

**NW Natural Pre-Remedial Design Data Gaps Sampling  
Gasco Sediments Site – Spring 2020  
Field Change Request Form**

**Project Name:** Gasco Sediments Cleanup Action      **Subconsultant:** Anchor QEA, LLC

**Field Activity:** Subsurface Sediment Sampling      **Request Number:** 15

**To:** Hunter Young, U.S. Environmental Protection Agency      **Date:** May 14, 2020


**Field Change Request (FCR) Title:** Additional Perimeter Subsurface Sediment Core Collection and Analyses to Determine Final Project Area

Description
<p>On April 16, 2020, NW Natural received approval from the U.S. Environmental Protection Agency (EPA) on Field Change Request Form No. 10 (FCR 10). FCR 10 described the rationale and approach for the collection of 18 additional perimeter subsurface sediment cores and analyses to determine the Final Project Area. The coring work was started on April 20, 2020, and all of these additional subsurface sediment cores have been successfully collected and processed with preliminary chemistry results received from the analytical laboratory. In addition, preliminary chemistry results have also been received on the cores collected pursuant to the EPA-approved FCR 12 dated April 24, 2020.</p> <p>Preliminary chemistry results from one location (PDI-150 [Figure 1]) identified sediment concentrations exceeding the Record of Decision Table 21 total polycyclic aromatic hydrocarbon remedial action levels (RALs). Due to these preliminary chemistry results, and in order to collect all necessary data for remedial design during this mobilization, NW Natural proposes to collect two additional sediment cores to bound potential RAL exceedances.</p>

Recommended Change
<p>NW Natural proposes to collect two additional sediment cores less than 150 feet from locations PDI-146, PDI-147, PDI-149, and PDI-150 at the stations shown in Figure 1 with the geographic coordinates provided in Table 1. In addition, two of the four locations (PDI-166 and PDI-167) in the EPA-approved FCR 13 (dated May 8, 2020) that have not yet been collected will be slightly adjusted to maintain the data density required for remedial design as shown in Figure 1 with the geographic coordinates provided in Table 1. The samples will be collected, processed, and submitted for chemical analysis consistent with FCR 10.</p>

<u>Nik Bacher, Anchor QEA</u>		<u>May 14, 2020</u>
<b>Respondent Field Coordinator (or Designee)</b>	<b>Signature</b>	<b>Date</b>

**Approval:**

<u>Ryan Barth, Anchor QEA</u>		<u>May 14, 2020</u>
<b>Respondent Project Lead</b>	<b>Signature</b>	<b>Date</b>

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# Table

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**Table 1**

**Additional Perimeter Interim Project Area Subsurface Sediment Core Sampling Locations**

<b>Location ID</b>	<b>Easting (X)</b>	<b>Northing (Y)</b>
PDI-166	7623439.31	706404.09
PDI-167	7623587.56	706380.32
PDI-171	7623277.18	706399.72
PDI-172	7623726.67	706351.43

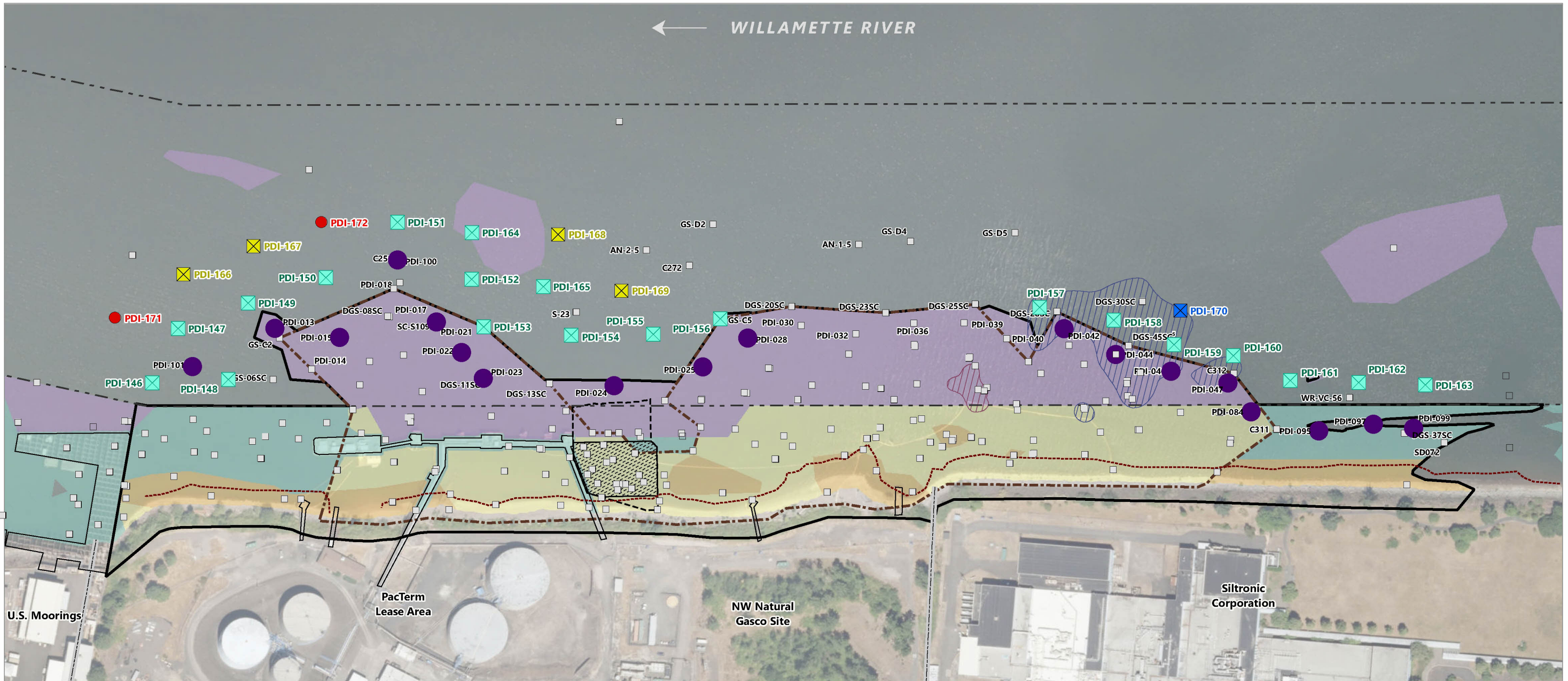
Notes:

Coordinates are in North American Datum of 1983 (HARN91), Oregon State Plane North, International Feet.

HARN91: High Accuracy Reference Network 91

# Figure

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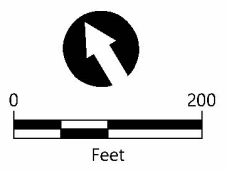


**LEGEND:**

<ul style="list-style-type: none"> <li> Navigation Channel</li> <li> Structures</li> <li> Property Line</li> <li> Tar Body Removal Action Area (RAPP, Anchor 2005)</li> <li> Tar Body Removal Action Pilot Cap</li> <li> PTW-NAPL Boundary</li> <li> Approximate Riprap Boundary<sup>1</sup></li> </ul>	<ul style="list-style-type: none"> <li> ROD-Identified SMAs (EPA 2017) Included in the Gasco Sediment Site Interim Project Area<sup>2</sup></li> <li><b>ROD SMA Technology<sup>2</sup></b></li> <li> Cap</li> <li> Dredge</li> <li> Dredge in Nav-FMD</li> <li> Dredge with Cap</li> <li> 2010 Transition Zone Water Vinyl Chloride Area 1 Boundary (Anchor QEA 2012)<sup>3</sup></li> <li> Area 2 - Detected CVOCs in TZW and One Subsurface Sediment Location<sup>4</sup></li> </ul>	<ul style="list-style-type: none"> <li> Existing Subsurface Sample Location</li> <li> Additional Collected Perimeter Subsurface Core</li> <li> Additional Perimeter Subsurface Core Approved Under FCR 13 (Yet to be Collected)</li> <li> Additional Perimeter Subsurface Core Approved Under FCR 14 (Yet to be Collected)</li> <li> Recommended FCR 15 Core Step Out Location</li> <li> Core Location Contains One or More Laterally Unbounded RAL Exceedances On Perimeter of Interim Project Area</li> </ul>
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**NOTES:**

1. Estimated from side scan sonar survey conducted by Blue Water Engineering April 2011.
2. All depicted SMA technology and PTW contours taken from the Portland Harbor Superfund Site Record of Decision (2017) without application of the EPA Explanation of Significant Differences (ESD; EPA 2019).
3. Boundary taken from Draft Engineering Evaluation/Cost Analysis, Appendix A, Figure 4.2. Transition zone water screening level exceedances of cis-1,2-dichloroethene identified within this vinyl chloride boundary.
4. Boundary taken from Gasco Sediments Site Statement of Work, Figure 1 (EPA 2009).
5. Only visual observations of PTW-NAPL were performed at these core locations (i.e., no chemical results available).
6. Bathymetry surveyed by DEA 2018. Topography surveyed by Geometrix 2011.
7. Arrow indicates direction of flow of river.
8. Horizontal datum is NAD83 (HARN 91) Oregon State Plane North, International Feet.
9. Vertical datum is City of Portland (COP), Feet.
10. Aerial imagery from City of Portland 2018.
11. BML: below mudline



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**Figure 1**  
**Proposed Additional Subsurface Sediment Core Locations**  
 Field Change Request No. 15  
 Gasco Sediments Cleanup Action