



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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TTY 711

August 4, 2015

Also Sent Via Email

Dan York
Safety and Training Manager
Arc Terminals
5501 NW Front Avenue
Portland, OR 97210

Re: Paramount Petroleum Naphtha Spill May 21, 2014 Monitoring Report
ECSI # 1281, OERS No. 11-1718

Dear Mr. York:

DEQ reviewed the May 21, 2014 monitoring report and your request to close the monitoring activities required for this spill. The monitoring report documented a product thickness of 0.13-foot at location S8, in May of 2014. This increase in the product thickness indicates a continued significant presence of separate phase hydrocarbons at the spill site. Our previous letter dated October 31, 2013 requested that if product thickness measurements for the year indicate that there is not an accumulation of more than 0.1 of a foot, then DEQ will consider the spill response completed. DEQ does not consider the cleanup complete and requests the following tasks:

1. Gauge product levels at all monitoring points,
2. Removal of product from the S8 location until the rebounded water level condition indicates a significant reduction in product thickness (less than 0.01-foot measured product),
3. Continued quarterly product thickness gauging and product removal until four events of monitoring indicate less than 0.1 of a foot of separate phase hydrocarbons,
4. If four quarters of monitoring indicate less than 0.1 of a foot of separate phase product, then report all the data to DEQ for site closure evaluation.

Please respond to this letter within 30-days of receipt. If you have any questions about this letter, please contact Jim Orr at (503) 229-5039.

Sincerely,

Jim Orr, R.G.

Project Manager

DEQ NW Region Cleanup Section

cc: Clayton Curtis, Arc Terminals Corporate VP, Regulatory Affairs
Mike Greenburg, DEQ NWR
Henning Larsen, DEQ NWR