

Memorandum

December 15, 2023

To: Timothy L. Westcott, 13th Coast Guard District PATON Manager
From: Ryan Barth, PE, Anchor QEA
cc: Robert Wyatt, NW Natural
Patty Dost, Pearl Legal Group
Hunter Young, U.S. Environmental Protection Agency

Re: Revised Private Aids to Navigation Application

On behalf of NW Natural, this memorandum is to submit the Private Aids to Navigation (PATON) Application (CG-2554) for the installation of four buoys 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 66. The proposed buoys shall be used to demarcate the perimeter of the In Situ Stabilization and Solidification (ISS) Field Pilot Study (FPS) footprint and notify vessel operators that the FPS footprint should not be disturbed. The FPS is being conducted as part of a U.S. Environmental Protection Agency (EPA) Superfund cleanup action, and post-construction sampling is required to measure potential diffusive flux of contaminants from the surface of ISS-treated sediment. The proposed PATON would prohibit vessel activities that could disturb the post-construction sampling ports. The remainder of this memorandum provides the background and purpose for this request and information required for the proposed PATON.

This revised memorandum addresses the feedback provided by Timothy L. Westcott of the U.S. Coast Guard on October 3, 2023.

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 ISS treatment technology in the nearshore area of the site. This includes obtaining information to optimize ISS construction means and methods.

The FPS consists of a 2,224-square-foot area within the Site that underwent ISS treatment. A series of 3-foot and 8-foot-diameter sediment mix columns were installed to stabilize and solidify contaminated sediment within the FPS footprint. Each column was advanced to approximately

30 feet below mudline and mixed with cementitious treatment grout. The columns were 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 to measure potential chemical diffusive flux from the ISS-treated sediment surface. 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 to install four nearshore buoys in a portion of the total FPS footprint (outside the navigation channel; Figure 2) to demarcate the 2,023-square-foot area that will contain the sampling ports and notify vessel operators that this area should not be disturbed. Note, in the future, EPA may determine that the FPS footprint should be modified as part of a future final remedy of the Site, and any PATON established is not intended to restrict such potentially appropriate activities.

In addition to the proposed buoy placement, a memorandum was originally submitted to the U.S. Coast Guard on September 21, 2023, requesting the establishment of a regulated navigation area (RNA) at the Site to further prevent disturbance to the FPS footprint. It is our understanding that the RNA request will be processed concurrently with this PATON application.

Required Information

Specific details, as requested in 33 CFR 66.01-5, related to this request are provided as follows:

1. **The proposed position of the aid to navigation by latitude and longitude as determined by GPS or differential GPS:** Figure 2 depicts the proposed buoy locations, and Table 1 contains the coordinates for each buoy location.
2. **The name and address of the person at whose expense the aid will be maintained:** Robert Wyatt, NW Natural, 250 SW Taylor Street, Portland, Oregon 97204.
3. **The name and address of the person who will maintain the aid to navigation:** Robert Wyatt, NW Natural, 250 SW Taylor Street, Portland, Oregon 97204.
4. **The time and dates during which it is proposed to operate the aid:** The PATON 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.
5. **The necessity for the aid:** The sampling ports must remain intact and undisturbed to avoid impacting the EPA-approved sampling.
6. **For buoys: Shape, color, number, or letter, depth of water in which located or height above water:** A description of the buoys is provided in Attachment A. Additionally, the buoys will have orange light reflective markings with 2-inch-wide tape and black lettering that is as large as possible. Regulatory information regarding the RNA will be indicated on the buoys.

Please provide documentation that this memorandum has been received and a status update of the rule-making process to establish the PATON. 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 Buoy Locations

Point	Latitude ¹	Longitude ¹
1	45° 34' 45.65"	122° 45' 21.73"
2	45° 34' 45.32"	122° 45' 22.00"
3	45° 34' 45.39"	122° 45' 21.09"
4	45° 34' 45.06"	122° 45' 21.36"

Note:

1. The coordinates are in State Plane Oregon North American Datum of 1983 (international feet).

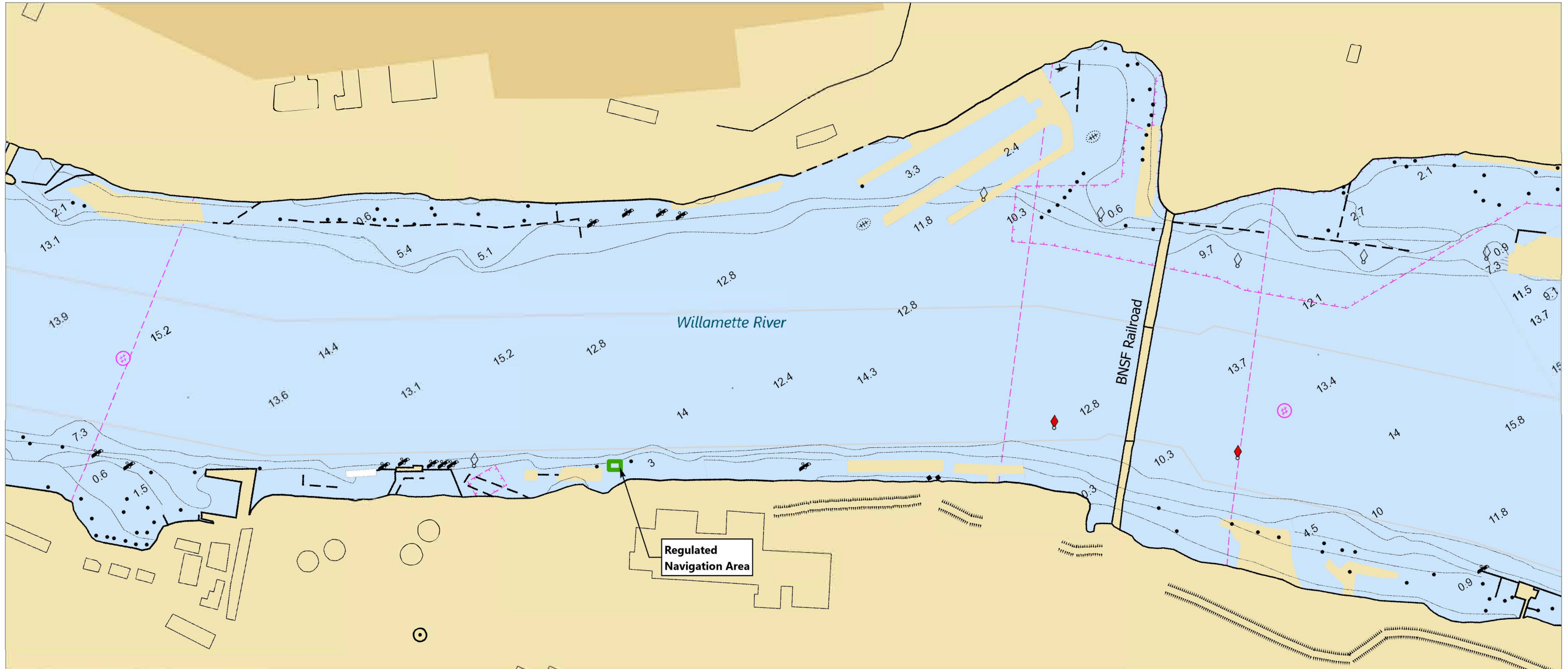
Reference

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

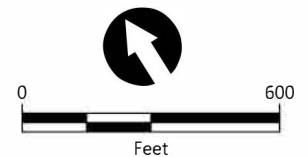
- Figure 1 Site Vicinity
- Figure 2 Proposed Buoy Locations
- Attachment A Private Aids to Navigation Application (CG-2554)

Figures



LEGEND:
■ Field Pilot Study Footprint

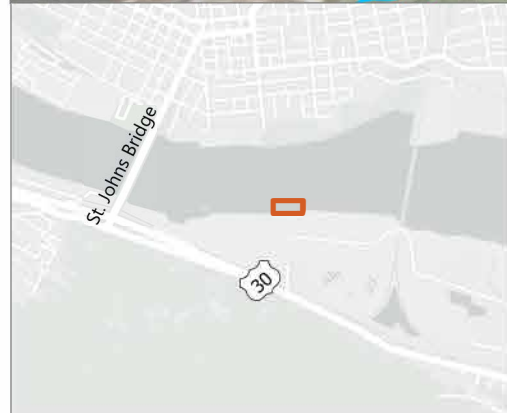
NOTE:
 1. Chart data from NOAA Electronic Navigational Charts (ENC)



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Figure 1
Site Vicinity
 Revised Private Aids to Navigation Application
 Gasco Sediments Project Area
GASCO0067521



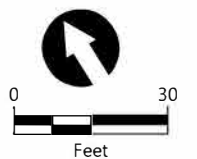
LEGEND:

- ▭ Field Pilot Study Footprint
- Ordinary High Water (+18 ft COP)
- Ordinary Low Water (+3 ft COP)
- ▭ Proposed Buoy Location

NOTE:

1. Aerial Imagery from City of Portland, 2022.
2. Horizontal Datum: GCS NAD83

COP: City of Portland Datum



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Figure 2
Proposed Buoy Locations
 Revised Private Aids to Navigation Application
 Gasco Sediments Project Area
GASCO0067522

Attachment A

Private Aids to Navigation Application (CG-2554)

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