



May 27, 2022

*via electronic delivery*

Franziska Landes  
Project Manager and Data Analyst  
Northwest Region Cleanup Section

RE: 2022 Johnson Lake, Source Control Review ECSI # 2086  
Response to ODEQ Letter dated March 29, 2022

Dear Franziska,

Thank you for your comments on the February 25, 2022, *Draft Johnson Lake, Upland Source Control Review Report for Owens Brockway Glass Container, Inc.* (Source Control Review) we prepared on behalf of Owens Brockway Glass Container, Inc. (Owens-Brockway).

In response to your comments, we have prepared the following response to comments and have revised the Draft Johnson Lake, Upland Source Control Review Report accordingly.

**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  - a. Some information in ECSI may be unconfirmed, outdated, or incomplete.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.

***Response:*** Thank you for clarification on the ECSI information and data. The reference has been revised to the ECSI#1311 No Further Action Recommendation (DEQ 2012) and have included this in the reference section of the revised document.

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.

***Response:*** Figures 2.2, 2.2 and 4.1 have been included in the revised 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.

***Response:** Sections 1.3.2 and 3.4 have been revised. Section 1.3.2 now includes a more comprehensive summary of the contaminants of concern during the implementation of the remedy at the site and Section 3.4 now lists the available historic data from stormwater sampling for contaminants in addition to those requested in the December 2021 DEQ letter.*

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.

***Response:** Section 2.3.1 has been revised to include details on the required monitoring activities post remedy implementation.*

5. Section 2.3.2. Clarify whether initial control measures were installed in May 2020 or May 2021.

***Response:** Section 2.3.2 has been revised clarifying that interim control measures were performed in May 2020.*

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.

***Response:** Section 4.3 and Table 4.1 has been added to provide a summary of ongoing BMPs performed on the Property.*

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.

***Response:** The new transformer site is not in Drainage Basin A (the area that drains to Outfall 6), clean imported soils for the construction of a new transformer pad were stored in Drainage Basin A. As a result, no new transformer BMPs were necessary for Outfall 6 and existing BMPs for containment and spill response for Outfall 2 are already covered in the Stormwater Pollution Control Plan.*

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.

***Response:** References have been amended and the sentence has been clarified.*

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.

**Response:** *The ISGP does not require this type of information as part of routine monitoring activities and these details were not recorded. The ISGP requirements for sampling timing in relation to storm event timing and size were provided. In general, it takes a storm event greater than ~0.6 inch of rainfall in order for there to be discharge from Outfalls 2 and 6 due to infiltration within the swales prior to any discharge occurring.*

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.

**Response:** *Owens has included additional data (historic results for all outfalls sampled from December 2013 to March 2022) as requested per the comment above from DEQ's March 29, 2022, letter. However, DEQ's December 2, 2021, letter prefaced their historic data request with the following "Please provide DEQ with a summary of the work completed for the stormwater discharges that are currently out of compliance with the permit levels." As a result, only data related to discharges exceeding permit benchmarks was initially provided.*

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.

**Response:** *We are unable to locate any first-hand accounts documenting a sheen was observed on Johnson Lake during this event. The documentation provided to DEQ consistently states that sheen was observed in onsite drainage systems, but sheen was captured in onsite infrastructure and with booms onsite. These were later removed for offsite disposal by NRC. The documentation referenced from DEQ that references a sheen includes a letter to DEQ dated September 14, 2018 (we have no record of a letter dated*

*September 18, 2018) and OERS Report #2018-2097. Notes from OERS Report #2018-2097 discuss a potential transformer or substation fire, but no sub-stations or transformers caught fire, just a power pole in the substation. In addition, notes from OERS Report #2018-2097 discuss that the oil sources that were inadvertently picked up with cooling water and discharged to the storm drain were not expected to contain PCBs. Near the end of the OERS Report there is a note about “some light sheen observed entering Johnson Lake and NRC had contained that with boom and picked it up...” The notes appear incomplete in the copy of the OERS report provided for our review. However, the OERS Report note of sheen most likely is an error or oversimplification (e.g., “sheen was observed draining to storm drain that drains to the lake” would be correct). All other documentation confirms that NRC removed contaminated water and booms from the stormwater infrastructure onsite, not from Johnson Lake. The September 14, 2018 letter and the OERS Report #2018-2097 have been included in the report as attachments.*

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.

***Response:*** *Stormwater monitoring was performed on February 28 and March 21, 2022, those results have been included in the revised report. At least one additional sample event will be collected prior the end of June as required under the ISGP.*

If you have any questions or require any additional information, please feel free to contact me.

Sincerely,



Rob Webb, PE  
Dalton Olmsted & Fuglevand, Inc.