From:	THOMAS Wesley * DEQ
To:	THIESSEN Kenneth * DEQ
Cc:	DIGIUSTINO Rebecca * DEQ; LACEY David J * DEQ; DONAHOWER Peter * DEQ
Subject:	RE: ODOT stormwater to outfall WR-209 (Linnton area)
Date:	Wednesday, January 3, 2024 9:34:31 AM
Attachments:	2023-08-17_ODOT_WY2023_SupplementalMonitoringRpt.pdf

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Ken,

I suggest we set up a group call to discuss. Stormwater is not surface water, and the Table 17 surface water CULs do not apply directly to stormwater, which is why we evaluate stormwater using multiple lines of evidence.

ODOT has not sampled WR-209 (and doesn't currently plan to), and their FS concluded that a structural source control measure to treat ODOT's stormwater contribution (which is very small) was infeasible. However, ODOT has recently sampled WR-102, WR-203 and WR-202, which are the next three drainage basins down Highway 30 from WR-209, and ODOT is in the process of preparing a statistical evaluation of the data from those outfalls to make the case that WR-209 has similar characteristics and is adequately characterized.

While we have not seen the results of ODOT's statistical evaluation, the results we have from WR-102, WR-203, and WR-202 do not appear to be of concern. I've attached a tech memo with the results of the sampling.

Once we talk as a group, it would be good to propose another discussion with Laura and Hunter to close the loop.

Wes

Wesley Thomas, P.E.
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From: THIESSEN Kenneth * DEQ <Kenneth.THIESSEN@deq.oregon.gov>
Sent: Wednesday, January 3, 2024 9:14 AM
To: THOMAS Wesley * DEQ <Wesley.THOMAS@deq.oregon.gov>
Cc: DIGIUSTINO Rebecca * DEQ <Rebecca.Digiustino@deq.oregon.gov>; LACEY David J * DEQ <David.J.LACEY@deq.oregon.gov>; DONAHOWER Peter * DEQ <Peter.DONAHOWER@deq.oregon.gov>; THIESSEN Kenneth * DEQ <Kenneth.THIESSEN@deq.oregon.gov>
Subject: ODOT stormwater to outfall WR-209 (Linnton area)

Wes,
We met with Laura Hanna yesterday to discuss the WR-209 river outfall, and its confusing relationship with the Shore Terminals facility. You are the ODOT PM for Portland Harbor matters. Laura asked me to confer with you and she will confer with Hunter Young to coordinate a stormwater data exchange and determine what SCMs are being implemented on ODOT property and their effectiveness. Please recall that near the Shore Terminals site, runoff from Hwy 30 is piped down a steep embankment from the elevated highway and daylights in a pool near the base of the slope, from there it flows overland to a ditch alongside the railroad (the railroad is also ODOT land).

A pipe inlet is located in the railroad ditch which the collects the overland flow of stormwater from the highway and the railroad right of way. This pipe then runs beneath Shore Terminals tank farm #3 to its river outfall. No stormwater from the Shore Terminals facility is included in the WR-209 flow to the river, however, groundwater infiltrates the pipe on occasion creating a dry weather flow condition and preferential pathway for groundwater beneath tank farm #3 to the river. This is being evaluated with the groundwater pathway for the Shore Terminals site.

Shore Terminals removed legacy sediment and debris from the WR-209 pipe and performed two performance monitoring events on dry weather flow. The dry weather flow following this SCM looks good as compared against Table 17 surface water CULs. We are prepared to write a SCD for this pathway, (to be included in a comprehensive SCD for the site planned for 2024).

The stormwater flow through the WR-209 pipe however has Table 17 surface water CULs exceedances which DEQ has determined are not the responsibility of the Shore Terminals site. Per previous DEQ requests, this stormwater has been sampled on many occasions and has been screened against Table 17 CULs. Laura is concerned that these stormwater flows constitute a recontamination risk to the river and asked me to offer WR-209 stormwater data collected by Shore Terminals to you for your use on the ODOT PHSS project. DEQ does not intend to request further stormwater or dry weather flow sampling from the WR-209 outfall from Shore Terminals.

Thank you,
Ken

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