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Sent: Wednesday, August 2, 2023 4:57 PM

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Subject: NW Natural Proposal for a Completeness Check for Potential Cross-Media COCs in the Gasco OU FS

Wes,

NW Natural would like to present this proposal to satisfy a new evaluation being requested by DEQ for the Gasco OU FS consisting of a “completeness check”. We were not able to identify any DEQ guidance for this kind of evaluation, so developed this approach for your consideration.

It is our understanding that DEQ would like to understand where potentially unacceptable risks for a COC in one media was not found to pose potentially unacceptable risk in another media. The results of this evaluation would be used strictly to evaluate the long-term effectiveness of remedies evaluated within the FS in hypothetical scenarios where COCs might be transferred from a media where risks have been identified to another media where risks from those contaminants have not been identified.

We recommend adopting the methodology presented in the proposal in lieu of trying to develop additional PRGs as suggested by DEQ during the July 28, 2023, meeting and mentioned in DEQ’s comments related to human health and ecological PRGs on July 14 and July 17, 2023. We believe this proposal will achieve DEQ’s objective to ensure that the technical evaluation of remedial alternatives in the FS can be completed appropriately.

NW Natural will prepare a series of “Cross-Media COC Tables”. The tables will present:

1. COCs that pose potential human health groundwater risk but do not pose potential human health soil risk.
2. COCs that pose potential ecological groundwater risk but do not pose potential ecological soil risk.
3. COCs that pose potential human health soil risk but do not pose potential human health groundwater risk.
4. COCs that pose potential ecological soil risk but do not pose potential ecological groundwater risk.

These tables will provide context for each COC and media type by presenting summary statistics regarding the COC in the medium that it is identified as a COC. These tables will not be used to identify new COCs in media that do not currently show unacceptable risk for those COCs, or to identify potential data gaps as related to risk assessment or FS evaluation purposes.

NW Natural believes that these tables will allow DEQ to meet the objectives of assuring the cross-media completeness objective discussed on July 28th. These tables will be included in the Gasco OU FS. They will be used to assure all COCs for all media have been considered and will fulfill the site-specific request for a “completeness” check of COCs with the potential for cross-media impacts. This list of potential cross-media COCs will also be used to ensure that selection of remedial alternatives in the FS is completed with an understanding of COCs with the potential for posing cross-media impacts.

The attached excel file has five tabs for the following Cross-Media COC Tables.

1. Human Health Fill WBZ Groundwater COCs That Are Not Human Health Soil COCs
2. Human Health Alluvium WBZ Groundwater COCs That Are Not Human Health Soil COCs
3. Ecological Fill WBZ Groundwater COCs That Are Not Ecological Surface Soil COCs
4. Ecological Alluvium WBZ Groundwater COCs That Are Not Ecological Surface Soil COCs
5. Ecological Surface Soil COCs That Are Not Ecological Groundwater COCs

The attached example tables are provided for your review. The COCs included in these tables are presented as examples. Final COCs and summary statistics will be based on FS data screening against PRGs. There are currently no human health soil COCs that are not human health groundwater COCs, thus there is no example cross-media COC table for this situation. If the FS screening identifies a need for such a table, it will be added to the FS.

These tables provide an appropriate method for identifying and providing context for evaluating the potential cross-media COCs in the FS, meeting DEQ’s the objectives for completeness, and assisting us to maintain the current schedule for FS submittal. We look forward to your review of this proposal and are happy to answer any questions or engage in further discussions on use of these tables in the FS.

Best regards.

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