April 20, 2011

Mike Romero
Oregon DEQ – Northwest Region
2020 SW 4th Avenue, Suite 400
Portland, Oregon 97201-5263

Re: RI-SCE Addendum, Former Mar Com Site (South)
2007 PGE Transformers Removal and Cleanup
DEQ ECSI ID Number: 2350

Dear Mike,

This is an addendum to the May 2010 Remedial Investigation and Source Control Evaluation (RI-SCE) report to document the July 2007 removal and cleanup of transformers from the former Mar Com Site (South) completed by Portland General Electric (PGE). The former Mar Com Site (South) is located at 8970 North Bradford Street in Portland, Oregon (Site).

Background

Historical activities at the Site consisted primarily of boat, ship, and barge construction and repair. The Site has been unoccupied since 2005. Prior to the removal of the buildings, there were reported to be a series of break-ins, acts of vandalism, and theft of metal from the Site. On July 11, 2007, Langley – St-Johns, LLC. (the property owner) contacted PGE to report that thieves knocked a PGE transformer onto the ground from the pole mounted platform and were removing metal from the transformer. There were previously three PGE transforms located on the pole mounted platform located approximately fifteen feet above the ground surface. The three transformers are shown in the Photo 1(Attachment 1 - Photographs). The one transformer knocked to the ground spilled oil onto the ground surface.

PGE Removal of Transformers and Soil Cleanup

A crew from PGE responded to the notification on the evening of July 11, 2007. PGE noted that the spilled oil was contained to the area immediately adjacent to the poles where the transformers were located. This area was an unpaved portion of the Site (approximately 14 feet by 30 feet) surrounded by pavement (Attachment 1, Photo 1). PGE estimated that 200 gallons of transformer oil was spilled. PGE removed the three transformers, removed surface debris, and excavated 17 cubic yards of soil based on visual observation. All soil with visually observed oil staining was reportedly removed by PGE and the oil staining on the paved surfaces was cleaned with degreaser. Photo 2 (Attachment 1) shows the transformer area following the removal of the transformers and the removal of the soil. A copy of PGE's Spill/Release Report (OERS No. 07-1515) is provided at Attachment 2. This Spill/Release Report includes additional photographs of the transformer area before and after removal. Removed material was reportedly taken to Columbia Ridge Landfill in Arlington, Oregon. Disposal receipts are included in Attachment 2. Sampling of the oil in the three PGE transformers was completed by PGE to assess the PCB content of the oil in the transformers. The transformer oil in transformer no.

233 was non-detect for PCBs , the total PCBs in the transformer oil in transformer no. 234 was 3 milligrams per kilogram (mg/Kg), and total PCBs in the transformer oil in transformer no. 235 was 30 mg/Kg. These results are provided in Attachment 3 - PGE Analytical Testing Report for total PCBs. Analysis for individual PCB Aroclor values was not completed. PGE did not collect confirmation soil samples following the removal of soil with observed oil staining. Analytical testing was limited to sampling of the oil in the three transformers for total PCB content.

Source Control Evaluation

Because sampling by PGE was limited to analysis of the total PCB content of the transformer oil, it is not possible to directly compare results to the PCB Aroclor screening levels values listed in the May 2010 RI-SCE report. However, Aroclor 1242, Aroclor 1254, and Aroclor 1260 are most commonly associated with transformer oils. The soil screening level values listed in the May 2010 RI-SCE included values for human health (direct contact) and ecological receptor exposure. The screening level values listed for Aroclor 1242, Aroclor 1254, and Aroclor 1260 for human health exposure was 980 µg/Kg (0.98 mg/Kg). Assuming the transformer containing 30 mg/Kg total PCB oil was spilled, and using soil properties associated with loose sand, the percent of oil in soil would need to be approximately 6 to 12 percent oil by volume to result in 0.98 mg/Kg PCBs in soil. It is assumed that 6 to 12 percent oil in soil would be visually apparent as oil stained soil. Oil stained soil was removed by PGE.

Records and photographs show that the PGE transformers were removed and soil was removed below the areas of the transformers. As presented in the PGE Spill/Release Report (Attachment 2) and as discussed in a paragraph above, the source of transformer oil has been removed and it is assumed that the residual impacts from the spill of transformer oil has also been removed to below the referenced screening level values. The area of soil removal by PGE was later filled with on-site fill material and covered with landscaping bark. This area has remained relatively unchanged since 2007. Soil remaining in the former transformer area following excavation by PGE is not in an area of stormwater runoff nor available to direct exposure. Information from the 2007 PGE transformers removal and cleanup does not change the conclusion for the May 2010 RI-SCE report that no potentially complete exposure pathways for contaminant migration to the Willamette River were identified in connection with residual surface or subsurface soil impacts.

Sincerely,
SLR International Corp

Megan Coracci
Senior Scientist

Attachments:
Attachment 1 – Photographs
Attachment 2 – PGE Spill/Release Report (OERS No. 07-1515)
Attachment 3 – PGE Analytical Testing Report for Total PCBs

Photo 1: Site Photograph from June 2006 showing the three PGE transformers

Photo 2: Transformer area following transformer removal and soil removal

SLR	RI-SCE Addendum, 2007 PGE Transformer Removal Former Mar Com Site (South) Portland, Oregon
PHOTOGRAPHS	Job No: 108.00242.00001

ATTACHMENT 2

PGE SPILL/RELEASE REPORT (OERS NO. 07-1515)

SPILL/RELEASE REPORT

State of Oregon Department of Environmental Quality

1 - GENERAL INFORMATION **OERS No.** __07-1515

a. Company/Individual Name: _Portland General Electric_____

b. Address: __121 SW Salmon, 3WTCBR05 _____
__Portland, OR 97204_____

c. Company Contact Person: ____Chip Bloomer_____

d. Phone Number(s): __503-464-7109_____

e. Specific on-site location of the release (and address if different from above):
___8970 N Bradford Street_____
___Portland Oregon_____
___Map Attached
Please provide a map of the site showing area(s) where the release occurred, any sample collection locations, location of roads/ditches/surface water bodies, etc.

2 - RELEASE INFORMATION

a. Date/Time Release started:__7/11/07_____ Date/Time stopped:___7/11/07 5:00 p.m.

b. Release was reported to (specify Date/Time/Name of Person contacted where applicable):
ODEQ _Follow up call with Kimberly Van Patton 7/12/07 aprox. 11:00 am
OERS __7/12/07 10:00 am_Jim Raymond _____
NRC _____
Other (describe):_____

c. Person(s) reporting release:___Chip Bloomer_____

d. Name, quantity and physical state (gas, liquid, solid or semi-solid) of material(s) released:
___Transformer (mineral oil) 200 gals_____
_____
Please attach copies of material safety data sheets (MSDS) for released material(s).

e. The release affected: ___Air ___Groundwater ___Surface Water _X__Soil ___Sediment

f. Name and distance to nearest surface water body(s), even if unaffected (include locations of creeks, streams, rivers and ditches that discharge to surface water on maps):
_____Willamette River aprox. 300 feet_____
Has the release reached the surface water identified above?: ____Yes __X_No
Could the release potentially reach the surface water identified above? ____Yes __X_No
Explain:___All material removed from site
_____
_____

g. Depth to nearest aquifer/groundwater:___NA_____
Is nearest aquifer/groundwater potable (drinkable)? ____Yes _X__No
Has the release reached the nearest aquifer/groundwater? ____Yes __X__No
Explain:____ Insufficient material spilt to saturate ground to below upper surface levels

h. Release or potential release to the air occurred? ____Yes __X_No
Explain:_____

_____

i. Was there a threat to public safety? ____Yes __X_No
j. Is there potential for future releases? ____Yes __X_No
Explain:____ Transformers removed from area. All oil and contaminated material removed from site._____

_____

k. Describe other effects/impacts from release (emergency evacuation, fish kills, etc.):
____None_____

_____

_____

l. Describe how the release occurred. Include details such as the release source, cause, contributing weather factors, activities occurring prior to or during the release, dates and times of various activities, first responders involved in containment activities, etc.:

___7/11/07 - Property owner reported to PGE dispatch that vandals were attempting to remove metal from three transformers. 7/11/07 5:00 p.m.- PGE immediately investigated and dispatch internal spill crew. There were three small electrical transformers that were not in service that thieves were attempting to extract the metal from. Initially all three transformers were pole mounted, but thieves knocked one to the ground and partially drained the oil from the other two on the mounts. Oil was contained to area immediately adjacent to poles were the transformers were mounted. Clean up was initiated at 5:00 pm 7/11/07 and continued until complete at 7/12/07 am. Pictures of the spill area and transformers are attached.

3 - SITE INFORMATION

a. Adjacent land uses include (check all that apply and depict on site maps):
____Residential ____Commercial __X__Light Industrial ____Heavy Industrial
____Agricultural ____Other (describe):_____
b. What is the population density surrounding the site:_____
c. Is the site and/or release area secured by fencing or other means? _X__Yes ____No
d. Soil types (check all that apply): ____alluvial ____ bedrock ____ clay ____sandy
____silt ____ silty loam __X__artificial surface (cement/asphalt/etc.)
e. Describe site topography:____Flat___- Vacant secure property formally used for marine repair activities. Primarily asphalt except for area immediately adjacent to transformer pole mounts._____

4 - CLEANUP INFORMATION

a. Was site cleanup performed? ___X_Yes ____No
   If No, explain:_____
   _____

b. Who performed the site cleanup?
   Company Name: __Portland General Electric_____
   Address: _____121 SW Salmon_____
   _____Portland, Oregon 97204_____
   Cleanup Supervisor: _Tom Van Hoon_____
   Phone Number(s): _____503-963-6884_____

c. Has all contamination been removed from the site? __X_Yes ____No
   If No, explain:_____
   _____

d. Estimated volume of contaminated soil removed:___17 Cubic Yards_____

e. Estimated volume of contaminated soil left in place:____0_____

f. Was a hazardous waste determination made for cleanup materials? __X__Yes ____No

g. Based on the determination, are the cleanup materials hazardous wastes?
   ____No __X_No If Yes, list all waste codes:_____

h. Was contaminated soil or water disposed of at an off-site location? __X__Yes ____No
   If yes, attach copies of receipts/manifests/etc., and provide the following information:
   Facility Name: ___Columbia ridge Landfill_____
   Address: _____18177 Ceder Springs Lane_____
   _____Arlington, OR 97812_____
   Facility Contact:_____
   Phone Number(s): _____

i. Is contaminated soil or water being stored and/or treated on-site? ____Yes __X__No
   If yes, please describe the material(s), storage and/or treatment area, and methods utilized (attach additional sheets if necessary):
   _____
   _____
   _____
   _____

j. Describe cleanup activities including what actions were taken, dates and times actions were initiated and completed, volumes of contaminated materials that were removed, etc. (attach additional sheets or contractor reports if necessary or more convenient):
   _____ Clean up was initiated at 5:00 pm 7/11/07 and continued until complete at 7/12/07 am. Soil, Vegetation, asphalt and various debris were removed. Remaining asphalt was cleaned with degreaser.
   _____
   _____

5 - SAMPLING INFORMATION

Attach copies of all sample data and indicate locations of sample collection on maps.

a. Were samples of contaminated soil collected? ____Yes __X__No ____N/A
b. Were samples of contaminated water collected? ____Yes __X__No ____N/A
c. Were samples collected to show that all contamination had been removed?
____Yes __X__No ____N/A
d. Describe sampling activities, results and discuss rationale for sampling methods:
____Oil from within the transformers was sampled for PCB content (results attached).
_____PCB levels were below 50 ppm. All visible oil contamination was removed.
Transformer oil analytical is attached.

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

6 - SPILL REPORT CHECKLIST

To ensure that you have gathered all the information requested by the Department in this Spill/Release Report, please complete the following checklist:

__X_ Map(s) of the site showing buildings, roads, surface water bodies, ditches, waterways, point of the release, extent of contamination, areas of excavation and sample collection locations attached.

__X_ Material Safety Data Sheet (MSDS) for released material(s) attached. **Note: an MSDS is not required for motor fuels.**

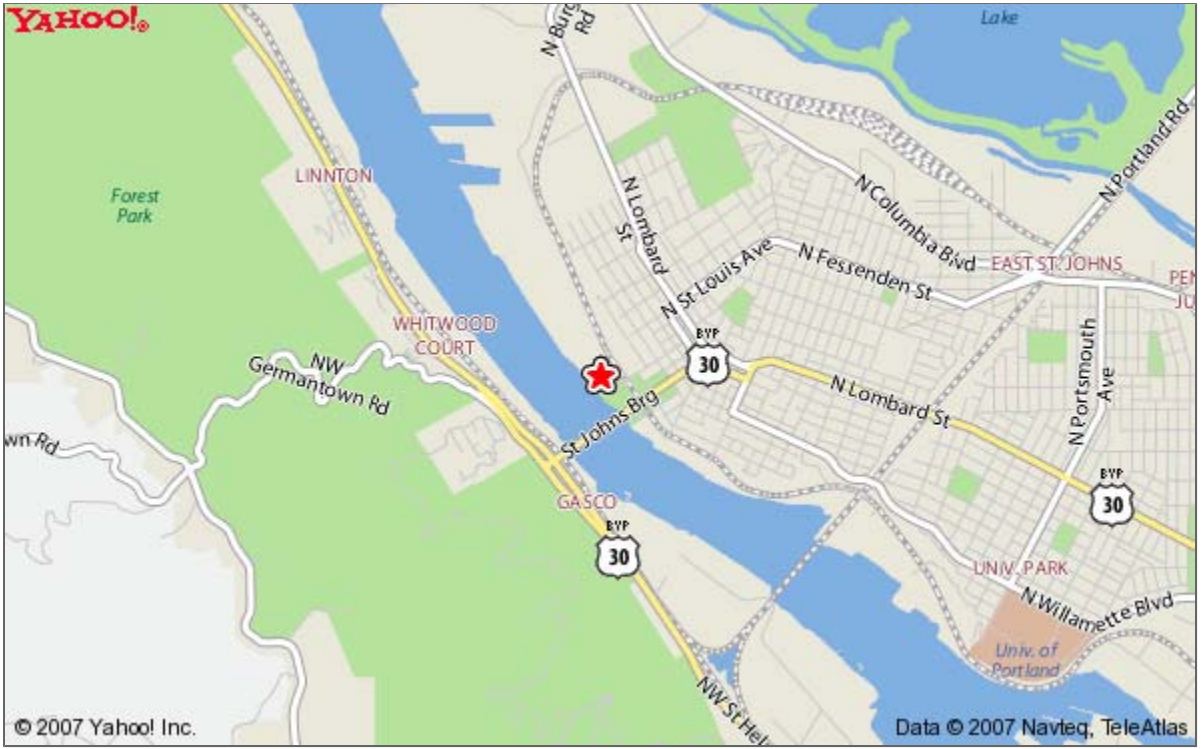
__X_ Sampling data/analytical results attached.

__X_ Receipts/manifests (if any) for disposal of cleanup materials attached.

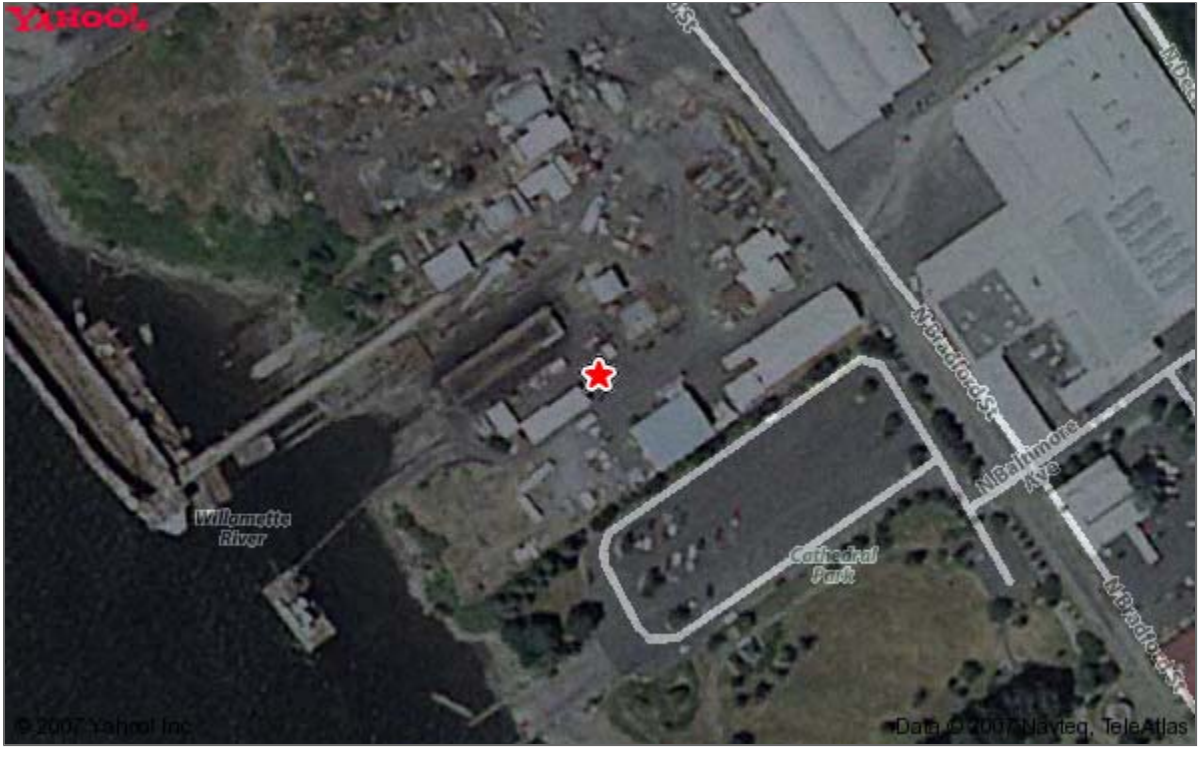
____ Contractor reports (if any) attached.

If you would like to submit your report by e-mail it can be submitted electronically to:
DOSPILLS@deq.state.or.us

LangleySt.Johns Property 8970 N Bradford St. St. Johns, Oregon



LangleySt.Johns Property Spill Location



TestAmerica
ANALYTICAL TESTING CORPORATION

PORTLAND, OR 9405 S.W. NIMBUS AVENUE
BEAVERTON, OR 97008-97132
ph: (503) 906.9200 fax: (503) 906.9210

PCB Analysis Summary Report

PGE-EM&C Substation Test/Maint Engrng (RC216)

Friday, July 13, 2007

Company #	Result	Sample Date	Analyte	Units	Lab ID	RC #
233/333KVA	30	07/11/07 00:00	Total PCBs	mg/kg	PQG0368-01	RC216
234/333KVA	3	07/11/07 00:00	Total PCBs	mg/kg	PQG0368-02	RC216
235/333KVA	ND	07/11/07 00:00	Total PCBs	mg/kg	PQG0368-03	RC216

Note: The results on this report have been rounded to show only integer values. The acutal results may be slightly higher, but are within standard rounding rules.

TestAmerica - Portland, OR

Brian L Cone

Brian Cone, Industrial Services Manager

PCB EMERGENCY RUSH SAMPLE CHAIN OF CUSTODY FOR ELECTRICAL EQUIPMENT ONLY

NCA WO# PQG03608

SPILL LOCATION: 8910 N BRADFORD (PORTLAND)		
COMPANY NO.: 233, 234, 235	KVA: 333 (3)	SERIAL NO.:
RC NO.: 328	DATE SAMPLED: 7/11/07	SAMPLE TAKEN BY: J THOMAS

TELEPHONE RESULTS TO

SITE RESPONDER		
SPILL COORDINATOR (EM&C Response/Foreman): J THOMAS	PHONE: 849-2659	PAGER:
EM&C RESPONSE	PHONE	PAGER
SAMPLE DELIVERED TO LAB BY: J THOMAS	TIME: 10:50AM	DATE: 7/12/07
SAMPLE RECEIVED BY: [signature]	TIME: 10:50	DATE: 7-12-07

SAMPLE RECEIVED IN APPROPRIATE CONTAINER?

☐ Yes ☐ No

HAND THIS CHAIN OF CUSTODY ALONG WITH SAMPLE OVER TO LAB PERSONNEL ONLY. THIS CHAIN OF CUSTODY MUST BE WITH THE SAMPLE WHEN DELIVERED TO THE LAB.

Note: Lab to Contact Environmental Services With Test Results.

Verbal Results Given To:	By NCA Staff:	Results Given:
Date:	Time:	

TestAmerica Sample Receipt Checklist

Received by: *(section A)*
Date: 7-12
Time: 10:50
Initials: MM

Unpacked by: *(section B)*
Date: 7-12
Initials: MM

Logged-in by:
Date: 7-12
Initials: MM

Work Order No. PQG0368
Client: PGE
Project: Rush PCB Spill

Cooler IDs:

***ESI Clients *(see Section C)*

Cooler Temperature (IR): ✓ °C plastic glass NA *(oil/air samples, ESI client)*

Temperature out of range:
___ *No Ice*
___ *Ice Melted*
___ *W/in 4 Hours*
___ *Other:*

A

Custody Seals: (#____)

Signature: Y N Dated:_____
X None

Container Type:
____#Cooler(s)
____#Box(s)
X None (___#Other:_____)

Coolant Type:
____Gel Ice
____Loose Ice
X None

Packing Material:
____Bubble Bags
____Styrofoam Cubbies
X None (____Other:_____)

Received from:
____TA Courier
____Senvoy
____UPS
____Fed Ex
X Client
____TDP
____DHL
____SDS
____Mid-Valley
____GS/TA
____GS/Senvoy
____Other:_____

B

Sample Status:
(If N circled, see NOD)

General:
Intact? (Y) N
Containers Match COC? (Y) N none given
IDs Match COC? (Y) N

For Analyses Requested:
Correct Type & Preservation? (Y) N
Adequate Volume? (Y) N
Within Hold Time? (Y) N

Volatiles:
VOAs Free of Headspace? Y N (NA)
TB on COC? not provided Y N (NA)

Metals:
HNO3 Preserved? Y N (NA)

C

***ESI Clients Only:

Temperature Blank: _____°C not provided

All preserved bottles checked Y N NA *(voas/soils/all unp.)*
All preserved accordingly? Y N *(see NOD)* NA *(voas/soils/all unp.)*

Army Corp:

Geiger (ticks/min): ___ ___ ___ ___

Temperatures (IR): _____°C _____°C _____°C _____°C
(left) (middle) (right) (air)

Project Managers:

Comments:_____

*PM Reviewed:*_____ *(Initial/Date)*

COOPER POWER SYSTEMS

MATERIAL SAFETY DATA SHEET

TRANELEC(R*) CONVENTIONAL TRANSFORMER OIL

COOPER POWER SYSTEMS
1900 EAST NORTH STREET
WAUKESHA, WISCONSIN 53188-3899
USA

EMERGENCY TELEPHONE: (262) 547-1251

PRODUCT INFORMATION: WWW.COOPERPOWER.COM

HAZARDOUS INGREDIENTS/IDENTITY INFORMATION

EXPOSURE LIMITS	OSHA PEL	ACGIH*	TLV	STEL
TWA (MG/M3) EXPOSURE LIMIT FOR TOTAL PRODUCT AS OIL MIST (AEROSOL)	5		5	10

INGREDIENTS	CAS#	COMPONENT	CONCENTRATION
	64742-46-7	PETROLEUM MIDDLE DISTILLATES, SEVERELY HYDROTREATED	50-100%
	64742-53-6	PETROLEUM LIGHT NAPHTHENIC DISTILLATES, HYDROTREATED	0-50%
	128-37-0	BUTYLATED HYDROXY TOLUENE (ALSO KNOW AS 2,6-DITERTIARY-BUTYL PARA-CRESOL, OR DBPC)	<0.3%

HAZARDOUS MATERIALS IDENTIFICATION SYSTEM (HMIS):
HEALTH 1
FLAMMABILITY** 1
REACTIVITY** 1

COMPONENTS OF THIS PRODUCT ARE LISTED ON THE U.S. TOXIC SUBSTANCES CONTROL ACT CHEMICAL SUBSTANCES INVENTORY.

* ACGI STATES THAT THE AIR IS TO BE SAMPLED BY A METHOD THAT DOES NOT COLLECT VAPOR.

** INTERCHANGEABLE WITH NFPA 704 RATINGS.

PHYSICAL/CHEMICAL CHARACTERISTICS

BOILING POINT: >160 DEG. C

VAPOR PRESSURE (MMHg): <0.1 @ 20 DEG. C

VAPOR DENSITY (AIR = 1): >5

SOLUBILITY IN WATER: NEGLIGIBLE: <0.1%

APPEARANCE AND ODOR: CLEAR LIQUID HAVING SLIGHT PETROLEUM ODOR.

VOLATILE ORGANIC COMPOUNDS (G/L): NIL

SPECIFIC GRAVITY (H20 = 1): 0.88

POUR POINT: -40 DEG. C

EVAPORATION RATE (BUTYL ACETATE = 1): NOT AVAILABLE

pH: ESSENTIALLY NEUTRAL

FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (ASTM D-92): 145 DEG. C (TYPICAL)

FLAMMABILITY LIMITS: NOT AVAILABLE

EXTINGUISHING MEDIA: CO2, DRY CHEMICAL, FOAM, AND WATER SPRAY (FOG)

SPECIAL FIRE FIGHTING PROCEDURES:
USE MSHA/NIOSH APPROVED SELF-CONTAINED BREATHING APPARATUS WITH FULL FACE MASK AND FULL PROTECTIVE EQUIPMENT IN CONFINED AREAS. USE WATER TO KEEP FIRE-EXPOSED CONTAINERS COOL. WATER SPRAY MAY BE USED TO FLUSH SPILLS AWAY FROM SOURCES OF IGNITION. APPLICATION OF WATER TO FLAMING OIL CAN CAUSE SPREADING.

UNUSUAL FIRE AND EXPLOSION HAZARDS:
SLIGHT WHEN EXPOSED TO FLAME; CAN REACT WITH OXIDIZING MATERIALS.

REACTIVITY DATA

STABILITY: TRANELEC TRANSFORMER OIL IS STABLE UNDER NORMAL CONDITIONS OF USE.

INCOMPATIBILITY (MATERIALS TO AVOID):
AVOID CONTACT WITH STRONG OXIDIZING AGENTS.

HAZARDOUS DECOMPOSITION OR BY-PRODUCTS:
THERMAL DECOMPOSITION PRODUCTS ARE HIGHLY DEPENDENT ON THE COMBUSTION CONDITIONS. A COMPLEX MIXTURE OF AIRBORNE SOLID, LIQUID, PARTICULATES, AND GASES WILL EVOLVE WHEN THIS MATERIAL UNDERGOES PYROLYSIS OR COMBUSTION. CARBON MONOXIDE AND OTHER UNIDENTIFIED ORGANIC COMPOUNDS MAY BE FORMED UPON COMBUSTION.

HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

HEALTH HAZARD DATA

ROUTES OF ENTRY:
SKIN CONTACT; EYE CONTACT OR INHALATION POSSIBLE UNDER MIST CONDITIONS.

SKIN:
ESSENTIALLY NON-TOXIC. RABBIT ACUTE DERMAL LD50 >2000 MG/KG. REPEATED OR PROLONGED CONTACT MAY RESULT IN LOCALIZED IRRITATION OF THE SKIN. MAY CAUSE ALLERGIC REACTIONS IN SOME INDIVIDUALS.

INGESTION:
ESSENTIALLY NON-TOXIC. RAT ACUTE ORAL LD50 >5000 MG/KG. MAY CAUSE GASTROINTESTINAL DISTRESS. SYMPTOMS MAY INCLUDE IRRITATION, NAUSEA, VOMITING AND DIARRHEA.

INHALATION:
MAY CAUSE RESPIRATORY TRACT IRRITATION. EXPOSURE TO DENSE OIL MIST MAY LEAD TO

RESPIRATORY PROBLEMS.

CARCINOGENICITY: NONE
NTP: NO
IARC MONOGRAPHS: NO
OSHA REGULATED: NO

SIGNS AND SYMPTOMS OF EXPOSURE:
PROLONGED OR REPEATED SKIN CONTACT MAY CAUSE IRRITATION.

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE: NONE RECOGNIZED

EMERGENCY AND FIRST AID PROCEDURES:
IF INGESTED, DO NOT INDUCE VOMITING. IF SPONTANEOUS VOMITING OCCURS, MONITOR THE SUBJECT FOR BREATHING DIFFICULTY. GET IMMEDIATE MEDICAL ATTENTION. IF INHALED, REMOVE AFFECTED PERSON FROM EXPOSURE TO MISTS. FOR EYE CONTACT, FLUSH THE EYES IMMEDIATELY WITH LARGE AMOUNTS OF WATER WITH THE EYELIDS HELD AWAY FROM THE EYE TO ENSURE THOROUGH RINSING. FOR SKIN CONTACT, REMOVE BY WASHING WITH SOAP AND WATER. GET MEDICAL ATTENTION IF IRRITATION PERSISTS.

CONTROL MEASURES

RESPIRATORY PROTECTION:
USE MSHA/NIOSH APPROVED SUPPLIED-AIR RESPIRATORY PROTECTION IF OCCUPATIONAL EXPOSURE LIMITS ARE EXCEEDED.

VENTILATION:
USE LOCAL EXHAUST TO CAPTURE VAPOR, MISTS, OR FUMES IF NECESSARY.

PROTECTIVE GLOVES:
USE CHEMICAL-RESISTANT (NITRILE) GLOVES TO PREVENT PROLONGED OR REPEATED SKIN CONTACT.

EYE PROTECTION:
WEAR SPLASH GOGGLES OR SAFETY SHIELD TO PREVENT EYE CONTACT. EYE BATHS SHOULD BE READILY AVAILABLE IN THE AREA OF HANDLING TRANELEC OIL.

OTHER PROTECTIVE CLOTHING OR EQUIPMENT:
WEAR CHEMICAL-RESISTANT (NITRILE) APRON OR OTHER IMPERVIOUS CLOTHING TO AVOID PROLONGED OR REPEATED SKIN CONTACT.

WORK/HYGENIC PRACTICES:
WASH WITH SOAP AND WATER AFTER CONTACT. AVOID EXPOSURE TO MISTS.

PRECAUTIONS FOR SAFE HANDLING AND USE

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

STOP FLOW OR ELIMINATE SOURCE OF LEAKAGE. ELIMINATE ALL SOURCES OF IGNITION. ABSORB WITH AN OIL ABSORBENT MATERIAL. NO SPECIAL HAZARDS EXCEPT UNDER MIST OR SPRAY CONDITIONS.

A SPILL OR RELEASE TO NAVIGABLE WATERS MUST BE REPORTED IMMEDIATELY TO THE NATIONAL RESPONSE CENTER (800-424-8802). SPILLS MAY BE REPORTABLE TO STATE OR LOCAL AGENCIES.

WASTE DISPOSAL:
FOR RECYCLING, CONSULT WITH LOCAL USED OIL RECYCLERS. TRANELEC OIL WHEN RECYCLED, DISCARDED OR DISPOSED OF IS A USED OIL PER 40 CFR 279. TRANELEC OIL IS NOT A HAZARDOUS WASTE PER 40 CFR 261. TRANELEC OIL FROM RETROFILLED ELECTRICAL EQUIPMENT, BY VIRTUE OF CONTAMINATION FROM RESIDUES OF EARLIER

FLUID(S), MAY QUALIFY AS A HAZARDOUS WASTE PER 40 CFR 261.

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:
AVOID EXTREMES OF TEMPERATURE IN STORAGE. STORE TRANELEC OIL IN LABELED, TIGHTLY CLOSED CONTAINERS IN COOL, DRY, ISOLATED AND WELL VENTILATED AREAS, AWAY FROM SOURCES OF IGNITION OR HEAT. TO MAINTAIN FLUID FOR INTENDED USE AS AN ELECTRICAL INSULATING FLUID, ELIMINATE EXPOSURE TO OXYGEN AND MOISTURE.

THIS MATERIAL SAFETY DATA SHEET HAS BEEN PREPARED IN ORDER TO HELP THE USERS OF TRANELEC CONVENTIONAL TRANSFORMER OIL. THE DATA CONTAINED HEREIN IS ACCURATE AS OF THE DATE OF PREPARATION OF THIS SHEET.

EFFECTIVE DATE: JANUARY 13, 2005

JOHN LUKSICH

SENIOR ENGINEER - DIELECTRIC FLUIDS

BULLETIN 98081

01/05

PGE 001

No. 1159

PORTLAND GENERAL ELECTRIC

TRANSPORTING ELECTRICAL EQUIPMENT OR MATERIALS REPORT (Form 0080)

For moving damaged (leaking and potentially leaking) electrical equipment and materials associated with cleanups (soil, water, absorbent pads, etc.).

LOCATION (prior to equipment malfunction or spill)

WAS THIS EQUIPMENT OR THESE MATERIALS INVOLVED WITH A SPILL? ☒ Yes ☐ No

CLEANUP PERFORMED BY EM&C SPILL RESPONSE? ☒ Yes ☐ No

ADDRESS: 8970 N BRADFORD ST. (PORTLAND)

DATE: 7/11/07

TYPE OF EQUIPMENT (one piece of electrical equipment per form)

☒ Transformer S ☐ Capacitor ☐ Other (_____) ☐ Not Applicable

KVA SIZE: 333 (3)

COMPANY NO.: 233, 234, 235

PCB CONTENT KNOWN BY STICKER

☐ <1 (blue) ☐ <15 (red) ☐ <48 (black) ☐ Non-PCB (green) ☒ No Sticker

PCB CONTENT (PPM) if known: 233-30/234-3/235-ND

OIL SAMPLE SENT TO LAB? ☒ Yes ☐ No

TYPE OF MATERIALS (check all that apply)

☒ Soil ☐ Water ☒ Misc. Cleanup Materials ☐ Other (_____) ☐ Not Applicable

MATERIALS (drums, etc) PROPERLY LABELED? ☒ Yes ☐ No

DRUM / CONTAINER INDENTIFICATION NUMBER(s): 2 DROPBOXES

TRANSPORTED BY (sign): NRC

LAST NAME (please print):

RO21565R+ / RO21566R+

TEMPORARY STORAGE AREA (IF APPLICABLE)

TSA LOCATION (line or service centers): ☐ Beaverton ☐ Gresham ☐ Newberg ☐ Oregon City ☐ Salem ☐ Sunset ☐ Wilsonville ☐ Woodburn ☐ Other (_____)

DATE EQUIPMENT / MATERIALS ARRIVED AT TEMPORARY STORAGE AREA:

TIME:

0080 FORM ATTACHED TO TRANSFORMER? ☐ Yes ☐ No

ANYONE PRESENT TO ACCEPT DELIVERY? ☐ Yes ☐ No

ACCEPTED BY (sign):

LAST NAME (please print):

DATE EQUIPMENT / MATERIALS MOVED FROM TEMPORARY STORAGE AREA?

TIME:

COPY OF THIS FORM ATTACHED TO TRANSFORMER? ☐ Yes ☐ No

TRANSPORTED BY (sign):

LAST NAME (please print):

THE TRANSFORMER SHOP

DATE EQUIPMENT / MATERIALS ARRIVED AT SHOP:

TIME:

0080 FORM ATTACHED TO TRANSFORMER? ☐ Yes ☐ No

ANYONE PRESENT TO ACCEPT DELIVERY? ☐ Yes ☐ No

ACCEPTED BY (sign):

LAST NAME (please print):

Original to Transformer Shop; Copy to Environmental Services

WASTE MANAGEMENT

Oregon Waste Systems

A Waste Management Company

18177 Cedar Springs Lane
Arlington, Oregon 97812
(541) 454-2030

No. 642926

DATE:/TIME: TIME 09:37 AM 13 JUL 07

LOAD DATE:

CUSTOMER: PGE

PROFILE NUMBER: PGE 0001

TRUCK NUMBER: TRUCK ID 2060

TRAILER/CONTAINER NUMBER: 21565/21566

SEAL NUMBER:

CUSTOMER INVOICE NO.: 1159

GROSS 81800 LB

GROSS WEIGHT:

TARE WEIGHT-TRACTOR: W TARE 47540 LB

TARE WGT.-TRAILER/CONTAINER:

NET 34260 LB

NET WEIGHT:

GATEHOUSE: SM

DRIVER:

TRAIN ID: ORIGIN:

WASTE TYPE: Residue & Debris

DISPOSAL: CM DC BU GRID SEGREGATE

REMARKS:

HAULER:

902-ARLINGTON

105760

WM Columbia Ridge Landfill
18177 Cedar Springs Lane
Arlington, OR 97812
(541)-454-2030

TICKET: 452802
DATE: 07/13/2007
TIME: 09:44 - 10:23
LOAD DATE: 07/13/2007
TIP DATE: 07/13/2007

CUSTOMER: PORTLAND GENERAL ELECTRIC
PROFILE: PGE001 / PORTLAND GENERAL
TRUCK: 2060 TRAILER:
ORIGIN: PDX / PORTLAND CONTAINER: 21565/21566
COMMENT:

P.O.: 642926
GROSS: 81800 LBS Manual
TARE: 47540 LBS Manual
NET: 34260 LBS
MANIFEST: 1159

WASTE	NET/TONS	UNIT
SPWCM / SPECIAL WASTE COMINGLE (SPP	17.13	T

Driver: _____
IN: SARAH MASTRIONA B: ORARLI01PC

Weighmaster: _____
OUT: SARAH MASTRIONA B: ORARLI01PC

ATTACHMENT 3

PGE ANALYTICAL TESTING REPORT

TestAmerica
ANALYTICAL TESTING CORPORATION

PORTLAND, OR 9405 S.W. NIMBUS AVENUE
BEAVERTON, OR 97008-97132
ph: (503) 906.9200 fax: (503) 906.9210

PCB Analysis Summary Report

PGE-EM&C Substation Test/Maint Engrng (RC216)

Friday, July 13, 2007

Company #	Result	Sample Date	Analyte	Units	Lab ID	RC #
233/333KVA	30	07/11/07 00:00	Total PCBs	mg/kg	PQG0368-01	RC216
234/333KVA	3	07/11/07 00:00	Total PCBs	mg/kg	PQG0368-02	RC216
235/333KVA	ND	07/11/07 00:00	Total PCBs	mg/kg	PQG0368-03	RC216

Note: The results on this report have been rounded to show only integer values. The acutal results may be slightly higher, but are within standard rounding rules.

TestAmerica - Portland, OR

Brian L Cone

Brian Cone, Industrial Services Manager

PCB EMERGENCY RUSH SAMPLE CHAIN OF CUSTODY FOR ELECTRICAL EQUIPMENT ONLY

NCA WO# PQG03608

SPILL LOCATION: 8910 N BRADFORD (PORTLAND)		
COMPANY NO.: 233, 234, 235	KVA: 333 (3)	SERIAL NO.:
RC NO.: 328	DATE SAMPLED: 7/11/07	SAMPLE TAKEN BY: J THOMAS

TELEPHONE RESULTS TO

SITE RESPONDER		
SPILL COORDINATOR (EM&C Response/Foreman): J THOMAS	PHONE: 849-2659	PAGER:
EM&C RESPONSE	PHONE	PAGER
SAMPLE DELIVERED TO LAB BY: J THOMAS	TIME: 10:50AM	DATE: 7/12/07
SAMPLE RECEIVED BY: [signature]	TIME: 10:50	DATE: 7-12-07

SAMPLE RECEIVED IN APPROPRIATE CONTAINER?

☐ Yes ☐ No

HAND THIS CHAIN OF CUSTODY ALONG WITH SAMPLE OVER TO LAB PERSONNEL ONLY. THIS CHAIN OF CUSTODY MUST BE WITH THE SAMPLE WHEN DELIVERED TO THE LAB.

Note: Lab to Contact Environmental Services With Test Results.

Verbal Results Given To:	By NCA Staff:	Results Given:
Date:	Time:	

TestAmerica Sample Receipt Checklist

Received by: *(section A)*
Date: 7-12
Time: 10:50
Initials: MM

Unpacked by: *(section B)*
Date: 7-12
Initials: MM

Logged-in by:
Date: 7-12
Initials: MM

Work Order No. PQG0368
Client: PGE
Project: Rush PCB Spill

Cooler IDs:

***ESI Clients *(see Section C)*

Cooler Temperature (IR): ✓ °C plastic glass NA *(oil/air samples, ESI client)*

Temperature out of range:
___ *No Ice*
___ *Ice Melted*
___ *W/in 4 Hours*
___ *Other:*

A

Custody Seals: (#____)

Signature: Y N Dated:_____
X None

Container Type:
____#Cooler(s)
____#Box(s)
X None (___#Other:_____)

Coolant Type:
____Gel Ice
____Loose Ice
X None

Packing Material:
____Bubble Bags
____Styrofoam Cubbies
X None (____Other:_____)

Received from:
____TA Courier
____Senvoy
____UPS
____Fed Ex
X Client
____TDP
____DHL
____SDS
____Mid-Valley
____GS/TA
____GS/Senvoy
____Other:_____

B

Sample Status:
(If N circled, see NOD)

General:
Intact? (Y) N
Containers Match COC? (Y) N none given
IDs Match COC? (Y) N

For Analyses Requested:
Correct Type & Preservation? (Y) N
Adequate Volume? (Y) N
Within Hold Time? (Y) N

Volatiles:
VOAs Free of Headspace? Y N (NA)
TB on COC? not provided Y N (NA)

Metals:
HNO3 Preserved? Y N (NA)

C

***ESI Clients Only:

Temperature Blank: _____°C not provided

All preserved bottles checked Y N NA *(voas/soils/all unp.)*
All preserved accordingly? Y N *(see NOD)* NA *(voas/soils/all unp.)*

Army Corp:

Geiger (ticks/min): ___ ___ ___ ___

Temperatures (IR): _____°C _____°C _____°C _____°C
(left) (middle) (right) (air)

Project Managers:

Comments:_____

*PM Reviewed:*_____ *(Initial/Date)*