

REDACTED

From: Young, Hunter <Young.Hunter@epa.gov>

Sent: Monday, March 20, 2023 11:52 AM

To: Jen Mott <jmott@anchorqea.com>

Cc: Wyatt, Robert <robert.wyatt@nwnatural.com>; Patricia Dost <pdost@pearllegalgroup.com>; Ryan Barth <rbarth@anchorqea.com>; Joe Smith <jsmith@anchorqea.com>; Peterson, Lance <petersonle@cdmsmith.com>; Azhar, Wardah <azharw@cdmsmith.com>; Nik Bacher <nbacher@anchorqea.com>

Subject: RE: Gasco Sediments: Additional Depth of Contamination Characterization Addendum

Jen, Bob, Ryan-

EPA has reviewed the revised Gasco Depth of Contamination Addendum dated March 1, 2023 and approves the document. We also have one item below for your consideration as you develop the Basis of Design Report:

- Regarding NW Natural's response to EPA General Comment 1 on the Depth of Contamination Addendum, this comment does pertain to EPA Comment 215 on the Combined BOD-PDR. However, since the EPA comments on the Combined BOD-PDR were submitted to NW Natural, EPA developed the Remedial Design SMA Delineation Uncertainty Evaluation in April 2022. EPA expects that NWN's SMA uncertainty evaluation will address EPA Comment 215 on the Combined BOD-PDR and will follow the procedures in EPA's Remedial Design SMA Delineation Uncertainty Evaluation. The uncertainty evaluation should be provided in the Gasco BODR.

Let me know if you have any questions,

Hunter Young
U.S. Environmental Protection Agency
Region 10 - Oregon Operations Office
Young.Hunter@epa.gov
(503)-326-5020

GASCO0049654

From: Jen Mott <jmott@anchorqea.com>
Sent: Wednesday, March 1, 2023 1:29 PM
To: Young, Hunter <Young.Hunter@epa.gov>
Cc: Wyatt, Robert <robert.wyatt@nwnatural.com>; pdost@pearllegalgroup.com;
rbarth@anchorqea.com; Joe Smith <jsmith@anchorqea.com>; Peterson, Lance
<peterstone@cdmsmith.com>; Wardah Azhar <azharw@cdmsmith.com>; Nik Bacher
<nbacher@anchorqea.com>
Subject: RE: Gasco Sediments: Additional Depth of Contamination Characterization Addendum

Hunter,

The following is provided on behalf of Ryan.

Attached for EPA's review and approval please find the *Revised Additional Depth of Contamination Characterization Addendum within the Gasco Sediments Site Project Area* (addendum). The addendum addresses EPA's February 16, 2023, comments on the January 13, 2023 *Additional Depth of Contamination Characterization Addendum within the Gasco Sediments Site Project Area*.

NW Natural requests EPA's approval by March 20 to allow NW Natural to perform this additional DOC characterization that is currently scheduled for our marine contractor to begin using barge-mounted sonic coring equipment on March 27. Timely collection of this additional DOC characterization is needed to facilitate completion of the forthcoming ISS Field Pilot Study during the 2023 in-water work window.

Please let us know if you have any questions during your review. Regards.

Ryan Barth, P.E.

Principal

Jen Mott
Project Coordinator
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From: Young, Hunter <Young.Hunter@epa.gov>
Sent: Thursday, February 16, 2023 6:25 PM
To: Jen Mott <jmott@anchorqea.com>
Cc: Wyatt, Robert <robert.wyatt@nwnatural.com>; Patricia Dost <pdost@pearllegalgroup.com>;
Ryan Barth <rbarth@anchorqea.com>; Joe Smith <jsmith@anchorqea.com>; Peterson, Lance

GASCO0049655

<peterstone@cdmsmith.com>; Azhar, Wardah <azharw@cdmsmith.com>

Subject: RE: Gasco Sediments: Additional Depth of Contamination Characterization Addendum

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Bob,

See attached for EPA's comments on the Additional Depth of Contamination Characterization Addendum for the Gasco Project area. Please reach out with any questions.

Thank you,

Hunter Young
U.S. Environmental Protection Agency
Region 10 - Oregon Operations Office
Young.Hunter@epa.gov
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From: Jen Mott <jmott@anchoragea.com>

Sent: Friday, January 13, 2023 1:31 PM

To: Young, Hunter <Young.Hunter@epa.gov>

Cc: Wyatt, Robert <robert.wyatt@nwnatural.com>; pdost@pearllegalgroup.com;
rbarth@anchoragea.com; Joe Smith <jsmith@anchoragea.com>; Peterson, Lance
<peterstone@cdmsmith.com>; Wardah Azhar <azharw@cdmsmith.com>

Subject: Gasco Sediments: Additional Depth of Contamination Characterization Addendum

Hunter,

The following email is provided on behalf of Ryan.

Hunter –

Attached for EPA's review and approval please find a memorandum entitled *Additional Depth of Contamination Characterization Addendum within the Gasco Sediments Site Project Area* (Addendum). This addendum presents NW Natural's proposed additional subsurface sediment characterization to complete the remedial design for the Full Dredge and In Situ Stabilization and Solidification (ISS) Design presented in the Preferred Alternative Report (PAR; Anchor QEA 2022) for the Gasco Sediments Site Project Area (Project Area). Over one hundred subsurface sediment cores have been collected previously throughout the Project Area under EPA-approved work plans. The bottom depth of contamination (DOC) based on exceedances of ROD Table 21 remedial action levels (RALs) and the presence of principal threat waste (PTW), and as described in EPA's *Remedial Design*

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Guidelines and Considerations—Portland Harbor Superfund Site, Portland, Oregon, was not identified in 58 cores and riverbank angled borings collected in the Project Area, so additional deeper vertical characterization is required to achieve the Full Dredge and ISS Design objectives. The Addendum describes the additional pre-design investigation activities to determine the DOC throughout the Project Area using EPA-approved sampling and analysis methodologies detailed in the *Revised Pre-Remedial Design Data Gaps Work Plan* (Anchor QEA 2019), with some changes to allow for deeper subsurface characterization to identify the remainder of the DOCs throughout the Project Area. A *Pre-Remedial Design Data Gaps Field Sampling Plan Addendum* and *Pre-Remedial Design Data Gaps Quality Assurance Project Plan Addendum* accompany this Addendum as Appendices A and B, respectively.

NW Natural would like to perform this additional characterization as soon as possible to facilitate completion of the forthcoming ISS Field Pilot Study during the 2023 in-water work window. As always, do not hesitate to contact Bob or me during your review. We look forward to your feedback. Regards.

Ryan Barth, P.E.

Principal

Jen Mott

Project Coordinator

Anchor QEA, LLC

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