
REDACTED

From: Taku Fuji <tfuji@anchorqea.com>

Sent: Friday, March 10, 2023 1:20 PM

To: Wesley Thomas <Wesley.Thomas@deq.state.or.us>

Cc: LARSEN Henning * DEQ <Henning.LARSEN@deq.oregon.gov>; POULSEN.Mike@deq.state.or.us; Jennifer Petersen <jenn.l.peterson@deq.oregon.gov>; Bob Wyatt <rjw@nwnatural.com>; Patricia Dost <pdost@pearllegalgroup.com>; Halah Voges <hvoges@anchorqea.com>; Rob Ede <robe@hahnenv.com>; Ryan Barth <rbarth@anchorqea.com>; Jen Mott <jmott@anchorqea.com>

Subject: Gasco OU - Human Health COC and PRG Tables and RBDM/RBC Workbooks for Review

Hello Wes,

Please find attached the tables (in PDF) and the RBDM/TPH RBC Excel workbooks that were presented and discussed with DEQ during the Human Health PRG Meeting held on February 8, 2023. These are provided for your review. As discussed with DEQ on February 8th, we are submitting these HH COC and PRG Tables and RBDM/TPH workbooks to DEQ in lieu of a formal PRG deliverable.

Attached for your review are the following tables and excel workbooks:

1. Tables 1 and 2 present the Human Health COCs and PRGs for surface soil.
2. Tables 3 and 4 present the Human Health COCs and PRGs for subsurface soil.
3. Tables 5 and 6 present the Human Health COCs and PRGs for Fill WBZ groundwater.
4. Tables 7 and 8 present the Human Health COCs and PRGs for Alluvium WBZ groundwater.
5. Table 9 presents the soil background evaluation for the Gasco GSAs, Siltronic GSA, and Doane Creek Area to identify metals that are at background levels and do not need further consideration in the Gasco OU FS.
6. Table 10 presents the site-specific TPH RBCs calculated in 2014 for the HERA, in 2018 for the Interim Feasibility Study (IFS), and in 2021 by DEQ as part of the PRG memorandum

(December 16, 2021).

7. Tables 11 and 13 present some of the differences noted in the 2018 and 2021 TPH and RBDM workbooks for various parameters used to calculate the RBCs for DEQ review.
8. Table 12 presents the Construction and Excavation Worker chronic and subchronic Site-Specific TPH RBCs.
9. A “zip” file that contains the following DEQ RBDM and TPH RBC workbooks in four subfolders:
 - a. A blank copy of the 2018 RBDM workbook (2018 RBDM Folder).
 - b. A copy of the 2018 RBDM workbook used to calculate the subchronic RBCs/PRGs for thallium, carbazole, and dibenzofuran (2018 SubChron RBDM).
 - c. Copies of the five site-specific 2018 TPH RBC workbooks used to calculate the revised site-specific TPH RBCs for the IFS (2018 TPH RBC).
 - d. Copies of the five site-specific DEQ TPH RBC workbooks provided to NW Natural in 2021 as part of the DEQ PRG memorandum (2021 TPH RBC).

We will be scheduling a technical meeting with Mike Poulsen to discuss the TPH RBC and RBDM workbooks and will follow-up in a separate email with some dates and times for this meeting.

At the February 8th meeting, DEQ requested that NW Natural provide proposals for how the site-specific TPH RBCs would be applied to surface/subsurface soil samples and Fill WBZ groundwater monitoring wells and how the Upper Alluvium WBZ groundwater would be evaluated in the Gasco OU FS as it relates to the potential occupational use of Lower and Deep Lower Alluvium WBZ groundwater. The proposal for the site-specific TPH RBCs is that they will be applied in the FS consistent with the methods used to apply the site-specific TPH RBCs in the HERA and HERA Addendum to soil and Fill WBZ groundwater. The proposal for the evaluation of the Upper Alluvium WBZ groundwater is that the portion of the plume within the Upper Alluvium WBZ that extends into the Lower Alluvium WBZ and Deep Lower Alluvium WBZ at concentrations greater than PRGs would be considered as part of FS cleanup evaluations of the Lower Alluvium WBZ and Deep Lower Alluvium WBZ. NW Natural will discuss these proposals in greater detail in upcoming PRG meetings with DEQ.

Thanks!

Taku Fuji, Ph.D. | he/him

ANCHOR QEA, LLC

tfuji@anchorqea.com

6720 S. Macadam Ave, Suite 125

Portland, OR 97219

DD 503.972.5002

C 503.459.1088

ANCHOR QEA, LLC

Please consider the environment before printing this email.

This electronic message transmission contains information that may be confidential and/or privileged work product prepared in anticipation of litigation. The information is intended for the use of the individual or entity named above. If you are not the intended recipient, please be aware that any disclosure, copying distribution or use of the contents of this information is prohibited. If you have received this electronic transmission in error, please notify us by telephone at (503)-924-1108.