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**From:** Jen Mott

**Sent:** Thursday, December 7, 2023 6:10 PM

**To:** Hunter Young (young.hunter@epa.gov) <young.hunter@epa.gov>

**Cc:** 'Gustavson.Karl@epa.gov' <Gustavson.Karl@epa.gov>; Lance Peterson (PetersonLE@cdmsmith.com) <PetersonLE@cdmsmith.com>; Wardah Azhar (azharw@cdmsmith.com) <azharw@cdmsmith.com>; Bob Wyatt - NW Natural (robert.wyatt@nwnatural.com) <robert.wyatt@nwnatural.com>; Patty Dost (pdost@pearllegalgroup.com) <pdost@pearllegalgroup.com>; Crystal, Mike <MDCrystal@sevenson.com>; Rob Ede <robe@hahnenv.com>; Ryan Barth <rbarth@anchorqea.com>; Kendra Skellenger <kskellenger@anchorqea.com>

**Subject:** FW: Gasco Sediments Site Revised Sediment Remedy Basis of Design Report

Hunter,

The following email is provided on behalf of Ryan Barth.

NW Natural is pleased to submit the *Revised Sediment Remedy Basis of Design Report* (Revised BODR) for the Gasco Sediments Site Project Area for EPA review. The Revised BODR has been prepared pursuant to the *Administrative Settlement Agreement and Order on Consent for Removal Action* (AOC; CERCLA Docket No. 10-2009-0255) and *Statement of Work – Gasco Sediments Site* (SOW; EPA 2009) executed between NW Natural and EPA. This Revised BODR was revised to address EPA's August 17, 2021, comments on the *Combined Sediment Remedy Basis of Design and Preliminary Design Report*. The Revised BODR also presents the Gasco Sediments Site Final Project Area identified based on the results of the remedial design-level sampling performed as part of the 2019-2020 pre-design investigation.

Due to file size, the documents are available via OneDrive, located here: [2023-12-07 Gasco Sediments Revised BODR](#)

Files on OneDrive include:



- **PDF:** *Revised Sediment Remedy Basis of Design Report* with tables/figures but no appendices

**Folder:** Appendices

- **PDF:** Appendix A Revised Final Pre-Remedial Design Data Gaps Data Summary Report
- **PDF:** Appendix B Preferred Alternative Report
- **PDF:** Appendix C Response to Comments
- **PDF:** Appendix D EPA RI and ROD-Related Supporting Documents
- **PDF:** Appendix E Revised Bank Assessment of Non-point Source Consequences of Sediment at Siltronic Corporation Memorandum (January 27, 2022)
- **PDF:** Appendix F Documentation on Existing Overwater Structures, Outfalls, and HC&C System Infrastructure
- **PDF:** Appendix G Final Gasco Sediments Site Sufficiency Assessment Summary Tables
- **PDF:** Appendix H Mitigation Evaluation Work Plan
- **PDF:** Appendix I SMA Uncertainty Analysis
- **PDF:** Appendix J NW Natural's Additional Revised Gasco Sediments Site Dredge and Cover Design, Implementation, Verification, and Closeout Approach Memorandum (June 3, 2019)

Please let us know if you have any questions during your review and/or would like to have a call/meeting to discuss anything. Regards.

Jen Mott  
Project Coordinator  
**Anchor QEA, LLC**  
[jmott@anchoragea.com](mailto:jmott@anchoragea.com)  
6720 S Macadam Ave, Suite 300, Portland, OR 97219  
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**From:** Young, Hunter <[Young.Hunter@epa.gov](mailto:Young.Hunter@epa.gov)>  
**Sent:** Tuesday, August 17, 2021 1:47 PM  
**To:** Jen Mott <[jmott@anchoragea.com](mailto:jmott@anchoragea.com)>; Bob Wyatt <[rjw@nwnatural.com](mailto:rjw@nwnatural.com)>; Ryan Barth <[rbarth@anchoragea.com](mailto:rbarth@anchoragea.com)>  
**Cc:** Gustavson, Karl <[Gustavson.Karl@epa.gov](mailto:Gustavson.Karl@epa.gov)>; Peterson, Lance <[peterstone@cdmsmith.com](mailto:peterstone@cdmsmith.com)>; Wardah Azhar <[azharw@cdmsmith.com](mailto:azharw@cdmsmith.com)>; Patricia Dost <[pdost@pearllegalgroup.com](mailto:pdost@pearllegalgroup.com)>; Crystal, Mike <[mdcrystal@sevenson.com](mailto:mdcrystal@sevenson.com)>; [tdonegan@sevenson.com](mailto:tdonegan@sevenson.com); Ross Pickering <[rpickering@anchoragea.com](mailto:rpickering@anchoragea.com)>  
**Subject:** RE: Gasco Sediments Site Combined Sediment Remedy Basis of Design and Preliminary Design Report

**CAUTION – EXTERNAL EMAIL:** This email originated from outside of Anchor QEA. Please exercise caution with links and attachments.

Bob, Ryan, Jen,

See attached for EPA's comments on the Gasco Sediments Site Combined Sediment Remedy Basis of Design and Preliminary Design Report. This submittal did not meet EPA's expectations and we request the document be revised and resubmitted based on direction provided in the comments.

**GASCO0055967**

Because of EPA's concerns with the technical evaluations presented in the appendices and overall basis of design, silence on a particular topic does not imply approval/agreement by EPA. All of the comments are relevant to developing a responsive document; however, we direct your attention to the general comments at the beginning of the comment set which articulate EPA's overarching concerns. Resolution to these overarching concerns is critical to the project moving forward. Once you have had an opportunity to review the comments we suggest scheduling one or more meetings to discuss a path forward.

Thanks,

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

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**From:** Jen Mott <[jmott@anchoragea.com](mailto:jmott@anchoragea.com)>  
**Sent:** Friday, April 30, 2021 2:24 PM  
**To:** Young, Hunter <[Young.Hunter@epa.gov](mailto:Young.Hunter@epa.gov)>  
**Cc:** Gustavson, Karl <[Gustavson.Karl@epa.gov](mailto:Gustavson.Karl@epa.gov)>; Peterson, Lance <[peterstone@cdmsmith.com](mailto:peterstone@cdmsmith.com)>; Wardah Azhar <[azharw@cdmsmith.com](mailto:azharw@cdmsmith.com)>; [rjw@nwnatural.com](mailto:rjw@nwnatural.com); [pdost@pearllegalgroup.com](mailto:pdost@pearllegalgroup.com); Crystal, Mike <[mocrystal@sevenson.com](mailto:mocrystal@sevenson.com)>; [tdonegan@sevenson.com](mailto:tdonegan@sevenson.com); [rbarth@anchoragea.com](mailto:rbarth@anchoragea.com); Ross Pickering <[rpickering@anchoragea.com](mailto:rpickering@anchoragea.com)>  
**Subject:** Gasco Sediments Site Combined Sediment Remedy Basis of Design and Preliminary Design Report

Hunter,

The following email is provided on behalf of Ryan Barth.

NW Natural is pleased to submit the *Combined Sediment Remedy Basis of Design and Preliminary Design Report* (Combined BOD-PDR) for the Gasco Sediments Site Project Area for EPA review. The BOD-PDR has been prepared pursuant to the *Administrative Settlement Agreement and Order on Consent for Removal Action* (AOC; CERCLA Docket No. 10-2009-0255) and *Statement of Work – Gasco Sediments Site* (SOW; EPA 2009) executed between NW Natural and EPA. This Combined BOD-PDR completes the site-specific technical evaluations described in the EPA-approved *Final Pre-Remedial Basis of Design Technical Evaluations Work Plan* (TEWP) along with the majority of the Preliminary Design requirements identified in the SOW. This combined BOD-PDR also presents the Gasco Sediments Site Final Project Area identified based on the results of the remedial design-level sampling performed as part of the 2019-2020 pre-design investigation. To maximize efficiency and decrease the project schedule, EPA and NW Natural agreed to combine the BOD Report and Preliminary Design into this Combined BOD-PDR. The remaining Preliminary Design requirements identified in the SOW will be completed as part of Interim Design following EPA approval of the final remedial technology assignments and the completion of more detailed site-specific remedial design.

Due to file size, the documents are available via an FTP site. A list of documents on the FTP site

and instructions to access the FTP site are provided below. This FTP site can be used by EPA's partners if you would like to provide them the below instructions for download. Please note that due to file size we are not providing a compiled PDF of the entire document. Rather, we are providing an individual PDF of the main text, tables, and figures, as well as a compiled PDF of each appendix.

- **PDF:** *Combined Sediment Remedy Basis of Design and Preliminary Design Report with tables/figures but no appendices*
- **Folder:** Appendices
  - **PDF:** Appendix A Pre-Remedial Design Data Gaps Data Summary Report
  - **PDF:** Appendix B EPA RI and ROD-Related Supporting Documents
  - **PDF:** Appendix C Documentation on Existing Overwater Structures, Outfalls, and HC&C System Infrastructure
  - **PDF:** Appendix D Final Gasco Sediments Site Sufficiency Assessment Summary Tables
  - **PDF:** Appendix E Fate and Transport Modeling Analysis in Support of Buried Contamination Evaluation
  - **PDF:** Appendix F Structural Inspection Report (KPF)
  - **PDF:** Appendix G Chemical Dissolved Phase Chemical Isolation Modeling in Support of Capping as a Remedy
  - **PDF:** Appendix H Sediment DNAPL Mobility Assessment
  - **PDF:** Appendix I Ebullition-Based DNAPL Mass Flux Assessment
  - **PDF:** Appendix J Ebullition Laboratory and Modeling Studies to Inform Cap Design Evaluations
  - **PDF:** Appendix K Summary of Final Cap Modeling and Long-Term Cap Modeling Approach – Gasco Sediments Site (June 25, 2019)
  - **PDF:** Appendix L Depth of Contamination Surface Delineation
  - **PDF:** Appendix M NW Natural's Additional Revised Gasco Sediments Site Dredge and Cover Design, Implementation, Verification, and Closeout Approach Memorandum (June 3, 2019)
  - **PDF:** Appendix N Analytical Results (Section 10)
  - **PDF:** Appendix O Preliminary Mitigation Evaluation Methods
  - **PDF:** Appendix P Biological Assessment Outline
  - **PDF:** Appendix Q Clean Water Act Section 404(b)(1) Outline
  - **PDF:** Appendix R Site-Specific Water Quality Barrier Control Technical Evaluation and Selection
  - **PDF:** Appendix S Draft Water Quality Monitoring Plan and Quality Assurance Outline
  - **PDF:** Appendix T Table of Contents for Design Specifications and Drawings

#### **Instructions to access the FTP:**

To access the FTP site automatically using Windows Explorer please follow the steps below for your version of Windows:

- **Windows 7:** Click Start -> and click in the search box; **Windows 8.1/10:** Right-Click Start -> Run
- Copy/Paste the following line into the "Open" box for XP/8.1/10 or the "Search" box for

Windows 7 and hit "enter"

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- You should now be logged into the site using Windows Explorer. You can use copy/paste to move files to or from the site

To access the FTP site manually using a FTP browser like [CoreFTP](#) or Windows Explorer please use the info below.

- Site URL:
- Username
- Password:

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To access the FTP site via web browser please follow the steps below.

- Click on the following link: **REDACTED**
- Input the username and password that are listed in the above section
- Use the tools available directly to the site to download or upload

Please do not hesitate to let Bob or me know if you have any questions during your team's review. Regards.

Jen Mott  
Project Coordinator  
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**GASCO0055970**