

POLLUTION PREVENTION AND ABATEMENT

**FISCAL YEAR 2000
WORK PLAN**

POLLUTION PREVENTION AND ABATEMENT FUNCTION

October, 1999

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FISCAL YEAR 2000
WORK PLAN**

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**POLLUTION PREVENTION AND ABATEMENT
WORK PLAN FOR FISCAL YEAR 2000**

PURPOSE AND SCOPE

This work plan outlines fiscal year activities for the Pollution Prevention and Abatement (PP&A) Function. PP&A actions are primarily associated with the operation, maintenance, and construction of BPA's transmission system and its facilities. The work plan centers around the public responsibilities of:

- complying with environmental laws and regulations
- minimizing BPA's environmental liability risks

These public responsibilities are achieved through a commercially successful Transmission Business Line. The Pollution Prevention and Abatement Function is responsible for three principle elements:

- provide overall pollution prevention and abatement strategies for the Corporate and Business Line(s)
- provide cost effective program support to the Corporate and Business Line(s),
- undertake project specific implementation.

This work plan groups the Pollution Prevention and Abatement Program into principle areas of focus (Focus Areas). Each Focus Area outlines major actions that will be undertaken for these Focus Areas during Fiscal Year 2000 (FY00):

FOCUS AREAS	PL6 Series
CERCLA Actions	V780
Environmental Guidance	Misc.
Environmental Investigations and Cleanups	V740
Environmental Land Actions	V791
Environmental Training	V750
PCB Capacitor Replacement and Retirement	V760 and V4C
Pesticide and Right-of-Way Maintenance Support	V751
Pollution Abatement Clearances	Misc.
Program Management	V790
Ross Facility Coordination	V701 - V702
Spill Prevention	V711, V713, and V2C
Waste Management and Minimization	V701 - V702
Water Protection	V710 - V730 and V7C

Program/Project Drivers:

Program/Project drivers are identified for actions outlined in the work plan. Drivers identify the basic principle behind the activity, are based primarily on regulatory sensitivity, and assist in managing work efforts and resources throughout the fiscal year.

- Regulator Driver (Reg) : Activities respond to a direct regulatory compliance or legal requirement;
- Risk Reduction Driver (Risk Red.): Activities address regulatory issues that BPA has some discretion regarding implementation and are undertaken to minimize liability, risk, and exposure;
- Best Management Driver (Best Mgt): Activities are best management practice driven (i.e., no regulatory driver) and are undertaken to minimize liability, risk, and exposure to provide program/project efficiencies and cost effectiveness.

CERCLA Actions

This area addresses BPA's actions to assure compliance with the requirements of CERCLA or Super-fund. It also addresses BPA's efforts to minimize our CERCLA environmental liabilities. CERCLA actions typically fall under three categories: (A) BPA owned facilities (Federal Docket Sites) currently undergoing investigation/cleanup under the formal CERCLA process; (B) Non-BPA or so-called "third party" sites for which BPA has been identified as a Potentially Responsible Party (PRP) or BPA sites that have been contaminated by another party; and (C) the BPA Off-Site Environmental Liability Assessment Program, which strives to minimize BPA's overall long-term environmental (CERCLA) liability at non-BPA off-site treatment, storage, disposal and/or recycling facilities.

The overall strategy for this area includes:

- Negotiate equitable resolution of BPA liability for "third party sites" utilizing payment from the "Judgment Fund" wherever possible.
- Investigate and take prompt corrective action at BPA CERCLA sites in order to prevent inclusion on the NPL.
- Minimize BPA's overall long-term liability for the proper management, transportation, treatment, storage, disposal and /or recycling of hazardous and toxic wastes at off-site (non-BPA) facilities through the conduct of off-site facility environmental liability assessments.
- Provide technical support for land actions (including BPA Facility Sales) and new spills to minimize long-term CERCLA liability

Fiscal Year 2000 Major Actions:

BPA Facilities

Site	Description	Start/Stop	Driver	Lead
Alvey	Review Site and Scope Future Actions	10/1/1999 - 9/30/2000	Regulatory	Kevin B. George
Big Eddy	Oil trap and oil house drainage evaluation.	10/1/1999 - 6/1/2000	Regulatory	Ken C. Hutchinson
Big Eddy	Delineate TPH contamination associated with oil house/oil trap and UST by Garage	10/1/1999 - 9/30/2000	Regulatory	Brett M. Sherer
Big Eddy	Ground water monitoring	10/1/1999 - 9/30/2000	Regulatory	Robert V. Hanan
Big Eddy	Ground water evaluation	10/1/1999 - 9/30/2000	Regulatory	Brett M. Sherer
Big Eddy	ODEQ Focused Remedial Investigation	9/1/1999 - 9/1/2000	Regulatory	Steve R. Sander
Celilo	Evaluate TPH contamination associated with oil Piping	10/1/1999 - 9/30/2000	Regulatory	Fredrick J. Walasavage
Celilo	DEQ Focused Remedial Investigation	9/1/1999 - 9/1/2000	Regulatory	Steve R. Sander
St. Johns	Oregon DEQ - Expanded Preliminary Assessment	9/1/1999 - 9/1/2000	Regulatory	Stuart G. Hugill

Compliance Reporting

Site	Description	Start/Stop	Driver	Lead
Multiple Sites	Annual DOE CERCLA 120 Report to Congress	11/1/1999 - 7/1/2000	Regulatory	Steve R. Sander

Off-site Facility Assessments

Site	Description	Start/Stop	Driver	Lead
Multiple Sites	Conduct assessments of BPA off-site waste disposal facilities	10/1/1999 - 9/30/2000	Risk Reduction	Steve R. Sander

Third Party Sites

Site	Description	Start/Stop	Driver	Lead
System Wide	CERCLA (Superfund) Third Party Sites	9/1/1999 - 9/1/2000	Regulatory	Steve R. Sander

Environmental Guidance

This area addresses and tracks the need and development of environmental guidance for BPA personnel in specific actions associated with the Pollution Prevention & Abatement function. PP&A currently develops three types of guidance: Environmental Standards and Procedures (ESPs), Standard Operating Procedures (SOPs), and Environmental Issue Updates.

Environmental Standards and Procedures (ESPs) instruct BPA personnel in specific actions which best assure BPA's operations, maintenance, and construction activities are planned and conducted to minimize adverse affects to employees and the environment. ESPs also communicate specific actions required to comply with applicable Federal, state and local law or regulation and/or DOE and BPA policy.

Standard Operating Procedures (SOPs) outline standard internal operating processes and procedures for PP&A such as the budget process and project management procedures.

Environmental Issue Updates convey timely, 'heads up' information to BPA personnel on environmental issues and changes in practices. Environmental Issue Updates are issued by the PP&A staff and coordinated through Focus Area Coordinators and PP&A management. They may ultimately lead to ESPs or SOPs being developed for the issue/topic.changes in practices.

The overall strategy for this area includes:

- Need Identification
- Development/Review
- Approval/Distribution

Fiscal Year 2000 Major Actions:

Site	Description	Start/Stop	Driver	Lead
❖ Environmental Guidance				
System Wide	Identify and scope needed guidance by Focus Area	10/1/1999 - 10/30/1999	Best Mgt.	Focus Area Coord
❖ Hazardous Waste Management				
System Wide	ESP - Pollution Abatement Clearance Process (PAC)	10/1/1999 - 10/30/1999	Best Mgt.	Kevin B. George
❖ PCBs				
System Wide	Notification Report SOP	10/1/1999 - 9/30/2000	Regulatory	Carol P. Leiter
System Wide	Mega Rule PCB Sampling SOP	10/1/1999 - 9/30/2000	Best Mgt.	Carol P. Leiter
System Wide	PCB Storage for Reuse Guidance	6/29/1999 - 12/31/1999	Regulatory	Nick F. Henderson
❖ Pesticides				
System Wide	Guidance for Processing Unwanted or Unusable Herbicides	10/1/1999 - 7/31/2000	Risk Reduction	Mark W. Hermeston
System Wide	ESP for Spills and Misapplications of Herbicides	10/1/1999 - 7/31/2000	Risk Reduction	Mark W. Hermeston
System Wide	Herbicide Storage Guidance	10/1/1999 - 7/31/2000	Risk Reduction	Mark W. Hermeston
❖ Spill Prevention				
System Wide	Complete Draft Guidance Standard Operating Procedure for Updating SPCC Plans	10/1/1999 - 1/1/2000	Best Mgt.	Stuart G. Hugill
System Wide	Develop Guidance to Address Repair/Replacement of Electronic Stop Valve Actuator Parts	1/1/2000 - 4/1/2000	Risk Reduction	Stuart G. Hugill
❖ Water Protection				
System Wide	UIC Program Development	10/1/1999 - 6/1/2000	Regulatory	Brett M. Sherer
System Wide	Update/prepare Stormwater Guidance for Construction projects	10/1/1999 - 9/30/2000	Regulatory	Kevin B. George

Environmental Investigations and Cleanups

This Focus Area addresses environmental investigation for cleanup of suspected and confirmed releases of hazardous and toxic materials. Actions associated with environmental cleanups consist of site investigations/characterizations; the coordination, monitoring, reporting, and verification of cleanups; issuing needed guidance; and participation in the regulatory reform of federal and state regulations and guidance.

The overall strategy for this area includes:

- Systematically identify, prioritize, investigate and evaluate suspected and/or confirmed releases.
- Clean confirmed historical contamination sites in accordance with Federal/state environmental standards (including documentation)
- Respond to new releases in accordance with Federal and State environmental standards
- Participate in regulatory reform of federal and state rules, regulations and standards.

Fiscal Year 2000 Major Actions:

Site	Description	Start/Stop	Driver	Lead
Alcoa	Review Status of confirmed release per WDOE listing.	11/1/1999 - 1/1/2000	Regulatory	Fredrick J. Walasavage
Alvey	Willow Creek Line Relocation	7/8/1998 - 10/15/1999	Regulatory	James R. Meyer
Chemawa	Sampling and Cleanup of PCBs	10/1/1999 - 9/1/2000	Risk Reduction	Brett M. Sherer
Colville	Confirmed Release Listing - Site is on WDOE's confirmed release list.	2/14/2000 - 3/24/2000	Regulatory	Michael A. Rosales
Covington	Site review and investigation	10/1/1999 - 9/30/2000	Regulatory	James M. Bazzani
Franklin	Confirmed Release List Site is on WDOE's confirmed release list.	2/14/2000 - 3/24/2000	Regulatory	Ken C. Hutchinson
Hot Springs	Water Supply Well Sampling	10/25/1999 - 12/15/1999	Risk Reduction	Ken C. Hutchinson
Lane	Confirmed Release Listing Site is on ODEQ's confirmed release list.	11/1/1999 - 12/17/1999	Risk Reduction	Steve R. Sander
Oregon City	Review status of confirmed release per DEQ	11/1/1999 - 1/1/2000	Regulatory	Larry K. Purchase
Snohomish	Management of investigative derived waste	10/1/1999 - 9/30/2000	Risk Reduction	Mark A. Martin
Snohomish	Groundwater and Free Product evaluation	8/1/1999 - 11/1/1999	Regulatory	Brett M. Sherer
Snohomish	Monthly free product recovery from 3 monitoring	10/1/1999 - 9/30/2000	Risk Reduction	Larry K. Purchase
Snoking	Site review	10/1/1999 - 9/30/2000	Regulatory	Mark A. Martin
System Wide	Spill Response & Cleanup Reports	10/1/1999 - 9/30/2000	Regulatory	PP&A Field Staff
System Wide	Prepare Generic Remedy for TPH with PGE and Oregon DEQ	9/1/1999 - 9/1/2000	Risk Reduction	Steve R. Sander
Tacoma	Oversee Long term O&M of BPA/OxyChem Site	10/1/1999 - 9/30/2000	Regulatory	Brett M. Sherer
Walla Walla	Confirmed Release Listing to soil and groundwater	1/3/2000 - 2/11/2000	Regulatory	Ken C. Hutchinson

Environmental Land Actions

This area addresses the environmental support required in the sales and acquisition of real property, evaluating encroachments as they effect BPA property, and evaluating permit actions effecting BPA properties.

The overall strategy for this area includes:

- Fully identify and disclose Recognized Environmental Conditions prior to the purchase or sale of a property through records review, interviews, and site inspection.
- Conduct high quality and consistent environmental site assessments and reviews.
- Conduct Phase II Environmental Assessments, as required, to determine the presence or absence of hazardous contamination on the property by obtaining the necessary sampling and investigative activities. Fully characterize levels and boundaries of contamination, mechanisms of transport, and identify alternatives for treating or removing the contaminants from properties that are subject to sale. Conduct Phase III Remedial Activities where contamination is identified which exceeds acceptable regulatory standards.
- Ensure that proposed use of BPA properties by the general public does not pose a risk to human health or the environment, and therefore, create additional environmental liabilities to the agency.
- Respond promptly to protect human health and the environment from damages occurring on BPA fee-owned property and on property for which BPA has right-of-way access.

Fiscal Year 2000 Major Actions:

Environmental Land Actions

Site	Description	Start/Stop	Driver	Lead
Multiple Sites	Fish and Wildlife Environmental Land Audits	10/1/1999 - 9/30/2000	Risk Reduction	Fredrick J. Walasavage
Multiple Sites	Substation Sales - Investigation and Cleanup	10/1/1999 - 9/30/2000	Regulatory	Fredrick J. Walasavage
Multiple Sites	TBL Land Action Support - Sales and Acquisition of real property	10/1/1999 - 9/30/2000	Risk Reduction	Fredrick J. Walasavage
System Wide	TBL Land Action Support - Permit Reviews for third party use of BPA	10/1/1999 - 9/30/2000	Risk Reduction	Fredrick J. Walasavage
System Wide	TBL Land Action Support - Environmental Encroachments & Permit	10/1/1999 - 9/30/2000	Risk Reduction	Fredrick J. Walasavage

Environmental Training

This focus area outlines BPA activities for 2000 in support of OSHA, DOT and environmental requirements with a purpose that training be accomplished to “an appropriate level.” Determining appropriate levels of training is an on-going process. The major populations targeted for this training are: cleanup operations at hazardous waste sites; TSD facilities; emergency response operations, herbicide applicators or those having oversight responsibilities; lab environmental staff; and workers transporting hazardous materials.

The overall strategy for this area includes:

- Continue high quality course content and presentation of course material through ongoing client involvement/evaluation.
- Provide clear direction on extent of training required to assure regulatory compliance, and environmental and worker protection.
- Continue client/partner satisfaction through ongoing communications and consensus building.
- Identify and implement cost reduction opportunities during planning and implementation phases of training program.

Fiscal Year 2000 Major Actions:

Environmental Training

Site	Description	Start/Stop	Driver	Lead
System Wide	PP&A Environmental Training Program	10/1/1999 - 9/30/2000	Regulatory	Joyce E. Lindsay
System Wide	Annual Pesticide Certification Curriculum Update and Training	10/1/1999 - 12/31/1999	Regulatory	Joyce E. Lindsay

PCB Equipment Replacement and Retirement

This Focus Area addresses the replacement or retirement of regulated PCB equipment. Capacitors represent approximately 98 percent of BPA's PCB equipment. The Toxic Substances Control Act (TSCA) requires cleanup of new and historic spills and regulates the marking, transportation, storage, and disposal of Polychlorinated biphenyl (PCB). The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) requires the reporting of spills greater than one pound of PCB. Typically one quart of fluid from a failed capacitors per incident will exceed the reporting requirement. Capacitors contain 2 to 5 gallons of fluid. CERCLA may also require that a Preliminary Assessment be conducted at sites with reportable spills. To minimize the liability associated with PCB spills and historic PCB contamination, BPA has a program to systematically cleanup PCB contamination in capacitor yards and replace all PCB capacitors with non PCB capacitors. At current funding levels the program will replace approximately 600 MVAR of PCB capacitors a year to remove all PCB capacitors from the BPA system by 2004.

The overall strategy for this area includes:

- Systematically eliminating the primary sources of PCB contamination (i.e., PCB capacitors).
- Cleaning up PCB-contaminated sites in accordance with Federal and State environmental laws and regulations;
- Periodic review of replacement of other PCB equipment.

Fiscal Year 2000 Major Actions:

Cleanup and Replacement Projects

Site	Description	Start/Stop	Driver	Lead
Celilo	Materials	10/1/1999 - 9/30/2000	Risk Reduction	Carol P. Leiter
Celilo	Install 5&7 Filters	10/1/1999 - 9/30/2000	Risk Reduction	Mark A. Martin
Celilo	11 & 13 PCB 230kV filters Converter 3 and 4 and Cleanup	10/1/1999 - 9/30/2000	Risk Reduction	Mark A. Martin
Grandview	PCB Capacitor Cleanup	5/1/2000 - 9/30/2000	Risk Reduction	Michael A. Rosales
Grandview	Capacitor Installation	6/1/2000 - 9/1/2000	Risk Reduction	Michael A. Rosales
Lane	230 Cleanup	5/1/2000 - 9/30/2000	Risk Reduction	Unassigned
Lane	Replace 230kv PCB capacitors Group 2 Section 1	5/1/2000 - 9/1/2000	Risk Reduction	Carol P. Leiter
Tacoma	Cleanup 230kV PCB Caps	5/1/2000 - 9/30/2000	Risk Reduction	Mark A. Martin
Tacoma	Install 230kV Caps	5/1/2000 - 9/30/2000	Risk Reduction	Mark A. Martin
Tacoma	Cleanup 14kV Caps	5/1/2000 - 9/30/2000	Risk Reduction	Mark A. Martin

Cleanup Reports

Site	Description	Start/Stop	Driver	Lead
Celilo	DC Neutral Final Report	10/1/1999 - 12/15/1999	Best Mgt.	Mark A. Martin
Celilo	VDRs and Neutral Final Report	10/1/1999 - 12/15/1999	Best Mgt.	Mark A. Martin
Cowlitz	Final Report	10/1/1999 - 12/15/1999	Best Mgt.	Carol P. Leiter
Freewater	Final Cleanup Report	10/1/1999 - 12/15/1999	Best Mgt.	Michael A. Rosales
Monroe	500 Cleanup Final Report	10/1/1999 - 12/15/1999	Best Mgt.	James M. Bazzani
Monroe	230 Final Report	10/1/1999 - 12/15/1999	Best Mgt.	James M. Bazzani
Tahkenitch	Final Report	10/1/1999 - 12/15/1999	Best Mgt.	Carol P. Leiter

PCB Capacitor Projects Initial Planning

Site	Description	Start/Stop	Driver	Lead
Multiple Sites	V4C Planning and FY01 materials specification and design: Santaim, Harney, Alvey 115 and 230.	10/1/1999 - 9/30/2000	Best Mgt.	Carol P. Leiter

Pesticides and ROW Maintenance Support

This Focus Area addresses PP&A's support to minimize environmental impacts to fee-owned lands, public lands and to private properties BPA manages as R/W.

The overall strategy for this area includes:

- Support the TBL Target for environmental stewardship.
- Continually improve environmental awareness of staff supporting the vegetation management program.
- Provide for use of herbicides in an integrated vegetation management program, comply with environmental regulations, and protect sensitive resources on rights-of-way.

Fiscal Year 2000 Major Actions:

Pesticides and ROW Maintenance Support

Site	Description	Start/Stop	Driver	Lead
Parkdale	Herbicide Assessment	10/1/1999 - 9/30/2000	Regulatory	Fredrick J. Walasavage
System Wide	Annual GAP Report to EPA	1/1/2000 - 3/1/2000	Regulatory	Mark W. Hermeston
System Wide	Technical Support to TBL ROW Issues	10/1/1999 - 9/30/2000	Risk Reduction	Mark W. Hermeston
System Wide	Herbicide Approval Process	10/1/1999 - 5/31/2000	Risk Reduction	Mark W. Hermeston
System Wide	Update Forest Service Pesticide Fact Sheets for Vegetation EIS	10/1/1999 - 12/31/1999	Regulatory	Mark W. Hermeston
System Wide	Technical Support to VEIS Issues	10/1/1999 - 3/31/2000	Regulatory	Mark W. Hermeston

Pollution Abatement Clearances

A Pollution Abatement Clearance (PAC) is prepared when BPA proposes a construction activity or a modification to existing facilities involving any disturbance, removal, and disposal of potentially contaminated equipment, material structures. Additional support is provided upon the completion of the PAC throughout the construction phase, if required.

The overall strategy for this area includes:

- Establish whether any hazardous or toxic contamination or other threats to the human health or the environment are associated with specific BPA projects.
- Provide designers, project managers, and construction personnel with the information and guidance necessary to effectively plan for and the construction phase of a project.
- Conduct a thorough review and investigation of the project and fully coordinate required environmental actions through project completion.
- Identify acceptable levels of contamination at a given site, identify a disposal location for contaminated material exceeding acceptable regulatory thresholds, and coordinate on-site placement of excess material.
- Provide on-site support during project implementation/construction to include sampling, delineation of contamination, coordination of disposal and documentation and record keeping.

Fiscal Year 2000 Major Actions:

Pollution Abatement Clearances

Site	Description	Start/Stop	Driver	Lead
Multiple Sites	Incorporate Facility Remodeling into PAC Process (i.e., Control Houses)	8/9/1999 - 11/1/1999	Risk Reduction	Kevin B. George
Multiple Sites	Complete PACs for BPA construction/maintenance projects	10/1/1999 - 9/30/2000	Risk Reduction	PP&A Field Staff
System Wide	Preferred Landfills & Transfer Stations List	10/1/1999 - 6/1/2000	Risk Reduction	Kevin B. George

Program Management

This area addresses overall Pollution Prevention and Abatement policy/strategy for the Business Lines and Corporate, and establishes Program Management and Project Management requirements needed to support achieving PP&A Program goals. This area supports implementation of the Work Plan in a manner which meets environmental compliance, minimizes environmental liabilities and risks, and assures cost effective environmental support services to the TBL. Program Management identifies the program processes needed to support PP&A, such as program objectives, regulatory requirements, and roles and responsibilities of project managers, focus coordinators, and performance managers. Project Management addresses the need for consistent processes for obtaining funding for projects, scheduling, prioritizing workload activities, scoping projects, preparing cost estimates, and tracking projects to completion. In addition, this area addresses efforts associated with workplace environment.

The overall strategy for this area includes:

- Establish overall Pollution Prevention and Abatement policy for the Business Lines and Corporate.
- Evolve toward a Management Structure that is Process and Performance based.
- Develop Program and Project Management Processes that are consistent for application across all Focus Areas.
- Identify and prioritize those processes that are vital to implementation of FY99 projects.
- Identify and undertake efforts to address and improve PP&A workplace environment.

Fiscal Year 2000 Major Actions:

Program Management

Site	Description	Start/Stop	Driver	Lead
System Wide	PP&A Web Site Development	10/1/1999 - 9/30/2000	Best Mgt.	Joyce E. Lindsay
System Wide	FY2000 Work Plan Quarterly Update	10/1/1999 - 9/30/2000	Best Mgt.	Focus Area Coord
System Wide	FY2001 Work Plan Development	7/1/2000 - 9/30/2000	Best Mgt.	Focus Area Coord
System Wide	Business Solutions Project	10/1/1999 - 9/30/1999	Best Mgt.	Carol P. Leiter
System Wide	Environmental Management System	10/1/1999 - 9/30/2000	Best Mgt.	Steve R. Sander
System Wide	Employee Development	10/1/1999 - 9/30/1999	Best Mgt.	PP&A Mgrs
System Wide	Work Place Environment	10/1/1999 - 9/30/2000	Best Mgt.	PP&A Mgrs
System Wide	Database Management	10/1/1999 - 9/30/2000	Best Mgt.	Larry K. Purchase
System Wide	BPA Greening Effort	9/1/1999 - 9/1/2000	Best Mgt.	Steve R. Sander

Ross Facility Coordination

This area addresses coordination of diverse pollution prevention and abatement projects at BPA's large, complex facilities. Objectives for this area include minimizing impacts on facility operations and maintaining positive relations with facility management and personnel while providing cost effective coordination of multiple, concurrently run, environmental compliance activities.

The overall strategy for this area includes:

- Provision of a central environmental point of contact for the Ross Complex
- Portrayal of key environmental objectives, priorities and strategies to facility owners and operators.
- Minimization of redundancy at sites through centralized coordination.

Fiscal Year 2000 Major Actions:

Ross Facility Coordination

Site	Description	Start/Stop	Driver	Lead
Ross Complex	Maintenance of the closed loop recycled wash rack equipment.	10/1/1999 - 9/30/2000	Risk Reduction	Brett M. Sherer
Ross Complex	Storm Drainage Clean Out	10/1/1999 - 9/30/1999	Risk Reduction	Elaine S. Stratton
Ross Complex	Dittmer Oil Water Separator	10/1/1999 - 9/30/2000	Risk Reduction	Elaine S. Stratton
Ross Complex	Air Emissions Inventory	2/1/2000 - 4/15/2000	Regulatory	Elaine S. Stratton
Ross Complex	Pollution Prevention	10/1/1999 - 9/1/2000	Regulatory	Elaine S. Stratton
Ross Complex	Annual Hazardous Waste Report	2/1/2000 - 3/1/2000	Regulatory	Elaine S. Stratton
Ross Complex	Spill Response	10/1/1999 - 9/1/2000	Regulatory	Elaine S. Stratton
Ross Complex	EPCRA Tier II	2/1/2000 - 3/1/2000	Regulatory	Elaine S. Stratton
Ross Complex	Part B Hazardous Waste Permit	10/1/1999 - 7/1/2000	Regulatory	Elaine S. Stratton
Ross Complex	Contingency Plan	10/1/1999 - 9/1/2000	Regulatory	Elaine S. Stratton
Ross Complex	Upgrade Ross SandBlast Facility	10/1/1999 - 9/1/2000	Risk Reduction	Elaine S. Stratton
Ross Complex	Audits/Facility Inspections	5/1/2000 - 7/1/2000	Risk Reduction	Elaine S. Stratton
Ross Complex	Stormwater Management	10/1/1999 - 9/1/2000	Regulatory	Elaine S. Stratton
Ross Complex	Institutional Controls - Superfund	10/1/1999 - 9/1/2000	Regulatory	Elaine S. Stratton
Ross Complex	Scope and Conduct Multimedia Environmental Inspection	11/1/1999 - 9/30/2000	Risk Reduction	Elaine S. Stratton

Spill Prevention

This area addresses BPA's actions to protect water resources through the development of site-specific Spill Prevention, Control, and Countermeasure (SPCC) Plans and the oil spill containment retrofit program. Specific program details include: 1)The Secondary Containment Program retrofits new or existing facilities with containment protection where a release of oil would pose a risk to water resources. The program operates as an inter-business line team with coordination between the Office of Environment, Fish and Wildlife, Facilities Design, Electrical Design, Civil Engineering Design, Design Specifications, Construction Contracting, Construction Scheduling, Force Account, Regional Management, and Substation Operations, and Maintenance. Each of these groups are involved with the individual projects before any construction begins. 2)The Spill Prevention, Control, and Countermeasure program undertakes the evaluation of BPA facilities for the need of site-specific spill Plans. Where plans are necessary for specific facilities they are developed and maintained in accordance with the appropriate Federal and state rules and regulations. Currently 212 plans have been completed. Plans are being developed at a rate of approximately 50 per year. Once plans are in place they are required to be updated every 3 years.

The overall strategy for this area includes:

Minimize the risk of environmental contamination from oil filled equipment by employing spill prevention and control measures.

Fiscal Year 2000 Major Actions:

Secondary Containment

Site	Description	Start/Stop	Driver	Lead
Alvey	Evaluate alternatives for gravity stop valve below the garage	10/1/1999 - 9/1/2000	Risk Reduction	Stuart G. Hugill
Bell	Percolation pond	10/1/1999 - 9/30/2000	Risk Reduction	Michael A. Rosales
Multiple Sites	Oil/Water Separator Storm Water Discharge Analysis	10/1/1999 - 9/1/2000	Regulatory	Stuart G. Hugill
Multiple Sites	Evaluate containment drainage retrofits at various facilities (St. Johns, Scarcello, Hatwai, Columbia Falls)	10/1/1999 - 3/1/2000	Regulatory	Stuart G. Hugill
Snohomish	Snohomish Containment Upgrade	6/1/2000 - 8/1/2000	Risk Reduction	Stuart G. Hugill

Spill Prevention, Control, and Countermeasures

Site	Description	Start/Stop	Driver	Lead
Multiple Sites	SPCC Plan Review - Review plans at facility to insure updates have been included, notification lists are current, etc.	10/1/1999 - 9/30/2000	Best Mgt.	PP&A Field Staff
Multiple Sites	Site Specific SPCC Plans (40 sites)	10/1/1999 - 9/30/2000	Regulatory	Stuart G. Hugill
Multiple Sites	Convert SPCC plans to Environmental Web Page	10/1/1999 - 9/1/2000	Best Mgt.	Stuart G. Hugill
System Wide	Systemwide Spill Response Kits and Materials	5/1/2000 - 9/1/2000	Risk Reduction	Kevin B. George
System Wide	Regional Field Specialist Training in updating SPCC Plans due for review in FY2000	12/1/1999 - 1/30/1999	Best Mgt.	Stuart G. Hugill

Waste Management and Minimization

This Focus Area addresses PP&A's role as a partner with the Transmission Business Line to assure BPA's compliance with waste management and minimization requirements. This includes reduction, characterization, packaging, labeling, storage, inspection, tracking, transportation, reporting, and disposal of hazardous and toxic waste.

The overall strategy for this area includes:

- Identification and resolution of any areas of noncompliance with waste management and minimization requirements.
- Continued improvement of client/partner satisfaction with PP&A by providing timely, high quality technical support, guidance, and assistance.
- Improvement of PP&A's visibility with Transmission Field Services clients.

Fiscal Year 2000 Major Actions:

Waste Management and Minimization

Site	Description	Start/Stop	Driver	Lead
Bell, G.H.	Low Level Radioactive Waste Disposal	11/1/1999 - 3/1/2000	Regulatory	Michael A. Rosales
Multiple Sites	Annual Waste Management Inspections	10/1/1999 - 5/1/2000	Risk Reduction	PP&A Field Staff
Multiple Sites	Emergency Planning and Community Right-to-know Act Reporting	11/1/1999 - 2/25/2000	Regulatory	PP&A Field Staff
Multiple Sites	Pollution Prevention (P2) Planning	10/1/1999 - 9/29/2000	Regulatory	PP&A Field Staff
Multiple Sites	HazWoper Training Participation	10/1/1999 - 5/1/2000	Risk Reduction	PP&A Field Staff
Multiple Sites	Annual Hazardous Waste Reporting	1/3/2000 - 3/1/2000	Regulatory	PP&A Field Staff
Multiple Sites	Environmental Requirements for Facility Remodeling	8/9/1999 - 11/1/1999	Risk Reduction	Lee Costanzo
Multiple Sites	Informal Site Visit/Review of Maintenance HQs	5/1/2000 - 9/30/2000	Risk Reduction	PP&A Field Staff
Spokane Region	Characterization and disposal of spent sandblast media	11/1/1999 - 9/30/2000	Risk Reduction	Michael A. Rosales
System Wide	Attend District Safety/Supervisor Meetings	10/1/1999 - 9/30/2000	Best Mgt.	PP&A Field Staff
System Wide	IWSH update	10/1/1999 - 9/30/1999	Risk Reduction	Lee Costanzo
System Wide	Electronic manifesting system update	10/1/1999 - 3/31/2000	Risk Reduction	Lee Costanzo
System Wide	PCB Annual Report (In-service portion for CY1999)	6/1/2000 - 6/30/2000	Regulatory	Lee Costanzo
System Wide	Propane Tanks-Risk Mgt Plans	11/1/1999 - 10/1/2000	Regulatory	Larry K. Purchase

Water Protection

This area focuses on actions to protect surface and ground water resources. The main areas of focus are: 1) Registering, and abandoning where necessary all required underground injection sources in accordance with the appropriate Federal and state rules and regulations. 2) Abandoning, protecting, and monitoring of all wells according to Federal, state, and local rules and regulations. 3) Continuing to evaluate the needs for National Pollutant Discharge Elimination System (NPDES) Permits, along with addressing monitoring and reporting needs. 4) Maintaining, monitoring, and inspecting drainage systems in sensitive watersheds and areas through the BPA system. 5) Release detection, reporting, investigation, response, and corrective actions associate with the management of Underground Storage Tanks (USTs).

The overall strategy for this area includes:

- Assure BPA's activities do no impact water resources through identification of potential pollution pathways and development of preventive or corrective actions.
- Protect ground water resource through proper construction, maintenance, monitoring, and abandonment of all wells
- Investigate and take prompt corrective action at all sites were BPA has inadvertently degraded of water quality has or may occur.
- Protect surface water resources through proper construction, maintenance, monitoring, and abandonment of drainage systems.

Fiscal Year 2000 Major Actions:

Groundwater and Wells

Site	Description	Start/Stop	Driver	Lead
Covington	Groundwater-Outfall monitoring	10/1/1999 - 9/30/2000	Best Mgt.	Robert V. Hanan
Multiple Sites	Washington State Tagging Water Supply Wells	10/1/1999 - 9/30/2000	Regulatory	Larry K. Purchase
Snohomish	Semi-Annual Groundwater monitoring/ annual review and assessment of groundwater.	10/1/1999 - 9/30/2000	Best Mgt.	Robert V. Hanan
System Wide	Groundwater Sampling Supplies	10/1/1999 - 9/30/2000	Best Mgt.	Ken C. Hutchinson
System Wide	Sampling Water Supply Wells (3)	11/1/1999 - 10/1/2000	Best Mgt.	Larry K. Purchase

Surfacewater and Drainage Systems

Site	Description	Start/Stop	Driver	Lead
Kalispell M.HQ	Oil water separator and retention basis system	11/1/1999 - 9/30/2000	Risk Reduction	Michael A. Rosales
Maple Valley	Storm water run off catch basins and Oil/water Separator maintenance	10/1/1999 - 9/30/2000	Risk Reduction	James M. Bazzani
Starr Complex	Celilo Cooling Water - NPDES Permit Monitoring	10/1/1999 - 9/30/2000	Regulatory	Fredrick J. Walasavage
System Wide	Outfall Identification and Cleaning.	10/1/1999 - 9/30/2000	Best Mgt.	PP&A Field Staff
System Wide	Evaluation and cleanup of stormwater drainage systems	10/1/1999 - 9/30/2000	Risk Reduction	James M. Bazzani
System Wide	Develop a catch basin marking program to be implemented and multiple	10/1/1999 - 9/30/2000	Best Mgt.	Kevin B. George
System Wide	Purchase Signs for Marking Drainage Outfalls at Substations	10/1/1999 - 9/30/2000	Best Mgt.	Larry K. Purchase

Underground Injection Sources (Drywells)

Site	Description	Start/Stop	Driver	Lead
Alvey	Management of Underground Injection Control	10/1/1999 - 6/1/2000	Regulatory	Brett M. Sherer
Bellingham	Oil House Drywell Review and Closure to PP&A files	4/3/2000 - 5/5/2000	Regulatory	Ken C. Hutchinson
Kalispell M.HQ	Heat Pump	10/1/1999 - 9/1/2000	Regulatory	Michael A. Rosales
Snohomish	Oil House Drywell Review and Closure to PP&A files	4/30/2000 - 5/5/2000	Regulatory	Ken C. Hutchinson
System Wide	UIC Registration	1/3/2000 - 2/18/2000	Regulatory	Ken C. Hutchinson

Underground Storage Tank Management and Restoration

Site	Description	Start/Stop	Driver	Lead
Chehalis	UST Release Corrective Action - Review of Monitoring Data/Recommendations for future work	10/18/1999 - 12/10/1999	Regulatory	Ken C. Hutchinson
Chehalis	UST release Ground Water Monitoring	10/1/1999 - 9/30/2000	Regulatory	Robert V. Hanan

Wash Facilities

Site	Description	Start/Stop	Driver	Lead
Alvey	Wash rack and drainage maintenance	10/1/1999 - 9/30/2000	Risk Reduction	Brett M. Sherer
Ashe	Vehicle Washing & Wash Rack Maintenance	10/1/1999 - 9/30/2000	Risk Reduction	Ken C. Hutchinson
Bell	Closed Loop Recycling System-Washrack Maintenance - Provide O&M support	10/1/1999 - 9/30/2000	Risk Reduction	Ken C. Hutchinson
Big Eddy	Closed Loop Recycling System-Washrack Maintenance - Provide O&M support	10/1/1999 - 9/30/2000	Risk Reduction	Ken C. Hutchinson
Chehalis	Wash Rack Cleaning	10/1/1999 - 9/30/2000	Risk Reduction	Nick F. Henderson
Chemawa	Chemawa - Wash rack trenches and drainage maintenance	10/1/1999 - 9/30/2000	Risk Reduction	Brett M. Sherer
Covington	Maintenance of the closed loop recycled wash rack	10/1/1999 - 9/30/2000	Risk Reduction	Brett M. Sherer
Covington	Wash rack trench, oil/water separator, and storm drainage sampling and cleaning.	10/1/1999 - 9/30/2000	Risk Reduction	James M. Bazzani
Olympia	Wash Rack Cleaning	10/1/1999 - 9/30/2000	Regulatory	Nick F. Henderson
Pasco Garage	Vehicle Washing - Wash Rack Maintenance	10/1/1999 - 9/30/2000	Risk Reduction	Ken C. Hutchinson
Redmond	WPCF Permit Monitoring/ Washrack Maintenance	10/1/1999 - 9/30/2000	Regulatory	Ken C. Hutchinson
Snohomish	Washrack trench, oil/water separators, and Stormdrain catchbasin testing of sediments and cleaning	10/1/1999 - 9/30/2000	Risk Reduction	James M. Bazzani