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ANCHOR QEA

Memorandum

September 26, 2023

To: Rear Admiral Charles E. Fosse, 13th Coast Guard District Commander

From: Ryan Barth, PE, Anchor QEA

cc: Robert Wyatt, NW Natural
Patty Dost, Pearl Legal Group
Hunter Young, U.S. Environmental Protection Agency

Re: Request for Establishment of Regulated Navigation Area

On behalf of NW Natural, this memorandum requests the establishment of a regulated navigation area (RNA) at the NW Natural Gasco Sediments Site Project Area (Site) located in the Willamette River in Portland, Oregon. This request is pursuant to the Code of Federal Regulations (CFR) Title 33, Part 165. The proposed RNA will preserve the integrity of the In Situ Stabilization and Solidification (ISS) Field Pilot Study (FPS) post-construction sampling ports placed over a portion of the Site as part of a U.S. Environmental Protection Agency (EPA) Superfund cleanup action. This memorandum proposes to prohibit activities that could disturb the sampling ports, which will be placed to measure potential diffusive flux of contaminants from the surface of ISS treated sediments. The remainder of this memorandum provides the background and purpose for this request and information required for proposing an RNA at the Site.

Background and Purpose

The Site is located within the Portland Harbor Superfund Site at approximately river mile 6.5 in the Willamette River (Figure 1). NW Natural entered into an Administrative Order on Consent (EPA 2009) with EPA on September 9, 2009, with removal response action goals of further characterization, studies, analysis, and preliminary design that will lead ultimately to a final remedy at the Site. As part of these actions, NW Natural is conducting an FPS to collect data for the full-scale implementation of ISS at the Site. These data and lessons learned from the FPS will be used to inform the final design of the full remedy using ISS treatment technology in nearshore area of the site. This includes obtaining information to optimize ISS construction means and methods.

The FPS consists of a 1,750-square-foot area within the Site that will undergo ISS treatment. A series of 8-foot-diameter sediment mix columns will be installed to stabilize and solidify contaminated sediment within the FPS footprint. Each column will be advanced to 30 feet below mudline and mixed with cementitious treatment grout. The columns will be installed in a honeycomb pattern on a grid spacing to provide 100% coverage of the FPS footprint.

Four long-term sampling ports will be installed in the FPS ISS footprint (Figure 2) to measure potential diffusive flux from the ISS-treated sediment. It will be necessary to limit potential disturbance of the sampling ports by vessel activity at the Site to avoid impacting the sampling data. Therefore, NW Natural is requesting an RNA prohibiting activities that will inappropriately disturb the sampling ports (Figure 2) in perpetuity or until EPA and NW Natural agree to modify the footprint as part of a future final Site remedy. Any RNA established at this time is not intended to restrict such activities.

Required Information

Specific details, as requested in 33 CFR 165.5, related to this request are provided as follows:

1. **Name of the person submitting the request:** Ryan Barth, NW Natural "Gasco" Sediments Site Project Coordinator, Anchor QEA on behalf of NW Natural.
2. **The location and boundaries of the RNA:** Location information (northing and easting; coordinates in Washington State Plane South Zone [North American Datum of 1983 (NAD 83)] latitude and longitude) is provided below for the vertices of the FPS footprint and is shown on Figure 2 and Table 1.
3. **Date, time, and duration that the RNA should be established:** The RNA should be established as soon as possible and last in perpetuity or until disturbance of the FPS footprint is approved by EPA and NW Natural.
4. **A description of the activities planned for the RNA:** As described above, long-term sampling of the ISS remedy is the planned activity for the RNA.
5. **The nature of the restrictions:** No vessels shall be allowed to disturb (e.g., anchor, drag lines, trawling, and motoring) the ISS-treated sediment surface or sampling ports in the FPS footprint.
6. **The reason why the RNA is necessary:** The sampling ports must remain intact and undisturbed to avoid impacting the EPA-approved sampling.

Please provide documentation that this memorandum has been received and a status update of the rule-making process to establish the RNA. If you need additional information, please feel free to contact Ryan Barth at (206) 903-3334 or rbarth@anchorqea.com.

Table 1
Coordinates for the Field Pilot Study Footprint

Point	Northing[1]	Easting[1]
1	705379.67	7624491.45
2	705358.37	7624478.36
3	705343.04	7624551.09
4	705321.73	7624538.01

Note:

1. The coordinates are in State Plane Oregon NAD 83 (international feet).

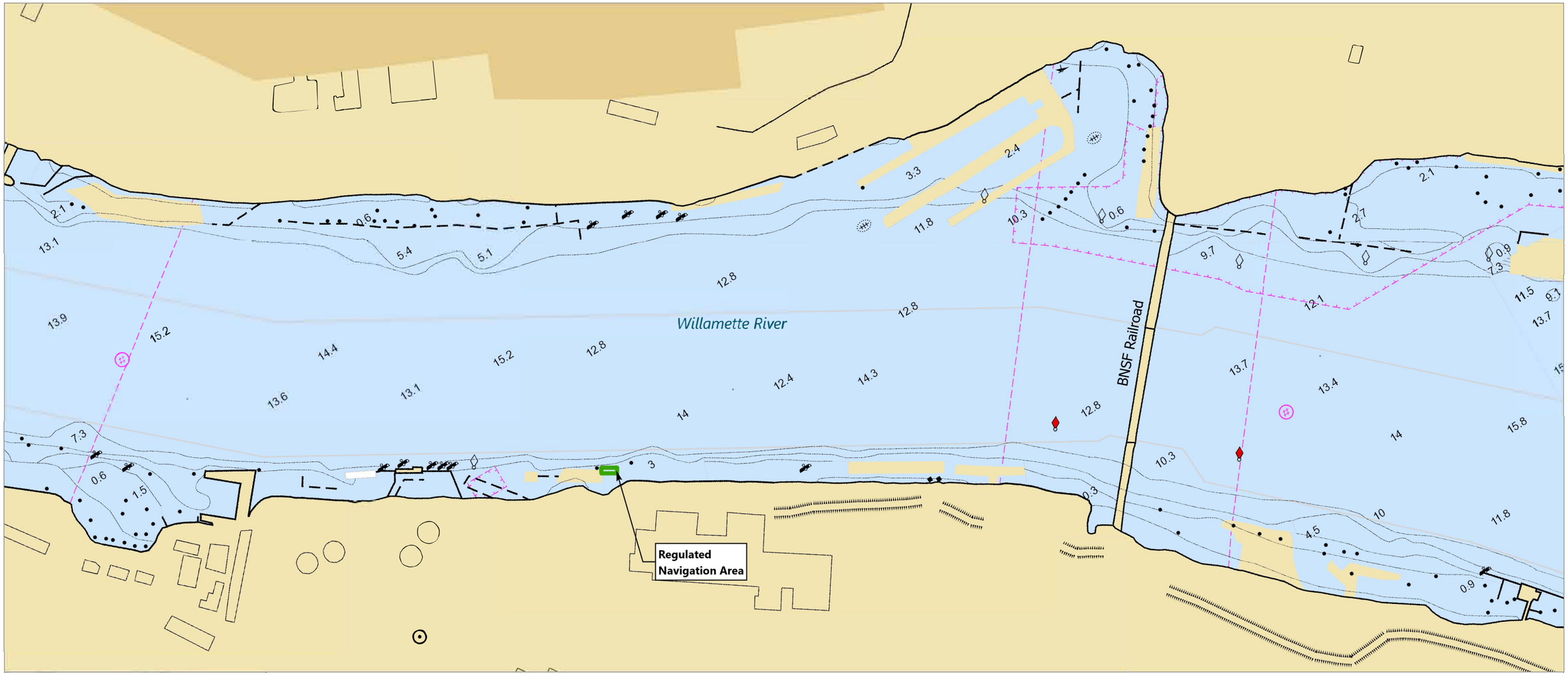
Reference

EPA (U.S. Environmental Protection Agency), 2009. *Administrative Settlement Agreement and Order on Consent*. Gasco Sediments Site, Portland Harbor Superfund Site, Portland, Multnomah County, Oregon. CERCLA Docket No. 10-2009-0255. September 2009.

Attachments

Figure 1 Site Vicinity
Figure 2 Field Pilot Study Footprint

Figures



LEGEND:

- Field Pilot Study Footprint

NOTE:

1. Chart data from NOAA Electronic Navigational Charts (ENC)

0 600
Feet

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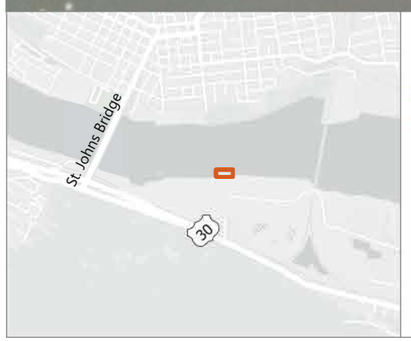
Figure 1
Site Vicinity
Request for Establishment of Regulated Navigation Area
Gasco Sediments Project Area
GASCO0054067



LEGEND:

- Field Pilot Study Footprint
- Ordinary High Water (+18 ft COP)
- Ordinary Low Water (+3 ft COP)
- Amendment Can
- ISS Field Pilot Study Post-Construction Sampling Port Location

NOTE:
1. Aerial Imagery from City of Portland, 2022.
2. Horizontal Datum: NAD 1983 HARN State Plane Oregon North, International Feet.

0 30
Feet

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Figure 2
Field Pilot Study Footprint
Request for Establishment of Regulated Navigation Area
Gasco Sediments Project Area
GASCO0054068