



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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May 25, 2022

via electronic delivery

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

RE: 2022 Johnson Lake, Fish Tissue Sampling
ECSI # 2086

Dear Rob Webb:

The Oregon Department of Environmental Quality (DEQ) reviewed the April 28, 2022 revised *Johnson Lake Fish Tissue Monitoring Study Sampling and Analysis Plan* (Sampling Plan) prepared by Grette Associates, LLC on behalf of Owens Brockway Glass Container, Inc. (Owens-Brockway). The sampling and analysis plan incorporated DEQ's comments on the fish tissue monitoring in Johnson Lake, located west of I-205 adjacent to the Owens Brockway Glass Container, Inc. facility (5850 NE 92nd Drive in Portland, Oregon; ECSI# 2086).

DEQ accepts this Sampling Plan with the following comments.

1. DEQ would like to review the compositing / analytical plan before fish processing or filleting. Please coordinate with DEQ during the sampling activities and provide an opportunity to review the fish collected (for example via a spreadsheet with all the fish information) before processing in order to finalize how to combine the fish into composites based on whole body / fillet, species, and size, etc.
2. RTC to DEQ Comment #3 Section 2.1, (b): Please revise the footnote to clarify: "The Large Whole-Fish category in the O&M Plan references target fish between 125 and 300 mm. In a comment letter dated March 29, 2022 (DEQ ECSI # 2086), DEQ stated that "the large whole-fish tissue type in the O&M Plan should be updated to reflect fish >350 mm in length ***consistent with the RI and Baseline Risk Assessment.***"
3. RTC to DEQ Comment #3 Section 2.1, (f): In Section 3.1, after the added statement about replicate samples, please include the language provided in the DEQ comment directly from the EPA guidance document which states "*Replicate composite samples should be as similar to each other as possible. In addition to being members of the same species, **individuals within each composite** should be of similar length (size) (see Section 6.1.1.6). The relative difference between the average length (size) of **individuals within any composite sample** from a given site and the average of the average lengths (sizes) of*

individuals in all composite samples from that site should not exceed 10 percent”.

4. RTC to DEQ Comment #4, Section 2.2: The document should be revised to state: “**Each** fish tissue sample composite will be created using equal mass from each individually homogenized fish **aliquot**”. Per definition in the SAP (Section 3.0), a sample aliquot is “A representative part or portion of a sample for analysis which is a fraction of the whole sample.”
5. While DEQ acknowledges that mercury is not a COC in the ROD, this information is important to accurately determine the health risk posed by people consuming fish from Johnson Lake. The additional mercury information would ensure that there are no remaining data gaps and allow OHA to reassess, and if the data support it, potentially lift the fish advisory. Without additional mercury data, OHA would default to the state-wide mercury advisory for bass of 2 meals/month in the event that the PCB levels indicate a less stringent advisory. DEQ continues to highly recommend that mercury be added to the analyte list. If Owens-Brockway chooses not to include mercury in the analysis, DEQ may request split samples of the fish tissue samples for an independent analysis.

Please contact DEQ when you have sampling dates planned. Please 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
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David Farrer, Oregon Health Authority
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