



FILE COPY

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

15 W Yakima Ave, Ste 200 • Yakima, WA 98902-3452 • (509) 575-2490

July 15, 2008

CERTIFIED MAIL

7007 2560 0001 7674 5999

PacifiCorp
Attn: Stan Yeend
825 NE Multnomah, Ste 1500
Portland, OR 97232-2135

Dear Mr. Yeend:

RE: Early Notice Letter Regarding the Release of Hazardous Substances on property located at PacifiCorp Substation, located at intersection of Burlington Northern Santa Fe Railroad and Ahtanum Road, Union Gap, Washington, ERTS # 604521, Facility Site ID # 18988829

Under Chapter 70.105D Revised Code of Washington (RCW), upon receiving a report of a release or threatened release of a hazardous substance that may pose a threat to human health or the environment, the Department of Ecology (Ecology) is required to conduct an Initial Investigation (II). The II is based upon the following reports:

1. Site Investigation Work Plan, Union Gap Substation, by CH2MHill, dated August 2007
2. Soil and Groundwater Sampling Results for PacifiCorp Union Gap Substation Investigation Technical Memorandum, by CH2MHill, dated January 14, 2008

A large power transformer had a mineral oil leak estimated at 250 gallons at the above location. Approximately 100 gallons were pumped from the transformer vault. About 27 cubic yards of soil were removed immediately adjacent to the transformer. No report was generated for the original excavation work. During a conversation with Patrick Heins with CH2Mhill, I found that a portion of the contaminated soil was still present underneath the transformer vault after the excavation. Subsequent soil boring samples around the excavation were non-detect for PCBs. Soil samples from the temporary groundwater well investigation were also non-detect for PCBs. Soil sheen testing was negative for hydrocarbons during the temporary groundwater sampling. However, no sheen testing or TPH soil analysis was conducted inside of the excavation or under the transformer vault.

Groundwater samples from temporary wells were also obtained from the vicinity of the transformer and the laboratory analyzed for TPH-D and PCBs. All groundwater samples were non-detect for PCBs, however two groundwater samples exceeded the MTCA Method A cleanup standard for oil and diesel.

Under the Model Toxics Control Act (MTCA), Ecology maintains a statewide database of confirmed or suspected contaminated sites. This database is made available to the public upon request and online at <http://www.ecy.wa.gov/programs/tcp/cscs/CSCSpage.HTM>. It is Ecology's decision that the above-referenced property will be added to this database because of oil contaminated soil and groundwater.



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Please note that inclusion in the database does **not** mean that Ecology has made a determination regarding the identification of any potentially liable person(s) under the Model Toxics Control Act (administered under Chapter 173-340 WAC).

It is the policy of the Department of Ecology to work cooperatively with persons to accomplish prompt and effective site cleanups. Ecology prefers to achieve site cleanup cooperatively through independent cleanup actions (WAC 173-340-510). Cooperating with Ecology in planning or conducting remedial actions is not an admission of guilt or liability.

In proceeding with an independent cleanup, please be aware that there are requirements in state law which must be adhered to. In particular, WAC 173-340-300(4) requires a report of independent actions. To the extent known, the report shall include:

1. identification and location of the hazardous substance(s)
2. circumstances of the release and discovery
3. remedial actions planned, completed, or underway

More requirements of independent cleanup actions are discussed in WAC 173-340-120(8)(b). Ecology will use the appropriate requirements contained throughout this chapter in its evaluation of the adequacy of any independent remedial actions performed.

You are encouraged to contact Ecology for limited informal advice and assistance. For technical assistance you are advised to hire an environmental consultant with the appropriate expertise. A copy of Chapter 70.105D RCW, the Model Toxics Control Act, and the implementing regulation Chapter 173-340 WAC, which details the requirements of the Act, is enclosed.

If you would like Ecology to review the independent cleanup actions conducted and determine if the site warrants **no further action**, you are encouraged to participate in the Voluntary Cleanup Program (VCP). Information about the Voluntary Cleanup Program is available online at <http://www.ecy.wa.gov/programs/tcp/vcp/Vcpmain.htm>, or you may contact Frosti Smith, CRO VCP Coordinator, at (509) 454-7841.

If you have any questions regarding this letter, please feel free to contact me at (509) 454-7290.

Sincerely,



Brian Deeken
Site Manager
Toxics Cleanup Program

cc: Pat Heins, CH2MHill

Enc: Chapter 173-340 WAC
Chapter 70.105D RCW