

June 21, 2023

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

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

Dear Ms. Greene,

NW Natural is requesting a monitoring waiver for Total Iron, currently required under the National Pollutant Discharge Elimination System Stormwater Discharge General Permit No. 1200-Z for the Gasco property (DEQ File No. 62231). We have compiled and reviewed our total iron analytical results for two full reporting years (eight samples) of consecutive monitoring events collected between October 22, 2021, and May 4, 2023. Compiled results for the eight monitoring events are included in Table 1. Our review of the data indicates that the geometric mean for total iron at Monitoring Location 001 (0.78 milligrams per liter [mg/L]) is well below the impairment concentration identified in our permit assignment letter (10 mg/L). Therefore, we request a monitoring waiver for total iron. Approval of this request, along with the monitoring waivers for pH, total copper, total lead, total zinc, and total suspended solids that were previously approved on January 25, 2023, would result in monitoring waivers for all required parameters at the Gasco property until July 1, 2025.

**Table 1**  
**Sample Results and Geometric Mean for Total Iron**

Monitoring Location	Sample Date	Total Iron (mg/L)
001	10.22.2021	0.608
001	12.06.2021	0.998
001	01.19.2022	0.448
001	04.04.2022	0.176
001	10.31.2022	0.358
001	12.29.2022	2.24
001	03.24.2023	1.55
001	05.04.2023	2.37
	<b>Geometric Mean</b>	<b>0.783</b>
	303(d) Limit	10

I have attached the May 4, 2023 laboratory report and chain of custody since that information has not yet been provided in a Discharge Monitoring Report. Please review the attached data and let us know if we qualify for the requested monitoring waiver at Monitoring Location 001. Feel free to call me at 503-924-6179 if you have any questions.

Sincerely,



Kendra Skellenger, PE  
Senior Managing Engineering  
Anchor QEA, LLC

### **Attachments**

Laboratory Report and Chain of Custody for May 4, 2023

# Attachments

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ANALYTICAL REPORT

Apex Laboratories, LLC

6700 S.W. Sandburg Street  
Tigard, OR 97223  
503-718-2323  
ORELAP ID: OR100062

Thursday, June 1, 2023

Kendra Skellenger  
Anchor QEA, LLC  
6720 SW Macadam Ave. Suite 125  
Portland, OR 97219

RE: A3E1145 - Gasco 1200Z Stormwater Sampling - 000029-02.84 T-14.014E

Thank you for using Apex Laboratories. We greatly appreciate your business and strive to provide the highest quality services to the environmental industry.

Enclosed are the results of analyses for work order A3E1145, which was received by the laboratory on 5/5/2023 at 12:33:00PM.

If you have any questions concerning this report or the services we offer, please feel free to contact me by email at: [dthomas@apex-labs.com](mailto:dthomas@apex-labs.com), or by phone at 503-718-2323.

Please note: All samples will be disposed of within 30 days of sample receipt, unless prior arrangements have been made.

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Cooler Receipt Information

(See Cooler Receipt Form for details)

Default Cooler      1.8      degC

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This Final Report is the official version of the data results for this sample submission, unless superseded by a subsequent, labeled amended report.

All other deliverables derived from this data, including Electronic Data Deliverables (EDDs), CLP-like forms, client requested summary sheets, and all other products are considered secondary to this report.

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Darwin Thomas, Business Development Director



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ORELAP ID: OR100062

<b>Anchor QEA, LLC</b> 6720 SW Macadam Ave. Suite 125 Portland, OR 97219	Project: <b>Gasco 1200Z Stormwater Sampling</b> Project Number: <b>000029-02.84 T-14.014E</b> Project Manager: <b>Kendra Skellenger</b>	<b>Report ID:</b> <b>A3E1145 - 06 01 23 0640</b>
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**ANALYTICAL REPORT FOR SAMPLES**

**SAMPLE INFORMATION**

Client Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
O107-04-050423	A3E1145-01	WOFL	05/04/23 13:15	05/05/23 12:33

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**ANALYTICAL SAMPLE RESULTS**

**Total Metals by EPA 200.8 (ICPMS)**

Analyte	Sample Result	Detection Limit	Reporting Limit	Units	Dilution	Date Analyzed	Method Ref.	Notes
<b>O107-04-050423 (A3E1145-01)</b>				<b>Matrix: WOFL</b>				
Batch: 23E0732								
<b>Iron</b>	<b>2.37</b>	0.0250	0.0500	mg/L	1	05/18/23 04:05	EPA 200.8	

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**QUALITY CONTROL (QC) SAMPLE RESULTS**

**Total Metals by EPA 200.8 (ICPMS)**

Analyte	Result	Detection Limit	Reporting Limit	Units	Dilution	Spike Amount	Source Result	% REC	% REC Limits	RPD	RPD Limit	Notes
<b>Batch 23E0732 - EPA 3015A</b>						<b>Water</b>						
<b>Blank (23E0732-BLK1)</b>			Prepared: 05/17/23 08:17 Analyzed: 05/18/23 02:19									
<u>EPA 200.8</u>												
Iron	ND	0.0250	0.0500	mg/L	1	---	---	---	---	---	---	
<b>LCS (23E0732-BS1)</b>			Prepared: 05/17/23 08:17 Analyzed: 05/18/23 02:25									
<u>EPA 200.8</u>												
Iron	2.78	0.0250	0.0500	mg/L	1	2.78	---	100	85-115%	---	---	
<b>Duplicate (23E0732-DUP1)</b>			Prepared: 05/17/23 08:17 Analyzed: 05/18/23 02:41									
<u>QC Source Sample: Non-SDG (A3E1052-01)</u>												
Iron	<b>0.0424</b>	0.0250	0.0500	mg/L	1	---	0.0593	---	---	<b>33</b>	<b>20%</b>	Q-05, J
<b>Matrix Spike (23E0732-MS1)</b>			Prepared: 05/17/23 08:17 Analyzed: 05/18/23 02:58									
<u>QC Source Sample: Non-SDG (A3E1052-03)</u>												
<u>EPA 200.8</u>												
Iron	3.03	0.0250	0.0500	mg/L	1	2.78	0.195	102	70-130%	---	---	
<b>Matrix Spike (23E0732-MS2)</b>			Prepared: 05/17/23 08:17 Analyzed: 05/18/23 03:26									
<u>QC Source Sample: Non-SDG (A3E1052-04)</u>												
<u>EPA 200.8</u>												
Iron	2.97	0.0250	0.0500	mg/L	1	2.78	0.0894	104	70-130%	---	---	

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**SAMPLE PREPARATION INFORMATION**

Total Metals by EPA 200.8 (ICPMS)

Prep: EPA 3015A					Sample	Default	RL Prep
Lab Number	Matrix	Method	Sampled	Prepared	Initial/Final	Initial/Final	Factor
<u>Batch: 23E0732</u>							
A3E1145-01	WOFL	EPA 200.8	05/04/23 13:15	05/17/23 08:17	45mL/50mL	45mL/50mL	1.00

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QUALIFIER DEFINITIONS

Client Sample and Quality Control (QC) Sample Qualifier Definitions:

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- J Estimated Result. Result detected below the lowest point of the calibration curve, but above the specified MDL.
Q-05 Analyses are not controlled on RPD values from sample and duplicate concentrations that are below 5 times the reporting level.

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**REPORTING NOTES AND CONVENTIONS:**

**Abbreviations:**

- DET Analyte DETECTED at or above the detection or reporting limit.
- ND Analyte NOT DETECTED at or above the detection or reporting limit.
- NR Result Not Reported
- RPD Relative Percent Difference. RPDs for Matrix Spikes and Matrix Spike Duplicates are based on concentration, not recovery.

**Detection Limits: Limit of Detection (LOD)**

Limits of Detection (LODs) are normally set at a level of one half the validated Limit of Quantitation (LOQ).  
If no value is listed ('-----'), then the data has not been evaluated below the Reporting Limit.

**Reporting Limits: Limit of Quantitation (LOQ)**

Validated Limits of Quantitation (LOQs) are reported as the Reporting Limits for all analyses where the LOQ, MRL, PQL or CRL are requested. The LOQ represents a level at or above the low point of the calibration curve, that has been validated according to Apex Laboratories' comprehensive LOQ policies and procedures.

**Reporting Conventions:**

Basis: Results for soil samples are generally reported on a 100% dry weight basis.  
The Result Basis is listed following the units as "dry", "wet", or " " (blank) designation.

- "dry" Sample results and Reporting Limits are reported on a dry weight basis. (i.e. "ug/kg dry")  
See Percent Solids section for details of dry weight analysis.
- "wet" Sample results and Reporting Limits for this analysis are normally dry weight corrected, but have not been modified in this case.
- " " Results without 'wet' or 'dry' designation are not normally dry weight corrected. These results are considered 'As Received'.

Results for Volatiles analyses on soils and sediments that are reported on a "dry weight" basis include the water miscible solvent (WMS) correction referenced in the EPA 8000 Method guidance documents. Solid and Liquid samples reported on an "As Received" basis do not have the WMS correction applied, as dry weight was not performed.

**QC Source:**

In cases where there is insufficient sample provided for Sample Duplicates and/or Matrix Spikes, a Lab Control Sample Duplicate (LCS Dup) may be analyzed to demonstrate accuracy and precision of the extraction batch.

Non-Client Batch QC Samples (Duplicates and Matrix Spike/Duplicates) may not be included in this report. Please request a Full QC report if this data is required.

**Miscellaneous Notes:**

- " --- " QC results are not applicable. For example, % Recoveries for Blanks and Duplicates, % RPD for Blanks, Blank Spikes and Matrix Spikes, etc.
- " \*\*\* " Used to indicate a possible discrepancy with the Sample and Sample Duplicate results when the %RPD is not available. In this case, either the Sample or the Sample Duplicate has a reportable result for this analyte, while the other is Non Detect (ND).

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Anchor QEA, LLC

6720 SW Macadam Ave. Suite 125  
Portland, OR 97219

Project: Gasco 1200Z Stormwater Sampling

Project Number: 000029-02.84 T-14.014E

Project Manager: Kendra Skellenger

Report ID:

A3E1145 - 06 01 23 0640

REPORTING NOTES AND CONVENTIONS (Cont.):

**Blanks:**

Standard practice is to evaluate the results from Blank QC Samples down to a level equal to 1/2 the Reporting Limit (RL).

-For Blank hits falling between 1/2 the RL and the RL (J flagged hits), the associated sample and QC data will receive a 'B-02' qualifier.

-For Blank hits above the RL, the associated sample and QC data will receive a 'B' qualifier, per Apex Laboratories' Blank Policy.

For further details, please request a copy of this document.

-Sample results flagged with a 'B' or 'B-02' qualifier are potentially biased high if the sample results are less than ten times the level found in the blank for inorganic analyses, or less than five times the level found in the blank for organic analyses.

'B' and 'B-02' qualifications are only applied to sample results detected above the Reporting Level, if results are not reported to the MDL.

**Preparation Notes:**

Mixed Matrix Samples:

Water Samples:

Water samples containing significant amounts of sediment are decanted or separated prior to extraction, and only the water portion analyzed, unless otherwise directed by the client.

Soil and Sediment Samples:

Soil and Sediment samples containing significant amounts of water are decanted prior to extraction, and only the solid portion analyzed, unless otherwise directed by the client.

**Sampling and Preservation Notes:**

Certain regulatory programs, such as National Pollutant Discharge Elimination System (NPDES), require that activities such as sample filtration (for dissolved metals, orthophosphate, hexavalent chromium, etc.) and testing of short hold analytes (pH, Dissolved Oxygen, etc.) be performed in the field (on-site) within a short time window. In addition, sample matrix spikes are required for some analyses, and sufficient volume must be provided, and billable site specific QC requested, if this is required. All regulatory permits should be reviewed to ensure that these requirements are being met.

Data users should be aware of which regulations pertain to the samples they submit for testing. If related sample collection activities are not approved for a particular regulatory program, results should be considered estimates. Apex Laboratories will qualify these analytes according to the most stringent requirements, however results for samples that are for non-regulatory purposes may be acceptable.

Samples that have been filtered and preserved at Apex Laboratories per client request are listed in the preparation section of the report with the date and time of filtration listed.

Apex Laboratories maintains detailed records on sample receipt, including client label verification, cooler temperature, sample preservation, hold time compliance and field filtration. Data is qualified as necessary, and the lack of qualification indicates compliance with required parameters.

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Table with 3 columns: Client (Anchor QEA, LLC), Project (Gasco 1200Z Stormwater Sampling), and Report ID (A3E1145 - 06 01 23 0640).

LABORATORY ACCREDITATION INFORMATION

ORELAP Certification ID: OR100062 (Primary Accreditation) - EPA ID: OR01039

All methods and analytes reported from work performed at Apex Laboratories are included on Apex Laboratories' ORELAP Scope of Certification, with the exception of any analyte(s) listed below:

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Table with 6 columns: Matrix, Analysis, TNI\_ID, Analyte, TNI\_ID, Accreditation. Content: All reported analytes are included in Apex Laboratories' current ORELAP scope.

Secondary Accreditations

Apex Laboratories also maintains reciprocal accreditation with non-TNI states (Washington DOE), as well as other state specific accreditations not listed here.

Subcontract Laboratory Accreditations

Subcontracted data falls outside of Apex Laboratories' Scope of Accreditation. Please see the Subcontract Laboratory report for full details, or contact your Project Manager for more information.

Field Testing Parameters

Results for Field Tested data are provided by the client or sampler, and fall outside of Apex Laboratories' Scope of Accreditation.

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Handwritten signature of Darwin Thomas

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**APEX LABS**  
6700 SW Sandburg St., Tigard, OR 97223 Ph: 503-718-2323

Company: Anchor QEA  
Address: 6720 S Macadam Av # 125 Portland, OR  
Sampled by: D Leffoon  
Site Location: \_\_\_\_\_  
State: OR  
County: Mult.  
SAMPLE ID: 0107-04-050423

**CHAIN OF CUSTODY**

Lab # A3E1145 COC 1 of 1

Project Mgr: Kendra Skellenger Phone: 503-670-1108 Email: KSkellenger@apexlabs.com

Project Name: Gasco 4th QTR 2022 1200Z STORMWATER SAMPLING Project #: 000029-02-84

Project Address: 6720 S Macadam Av # 125 Portland, OR Project #: 000029-02-84

Project: Gasco 1200Z Stormwater Sampling

Project Number: 000029-02.84 T-14.014E

Project Manager: Kendra Skellenger

DATE	TIME	MATRIX	# OF CONTAINERS	NWTPH-CID	NWTPH-DX	NWTPH-GX	8260 RTEX	8260 RBDM VOCs	8260 Halo VOCs	8260 VOCs Full List	8270 SIM PAHs	8270 Senti-Vols Full List	8082 PCBs	8081 Pesticides	RCRA Metals (9)	Priority Metals (13)	M, Sb, As, Ba, Be, Bi, Br, Cd, Cr, Cu, Fe, Hg, K, Mn, Mo, Ni, Pb, Se, Ag, Na, Ti, V, Zn	TCAD, TCDF, TCDF-DISS, TCDF	TCIP Metals (8)	Hold Sample	Frozen Archive	
5/4/23	1315	WQEFF	1																			
Standard Turn Around Time (TAT) = 10 Business Days TAT Requested (circle): 1 Day    2 Day    3 Day    5 Day <b>Standard</b> Other: _____																						
SPECIAL INSTRUCTIONS: <u>Analyze for Total Iron only.</u>																						

RELINQUISHED BY:  
Signature: [Signature] Date: 5/5/23  
Printed Name: Doug Lafoon Time: 12:33  
Company: Anchor QEA

RECEIVED BY:  
Signature: [Signature] Date: 5/5/23  
Printed Name: Andy Nantopola Time: 12:33  
Company: Apex

SAMPLES ARE HELD FOR 30 DAYS

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*[Signature]*

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**APEX LABS COOLER RECEIPT FORM**

**Client:** Anchor QEA Element WO#: A3 E1145

**Project/Project #:** Gasco 4<sup>th</sup> Qtr 2022 1200Z Stormwater Sampling / 000029-02.84 T-14.014E

**Delivery Info:**  
 Date/time received: 5/5/23 @ 1233 By: AJM  
 Delivered by: Apex  Client  ESS  FedEx  UPS  Radio  Morgan  SDS  Evergreen  Other

**Cooler Inspection** Date/time inspected: 5/5/23 @ 1325 By: AJM  
 Chain of Custody included? Yes  No   
 Signed/dated by client? Yes  No

	Cooler #1	Cooler #2	Cooler #3	Cooler #4	Cooler #5	Cooler #6	Cooler #7
Temperature (°C)	<u>1.8</u>						
Custody seals? (Y/N)	<u>N</u>						
Received on ice? (Y/N)	<u>Y</u>						
Temp. blanks? (Y/N)	<u>Y</u>						
Ice type: (Gel/Real/Other)	<u>Real</u>						
Condition (In/Out):	<u>In</u>						

Cooler out of temp? (Y/N) Possible reason why: \_\_\_\_\_  
 Green dots applied to out of temperature samples? Yes  No   
 Out of temperature samples form initiated? Yes  No   
**Sample Inspection:** Date/time inspected: 5-8-23 @ 1610 By: DJS

All samples intact? Yes  No  Comments: \_\_\_\_\_

Bottle labels/COCs agree? Yes  No  Comments: Container ID reads 0107-050423

COC/container discrepancies form initiated? Yes  No  <sup>05/5/23</sup>

Containers/volumes received appropriate for analysis? Yes  No  Comments: \_\_\_\_\_

Do VOA vials have visible headspace? Yes  No  NA   
 Comments: \_\_\_\_\_

Water samples: pH checked: Yes  No  NA  pH appropriate? Yes  No  NA   
 Comments: \_\_\_\_\_

**Additional information:**  
 \_\_\_\_\_  
 \_\_\_\_\_

Labeled by: DJS                      Witness: [Signature]                      Cooler Inspected by: DJS

Form Y-003 R-00 -

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