

September 22, 2020

Angelica Greene
Industrial Stormwater Permit Manager
City of Portland Bureau of Environmental Services
6543 N. Burlington Avenue
Portland, OR 97203-5452

Re: Monitoring Waiver Request for NW Natural Gasco Property
DEQ File No. 62231

Dear Ms. Greene,

NW Natural Gasco Property (DEQ File No. 62231) is requesting a monitoring waiver for the remainder of the benchmark and impairment pollutants currently required under our National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge General Permit No. 1200-Z. We have reviewed our stormwater analytical results for the last four consecutive monitoring events collected between November 19, 2019 and May 18, 2020. Our review of the data from these four monitoring events indicates that our geometric mean for all remaining parameters at Monitoring Location 001 are well below the benchmarks and reference concentrations identified in our permit assignment letter. Therefore, we request a monitoring waiver for all remaining monitoring parameters, including the following: cyanide, total iron, hexachlorobenzene, acenaphthene, anthracene, benzo(a)anthracene, benzo(a)pyrene, benzl(b)fluoranthene3,4, benzo(k)fluoranthene, chrysene, dibenz(a,h)anthracene, fluoranthene, indenco(1,2,3-cd)pyrene, and pyrene.

I have attached the discharge monitoring report which includes the data for the four monitoring events during the period identified above. Please review the attached data and let us know if we qualify for the requested monitoring waiver at Monitoring Locations 001.

Sincerely,



Kendra Skellenger, PE
Managing Engineering
Anchor QEA, LLC

Attachments

Attachment 1 Discharge Monitoring Report for Monitoring Waiver



For official use only:
#REF!
#REF!

Instructions: This report must be completed for each quarter and submitted by the 15th of February, May, August and November to the appropriate DEQ regional or agent office. The report must contain the results of all stormwater monitoring conducted during each quarter, and variance requests are due semi-annually, in February and August. Sample for the pollutants at monitoring location(s) specified in your SWPCP and use the monitoring location(s) number from your SWPCP. You must include the laboratory results, including minimum detection level, Quality Assurance/Quality Control and analytical methods for the parameters analyzed. You must also submit pH field notes and chain of custody.

Impairment Pollutants and Reference Concentrations
(see permit assignment letter for identification of required parameters)

Monitoring Location(s)	Sample Date	Copper, Dissolved	Cyanide	DDT or DDT+ metabolites	DDE	Dieldrin	E. Coli	Endrin Aldehyde	Endosulfan
		mg/L	mg/L	mg/L	mg/L	mg/L	counts/100 ml	mg/L	mg/L
001									
001	11/19/19		ND (0.00250)						
001	12/10/19		ND (0.00250)						
001	01/29/20		0.0205						
001	05/18/20		ND(0.00250)						
Geometric Mean			0.003						
Geometric Mean									
Geometric Mean									
Geometric Mean									

Impairment Ref. Concentration	See Letter	0.022	0.0011	0.00001	0.00024	406	0.00003	0.00022
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Impairment Pollutants and Reference Concentrations
(see permit assignment letter for identification of required parameters)

Monitoring Location(s)	Sample Date	Guthion	Heptachlor	Hexachlorobenzene	Iron, Total	Lead, Dissolved	Malathion	Mercury, Total	Nickel, Dissolved
		mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
001									
001	11/19/19			ND (0.000485)	0.438				
001	12/10/19			ND(0.000481)	0.462				
001	01/29/20			ND (0.000196)	1.01				
001	05/18/20			ND(0.00000971)	0.737				
Geometric Mean				0.000	0.6				
Geometric Mean									
Geometric Mean									
Geometric Mean									

Impairment Ref. Concentration	0.001	0.00052	0.001	1.0	See Letter	0.0002	0.0024	See Letter
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Impairment Pollutants and Reference Concentrations
(see permit assignment letter for identification of required parameters)

Monitoring Location(s)	Sample Date	Turbidity	Zinc, Dissolved	Acenaphthene	Anthracene	Benzo(a) anthracene	Benzo(a) pyrene	Benzo(b) fluoranthene 3,4	Benzo(k) fluoranthene
		mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
001									
001	11/19/19			ND(0.000485)	ND(0.000485)	ND (0.000485)	ND(0.000485)	ND(0.000485)	ND(0.000485)
001	12/10/19			ND(0.000481)	ND(0.000481)	ND (0.000481)	ND(0.000481)	ND(0.000481)	ND(0.000481)
001	01/29/20			ND(0.000196)	ND(0.000196)	ND (0.000196)	ND(0.000294)	ND(0.000294)	ND(0.000294)
001	05/18/20			ND(0.00000971)	ND(0.00000971)	ND(0.00000971)	ND(0.0000146)	0.0000152	ND(0.0000146)
Geometric Mean				0.000	0.0	0.000	0.000	0.000	0.000
Geometric Mean									
Geometric Mean									
Geometric Mean									

Impairment Ref. Concentration	100	See Letter	0.095	2.9	0.001	0.001	0.001	0.001
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Impairment Pollutants and Reference Concentrations
(see permit assignment letter for identification of required parameters)

Monitoring Location(s)	Sample Date	Chrysene	Dibenz(a,h) anthracene	Fluoranthene	Fluorene	Indeno (1,2,3-cd) pyrene	Pyrene
		mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
001							
001	11/19/19	ND(0.000485)	ND(0.000485)	ND(0.000485)	ND(0.000485)	ND(0.000485)	ND(0.000485)
001	12/10/19	ND(0.000481)	ND(0.000481)	ND(0.000481)	ND(0.000481)	ND(0.000481)	ND(0.000481)
001	01/29/20	ND(0.000196)	ND(0.000196)	ND(0.000196)	ND(0.000196)	ND(0.000196)	ND(0.000196)
001	05/18/20	ND(0.00000971)	ND(0.00000971)	0.99999996	ND(0.00000971)	ND(0.00000971)	0.0000109
Geometric Mean		0.000	0.000	0.002	0.00	0.000	0.00
Geometric Mean							
Geometric Mean							
Geometric Mean							

Impairment Ref. Concentration	0.001	0.001	0.014	0.39	0.001	0.29
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