

**NW Natural ISS Field Pilot Study Implementation  
Gasco Sediments Site – September/October 2023  
Field Change Request Form**

**Project Name:** Gasco Sediments Site **Contractor:** Sevenson Environmental Services, Inc.

**Field Activity:** Swell Material Removal **Request Number:** 3

**To:** Hunter Young, U.S. Environmental Protection Agency **Date:** October 9, 2023

**Field Change Request Title:** Swell Material Removal Outside and Cover Placement Inside of the Gasco Sediments Site Field Pilot Study Footprint

**Description**

Section 3.4 of the U.S. Environmental Protection Agency (EPA)-approved *Final Revised In Situ Stabilization and Solidification Field Pilot Study Work Plan* (Work Plan) describes the means and methods for managing the in situ stabilization and solidification (ISS)-treated swell materials that are generated as part of the Field Pilot Study at the Gasco Sediments Site. These means and methods assumed that the swell materials would be generated above the pre-construction mudline and be maintained within the Field Pilot Study footprint, so removal of these materials would occur overlying other ISS-treated sediments. The Work Plan assumed the targeted removal elevation would be the pre-construction mudline (i.e., swell materials above the pre-construction survey), including tolerances for the uneven surfaces created by the bucket and the removal equipment. However, progress bathymetric surveys completed to date following ISS auguring has shown that the mudline elevations within the Field Pilot Study footprint have deepened relative to the pre-construction elevations, as discussed in EPA-approved Field Change Request Form (FCR) #1 dated September 28, 2023, and that swell materials are present downslope of the footprint providing treated cover of untreated, contaminated sediments.

**Recommended Change**

NW Natural is scheduled to perform additional ISS auguring and associated progress bathymetric surveys through Saturday October 14, 2023. To facilitate expedited swell management within and outside the footprint based on the findings of the surveys, NW Natural requests the following approvals from EPA:

- **Inside the Field Pilot Study footprint:** Approval to not place clean, cover material within the Field Pilot Study footprint in the areas that are deeper than the pre-construction mudline elevations and are targeted for placement of the long-term sampling ports detailed in Section 4 of the Work Plan. This request is necessary to the sampling design objective “prevent short-circuiting of surface water” discussed in Section 4.1, which states: “*The bottom of the sampling ports is specifically designed to be “sealed” to a relatively flat post-ISS surface that is slightly sloping or level to maintain them in position over time while preventing short-circuiting of surface water into the bottom of the ports.*” Placement of sand cover on top of the ISS-treated surface would act as a conduit that allows short-circuiting of surface water. NW Natural would place clean, cover material in the portions of the Field Pilot Study footprint that are not in contact with the long-term sampling ports, in accordance with EPA-approved FCR #1.
- **Downslope from the Field Pilot Study footprint:** Approval to evaluate if swell materials overlying untreated, contaminated sediments downslope areas from the Field Pilot Study footprint can be effectively removed without disturbing the contaminated sediments. If this evaluation shows the removal could not be performed effectively, NW Natural requests EPA approval to leave the overlying swell material in place until the final remedy is performed. The swell material would effectively “cap” the underlying contaminated sediments until that time. The final design will address management of any remaining pilot study swell material based on final remedy target elevations and habitat configurations.

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All work in this FCR will be performed in accordance with the Applicable or Relevant and Appropriate Requirements (ARARs) described in Section 5 and detailed in Tables 5-1 and 5-3 of the Work Plan. NW Natural will coordinate with EPA in the coming days to establish procedures to document ARAR compliance.

**Respondent Lead:**

Ryan Barth

**Respondent Project Lead**



**Signature**

October 9, 2023

**Date**

**Distribution List:**

**Hunter Young**, EPA

[Young.Hunter@epamail.epa.gov](mailto:Young.Hunter@epamail.epa.gov); 503-326-5020

**Lance Peterson**, CDM Smith

[PetersonLE@cdmsmith.com](mailto:PetersonLE@cdmsmith.com); 425-519-8382

**Wardah Azhar**, CDM Smith

[azharw@cdmsmith.com](mailto:azharw@cdmsmith.com); 303-383-2364

**Bob Wyatt**, NW Natural

[rjw@nwnatural.com](mailto:rjw@nwnatural.com); 503-226-4211, ext. 5425

**Patty Dost**, Pearl Legal Group PC

[pdost@pearllegalgroup.com](mailto:pdost@pearllegalgroup.com); 503-467-4675

**Ryan Barth**, Anchor QEA

[rbarth@anchoragea.com](mailto:rbarth@anchoragea.com); 206-903-3334

**Mike Crystal**, Severson Environmental Services, Inc.

[Mdcystal@sevenson.com](mailto:Mdcystal@sevenson.com); 716-998-8410

**Rob Ede**, Hahn & Associates

[Robe@hahnenv.com](mailto:Robe@hahnenv.com); 503-863-0958

**Joe Smith**, Anchor QEA

[jsmith@anchoragea.com](mailto:jsmith@anchoragea.com); 206-219-5892

**Billie-Jo Gauley**, Anchor QEA

[bgauley@anchoragea.com](mailto:bgauley@anchoragea.com); 978-712-4475