



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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May 7, 2024

via electronic delivery (email)

Victoria Wark
NuStar Energy
P.O. Box 781609
San Antonio, TX 78278

RE: Shore Terminals WR-209 Source Control Measures Report, Approval for the Groundwater to Surface Water Pathway. Shore Terminals, LLC., 9420 NW St. Helens Road, Portland, Oregon. ECSI #5130

Dear Ms. Wark,

The Oregon Department of Environmental Quality (DEQ) has reviewed the document entitled *Shore Terminals WR-209 Source Control Measures Report, Shore Terminals, LLC.*, dated January 20, 2023. This document provided information on the source control measure to remove legacy sediment from the WR-209 stormwater pipe between the railroad inlet and river outfall and provides performance monitoring results of dry weather flow. The WR-209 stormwater pipe transmits groundwater to the outfall during dry weather from groundwater intrusion into the pipe during occasional periods of elevated water table conditions. The WR-209 report was prepared on your behalf by GeoEngineers, Inc.

DEQ approves this source control measure as effective at reducing dissolved contaminants as evidenced by the performance monitoring dry weather flow results presented in the *WR-209 Source Control Measures Report*. DEQ has determined that this groundwater to surface water pathway source control measure is suitable for inclusion in the forthcoming Source Control Decision document being prepared by DEQ for the Shore Terminals facility.

The current *WR-209 Source Control Measures Report* is supported by several previous stormwater and dry weather flow investigations at the WR-209 pipe and outfall. This *WR-209 Source Control Measures Report* is focused on groundwater intrusion into the WR-209 pipe from beneath Shore Terminals Tank Farm #3, not on the stormwater that also flows through this pipe to the Willamette River from non-Shore Terminals upland sources.

Attached for your information is the United States Environmental Protection Agency comment letter, dated January 22, 2024, on your *WR-209 Source Control Measures Report*. The EPA comments will be addressed by DEQ in the forthcoming Source Control Decision for the Shore Terminals facility.

Please feel free to call me with questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Thiessen', with a stylized, flowing script.

Kenneth Thiessen, RG/CEG
Northwest Region Cleanup Section

Attachment:

EPA 2024, Region 10, Memorandum, EPA Comments on WR-209 Source Control Measures, Shore Terminals, LLC., Portland, Oregon. January 22, 2024.

Distribution:

Rebecca Digiustino, DEQ NWR
Katie Daugherty, RG, DEQ NWR
Dave Lacey, DEQ NWR
Laura Hanna, EPA Region 10
Ian McGuire, PE, GeoEngineers
Amanda Spencer, PE, RG, GeoEngineers
Peter Shanahan, Hydro Analysis, LLC
ECSI #5130 File