



Oregon

John A. Kitzhaber, MD, Governor

Department of Environmental Quality

Northwest Region

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TTY 711

November 12, 2014

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

RE: Initial Site Investigation for South Rivergate Pond in Portland
ECSI #5822

Dear Mr. Sharpe:

The Oregon Department of Environmental Quality (DEQ) has reviewed your letter dated October 21, 2014, declining on behalf of the Bonneville Power Administration (BPA) to participate in an investigation of the South Rivergate Pond without the participation of other potentially responsible parties. The South Rivergate Pond is located north of BPA's St. Johns Substation at 12567 North Columbia Boulevard in Portland, Oregon.

DEQ met with representatives of BPA, Portland General Electric (PGE), the Port of Portland and Union Pacific Railroad (UPRR) on October 1, 2013, to discuss their land holdings and operations in the vicinity of the South Rivergate Pond. The other three parties have declined to participate in an investigation of the pond, stating that they never discharged stormwater or hazardous substances to the pond. The BPA St. Johns Substation, in contrast, is known to have discharged stormwater directly to the pond through at least one and possibly two outfalls. In addition, soils at the St. Johns Substation are known to have been impacted by releases of PCBs during its 70-plus years of operation.

DEQ has determined that an investigation of potential contamination in the South Rivergate Pond is necessary. The pond discharges through a culvert to the Columbia Slough across from the St. Johns Landfill. Remediation of contaminated sediments is expected to be conducted next summer along this stretch of the Slough, and DEQ is in the process of ensuring that additional contaminants do not enter the Slough and recontaminate the area. The pond and the surrounding South Rivergate Corridor are also important ecological habitat, particularly to the Western Painted Turtle which is listed as a "sensitive species" by the Oregon Department of Fish and Wildlife.

DEQ will retain a state-authorized contractor to collect sediment samples from the South Rivergate Pond. The contractor will contact you about obtaining access to the pond. DEQ will keep you informed as to when the samples will be collected, and will also inform you of the sampling results. This investigation is authorized by Oregon Revised Statute (ORS) 465.210.

If you have any questions about DEQ's investigations of the South Rivergate Pond and the BPA St. Johns Substation, please contact DEQ's Project Manager, Kevin Dana, at 503-229-5369.

Sincerely,

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

Kevin Parrett, PhD
Manager, Northwest Region Cleanup & Leaking USTs

cc: Arya Behbehani, Portland General Electric
Stan Jones, Port of Portland
William Joyce, Joyce Ziker Parkinson on behalf of UPRR
ECSI #5822

(kpd:KGP)