



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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Portland, OR 97232

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TTY 711

September 08, 2020

Kathryn Williams
Vice President of Public Affairs
NW Natural
250 SW Taylor Street, Ave
Portland, OR 97204

Re: Approval of Proposed Pretreatment Expansion Project
NW Natural Source Control Groundwater Treatment Facility
NPDES File # 120589, Permit # 103061
Multnomah County

Dear Ms. Williams:

The DEQ has reviewed NW Natural's proposal to expand the existing pre-treatment plant for the NW Natural Source Control Groundwater Treatment Facility at 7900 NW St. Helens Road, Portland OR. NW Natural currently operates a pretreatment system as part of the remediation efforts at the former Gasco facility. The Pretreatment system discharges to the main Groundwater Treatment Plant which discharges under NPDES Permit #103061. The expansion is necessary to treat additional flow of contaminated groundwater from new groundwater interceptor trenches to be installed at DEQ's direction. The new Interim Trenches will generate additional groundwater flow volume expected to contain higher concentrations of pollutants.

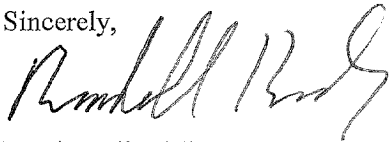
NW Natural has not requested changes to the limits or requirements of the treatment systems discharge permit. The additional flow volume from the Interim Trenches is projected to be 60 gallons per minute peak flow with an average flow of 35 gpm during the wet season. The pollutant concentration limits in the permit were developed based on a maximum daily discharge of 619 gpm and an average flow of 459 gallons per minute. The average daily discharge from the main Groundwater Treatment Plant during the wet season (November 2019 through April 2020) was 210 gpm with a maximum daily average discharge rate of 230 gpm. Therefore, the proposed total discharge flow volume with the contribution from the new Interceptor Trenches will be well below the volumes modeled in the Reasonable Potential Analysis for the current permit, and the current permit limits are adequate to protect human health and aquatic life.

No changes are necessary to the permit to allow the proposed changes, and the construction is allowed under the NPDES Permit. Be aware that review and approval is likely needed from other DEQ programs before this project can proceed.

DEQ Water Quality Source control program hereby approves NW Natural's Pretreatment Plant Process Expansion plan as proposed in your August 15, 2020 letter.

Should you have any questions about the content of this letter, feel free contact me in writing or by phone at 503-229-5019, or by email at bailey.randall@deq.state.or.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Bailey". The signature is fluid and cursive, with the first name "Randy" being more prominent than the last name "Bailey".

Randy Bailey EIT.
Department of Environmental Quality
Northwest Region - Water Quality Source Control

cc: Terry Driscoll, ADA, Inc.
Heidi Nelson PE, DEQ