ERTS # 654375

Initial Report

External Reference #

Caller Information

	First	Last
Name	TOM	MEYER
Busines Name	SEATTLE CITY LIGHT	
Street Address		
Other Address		
City	State WA	Zip
E-mail	tom.meyer@seattle.gov	Confidential_FL ☐

Phone	Ext	Type
(206) 386-9168		Business

Where did it happen

Berth	Anchorage		
Location Name	SCL NEWHALEM PENSTOCK		
Street Address	SOUTH OF NEWHALEM		
Other Address			
City/Place	NEWHALEM	State WA	Zip
County - Region	WHATCOM	NWRO	FS ID 10891
WIRA #			
Waterway	SKAGIT RIVER	Type RIVER	
Latitude		Longitude	
Topo Quad 1:24:000	DIABLO DAM		

Direction/Landmark (mile post, cross roads, township/range)

What happened

Spills Program Oil Spill? N

Incident Date	7/18/2014	Received Date	12/31/2014 14:55
Medium	SOIL		
Material	OTHER HAZARDOUS		
	Quantity	Unit	
Source	PUBLIC AGENCY		
Cause	OTHER		
Activity	OTHER		
Impact			
Vessel Name			
Hull Number			

Primary Potentially Responsible Party Information

	First	Last		
Name				
Business Name	SEATTLE CITY LIGHT			
Street Address				
Other Address				
City		State WA	Zip	
Phone		Ext	Type	
E-mail				

Additional Contact Information

Name	Phone	Ext	Type

More Information

From: Meyer, Tom [mailto:Tom.Meyer@seattle.gov]
Sent: Wednesday, December 31, 2014 2:55 PM
To: Bardy, Louise (ECY)
Cc: Musa, Donna K. (ECY); Vick, Heather (ECY)
Subject: Seattle City Light Newhalem Penstocks

Hello Louise.

This email is to notify the Department of Ecology of Seattle City Light's discovery and preliminary investigation of lead impacts to soils along the Penstock at our Newhalem Hydropower project. The site is located in the Skagit Valley near Newhalem, WA. The attached report prepared by Hart Crowser summarizes findings from a preliminary soil sampling investigation conducted in summer 2014. During 2015 we plan to conduct a limited remedial investigation and feasibility study on the alignment to better define the impacts to soils and determine our best course of action.

Currently City Light is in the planning phase of an engineering project that will replace the support saddles along the penstock's entire overland length in response to federal (FERC) requirements. Due to the nature of the project, including the remote location and very difficult access to portions of the penstock, we anticipate the saddle project will not be completed until late 2016. Soils managed or removed as part of the saddle replacement project will be sampled and managed as contaminated waste where appropriate and disposed of accordingly. Preliminary sampling indicates that lead-impacted soils do not designate as dangerous.

Further actions to remove or contain impacted soil resulting from the RI/FS findings would follow the saddle replacement project. Likewise, a determination of whether to enter the site into the Voluntary Cleanup Program will likely be made after the RI/FS.

Please feel free to contact me with questions.

ERTS # 654375

Happy New Year

-Tom Meyer

TOM MEYER
SEATTLE CITY LIGHT
ENVIRONMENTAL AFFAIRS & REAL ESTATE

tom.meyer@seattle.gov
TEL (206) 386-9168

CC: Heather Vic, Donna Musa

Entry Person MUSA TCP, DONNA Entry Date 1/28/2015

ERTS # **654375**

Referral

Referral # 190261

Primary ☑

Referral Method

- ○ E-mail ERTS number
- ○ E-mail attachment
- ◉ Print
- ○ Telephone

Person Referred to	MUSA TCP, DONNA		
Phone	(425) 649-7136	Fax	(425) 649-7098
E-mail	DMUS461@ECY.WA.GOV		
Program/Organization	TOXICS CLEANUP		
Address	3190 160th AVE SE		
City	Bellevue	WA	98008-5452
Region/Location	NWRO		
Referral Date	1/2/2015		

ERTS # 654375

Followup

Followup #1

Inspector Information

Referral # 190261
☑ Lead Inspector MUSA TCP, DONNA
Program/Organization TOXICS CLEANUP
* Region/Location NWRO
# of Ecology Staff 1 Overtime ☐

Action

	Start Date	End Date
E-MAIL	2/18/2015	2/18/2015
TCP - SIS	5/19/2015	5/19/2015

Where did it happen

Berth Anchorage
Location Name SCL NEWHALEM PENSTOCK
Street Address SOUTH OF NEWHALEM
Other Address
City/Place NEWHALEM State WA Zip
County WHATCOM Region NWRO FS ID
Waterway SKAGIT RIVER Type RIVER
WRIA #

What happened

Spills Program Oil Spill? N
Incident Date 7/18/2014
Medium
SOIL
Material
OTHER HAZARDOUS
Quantity Unit Est ☐
Source Regulated? ☐
PUBLIC AGENCY
Cause
OTHER
Activity
OTHER
Impact
Vessel

Latitude Longitude
Topo Quad 1:24,000 DIABLO DAM
Direction/Landmark (mile post, cross roads, township/range)

Potentially Responsible Party Information

Check if the primary PRP provided notice to Ecology ☐
Primary ☑ First Last
Name
Business Name SEATTLE CITY LIGHT
Street Address
Other Address
City State WA Zip
Phone Ext Type
E-mail

Narrative

Tamara Cardona, NWRO TCP, reviewed documentation for Initial Investigation:

COMPLAINT (Brief Summary of ERTS Complaint): Seattle City Lights submitted a report in which soil contamination was documented at levels above MTCA Method A for lead and Method B for PAH's. Seattle City Lights hired Hart Crowser to screen and sample soil for heavy metals and SVOCs adjacent to the penstock support saddles near the Newhalem powerhouse, where additional work that may impact soil is planned.

CURRENT SITE STATUS (Brief Summary of why Site is recommended for Listing or NFA):
Concentrations of lead in surface soil are up to 10 times the MTCA Method A cleanup levels in an area that can potentially be accessed by the public. Additional information should be obtained on whether the extent of the penstock is accessible to the public. The area sampled is near a public campground and could potentially serve as a walking trail.
PAHs are also above the MTCA Method B cleanup levels.
It is recommended that additional TCLP analysis is completed during future work since no correlation was observed between the lead concentrations and TCLP results.

OBSERVATIONS: Description (If site visit made, please be sure to include the following: site observations, site features and cover, chronology of events, sources/past practices likely responsible for contamination, presence of water supply wells and other potential exposure pathways, etc.):

Document reviewed:
Hart Crowser; Seattle City Light Newhalem Penstock Soil Sampling/ XRF Survey; September 22, 2014.

Hart Crowser conducted an investigation, in support of the penstock pedestal replacement project, to determine how to dispose of potentially contaminated soil likely to be disturbed by the project.
Potential sources of contamination to the soil included: sandblasting (likely used to remove coats of paint which may have contained lead); sandblast grit (possibly containing heavy metals); and wood supports for the penstock, which may have contained wood preservatives.

ERTS # 654375

A field survey was conducted by establishing 6 transects along the penstock near the Newhalem powerhouse. Each transect was established at ~100 foot intervals perpendicular to the penstock. Starting with a sample from underneath the penstock, samples were collected moving 3 feet away in each direction. Each location was screened using a portable XRF (X ray fluorescence spectrometer) for metals associated to sandblast grit, lead based paint, or wood preservatives (chromium, lead, copper, arsenic, and zinc) . A total of 57 samples were screened. 16 of the soil samples were sent to an analytical laboratory for confirmation of the five target metals. Two samples were also selected near the support saddle for SVOC analysis. In addition, two samples away from the penstock were collected as background samples. Four of the samples with the highest lead concentration were also analyzed for TCLP.

In general, a good correlation between XRF screening samples and laboratory confirmation samples was observed for lead. Although, the results were slightly lower with the XRF than the lab analysis. Laboratory results for lead for the highest 14 XRF screened samples ranged from 9.6 – 2000 mg/kg. Background samples indicated lead concentrations of 12 and 42 mg/kg.
Results for zinc, chromium III, and cadmium were below the MTCA Method A cleanup level. Results for copper were below the Method B cleanup level. Arsenic exceeded the MTCA Method A cleanup level in one sample with a concentration of 25 mg/kg. Note that chromium results were compared to Chromium III cleanup levels, however laboratory analysis was for total chromium; these concentrations ranged from 11-40 mg/kg including background samples.

None of the four TCLP results exceeded the 5 mg/L for lead. However; the lead concentrations and TCLP results showed no correlation, therefore it is recommended that additional TCLP sampling is completed during future work.

PAHs concentrations exceeded the Method B cleanup level in both samples analyzed. These samples were collected near the wood support for the penstock in an area that was visibly stained.

Recommendation: List on CSCSL.

New TCP file "Seattle City Light Newhalem Penstock"

Vessel Emergency ☐ Entry Person: MUSA TCP, DONNA Entry Date 2/18/2015