



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

March 29, 2022

via electronic delivery

Rob Webb, Principal Engineer
Dalton Olmsted Fuglevand
1236 Finn Hill Road
Poulsbo, WA 98370

RE: 2022 Johnson Lake, Source Control Review
ECSI # 2086

Dear Rob Webb:

The Oregon Department of Environmental Quality (DEQ) reviewed the February 25, 2022 *Draft Johnson Lake, Upland Source Control Review Report for Owens Brockway Glass container, Inc* (Source Control Review) prepared by Dalton, Olmsted, and Fuglevand on behalf of Owens Brockway Glass Container, Inc. (Owens-Brockway). The Source Control Review summarizes work completed on stormwater discharges at outfalls from the Owens Brockway facility (5850 NE 92nd Drive in Portland, Oregon; ECSI# 2086) to Johnson Lake, per a request by DEQ in a December 2, 2021 email.

DEQ's comments on the documents are presented below. Please review these comments and submit a Revised Draft Source Control Review, incorporating these comments within 60 days.

General Comments

1. Please provide individual references for all documents cited with an accurate date for the information included in this report. The reference provided, DEQ 2022, is used throughout the document and is misleading. As indicated in the disclaimer for ECSI, the site provides "working information" used by DEQ's Environmental Cleanup Section and:
 - a. Some information in ECSI may be unconfirmed, outdated, or incomplete.
 - b. Data in ECSI is summary in nature, rather than comprehensive.
 - c. There may be contaminated sites in Oregon that are unknown to DEQ and do not appear in ECSI. Conversely, the appearance of a site in ECSI does not necessarily mean that the site is contaminated.
 - d. Information in ECSI is subject to change at any time.
2. Figures 2.1, 2.2, and 4.1 are not included in the document, as referenced in the Table of Contents and elsewhere in throughout the sections. These are important figures to understand the site layout and the drainage areas for the outfalls discussed in this document.

Section-Specific Comments

3. Section 1.3.2 and 3.4. It should be noted that the potential contaminants of interest identified do not include a complete list when considering recontamination of the remedy that was implemented at the Site. Site-specific contaminants of interest include metals, PCBs, and PAHs.
4. Section 2.3.1. This section states that annual monitoring is ongoing. Please elaborate on the activities and reporting of these annual monitoring activities.
5. Section 2.3.2. Clarify whether initial control measures were installed in May 2020 or May 2021.
6. Section 4. Please describe other ongoing BMPs that are implemented at the upland site, including parking lot sweepings, biobags around catch basins, catch-basin cleanouts, secondary containment berms, etc. along with schedule of the activities, if applicable.
7. Section 4.2. See DEQ's comment to Section 4 above and include any site-specific BMPs that are related to the new transformer site and Outfall 6 in Section 4.
8. Section 4.2. Please see general comment #1 above. The following statement is misleading, "...or current sources of PCBs connected with this outfall." DEQ has requested this report to evaluate the possibility of any current sources from the upland to this outfall.
9. Section 5.1.1. Please describe the storm event that was represented by the sample results shown. For instance, the table should indicate the antecedent dry period, the time of the sample collection, and the volume/intensity of rainfall. Please evaluate this information when drawing conclusions about the sampling results.
10. Section 5.2. Per DEQ's letter, dated December 2, 2021, please include the historic results for the 1200-Z permit, which should include the oil and grease, copper, lead, zinc, iron and BOD₅ (and others listed in Table 3.1) for all outfalls samples, in addition to the two constituents of interest at the two outfalls that are currently presented. This historical data provides a basis of comparison for trends between these permitted analytes and provide additional information to determine if the two contaminants of interest are representative of other constituents, which may be present at the property and are not regulated under the 1200-Z permit.
11. Section 6.2.1. The information currently reported for the spill from Owens Brockway is not complete. Based on the notes from OERS Report #2018-2097, and an on-site visit from DEQ representative, Mike Greenburg, there was sheen observed entering Johnson Lake and NRC contained that with booms at the outfall to Johnson Lake. Sheen was also picked up with absorbents. The report goes on to state that was a food grade oil from their glass processing machinery, with up to 50 gallons of oil released. The presence of the sheen should be discussed, as the oil was exposed to heat during the fire. The OERS report further indicates DEQ requested the analysis of PAHs and PCBs during the site visit, which were not analyzed, "due to errors in the collection". The presence of sheen on the water from this incident were also noted in a letter from Owen-Brockway Glass Container, Inc. to DEQ, RE: September 10, 2018 Fire and Water Discharge dated September 18, 2018. It should be noted that the lack of the analytical results for PAHs and PCBs represents a data gap related to this spill event.

12. Section 8. This section states that only one benchmark exceedance has occurred at Outfall 2 and one at Outfall 6 since 2019. Similarly, the cover letter states that “currently none of the discharges are out of compliance with permit levels.” However, Outfall 2 has only had two samples collected in this time and the most recent sample exceeded the permit benchmark. More samples will need to be collected, including after construction is completed in April 2022, to evaluate whether or not sources of suspended solids have been adequately controlled.

Please review DEQs comments and contact me at (503) 229-5538 or franziska.landes@deq.oregon.gov if you have any questions.

Sincerely,



Franziska Landes
Project Manager and Data Analyst
Northwest Region Cleanup Section

Ec: Sue Sholl, Owens Illinois
Sarah Van Glubt, DEQ
Heidi Nelson, DEQ
Jennifer Peterson, DEQ
David Farrer, Oregon Health Authority
Andrew Davidson, City of Portland