

## REDACTED

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**From:** Halah Voges <hvoges@anchorqea.com>  
**Sent:** Friday, December 1, 2023 12:51 PM  
**To:** THOMAS Wesley \* DEQ <wesley.thomas@deq.oregon.gov>  
**Cc:** Wyatt, Robert <robert.wyatt@nwnatural.com>; Patricia Dost <pdost@pearllegalgroup.com>; Rob Ede <robe@hahnenv.com>; Jen Mott <jmott@anchorqea.com>; Ryan Barth <rbarth@anchorqea.com>; Crystal, Mike <mdcrystal@sevenson.com>  
**Subject:** Gasco OU Upland Feasibility Study

Wes,

Thank you for confirming we can begin writing the Gasco OU Feasibility Study and that no additional technical meetings are needed. The technical discussions and meetings we've had to discuss and resolve critical FS issues have been very helpful, including:

- Selection of PRGs
- DNAPL mobility analysis
- DNAPL/residual mapping
- Groundwater flow model recalibration
- NAPL dissolution modeling to assist with restoration timeframe evaluation
- Remedial technology assignments, alternatives development, and relationship to site areas and evaluation of hot spots

Two other FS issues we've discussed are the data gaps sampling for Doane Creek and 3D modeling. Those have also been resolved, specifically:

1. Doane Creek FS Data Gap Sampling. Since Doane Creek FS data gap sampling is dependent on finalizing an access agreement with The BNSF Railway Company, DEQ and NW Natural have agreed that currently available data for Doane Creek will be used to develop and evaluate remedial alternatives for this portion of the Siltronic GSA. The evaluation included in the draft FS

will be considered preliminary and will be updated in the revised FS using data gaps results.

2. 3D Model. During two technical meetings held on Monday, October 30 and Thursday, November 16, 2023 to discuss remedial alternatives to be evaluated in the FS, the DEQ team emphasized the utility of a 3D model of DNAPL distribution, showing stratigraphy, water table, and possibly other contaminant information. As we discussed, NW Natural has been preparing a 3D model using the available TarGOST data; however, it does not include all of the elements mentioned by DEQ during the meetings. Based on our follow-up discussions and a review of the extensive suite of graphics already developed to address prior DEQ requirements and to support the FS, and the list of additional graphical tools currently being developed (3D TarGOST data visualization, plan view residual maps incorporating multiple lines of evidence, cross-sections, raster maps and an interactive webmap), DEQ has determined that a detailed 3D model is not required for DEQ's review of the Draft FS. If needed to support DEQ's review, DEQ and NW Natural will evaluate the need for additional area specific 3D depictions as part of the remedial design process.

The current Gasco OU FS Schedule was conditionally approved by DEQ in a letter dated July 25, 2023 with establishment of a May 28, 2024 submittal date to DEQ. As noted in the schedule, Draft Gasco OU FS report preparation must begin by November 28, 2023 in order to meet the draft submittal schedule. With this approval to proceed, our target submittal date for the FS is May 28, 2024.

We will continue to conduct regular check-ins with DEQ and appreciate your availability to confer on FS topics that come up during its preparation and look forward to completing this very important project milestone.

Have a great weekend and try to stay dry!

**Halah M. Voges, P.E.**  
**Principal Engineer**

**ANCHOR QEA, LLC**

1201 3rd Avenue, Suite 2600  
Seattle, WA 98101  
T 206.287.9130  
D 206.903.3303  
C 206.462.9572

**ANCHOR QEA, LLC**

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