

## Andy Peters

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**From:** BRITSON Aliana <Aliana.BRITSON@state.or.us>  
**Sent:** Wednesday, August 26, 2020 3:50 PM  
**To:** Gerald Fisher; RABINOWITZ Geoff  
**Cc:** NAVARRO Jeffrey; PINNEY Mike; BRITSON Aliana; YELTON-BRAM Tiffany; Andy Peters  
**Subject:** RE: Permit #101514 Monitoring Request Letter  
**Attachments:** 101514-LTR-MonitoringLetterMolallaREVISED-SIGNED-20200825.pdf

Hello Gerald and Andy,

Please find attached a revised monitoring request letter for your facility. The monitoring dates have been modified to be within your permitted discharge window and the conflicting language concerning cyanide monitoring has been fixed. Also, please note that your permit renewal has been moved to 2022, and this is reflected in the monitoring.

As before, requests for extensions or modifications must be made within two weeks of the letter date (8/26/2020).

Regards,  
Aliana

Aliana Britson, Ph.D.  
Permit Developer  
Oregon Department of Environmental Quality  
Water Quality Permitting and Program Development  
700 NE Multnomah St., Suite #600 Portland, OR 97232  
Phone: (503) 229-6044  
Email: [Britson.Aliana@deg.state.or.us](mailto:Britson.Aliana@deg.state.or.us)

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**From:** Gerald Fisher <gfisher@cityofmolalla.com>  
**Sent:** Monday, August 24, 2020 5:33 PM  
**To:** RABINOWITZ Geoff <Geoff.RABINOWITZ@state.or.us>  
**Cc:** NAVARRO Jeffrey <Jeffrey.NAVARRO@state.or.us>; PINNEY Mike <Mike.PINNEY@state.or.us>; BRITSON Aliana <Aliana.BRITSON@state.or.us>; YELTON-BRAM Tiffany <Tiffany.YELTON-BRAM@state.or.us>; Andy Peters <apeters@cityofmolalla.com>  
**Subject:** RE: Permit #101514 Monitoring Request Letter

From my conversation with Andy, it appears that Aliana will be reissuing a new letter. I will wait to see what that says and consider the old one as revised. Thank you.

Regards,

**Gerald Fisher, P.E. | Public Works Director**

City of Molalla

117 N Molalla Ave. | PO Box 248 | Molalla, OR 97038

Office: [503.829.6855](tel:503.829.6855) | Direct: [503.759.0218](tel:503.759.0218)

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**From:** RABINOWITZ Geoff <[Geoff.RABINOWITZ@state.or.us](mailto:Geoff.RABINOWITZ@state.or.us)>

**Sent:** Monday, August 24, 2020 4:56 PM

**To:** Gerald Fisher <[gfisher@cityofmolalla.com](mailto:gfisher@cityofmolalla.com)>

**Cc:** NAVARRO Jeffrey <[Jeffrey.NAVARRO@state.or.us](mailto:Jeffrey.NAVARRO@state.or.us)>; PINNEY Mike <[Mike.PINNEY@state.or.us](mailto:Mike.PINNEY@state.or.us)>; BRITSON Aliana <[Aliana.BRITSON@state.or.us](mailto:Aliana.BRITSON@state.or.us)>; YELTON-BRAM Tiffany <[Tiffany.YELTON-BRAM@state.or.us](mailto:Tiffany.YELTON-BRAM@state.or.us)>; Andy Peters <[apeters@cityofmolalla.com](mailto:apeters@cityofmolalla.com)>

**Subject:** RE: Permit #101514 Monitoring Request Letter

Mr. Fisher,

Thank you for your email. I am presuming the issue still centers around finding a laboratory that can properly analyze CAS 117817 and 608935? At this time, I am not inclined to grant an additional 30 day extension. I will however agree to make the extension 30 days from the original deadline, which means DEQ will give the City of Molalla until September 10, 2020. Please note, that any modification of the original monitoring request letter sent by Aliana, will be evaluated on the specifics of the request, if one is requested, and extensions and modifications are not guaranteed to be granted.

With this being stated, I encourage the continued dialogue between Andy Peters and Aliana as it appears that good progress is being made.

Thank you,

Geoff Rabinowitz

Water Quality Permitting and Program Development Manager

Oregon Department of Environmental Quality

[Rabinowitz.geoff@deq.state.or.us](mailto:Rabinowitz.geoff@deq.state.or.us)

Office: 503.229.5589

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**From:** Gerald Fisher <[gfisher@cityofmolalla.com](mailto:gfisher@cityofmolalla.com)>

**Sent:** Thursday, August 20, 2020 5:39 PM

**To:** BRITSON Aliana <[Aliana.BRITSON@state.or.us](mailto:Aliana.BRITSON@state.or.us)>

**Cc:** RABINOWITZ Geoff <[Geoff.RABINOWITZ@state.or.us](mailto:Geoff.RABINOWITZ@state.or.us)>; NAVARRO Jeffrey <[Jeffrey.NAVARRO@state.or.us](mailto:Jeffrey.NAVARRO@state.or.us)>; PINNEY Mike <[Mike.PINNEY@state.or.us](mailto:Mike.PINNEY@state.or.us)>; YELTON-BRAM Tiffany <[Tiffany.YELTON-BRAM@state.or.us](mailto:Tiffany.YELTON-BRAM@state.or.us)>; Andy Peters <[apeters@cityofmolalla.com](mailto:apeters@cityofmolalla.com)>  
**Subject:** RE: Permit #101514 Monitoring Request Letter

Hi Aliana,

It appears that there are some questions that need to be answered regarding the tests that DEQ is requiring and you've been exchanging emails with Andy Peters. I don't want to ask for multiple extensions on the response to DEQ's letter and want to know how you want to proceed. Right now the deadline for response is August 28<sup>th</sup>. Do you want to push that back another 30 days or do you want to put the clock on hold while the lab questions get worked out. Let me know your thoughts when you return next week. Thank you.

Regards,

**Gerald Fisher, P.E. | Public Works Director**

City of Molalla

117 N Molalla Ave. | PO Box 248 | Molalla, OR 97038

Office: [503.829.6855](tel:503.829.6855) | Direct: [503.759.0218](tel:503.759.0218)

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**From:** Gerald Fisher

**Sent:** Monday, August 17, 2020 12:40 PM

**To:** 'BRITSON Aliana' <[Aliana.BRITSON@state.or.us](mailto:Aliana.BRITSON@state.or.us)>

**Cc:** RABINOWITZ Geoff <[Geoff.RABINOWITZ@state.or.us](mailto:Geoff.RABINOWITZ@state.or.us)>; NAVARRO Jeffrey <[Jeffrey.NAVARRO@state.or.us](mailto:Jeffrey.NAVARRO@state.or.us)>; PINNEY Mike <[Mike.PINNEY@state.or.us](mailto:Mike.PINNEY@state.or.us)>; YELTON-BRAM Tiffany <[Tiffany.YELTON-BRAM@state.or.us](mailto:Tiffany.YELTON-BRAM@state.or.us)>

**Subject:** RE: Permit #101514 Monitoring Request Letter

Hi Aliana,

Just an email update. We are still waiting on word back regarding two tests that our lab does not do. It is the CAS 117817 and 608935. We are check with a lab subcontractor and once we have that we will be getting back to you on some recommended modifications to the letter. Thanks.

Regards,

**Gerald Fisher, P.E. | Public Works Director**

City of Molalla

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**From:** BRITSON Aliana <[Aliana.BRITSON@state.or.us](mailto:Aliana.BRITSON@state.or.us)>

**Sent:** Thursday, July 30, 2020 8:55 AM

**To:** Gerald Fisher <[gfisher@cityofmolalla.com](mailto:gfisher@cityofmolalla.com)>

**Cc:** RABINOWITZ Geoff <[Geoff.RABINOWITZ@state.or.us](mailto:Geoff.RABINOWITZ@state.or.us)>; NAVARRO Jeffrey <[Jeffrey.NAVARRO@state.or.us](mailto:Jeffrey.NAVARRO@state.or.us)>; PINNEY Mike <[Mike.PINNEY@state.or.us](mailto:Mike.PINNEY@state.or.us)>;

YELTON-BRAM Tiffany <[Tiffany.YELTON-BRAM@state.or.us](mailto:Tiffany.YELTON-BRAM@state.or.us)>

**Subject:** RE: Permit #101514 Monitoring Request Letter

Hi Gerald,

Yes, 4 weeks is fine. August 28<sup>th</sup> will be the new deadline for requesting extensions/modifications. I am not allowed to recommend specific labs since I work for state government. However, I have found this search tool to be most helpful in finding labs: <https://lams.nelac-institute.org/Search>. It has a number of search features including search by state, method, and/or analyte.

Regards,

Aliana

Aliana Britson, Ph.D.

Permit Developer

Oregon Department of Environmental Quality

Water Quality Permitting and Program Development

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**From:** Gerald Fisher <[gfisher@cityofmolalla.com](mailto:gfisher@cityofmolalla.com)>

**Sent:** Wednesday, July 29, 2020 4:51 PM

**To:** BRITSON Aliana <[Aliana.BRITSON@state.or.us](mailto:Aliana.BRITSON@state.or.us)>

**Cc:** RABINOWITZ Geoff <[Geoff.RABINOWITZ@state.or.us](mailto:Geoff.RABINOWITZ@state.or.us)>; NAVARRO Jeffrey <[Jeffrey.NAVARRO@state.or.us](mailto:Jeffrey.NAVARRO@state.or.us)>; PINNEY Mike <[Mike.PINNEY@state.or.us](mailto:Mike.PINNEY@state.or.us)>;

YELTON-BRAM Tiffany <[Tiffany.YELTON-BRAM@state.or.us](mailto:Tiffany.YELTON-BRAM@state.or.us)>

**Subject:** RE: Permit #101514 Monitoring Request Letter

Hi Aliana,

I have my staff reviewing the letter and what it entails. I'm going to ask for a little bit more time on the two weeks from the date of the letter. I am out on vacation for the next week and a half and as part of our initial review we are finding significant cost in this testing that are currently unbudgeted. We did not

budget for either the Copper/Aluminum test or the Tier 1/2 Toxics in this year's budget. I would have had to know of these requirements in November 2019 when I started the budgeting process for this current fiscal year.

If possible, we would like four weeks (August 28<sup>th</sup>) to determine if we need to request an extension or modification. To help facilitate us getting a better handle on costs, time, and requirements, can you tell me which labs in our area can handle this level of work? Thanks and I'll be here through Friday.

Regards,

**Gerald Fisher, P.E. | Public Works Director**

City of Molalla

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**From:** BRITSON Aliana <[Aliana.BRITSON@state.or.us](mailto:Aliana.BRITSON@state.or.us)>

**Sent:** Tuesday, July 28, 2020 9:52 AM

**To:** Gerald Fisher <[gfisher@cityofmolalla.com](mailto:gfisher@cityofmolalla.com)>

**Cc:** RABINOWITZ Geoff <[Geoff.RABINOWITZ@state.or.us](mailto:Geoff.RABINOWITZ@state.or.us)>; NAVARRO Jeffrey <[Jeffrey.NAVARRO@state.or.us](mailto:Jeffrey.NAVARRO@state.or.us)>; PINNEY Mike <[Mike.PINNEY@state.or.us](mailto:Mike.PINNEY@state.or.us)>;

YELTON-BRAM Tiffany <[Tiffany.YELTON-BRAM@state.or.us](mailto:Tiffany.YELTON-BRAM@state.or.us)>

**Subject:** Permit #101514 Monitoring Request Letter

Hello Mr. Fisher,

I hope this email finds you well. After our phone conversation last month concerning additional monitoring DEQ was requesting of City of Mollala, I conferred with the permitting managers for Northwest Region and Headquarters. We have determined that supplemental information will be necessary to proceed with Molalla STP's upcoming permit renewal. Please find attached a monitoring request letter for Copper BLM and additional Tier I/Tier II monitoring. This is to ensure that we have the necessary information to evaluate your facility's site specific conditions.

Please review the letter, and contact me with any questions or concerns about monitoring. If you have questions about the status of your facility please contact Tiffany Yelton-Bram ([YELTON-Bram.Tiffany@deq.state.or.us](mailto:YELTON-Bram.Tiffany@deq.state.or.us)). Requests for extensions or modifications must be made within two weeks of the letter date (7/28/2020).

Regards,  
Aliana

Aliana Britson, Ph.D.

Permit Developer

Oregon Department of Environmental Quality

Water Quality Permitting and Program Development

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