

October 16, 2023

Hunter Young
Project Coordinator
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, M/S ECL-111
Seattle, Washington 98101

Re: September 2023 Monthly Progress Report
Administrative Settlement Agreement and Order on Consent for Removal Action
EPA Region 10 Docket No. CERCLA 10-2009-0255
Gasco Sediments Site Within the Portland Harbor Superfund Site

Dear Mr. Young,

This monthly progress report provides information required by Section VIII, Paragraph 26, of the Administrative Settlement Agreement and Order on Consent for Removal Action for actions taken in September 2023 at the Gasco Sediments Site within the Portland Harbor Superfund Site.

1. Actions Taken in This Month and Problems Encountered

The following actions and correspondences occurred in this month:

- September 1 through 30 – Anchor QEA continued development of the *Revised Sediment Remedy Basis of Design Report* and held discussions with and developed responses to the U.S. Environmental Protection Agency's (EPA's) comments on the *Revised In Situ Stabilization and Solidification Field Pilot Study Work Plan* and *Additional Revised In Situ Stabilization and Solidification Field Pilot Study Work Plan*. Anchor QEA also coordinated with Siltronic to attempt to get access to the Siltronic Corporation (Siltronic) property to facilitate completion of the vibration monitoring scope of work detailed in the *Revised In Situ Stabilization and Solidification Field Pilot Study Work Plan*. The Anchor QEA and Siltronic technical teams attended a conference call on August 31 to discuss the scope of work and associated access, and Pearl Legal Group followed up between September 20 and 30 requesting written agreement for access.
- September 8 – NW Natural received the following documents from EPA:
 - Comments on Anchor QEA's *In Situ Stabilization and Solidification Field Pilot Study Health and Safety Plan*
 - Comments on Severson Environmental Services *Contractor Health and Safety Plan, In Situ Stabilization and Solidification Field Pilot Study, Gasco Sediments Project Area*
 - Conditional approval of the *Revised In Situ Stabilization and Solidification Field Pilot Study Work Plan*

- *Clean Water Act §404 ARAR Memorandum for the Revised In Situ Stabilization and Solidification Field Pilot Study*
- September 11 – NW Natural submitted Severson Environmental Services revised *Contractor Health and Safety Plan, In Situ Stabilization and Solidification Field Pilot Study, Gasco Sediments Project Area* to address EPA's September 8 comments and received confirmation from EPA it has no additional comments.
- September 12 – Anchor QEA submitted the *Final Revised In Situ Stabilization and Solidification Field Pilot Study Work Plan* to address EPA's conditional approval comments dated September 11 and the revised *In Situ Stabilization and Solidification Field Pilot Study Health and Safety Plan* to address EPA's comments dated September 8.
- September 13 – NW Natural received EPA's confirmation it has no further comments on the revised *In Situ Stabilization and Solidification Field Pilot Study Health and Safety Plan*.
- September 14 – NW Natural received EPA's approval of the *Final Revised In Situ Stabilization and Solidification Field Pilot Study Work Plan*.
- September 15 – Anchor QEA submitted the August Gasco Sediments Site monthly progress report.
- September 15 through 30 – In accordance with the notification requirements identified in EPA's *Clean Water Act §404 ARAR Memorandum*, Anchor QEA submitted draft scanned daily (when applicable) field forms for the water quality monitoring performed as part of the Field Pilot Study.
- September 19 – Anchor QEA submitted a Weekly Summary Report associated with the Field Pilot Study for the period September 6 through 17.
- September 26 – Anchor QEA completed the following:
 - Performed the monthly visual monitoring of the shoreline area in the direct vicinity of the pilot cap.
 - Submitted a Private Aids to Navigation Application (CG-2554) for the installation of six buoys at the Gasco Sediments Site Field Pilot Study footprint pursuant to the Code of Federal Regulations Title 33 Part 66.
 - Submitted a memorandum requesting the establishment of a regulated navigation area at the Gasco Sediments Site Field Pilot Study footprint.
 - Submitted a Weekly Summary Report associated with the Field Pilot Study for the week of September 18.
- September 28 – Anchor QEA submitted Field Change Request Form (FCR) #1 for the ongoing construction associated with the Field Pilot Study.
- September 28 and 29 – Anchor QEA submitted draft water chemistry sampling results collected on September 25, 26, and 27 for the Field Pilot Study in accordance with the notification requirements identified in EPA's *Clean Water Act §404 ARAR Memorandum*.

- September 29 – NW Natural received EPA approval of FCR #1, and Anchor QEA submitted and received EPA approval of FCR #2.

2. Results of Sampling, Tests, and Other Data Received

The results of the monthly visual monitoring of the shoreline area in the direct vicinity of the pilot cap are provided as Attachment A. The draft scanned daily field forms and received chemistry results for the water quality monitoring performed as part of the Field Pilot Study were submitted to EPA on the dates noted above in Section 1 of this monthly progress report.

3. Schedule of Activities for the Next Month

Anchor QEA anticipates the following activities to occur in the next month:

- Submit the October Gasco Sediments Site monthly progress report.
- Complete monthly visual monitoring of the shoreline area in the direct vicinity of the pilot cap area.
- Continue laboratory analysis associated with the *Additional Revised In Situ Stabilization and Solidification Bench Scale Treatability Study Work Plan*.
- Submittal of the Field Sampling Plan and Quality Assurance Project Plan for implementation of the long-term sampling ports following completion of the Field Pilot Study.
- Respond to EPA comments on the *Additional Revised In Situ Stabilization and Solidification Bench Scale Treatability Study Work Plan* and submit the associated *Final Revised In Situ Stabilization and Solidification Bench Scale Treatability Study Work Plan*.
- Continue development of the *Revised Sediment Remedy Basis of Design Report*.
- Continue construction and completion of the Field Pilot Study.

4. Anticipated Problems and Proposed Resolutions

As noted in Section 1 of this monthly progress report, Anchor QEA submitted FCRs #1 and #2 to address necessary changes to the Field Pilot Study based on encountered conditions that were not addressed in the *Final Revised In Situ Stabilization and Solidification Field Pilot Study Work Plan*.

Please contact the undersigned if you have any questions or require additional information.

Sincerely,



Ryan Barth, PE
Project Manager

cc:

Bob Wyatt, NW Natural

Patty Dost, Pearl Legal Group PC

Rob Ede, Hahn and Associates, Inc.

Mike Crystal, Severson Environmental Services, Inc.

Elizabeth Bingold, Siltronic Corporation

Traci Parker, Siltronic Corporation

David Rabbino, Jordan Ramis PC

Mike Murray, Maul Foster & Alongi, Inc.

Lance Peterson, CDM Smith

Sarah Greenfield, DEQ

Dan Hafley, DEQ

Wesley Thomas, DEQ

Attachment

Attachment A Monthly Visual Monitoring Report for Pilot Cap Vicinity

Visual Observations Log Form

September 26, 2023

Project: NW Natural – Gasco

Project Number: 000029-02.85, Task 5.1

Location: NW Natural “Gasco” Site

Monitoring Period: Monthly (Year 17) – August 2023

Observations Started: September 26, 2023 @ 12:45

Observations Concluded: September 26, 2023 @ 13:45

Photographs Taken: Yes: No:

Recorded by: Douglas Laffoon

Weather Conditions

Mostly cloudy, 63°F, medium wind from the south.

Wave Action Observations

Light wave action (0.2 – 0.4 foot in height).

Tidal Conditions

Willamette River level on 9/26/2023 ranged in elevation from 0.48 to 4.63 feet. The Willamette River level during the photos in this report is approximately 0.63 feet measured at 13:00 (River Level Elevation Datum: Morrison Gage Height).

Observations of Erosion/Deposition

No erosion or deposition was evident along the shoreline within the cap area.

Observations of Long-term Controls (i.e., oil booms, organoclay mat, etc.)

During the observation, a barge was moored at the Centerline Logistics (Centerline) ship dock. The Centerline containment boom is being managed along the dock face during the ongoing Gasco In Situ Stabilization and Solidification (ISS) Field Pilot Study. The sheen control boom at the Gasco/Siltronic property line has been temporarily reconfigured and replaced to support the ISS Field Pilot Study. The three buoys identifying the cap area to mariners were in place as installed. The positions of the warning buoys are shown in Photo 1.

All exposed organoclay mat material segments were visible and out of the water (Photo 2). The visible, exposed segments of organoclay mat were in visually good condition.

Other Comments

Photo 3 shows the water surface and shoreline immediately downriver of the sediment cap. No sheen was observed within the cap area.

Fish advisory signage is present and in good condition.

Photos

Photo 1
Three Mariner Warning Buoys at Pilot Cap Area (9/26/2023)



Photo 2
Organoclay Mat Material at the Downriver Extent of the Pilot Cap Area (9/26/2023)



Photo 3
Conditions Immediately Downriver of Cap Area Looking Upriver (from PZ-5 Location)
(9/26/2023)

