



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

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TTY 711

June 16, 2016

Joseph Sharpe – KEP-4
Bonneville Power Administration
PO Box 3621
Portland, OR 97208-3621

RE: Request for Further Action
at South Rivergate Pond in Portland
ECSI #5822

Dear Mr. Sharpe:

A year ago at this time (June 2015) the Oregon Department of Environmental Quality (DEQ) received the *Sediment Characterization Data Report* from Apex Companies, summarizing the results of sediment sampling of the South Rivergate Pond. DEQ commissioned this study after BPA declined to conduct a sediment characterization, citing in part a lack of evidence that a release had occurred to the pond from BPA's adjacent St. Johns Substation. Polychlorinated biphenyls (PCBs) were detected in 15 of the 16 analyzed sediment samples, with the highest concentrations closest to the substation's current and former stormwater outfalls.

DEQ and BPA met in August 2015 to discuss a path forward. We conveyed to you our conclusion that the PCB contamination most likely originated from the St. Johns Substation. We requested that BPA conduct a remedial investigation and possible feasibility study aimed at assessing the nature and extent of the contamination and the risks to human health and the environment, along with an evaluation of cleanup alternatives. We also discussed possible options including streamlining the RI/FS, proceeding with a presumptive remedy, and reaching a settlement to address potential releases to the Columbia Slough. We understood BPA to have expressed interest in working with DEQ to address these matters.

DEQ has subsequently tried to contact you on multiple occasions, by phone and e-mail, to determine BPA's decision on moving forward. To date we have not received a substantive response.

We request that BPA provide a formal response to DEQ's request for further action at the South Rivergate Pond no later than Friday, July 29, 2016. If DEQ does not receive a response by that time, or if BPA declines to conduct substantive work to address DEQ's concerns, we will refer the South Rivergate Pond site to the U.S. Environmental Protection Agency (EPA) with a request that EPA take enforcement action against BPA and, if appropriate, other potentially responsible parties.

Please contact me by phone at 503-229-5567 or by e-mail at parrett.kevin@deq.state.or.us if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kevin Parrett', with a long horizontal stroke extending to the right.

Kevin Parrett, Manager
Northwest Region Cleanup Program

cc: Arya Behbehani, PGE
Stan Jones, Port of Portland
William Joyce, on behalf of UPRR
ECSI #5822 File