

August 15, 2020

Mr. Randall Bailey  
Oregon Department of Environmental Quality  
Northwest Region  
700 NE Multnomah St., Suite 600  
Portland, Oregon 97232

**Re NW Natural Pretreatment Plant Process Expansion—Request for Approval  
NW Natural Source Control Groundwater Treatment Facility  
7900 NW St. Helens Road, Portland OR  
NPDES Permit Number 103061 (permit renewal pending with DEQ)**

Dear Mr. Bailey:

Please find our consultant's Design Report for the proposed expansion of the NW Natural Pretreatment Plant for your review and approval, pursuant to Condition D.1 of the subject permit on Planned Changes.

In April 2020, the Oregon Department of Environmental Quality (DEQ) directed NW Natural to install and operate an interim source control measure, consisting of a groundwater interceptor trench system and a network of piezometers and monitoring wells for monitoring the performance of the interceptor trenches (DEQ 2020).

Previous groundwater data and groundwater data collected subsequent to the LNG Basin project showed increases in benzene concentrations in the fill downgradient of the LNG Basin necessitating an expansion to the existing NW Natural Pretreatment Plant with the construction of the interim trench project. The processes to be used are identical to the existing processes and are merely an expansion of the existing pretreatment plant.

As this expansion project is proposed to be implemented at the same time as the interim trench project in October/November 2020, we would appreciate an expeditious review and approval so that we may proceed with the purchase and installation of the necessary tanks and equipment.

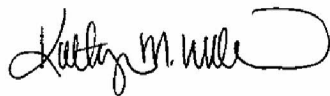
I certify under penalty of law that this document and all documents were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the

information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violation.

If you have any questions about this package, please contact Terry Driscoll at Aponowich, Driscoll & Associates, Inc., at (404) 641-8107, [tpdriscoll@mindspring.com](mailto:tpdriscoll@mindspring.com).

Very truly yours,



Kathryn Williams  
Vice President of Public Affairs  
NW Natural