



Oregon

Tina Kotek, Governor

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October 6, 2023

Bob Wyatt
Northwest Natural Gas Company
220 NW 2nd Avenue
Portland, OR 97209
Robert.Wyatt@nwnatural.com

via electronic delivery

Re: Year 3 Monitoring Report: PGM Long-Term Monitoring and Maintenance
Portland Gas Manufacturing site
ECSI# 1138

Dear Mr. Wyatt,

DEQ staff reviewed the *Year 3 Monitoring Report: PGM Long-Term Monitoring and Maintenance* plan (Year 3 Report) prepared by Anchor QEA on behalf of NW Natural dated September 21, 2023. The report summarizes the results of the Year 3 bathymetry survey performed on June 20, 2023 and presents the recommended path forward for ongoing long-term monitoring at the former Portland Gas Manufacturing site to assess performance of the sediment remedial action completed in October 2020.

DEQ appreciates the additional information that has been provided in the report including detailed cross sections and tables that demonstrate the depth of subsurface contamination compared to the existing sediment surface. DEQ agrees that areas of new erosion have not likely exposed subsurface contamination that may pose a risk to aquatic life and humans. However, in consideration of the movement and erosion of cover material observed during the Year 3 survey and in previous years, DEQ expects that sediment movement continue to be monitored and supports NW Natural's recommendation to conduct a contingency bathymetric survey in Year 4 (2024). Results of the Year 4 bathymetric survey will be reviewed by DEQ and NW Natural to determine whether areas of significant new erosion are observed or if buried contamination has been potentially exposed to inform the need for follow-up chemical monitoring or other appropriate contingency actions in accordance with the March 2020 *Long-Term Monitoring and Maintenance Plan*.

Consistent with DEQ comments on the Year 2 report, DEQ recommends that the latest multi-beam sonar technology be used for the Year 3 survey and that the same contractor and control points be used year over year, if possible, to improve comparability across surveys. We also continue to assert that the monitored natural recovery (MNR) and enhanced monitored natural recovery (EMNR) technologies applied at the site were selected based on a design assumption that these areas would be depositional over time. While these are flexible technologies and some amount of mixing or elevation change is not unexpected, erosional trends in these areas may suggest that the remedial action in these areas is not performing as designed, as concluded in Section 3 of the report. For as long as elevation losses continue to be observed in MNR and EMNR areas, future monitoring reports should not conclude that the remedy is working as designed. DEQ will continue to rely on chemical monitoring data to ensure that the remedy remains protective in the long-term.

With these understandings, the Year 3 Report is approved. Please submit a final electronic copy of the Year 3 Report for the project administrative record.

Please do not hesitate to contact me at (503) 229-5245 or greenfield.sarah@deq.oregon.gov if you have questions or comments.

Respectfully,



Sarah Greenfield, P.E.
Project Manager/Engineer
NWR Cleanup Section

Ec: Heidi Nelson, DEQ
Dan Hafley, DEQ
Todd Thornburg, Anchor
Kendra Skellenger, Anchor

Cc: ECSI# 1138