



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

July 20, 2022

via electronic delivery

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

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

Dear Rob Webb:

The Oregon Department of Environmental Quality (DEQ) reviewed the May 2022 *Revised Johnson Lake, Upland Source Control Review Report for Owens Brockway Glass Container, Inc.* (Revised Source Control Review) prepared by Dalton, Olmsted, and Fuglevand (DOF) on behalf of Owens Brockway Glass Container, Inc. (Owens-Brockway). The Revised 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.

On July 6, 2022, DEQ representatives performed a site visit to inspect the bioswales near Outfall 2 (OF2) and Outfall 6 (OF6). Based on our conversation with DOF representatives at the site visit, some additional work is planned for the OF6 bioswale area this fall, which will include additional planting and tree canopy management. DEQ agrees that this additional swale maintenance is warranted and recognizes the effort will provide additional erosion and sediment control and may further reduce TSS concentrations in OF6.

DEQ also observed the recent improvements completed by Owens-Brockway to the upland stormwater system and BMPs completed for the sedimentation manholes and vaults servicing OF2. The improvements to the upland system appeared to be in good condition and performing as designed. Please note - DEQ observed an isolated hydrocarbon sheen at the confluence of OF2 and Johnson Lake during this visit. The DOF representative on-site acknowledged this observation and also noted the need to determine the source in this location, once the water recedes.

After completing the site visit, DEQ fully considered the Revised Source Control Review. DEQ's comments on the document are presented below.

General Comments

1. DEQ would like to clarify the intended purpose of the Source Control Review. The source control measures outlined in the Revised Source Control Review appear to meet the objectives of the NPDES industrial stormwater general permit (ISGP) and associated Tier II

corrective actions. However, the constituents monitored as part of the ISGP do not include all constituents of concern in Johnson Lake sediments (e.g., PCBs). The Source Control Review was requested to understand the existing source control measures in place at the site and any potential impacts sources from the site may pose to the Johnson Lake sediment cap. However, while not anticipated at this time based on the current data set and DEQ's recent observations made during the site visit, additional source control measures may be warranted depending on the results of ongoing monitoring (i.e., fish tissue sampling and longer-term NPDES monitoring).

Section-Specific Comments

1. Section 4.2. DEQ observed the location of the new transformer site. Please update Figure 2.2 with the location of the new transformer and include any site-specific BMPs that are related to the new transformer site (i.e., new containment structure, etc.).
2. Section 4.3. Please provide a copy of the referenced Stormwater Pollution Control Plan for the site.
3. Section 6.2.1. The letter provided in Attachment B is a letter from DEQ to Owens-Brockway dated September 11, 2018. However, the text and response to comments indicates that Attachment B includes a letter to DEQ dated September 14, 2018. Please provide the letter to DEQ as referenced, if available.
4. Tables
 - a. Please include units for values included in Tables 5.2 through 5.6.
 - b. Please include all NPDES ISGP stormwater benchmark screening values and the screening level values for non-Portland Harbor sites from DEQ's Guidance for Evaluating the Stormwater pathway at Upland Sites, Appendix D (currently shown in Table 6.1 for those constituents that have them available), in Tables 5.2 through 5.6 and indicate any exceedances to the screening values, using shading or bolded text.
 - c. Please provide a reference for the screening values included in Table 6.1.

Please review these comments and submit a Final-Revised Source Control Review Report, incorporating these remaining comments within 60 days. Please contact me at (503) 709-8253 or sarah.vanglubt@deq.oregon.gov if you have any questions.

Sincerely,

Sarah Van Glubt

Sarah Van Glubt
Project Manager and Data Analyst
Northwest Region Cleanup Section

Cc: Sue Sholl, Owens Illinois
Franziska Landes, DEQ
Heidi Nelson, DEQ
David Farrer, Oregon Health Authority
Andrew Davidson, City of Portland