

## REDACTED

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**From:** Taku Fuji <tfuji@anchorqea.com>  
**Sent:** Wednesday, January 25, 2023 7:53 AM  
**To:** THOMAS Wesley \* DEQ <Wesley.THOMAS@deq.oregon.gov>  
**Cc:** Bob Wyatt <rjw@nwnatural.com>; Patricia Dost <pdost@pearllegalgroup.com>; SEIDEL Paul \* DEQ <Paul.SEIDEL@deq.oregon.gov>; HAFLEY Dan \* DEQ <Dan.HAFLEY@deq.oregon.gov>; Heidi Nelson <Heidi.NELSON@state.or.us>; LARSEN Henning \* DEQ <Henning.LARSEN@deq.oregon.gov>; PETERSON Jenn L \* DEQ <Jenn.L.PETERSON@deq.oregon.gov>; POULSEN Mike \* DEQ <Mike.POULSEN@deq.oregon.gov>; PAULIK Blair \* DEQ <Blair.PAULIK@deq.oregon.gov>; Myron Burr <Myron.Burr@siltronic.com>; Mike Murray <mmurray@maulfoster.com>; David Rabino <David.Rabino@jordanramis.com>; Halah Voges <hvoges@anchorqea.com>; Ryan Barth <rbarth@anchorqea.com>; Rob Ede <robe@hahnenv.com>; John Renda <jrenda@anchorqea.com>; Jen Mott <jmott@anchorqea.com>; Young, Hunter <young.hunter@epa.gov>; Peterson, Lance <petersonle@cdmsmith.com>; Azhar, Wardah <azharw@cdmsmith.com>  
**Subject:** RE: Gasco OU Draft Feasibility Study Comprehensive Data Gaps Work Plan

Good morning, Wes,

On behalf of NW Natural, please find attached a Response to Comment Matrix (RTC) prepared in response to DEQ comments on the Draft Feasibility Study Comprehensive Data Gaps Work Plan (DGWP) received on November 15, 2022. This RTC and associated materials were developed based on the meetings held between Anchor QEA and DEQ on December 15, 2022, and January 6, 2023, and supplemental information provided to Anchor QEA by DEQ in an email on December 20, 2022. As discussed with DEQ, this RTC was prepared in lieu of revising the DGWP and is provided to DEQ for review and approval of the DGWP. NW Natural has added the requested additional soil samples included in DEQ's General Comment No. 7 to the DGWP. The NW Natural responses in the RTC identify the specific tables and figures that were updated in response to DEQ comments, and the tables and figures attached to the RTC include all the tables and figures from the DGWP to provide a comprehensive package that summarizes the DGWP sampling program. Also attached to the RTC are a series of the supplemental tables that provide the summary statistics and risk-based screening of herbicide data available on the Siltronic GSA as requested in DEQ's General Comment No. 6. This

information is provided to support the conclusion that herbicides are not present at levels of concern and can be excluded from the DGWP sampling program.

Let us know if there are any questions or concerns as you review the RTC and associated materials. We look forward to the approval of the DGWP and the initiation of this sampling program.

Thanks.

**Taku Fuji, Ph.D.** | he/him

**ANCHOR QEA, LLC**

[tfuji@anchorqea.com](mailto:tfuji@anchorqea.com)

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**From:** THOMAS Wesley \* DEQ <[Wesley.THOMAS@deq.oregon.gov](mailto:Wesley.THOMAS@deq.oregon.gov)>

**Sent:** Tuesday, November 15, 2022 3:15 PM

**To:** Bob Wyatt <[rjw@nwnatural.com](mailto:rjw@nwnatural.com)>

**Cc:** Patricia Dost <[pdost@pearllegalgroup.com](mailto:pdost@pearllegalgroup.com)>; SEIDEL Paul \* DEQ <[Paul.SEIDEL@deq.oregon.gov](mailto:Paul.SEIDEL@deq.oregon.gov)>; HAFLEY Dan \* DEQ <[Dan.HAFLEY@deq.oregon.gov](mailto:Dan.HAFLEY@deq.oregon.gov)>; Heidi Nelson <[Heidi.NELSON@state.or.us](mailto:Heidi.NELSON@state.or.us)>; LARSEN Henning \* DEQ <[Henning.LARSEN@deq.oregon.gov](mailto:Henning.LARSEN@deq.oregon.gov)>; PETERSON Jenn L \* DEQ <[Jenn.L.PETERSON@deq.oregon.gov](mailto:Jenn.L.PETERSON@deq.oregon.gov)>; POULSEN Mike \* DEQ <[Mike.POULSEN@deq.oregon.gov](mailto:Mike.POULSEN@deq.oregon.gov)>; PAULIK Blair \* DEQ <[Blair.PAULIK@deq.oregon.gov](mailto:Blair.PAULIK@deq.oregon.gov)>; Myron Burr <[Myron.Burr@siltronic.com](mailto:Myron.Burr@siltronic.com)>; Mike Murray <[mmurray@maulfooster.com](mailto:mmurray@maulfooster.com)>; David Rabino <[David.Rabino@jordanramis.com](mailto:David.Rabino@jordanramis.com)>; Halah Voges <[hvoges@anchorqea.com](mailto:hvoges@anchorqea.com)>; Taku Fuji <[tfuji@anchorqea.com](mailto:tfuji@anchorqea.com)>; Ryan Barth <[rbarth@anchorqea.com](mailto:rbarth@anchorqea.com)>; Rob Ede <[robe@hahnenv.com](mailto:robe@hahnenv.com)>; John Renda <[jrenda@anchorqea.com](mailto:jrenda@anchorqea.com)>; Jen Mott <[jmott@anchorqea.com](mailto:jmott@anchorqea.com)>; Young, Hunter <[Young.Hunter@epa.gov](mailto:Young.Hunter@epa.gov)>; Peterson, Lance <[peterstone@cdmsmith.com](mailto:peterstone@cdmsmith.com)>; Azhar, Wardah <[azharw@cdmsmith.com](mailto:azharw@cdmsmith.com)>

**Subject:** RE: Gasco OU Draft Feasibility Study Comprehensive Data Gaps Work Plan

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Bob,

DEQ has reviewed the Draft Feasibility Study Comprehensive Data Gaps Work Plan (DGWP) that was prepared and submitted by Anchor QEA, LLC on behalf of NW Natural on September 13, 2022. The DGWP was prepared in response to our April 11, 2022 General Comment #3 to the Draft Remedial Investigation/Human Health and Ecological Risk Assessment for the Siltronic GSA (Draft RI/HERA Addendum). General Comment #3 requested additional sampling to characterize “data gap COIs,” including herbicides and pesticides, polychlorinated biphenyls, and dioxin/furans, and to improve sampling density for Gasco contaminants of concern (COCs) in the southern portion of the Siltronic GSA.

I have attached our comments to the Draft DGWP. In general, the Draft DGWP does not provide enough information to justify the proposed sampling scope of work. Please either prepare a “response to comment matrix” providing the necessary information to resolve our comments below or submit a revised

DGWP that addresses our comments.

Please let me know if you have any questions regarding the attached comments.

Regards,

Wes

**Wesley Thomas, P.E.**

Project Manager/Environmental Engineer

O: 503-229-6932

M: 971-263-8822

[Wesley.Thomas@deq.oregon.gov](mailto:Wesley.Thomas@deq.oregon.gov)

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**From:** Taku Fuji <[tfuji@anchoragea.com](mailto:tfuji@anchoragea.com)>

**Sent:** Tuesday, September 13, 2022 9:09 AM

**To:** THOMAS Wesley \* DEQ <[Wesley.THOMAS@deq.oregon.gov](mailto:Wesley.THOMAS@deq.oregon.gov)>

**Cc:** Bob Wyatt <[rjw@nwnatural.com](mailto:rjw@nwnatural.com)>; Patricia Dost <[pdost@pearllegalgroup.com](mailto:pdost@pearllegalgroup.com)>; SEIDEL Paul \* DEQ <[Paul.SEIDEL@deq.oregon.gov](mailto:Paul.SEIDEL@deq.oregon.gov)>; HAFLEY Dan \* DEQ <[Dan.HAFLEY@deq.oregon.gov](mailto:Dan.HAFLEY@deq.oregon.gov)>; Heidi Nelson <[Heidi.NELSON@state.or.us](mailto:Heidi.NELSON@state.or.us)>; LARSEN Henning \* DEQ <[Henning.LARSEN@deq.oregon.gov](mailto:Henning.LARSEN@deq.oregon.gov)>; Myron Burr <[Myron.Burr@siltronic.com](mailto:Myron.Burr@siltronic.com)>; Mike Murray <[mmurray@maulfoster.com](mailto:mmurray@maulfoster.com)>; David Rabino <[David.Rabino@jordanramis.com](mailto:David.Rabino@jordanramis.com)>; Halah Voges <[hvoges@anchoragea.com](mailto:hvoges@anchoragea.com)>; Ryan Barth <[rbarth@anchoragea.com](mailto:rbarth@anchoragea.com)>; Rob Ede <[robe@hahnav.com](mailto:robe@hahnav.com)>; John Renda <[jrenda@anchoragea.com](mailto:jrenda@anchoragea.com)>; Jen Mott <[jmott@anchoragea.com](mailto:jmott@anchoragea.com)>

**Subject:** Gasco OU Draft Feasibility Study Comprehensive Data Gaps Work Plan

Wes,

On behalf of NW Natural, please find attached the Draft Feasibility Study Comprehensive Data Gaps Work Plan for review. The *Draft Remedial Investigation/Human Health and Ecological Risk Assessment Addendum (RI/HERA Addendum) for the Siltronic Geographic Subarea (Siltronic GSA)* identified chlorinated herbicides and pesticides, polychlorinated biphenyls, and dioxins/furans as contaminants with limited data within the RI/HERA Addendum datasets for fill soil and Fill Water Bearing Zone (Fill WBZ) groundwater on the Siltronic GSA. The Oregon Department of Environmental Quality's comments on the draft RI/HERA Addendum provided on April 11, 2022, requested that NW Natural prepare and submit a work plan to address all remaining Feasibility Study data gaps. The attached work plan provides the proposed scope of work to address the Feasibility Study data gaps identified in the RI/HERA Addendum and the groundwater pumping tests to provide supplemental Fill WBZ hydraulic conductivity data. This work plan addresses all remaining FS data gaps for the Gasco OU.

The attached PDF provides the text, tables, figures, and appendices of the work plan. The attached excel file is a data export of the Siltronic fill soil and groundwater data for the Siltronic GSA that is Appendix B of the work plan.

Please feel free to contact me with any questions that arise during your review of the attached materials.

Thanks!

**Taku Fuji, Ph.D.**

**ANCHOR QEA, LLC**

[tfuji@anchorqea.com](mailto:tfuji@anchorqea.com)

6720 S. Macadam Ave, Suite 125

Portland, OR 97219

DD 503.972.5002

C 503.459.1088

**ANCHOR QEA, LLC**

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