

From: [ORR Jim * DEQ](#)
To: [Marty Burck](#)
Cc: [Josh Owen](#); [ORR Jim * DEQ](#); [ORR Jim * DEQ](#)
Subject: RE: Lawrence - SWLA Permit - NPDES Permit
Date: Tuesday, November 26, 2024 3:00:48 PM

Marty

I agree with the path forward you gave me below.

I cannot think of other COCs to test the water for NPDES discharges.

Thank you

Jim

From: Marty Burck <mburck@msbaenvironmental.com>
Sent: Tuesday, November 26, 2024 12:41 PM
To: ORR Jim * DEQ <Jim.ORR@deq.oregon.gov>
Cc: Josh Owen <jowen@msbaenvironmental.com>
Subject: Lawrence - SWLA Permit - NPDES Permit

Hi Jim,

This email presents a brief recap of our discussion earlier today and poses a question about a possible future NPDES batch discharge permit.

SWLA – Based on our discussion, MSBA will temporarily suspend its pursuit of the SWLA permit until excavation cleanup activities are complete and material is no longer being added to the stockpile, or until you direct us to proceed with the permit process.

NPDES – As we discussed, approximately 21,000 gal of water was pumped from the excavation area over the weekend and stored in a tank onsite. I mentioned that we may choose to treat the water using activated carbon and obtain an NPDES batch discharge permit as an alternative to disposal costs at ORCCO. However, it occurred to me that since the water was primarily from recently accumulated rainfall, it might already meet the untreated NPDES discharge criteria. Therefore, we are planning to sample the water today and submit for laboratory analysis. We will test the water for PHCs, VOCs, SVOCs, and RCRA 8 metals.

Question – Can you think of any other analyses that would be required for analysis to obtain approval of the NPDES permit ?

Please let me know if any part of this email summary is not consistent with your recollection of our discussion earlier today. Thanks for your time and assistance with this cleanup.

Sincerely,

Marty Burck

Licensed Geologist OR, CA, WA



Martin S. Burck Associates, Inc.
Geologic and Environmental Consulting Services

Phone: 855 387 4422

mburck@msbaenvironmental.com