



Sevenson Environmental Services
2749 Lockport Road
Niagara Falls, NY 14305
Phone 716.284.0431
Fax 716.284.1796

May 22, 2023

Mr. Mark Krening
Waste Management, Inc.
7227 N.E. 55th Avenue
Portland, OR 97218

Re: NW Natural Source Control Groundwater Treatment Facility – Siltronic Pretreatment Plant Purge Water and Decontamination Tank (T-103. #15) Residuals.

Dear Mr. Krening:

On behalf of NW Natural, Sevenson Environmental Services, Inc. (SES) has prepared the attached waste disposal package for Waste Management, Inc. review and acceptance. This profile package, inclusive of analytical testing results, is for the disposal of residual materials consisting of sands, silts, oily solids, and other media that have settled out from contaminated groundwater or sampling decontamination water from site cleanup activities. These solids accumulate within the Purge Water and Decontamination Tank (T-103) that is a plumbed component to the Siltronic Pretreatment Plant.

The Siltronic Pre-Treatment Facility is designed to remove spent trichloroethene (TCE) and its degradation products from the contaminated groundwater before it is plumbed to the Main Groundwater Treatment Plant for the NW Natural Gasco site for processing. Spent TCE and its degradation products are considered by the Oregon DEQ to be RCRA F002 listed hazardous waste constituents. Other contamination within the water discharged to this tank includes Manufactured Gas Plant (MGP)-derived constituents (e.g., petroleum constituents).

Based on the treatment of the spent TCE and its degradation products within the Siltronic Pre-Treatment Facility, the solids within this Purge Water and Decontamination Tank (T-103) are considered to be residues from the treatment of an F002 RCRA listed waste at the time of tank cleanout.

NW Natural is presumptively managing the spent carbon media from the Siltronic Pretreatment Plant as RCRA F002-listed hazardous waste. NW Natural understands the “derived-from” rule to require presumptive management of these residuals as RCRA F002-listed hazardous waste.

Sample data are attached to the profile from testing of the solid material accumulated within the water discharge box (T-103) located at Siltronic pretreatment plant. The sample of material within this box was submitted to Apex Laboratories, LLC on March 17, 2023 for analysis of: free liquids, total metals, leachable metals (toxicity characteristic leaching procedure-TCLP), total petroleum hydrocarbons (TPH), total cyanide, total volatile organic compounds (VOCs) and TCLP VOCs, and semi-volatile organic compounds (SVOCs).

Attached please find the profile for this waste stream (Profile OR344464). Also attached please find the Apex Laboratory analytical report (A3C0669) dated April 4, 2023 documenting the chemistry of the residual treatment materials, and Table 1, a summary of those testing results. The April 2023 analytical results confirm that the residuals in the drop box conform to the description included within previously approved profile OR344464, LDR Form, and Constituents Form.

As indicated on the laboratory testing and as described in the attached profile (OR344464), it is requested that Waste Management Inc. approve disposal of these contaminated treatment residuals as F002 hazardous waste at the Chemical Waste Management (CWM) RCRA Subtitle C permitted landfill in Arlington, Oregon. NW Natural anticipates the generation of similar quantities of accumulated residuals on a frequency of approximately three times per year. Prior to arranging for disposal of future accumulations of residuals from the Purge Water and Decontamination Tank (T-103) under Profile OR34464, sampling and characterization will be completed identical to that described herein in order to confirm the residuals match the profile in-place at that time. These data will be provided for Waste Management's information and use prior to disposal.

In response to the EZ Profile Addendum #D.7, requesting documentation regarding the State-mandated cleanup, NW Natural's Voluntary Agreement with DEQ, no. WMCVC-NWR-94-13, dated August 8, 1994, as amended July 19, 2006 has been previously provided to Waste Management.

Please contact me if you have any questions.

Thank You,



William Byrd
Sevenson Environmental Services

Cc: Robert Wyatt (NW Natural), Kathryn Williams (NW Natural), Patty Dost (Pearl Legal Group), Ryan Barth (Anchor QEA), Rob Ede (Hahn and Associates), Tim Stone (Anchor QEA), Jen Mott (Anchor QEA), Mike Crystal (Sevenson Environmental Services), Joe Burke (Sevenson Environmental Services), Wesley Thomas (ODEQ), Terence Driscoll (Aponowich, Driscoll & Associates, Inc.)

Enclosures:

Table 1— Purge Water and Decontamination Tank (T-103) #15
Waste Management Disposal Profile # OR344464
OR344464 Approval

Apex Laboratory Report #A3C0669