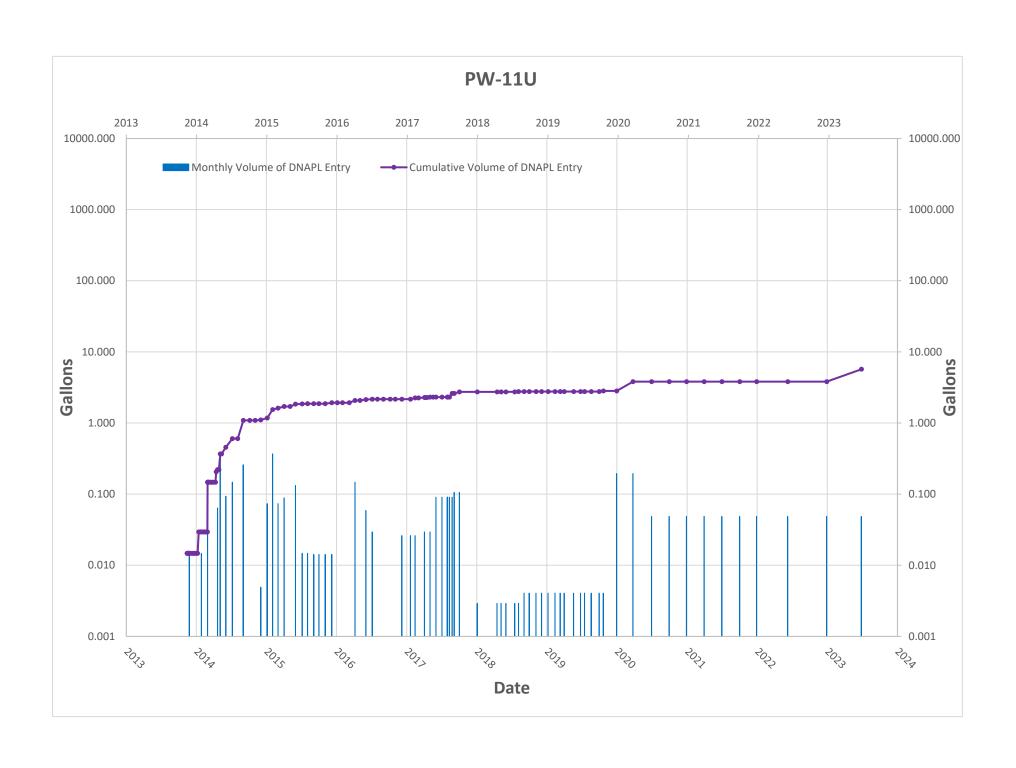


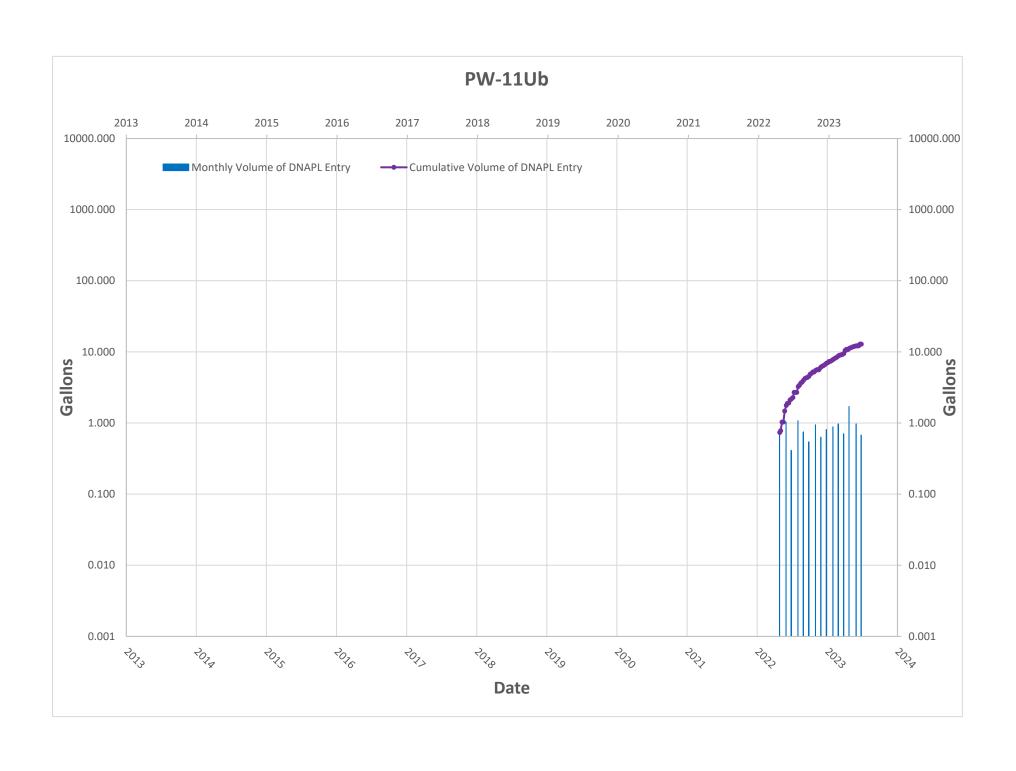


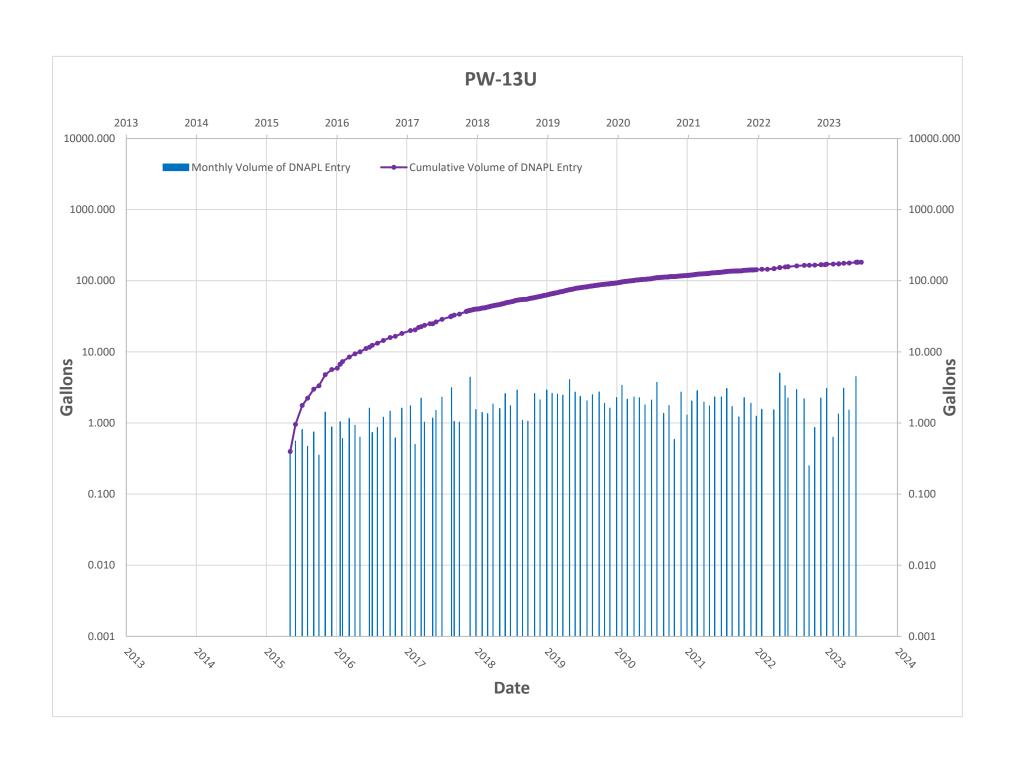


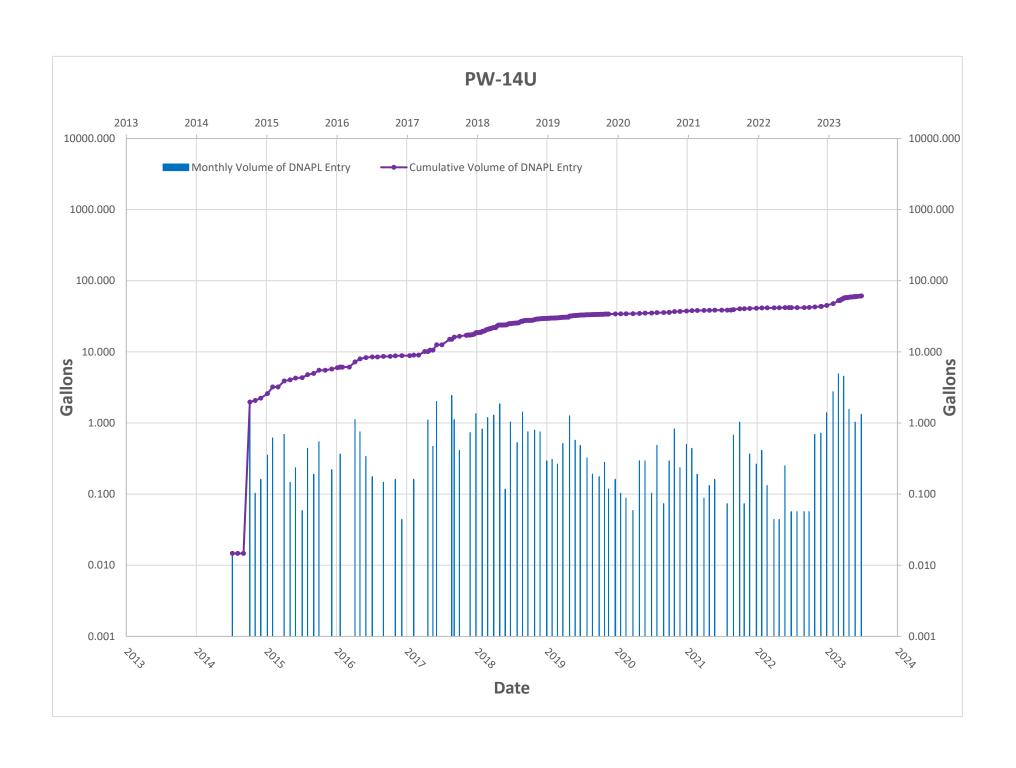


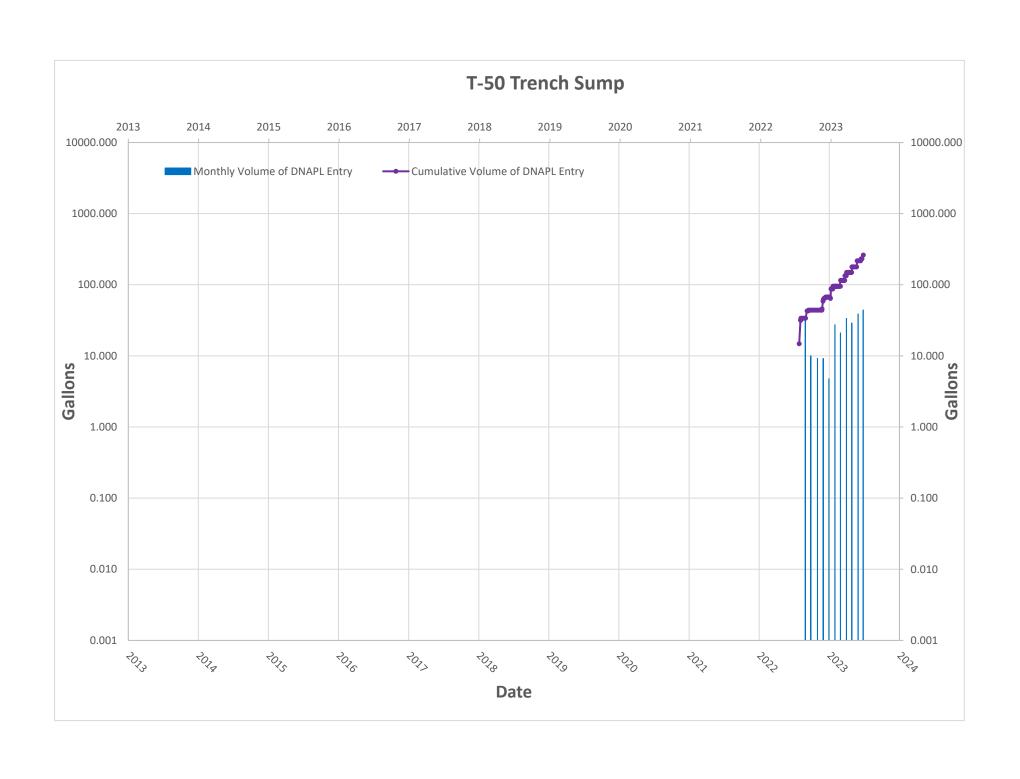


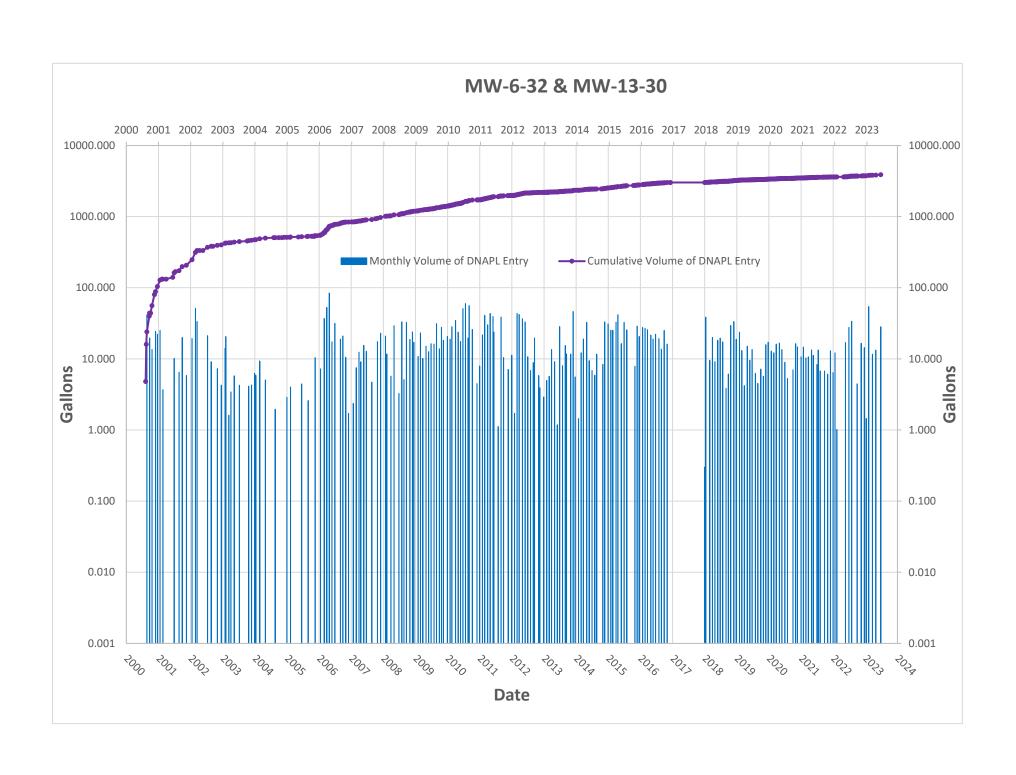












## Appendix D Time-Series Plots – Normalized DNAPL Entry Rates

