



Oregon

Northwest Region

Kate Brown, Governor

Department of Environmental Quality

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May 6, 2022

Sent Via Email

Stephanie Heldt-Sheller
Corporate Environmental Manager
NW Pipe Company
201 NE Park Plaza Drive, Suite 100
Vancouver, Washington 98684

RE: DEQ Review March 2022 Dioxin/Furan Stormwater Sampling Work Plan
ECSI #138

Dear Ms. Heldt-Sheller:

The Department of Environmental Quality (DEQ) reviewed the Draft March 2022 Dioxin/Furan Stormwater Sampling Work Plan (WP) prepared for NWP by Jacobs. The WP proposes the methodology and data evaluation to evaluate the performance of Northwest Pipe Company's Aquip stormwater treatment system to remove dioxins and furans from stormwater. The Environmental Protection Agency (EPA) provided comments for the WP. DEQ concurs with EPA's comments, which are attached to this letter. Please revise the work plan to address EPA's Primary and To Be Considered Comments and DEQ's specific comments presented below.

Specific Comments

1. Section 3-Stormwater Sampling Methodology. This section states that if the first two sampling events result in concentrations less than the ROD RALs, DEQ and EPA have indicated Northwest Pipe Company may propose suspending the final two sampling events. As noted by EPA in their Primary Comment 1, the RALs apply to sediment, not stormwater. Therefore, please revise the work plan to indicate NW Pipe may propose eliminating the final two rounds depending on the results from the first two events. DEQ will consider the reduction, with EPA consultation, based on the information provided at that time.
2. Section 3.1-Sampling Frequency and Location. As noted by EPA in To Be Considered Comment 4, the proposed target storm events do not include the Joint Source Control Strategy (DEQ and EPA 2005) storm event criteria. Heavy rain events may be targeted as suggested based on the known flow conditions of the system, but they should still be consistent with the JSCS guidance. Please revise the work plan to include the target criteria. Of particular importance is the antecedent dry period.

3. Section 7-Reporting. In order to support DEQ's evaluation of the data, please submit results and TEQ calculations in an Excel electronic format to DEQ.

DEQ requests that NWP finalize the WP and submit it to DEQ within 30 days of the date of this letter. If NWP accepts EPA and DEQ comments, you may begin stormwater sampling before submitting the final WP.

Please get in touch with me if you have questions regarding this letter.

Sincerely,

Jim Orr

Jim Orr, R.G.
Project Manager
Northwest Region Cleanup Program

Ec: By Electronic Format Only
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Paul Seidel, DEQ
Dave Lacey, DEQ
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Benjamin Leake, EPA
Kris Ivarson, Jacobs
ECSI File #138

EPA April 20, 2022, Comment Letter as a Separate Attachment