

Andy Peters

From: BRITSON Aliana <Aliana.BRITSON@state.or.us>
Sent: Thursday, December 10, 2020 4:22 PM
To: Andy Peters; Jake Ehredt; Gerald Fisher
Cc: RABINOWITZ Geoff
Subject: RE: TX and CU NetDMR submissions

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Andy,

In order to process the data, it has to be downloaded from NetDMR, which then separates it from the submission. The information is needed so that anyone who opens the file after it has been separated from the NetDMR submission will still have access to the necessary information. Also, while the NetDMR submission does have the monitoring location, this does not include the latitude and longitude, which I need.

Thank you for your compliance with this request. I understand that it may seem like frustrating nitpicky details, but it really helps me to keep the data process running smoothly and our files in order.

Regards,
Aliana

Aliana Britson, Ph.D.
Permit Developer
Oregon Department of Environmental Quality
Water Quality Permitting and Program Development
700 NE Multnomah St., Suite #600 Portland, OR 97232
Phone: (503) 229-6044
Email: Britson.Aliana@deq.state.or.us

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From: Andy Peters <apeters@cityofmolalla.com>
Sent: Thursday, December 10, 2020 4:11 PM
To: BRITSON Aliana <Aliana.BRITSON@state.or.us>; Jake Ehredt <jehredt@cityofmolalla.com>; Gerald Fisher <gfisher@cityofmolalla.com>
Subject: RE: TX and CU NetDMR submissions

Aliana, you have all that information on the NET DMR submission it's attached to.

Andy

From: BRITSON Aliana <Aliana.BRITSON@state.or.us>

Sent: Thursday, December 10, 2020 4:10 PM

To: Andy Peters <apeters@cityofmolalla.com>; Jake Ehredt <jehredt@cityofmolalla.com>; Gerald Fisher <gfisher@cityofmolalla.com>

Subject: RE: TX and CU NetDMR submissions

Hi Andy,
That is good, but I will still need you to put it into the template and submit that, as the organization and monitoring location information is important and the submission is considered incomplete without it (I can't enter data into the necessary databases unless I have monitoring coordinates).

Regards,
Aliana

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From: Andy Peters <apeters@cityofmolalla.com>

Sent: Thursday, December 10, 2020 4:08 PM

To: BRITSON Aliana <Aliana.BRITSON@state.or.us>; Jake Ehredt <jehredt@cityofmolalla.com>; Gerald Fisher <gfisher@cityofmolalla.com>

Subject: RE: TX and CU NetDMR submissions

Aliana, I converted the .txt files supplied by the lab to .xls files and uploaded to NetDMR.

Respectfully,

Andy Peters
City of Molalla

Public Works Operations Supervisor
(503) 829-6855 x220
Cell: 503-793-0507
apeters@cityofmolalla.com
117 N Molalla Ave
Molalla, OR 97038

From: Gerald Fisher <gfisher@cityofmolalla.com>
Sent: Thursday, December 10, 2020 2:31 PM
To: BRITSON Aliana <Aliana.BRITSON@state.or.us>
Cc: Andy Peters <apeters@cityofmolalla.com>
Subject: RE: TX and CU NetDMR submissions

Hi Aliana,

Will get our folks to revise and resubmit. Andy will contact you if they have any questions. Thanks.

Regards,

Gerald Fisher, P.E. | Public Works Director

City of Molalla
117 N Molalla Ave. | PO Box 248 | Molalla, OR 97038
Office: [503.829.6855](tel:503.829.6855) | Direct: [503.759.0218](tel:503.759.0218)

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From: BRITSON Aliana <Aliana.BRITSON@state.or.us>
Sent: Thursday, December 10, 2020 2:29 PM
To: Gerald Fisher <gfisher@cityofmolalla.com>
Subject: TX and CU NetDMR submissions

Hello Gerald,

Thank you for your recent TX and CU submission in NetDMR. I gave them a quick look and I noticed that the data is not in the right format. Unfortunately, I cannot accept .txt files. Please use the excel template found at this website: <https://www.oregon.gov/deq/wq/wqpermits/Pages/Electronic-Data-Delivery-for-Toxics-Data.aspx> to submit the data. Please be sure to not only fill out the "Results" tab, but also the "Organization Details" and the "Monitoring Locations" tabs as well. Once this is done please upload the excels to the TX and CU NetDMR submissions and resubmit. Please let me know if you have any questions.

Regards,
Aliana

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Andy Peters

From: Gerald Fisher
Sent: Tuesday, December 15, 2020 11:00 AM
To: PINNEY Mike
Cc: Andy Peters
Subject: RE: Please submit DMRs as Excel

Mr. Pinney,

We are extremely concerned with the potential for data entry errors associated with the continual changes in request from DEQ for DMR reporting. In order to keep this clean going forward, Andy and our staff will continue to use the NetDMR system as originally intended and instructed. We will also, in a separate email, provide you with the spreadsheet of the DMR information that we post in PDF form to our website each month. This is in an effort to provide you with the information that you've requested in this latest change. Once you have the spreadsheet, you can use it in whatever format you need to do your work.

In response to your statement regarding the TSS limits in our DMR, our October sheet shows monthly limits of 15mg/L and loading of 240 lbs., weekly limits of 20 mg/L and loading of 300 lbs, daily limits of 480 lbs, and 85% monthly removal. This is consistent with the TSS limits listed at the end of Section 8B of the executed Mutual Agreement and Order #WQ/M-NWR-2016-246. We will continue to show these values in our DMR spreadsheet to ensure that our treatment operators know and understand what the permit limits, as amended by the MAO, are so that they can operate the plant and report accordingly to DEQ.

Thank you and feel free to call me if you have any further questions.

Regards,

Gerald Fisher, P.E. | Public Works Director

City of Molalla

117 N Molalla Ave. | PO Box 248 | Molalla, OR 97038

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From: Andy Peters <apeters@cityofmolalla.com>
Sent: Monday, December 14, 2020 4:35 PM
To: Gerald Fisher <gfisher@cityofmolalla.com>
Subject: FW: Please submit DMRs as Excel

FYI

From: PINNEY Mike <Mike.PINNEY@state.or.us>
Sent: Monday, December 14, 2020 3:18 PM
To: Andy Peters <apeters@cityofmolalla.com>
Subject: RE: Please submit DMRs as Excel

Also,
The TSS load permit limits are **wrong**. They are the same as BOD.

Mike

From: PINNEY Mike
Sent: Monday, December 14, 2020 9:46 AM
To: 'Andy Peters' <apeters@cityofmolalla.com>
Subject: Please submit DMRs as Excel

Andrew,

When you attach DMRs to NetDMR, use Excel not a pdf. This is so we can download DMR info easily and quickly at our lab.

Nice DMR values, by the way.

Thanks,

Michael Pinney PE
Senior Environmental Engineer
Northwest Region – Source Control
Oregon Department of Environmental Quality
700 NE Multnomah St., Suite 600
Portland OR, 97232
971-227-1765
503 229 6957 fax

Andy Peters

From: BRITSON Aliana <Aliana.BRITSON@state.or.us>
Sent: Wednesday, December 16, 2020 9:09 AM
To: Andy Peters; Thanh Phan
Subject: RE: EDD and Mercury Question

Hi Thanh,

Thank you for helping Molalla with this request! Proper data formatting is really important for us to be able to keep track of the increasing number of data submissions we are receiving here at DEQ, and your efforts are appreciated. Also, I would like to note that when I reviewed the EDD that Molalla had sent to me, that the analytes that had been subcontracted to other labs were missing from the excel. Since it was only two analytes and I had the lab reports I was able to manually add them this time, but they will need to be included in future submissions.

Regards,
Aliana

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From: Andy Peters <apeters@cityofmolalla.com>
Sent: Wednesday, December 16, 2020 8:23 AM
To: Thanh Phan <tphan@edgeanalytical.com>
Cc: BRITSON Aliana <Aliana.BRITSON@state.or.us>
Subject: EDD and Mercury Question

Good Morning Thanh,

Will you please double check with your team and see if they can provide the next round of results to Molalla in DEQs newest EDD format? I can take them in any file type, csv, txt, ect. But the columns just need to be in the DEQs' newest order. The txt files provided last round were in two different orders, neither

consistently formatted. The template with the needed column order that DEQ is asking for now is attached, and Link to info. I think Edge and ALS have systems that can simply spit this information out as a report, correct? Please let me know if that's not the case, we'll need to analyze the risk involved in manual entry.
<https://www.oregon.gov/deq/wq/wqpermits/Pages/Electronic-Data-Delivery-for-Toxics-Data.aspx>

Also, in reviewing the results for Mercury, I can't tell if ALS labs did an equipment blank as requested by note C in table in the original letter from DEQ (attached). Can you confirm?

Thank you for your help, this is a very complex process and we couldn't have gotten this far without you!

Respectfully,

Andy Peters

City of Molalla

Public Works Operations Supervisor

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Andy Peters

From: Andy Peters
Sent: Tuesday, December 29, 2020 4:15 PM
To: BRITSON Aliana; PINNEY Mike
Cc: RABINOWITZ Geoff; NAVARRO Jeffrey; YELTON-BRAM Tiffany; Gerald Fisher
Subject: RE: Tier I/II and CuBLM monitoring issues

Aliana, thanks for this detailed analysis, it's one of the best I've ever seen from any regulatory agency. We have already made adjustments to some of our procedures based on your reports.

On Mercury, we are still waiting to hear back from the laboratory on what's possible, and will likely be able to respond in early January. In the meantime, a few questions:

- 1) Your original request for additional sampling (August 28th) states that Mercury should be tested with a QL of 1.0 nano-grams /L. What has the EPA decided for the actual NPDES limit that will need to be achieved for dischargers?
- 2) Is there a need to reject the Ambient River's Mercury tests submitted due to method blank's concentration since both **all results and all blank concentrations** measured less than the QL requested in the letter? This would be the definition of a "No Detect" as I understand it. Do we just need to have the Laboratory report those results differently?
- 3) EPA Method 1631 appears to only be valid for Grab Sampling; it's likely the Mercury tests from the Composite Sampler will not be able to meet the guidelines in the document you forwarded (Method 1669 1996.pdf). Should we switch to Method 245.1 (range 0.2-10.0 Micrograms/L) for the Effluent Composite Samples?
- 4) May we please request an unabridged data dump (in excel) of all other tests in the "AWQMS" database where EPA Method 1631 was used, including the results for any blanks associated with those tests, and including "failures"? This will allow us to see who else has ran these tests, what labs they used, their blank results, and potentially contact them for advice and lessons learned.

I will be out of the office the remainder of the week, returning January 4th. Thank you, and Happy New Year!

Respectfully,

Andy Peters

City of Molalla
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Molalla, OR 97038

From: BRITSON Aliana <Aliana.BRITSON@state.or.us>

Sent: Wednesday, December 16, 2020 1:20 PM

To: Andy Peters <apeters@cityofmolalla.com>; Gerald Fisher <gfisher@cityofmolalla.com>

Cc: RABINOWITZ Geoff <Geoff.RABINOWITZ@state.or.us>; NAVARRO Jeffrey <Jeffrey.NAVARRO@state.or.us>; PINNEY Mike <Mike.PINNEY@state.or.us>; YELTON-BRAM Tiffany <Tiffany.YELTON-BRAM@state.or.us>

Subject: Tier I/II and CuBLM monitoring issues

Importance: High

Hi Andy,

Thank you for your recent Tier I/II toxics and CuBLM submission. Review of the data is complete. There are a few things to bring to your attention:

Tier I/II Toxics:

The presence of high levels of Mercury in the equipment blank caused the results for mercury to be rejected. Similarly, the results for Bis (2-ethylhexyl) phthalate in the laboratory method blank caused the results for this analyte to be rejected as well. Because of the low number of samples we are requesting, we unfortunately do not have much margin for error and must ask you to resample these analytes. Please resample Mercury and Bis (2-ethylhexyl) phthalate so that they may be included with your **April 15th, 2021** toxics submission.

We recommend speaking with your lab about what can be done in the event of method blank contamination for Bis (2-ethylhexyl) phthalate. For example, you may be able to submit a larger sample so that in the event of a QC issue the sample could be quickly rerun. In the case of Mercury, since it was the equipment blank that caused the rejection of the result, we recommend that you review your sample collection procedures and equipment cleaning procedures to troubleshoot for mercury contamination. You can find a handy resource from EPA outlining potential sample contamination issues here:

https://www.epa.gov/sites/production/files/2015-10/documents/method_1669_1996.pdf. I believe section 4 may be of the most use to you. One of the more unexpected but surprisingly common forms of mercury contamination happens when someone who takes a mercury sample has metal amalgam fillings and accidentally breathes on the sample, so that may be something to consider.

CuBLM:

Temperature and pH results were rejected as they were analyzed by the lab more than 2X beyond holding time. Temperature and pH are field measurements that need to be done within 15 minutes of sample collection. DOC results were also rejected due to significant amounts of analyte found in the laboratory method blank. For future sampling events, please perform field sampling for Temperature/pH and have a conversation with your contract lab about DOC and what can be done in the event of method blank contamination. We are not requesting a resampling for these analytes at this time, as we should have enough information by the end of the 24 sampling events to be able to make an educated estimate for the missing analytes for our analyses.

Please feel free to contact me with any questions.

Regards,
Aliana

Aliana Britson, Ph.D.

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