



September 13, 2022

*via electronic delivery*

Sarah Van Glubt  
Project Manager and Data Analyst  
Oregon Department of Environmental Quality  
Northwest Region Cleanup Section

RE: 2022 Johnson Lake, Revised Source Control Review ECSI # 2086  
Response to ODEQ Letter May 2022

Dear Sarah,

Thank you for your comments on the May 2022, *Johnson Lake, Revised 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 Johnson Lake, Revised Upland Source Control Review Report accordingly.

Prior to the general comments DEQ noted the presence of a hydrocarbon sheen at the confluence of OF2 and Johnson Lake during their July 6, 2022 site visit. Owens- Brockway has since inspected this area at reduced lake levels to check for possible sources of sheen. No sheen has been observed and no sources of the previously observed sheen have been identified based on the lower lake level.

#### **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).

***Response:*** *Comment acknowledged.*

**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.)

**Response:** *Figure 2.2 has been revised to include the location of the new transformer (transformer #26) and to be consistent with recent updates to the facility maps. No new BMPs were added to the SWPCP, as Transformer 26 was designed with similar BMPs to other transformers already onsite. Transformer 26 is visually inspected monthly for signs of leaks, damage, or corrosion and secondary containment is inspected for signs of leaks or damage as well. Secondary containment for the transformer in the substation enclosure is provided by the permeable gravel that surrounds the equipment, similar to transformers in the main transformer yard. A release of oil will penetrate into the surrounding gravel. In the event of a spill the Facility will respond using sorbent materials and remove impacted soil and gravel for disposal offsite. Containment is sized in excess of transformer capacity plus rain water, as per drawing # G-4314 (Attachment C to the Revised Source Control Report.).*

2. Section 4.3. Please provide a copy of the referenced Stormwater Pollution Control Plan for the site.

**Response:** *The most recent version of the SWPCP is provided as Attachment D to the Revised Source Control Report.*

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.

**Response:** *Attachment B has been updated to include the September 14, 2018 letter and a follow up October 8, 2018 letter and associated data packages. Section 6.2.1 has also been updated.*

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.

**Response:** *The tables have been revised as requested.*

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

Sincerely,

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Rob Webb, PE  
Dalton Olmsted & Fuglevand, Inc.

CC: John Cayton  
Susan Sholl

Attachments:  
Revised Source Control Report September 13, 2022