

Memorandum

September 12, 2023

To: Hunter Young, U.S. Environmental Protection Agency

From: Ryan Barth, Anchor QEA

cc: Bob Wyatt, NW Natural; Patty Dost, Pearl Legal Group; Lance Peterson, CDM Smith;
Jen Mott, Anchor QEA

Re: NW Natural Response to EPA's September 8, 2023, Comments on the *In Situ Stabilization and Solidification Field Pilot Study Health and Safety Plan* for the Gasco Sediments Project Area

This memorandum has been prepared by Anchor QEA, LLC, on behalf of NW Natural and provides responses to the U.S. Environmental Protection Agency's (EPA's) comments dated September 8, 2023, on the *In Situ Stabilization and Solidification Field Pilot Study Health and Safety Plan* (HASP) for the Gasco Sediments Project Area (Project Area) dated August 29, 2023.

EPA General Comments on HASP

Not Applicable

EPA Specific Comments on HASP

EPA Specific Comment 1

Liability Waiver, pages L-1 through L-2: Some of the language, particularly in points 1, 2, and 4, seem to conflict with OSHA's General Duty Cause and the employer's obligation to provide a workplace free of recognized hazards.

NW Natural Response

The Liability Waiver is applicable for visitors only and not to staff working at the Project Area.

EPA Specific Comment 2

Section 5.2, Project Air Monitoring Requirements, Table 5-1, Project Job Tasks and Required PPE, page 10: Consider adding two-way radio communication or another verified means of communication during emergencies for the following job task: *Field activities on shore or on vessels with no anticipated direct contact with soils, sediments, sheens, or decontamination chemicals, including deploying instrumentation.*

NW Natural Response

The text and table have been revised according to the comment.

EPA Specific Comment 3

Section 7.4.1.3, Safety Equipment, page 20: Specify how equipment that Anchor QEA and/or a subconsultant is providing complies with regulatory requirements (e.g., PFD's meet U.S. Coast Guard [USCG] requirements).

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The text has been revised according to the comment.

EPA Specific Comment 4

Section 8.5, Handling of Investigation-Derived Waste, page 23: Provide detail on the disposal method for waste generated and staged during the handling of investigation-derived waste.

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Excess water and decontamination water generated during water quality monitoring will be returned to the river if no visible sheen or principal threat waste (PTW)-nonaqueous phase liquid (NAPL) are observed to be present. Excess material generated during situ stabilization and solidification (ISS) quality assurance/quality control sample collection will be transferred to the swell material removal haul barge for subsequent disposal at the permitted landfill.

EPA Specific Comment 5

Attachment B, Job Safety Analysis Documents: Consider incorporating the potential wildfire hazard into applicable job safety analysis documents.

NW Natural Response

The text has been revised according to the comment.

EPA Specific Comment 6

Attachment B Job Safety Analysis Documents, Boat/Barge Activities: It is suggested that language be included to address the following:

- a. Training and certification of crew members
- b. Communication methods
- c. Embarking and disembarking of crew members
- d. Housekeeping procedures

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The above items are addressed in various sections of the HASP and Job Safety Analyses.

EPA Specific Comment 7

Attachment C Safety Data Sheets: It is suggested that a safety data sheet table of contents be included.

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The text has been revised according to the comment.

EPA Specific Comment 8

Section 12.1.14, Boating Operations and Section 12.1.15, Working Over or Near Water, pages 46-49: While each section alludes to ring buoys and retrieval lines being needed, a specific subsection on Man/Person Overboard Procedures should be added. This should also be referenced in the emergency response procedures section that precedes the Table of Contents.

NW Natural Response

The text has been revised according to the comment.

EPA Specific Comment 9

Section 12.2.11, Public at Large, page 64: This section does not directly address the hazards presented by unhoused community members. Security concerns and procedures should be listed.

NW Natural Response

The text has been revised according to the comment.