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1155 Market St., 4th Floor, San Francisco, CA 94103 • Tel. (415) 554-0725 • Fax (415) 554-1854
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DOCKET
04-AFC-1
DATE DEC 23 2005
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December 23, 2005

Mr. William Pfanner
Siting Project Manager
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814-5504

RE: SFPUC : Revised Summary Work Plan Regarding Additional Site Characterization Activities San Francisco Electric Reliability Project (04-AFC-01)

Dear Bill:

During the meeting between CEC Staff and representatives of the City and County of San Francisco (Applicant or City) on November 10, 2005, a general discussion took place regarding the need for additional site characterization on the 4-acre SFERP site. As a result of that meeting Applicant was asked to prepare a summary work plan for submittal to CEC Staff addressing activities to be performed for this additional site characterization per Staff's proposed Conditions of Certification WASTE-7 and -8. The approach was discussed further during a meeting between CEC Staff and the City on December 20, 2005.

The purpose of the following discussion is to provide Applicant's updated proposed approach for moving forward, including a very general schedule of activities, for site characterization, risk assessment update, and potential soil removal at the proposed SFERP site.

Task 1—Preparation of Sampling and Analysis Work Plan

Applicant is currently preparing a Sampling and Analysis Work Plan that will address Staff's request for additional discreet sampling on the SFERP site. It is anticipated that this detailed work plan will propose additional soil and groundwater sampling at multiple borehole locations with discreet soil samples collected at the surface, at 5 feet, at 10 feet, and at a level where groundwater is encountered; a groundwater sample will then be collected from each borehole. Applicant anticipates that each discreet soil and groundwater sample will be analyzed for total petroleum hydrocarbons as diesel (TPH-D), TPH as motor oil (TPH-MO), TPH as oil (TPH-Bunker), TPH as gasoline (TPH-Gasoline), arsenic, lead, asbestos and pH levels, naphthalene, PAHs, VOCs, SVOCs, and PCBs as appropriate. In addition, the detailed work plan will provide an approach for soil gas sampling at the site.

PROOF OF SERVICE (REVISED 8-3-05) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 12-27-05
Johnson

Applicant anticipates that a draft of the Sampling and Analysis Work plan will be provided to the City Department of Public Health (DPH) for Article 22A concurrence, to the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB), to the Department of Toxic Substances Control (DTSC) and to CEC Staff. Applicant is currently preparing the work plan and hopes to have copies available for agency review in early January 2006. Applicant plans to initiate site sampling activities immediately following agency review, currently anticipated for mid-to-late January 2006.

Task 2—Preparation of Risk Assessment Work plan and Revised Risk Assessment

Applicant notes that prior Human Health Risk Assessments of the Western Pacific Area have concluded that there are no significant risks in light of existing and ongoing risk management practices. These Assessments are in the process of being reviewed by the agencies with jurisdiction. That said, in order to move the proceeding along in an expeditious manner, Applicant is committing to update the previously performed Human Health Risk Assessment by incorporating newly collected data.

Upon receipt of the analytical results from the additional site sampling described in Task 1, Applicant's consultant risk assessment staff will prepare a Risk Assessment Work Plan addressing typical exposure pathways for construction and operation scenarios from soil and groundwater contamination. This work plan will be submitted to the San Francisco DPH, SFBRWQCB, and DTSC for review and comment and to the CEC for review and approval. Upon approval of the work plan, an updated Human Health Risk Assessment will be performed. Applicant will use existing and new data collected at the SFERP site. In addition, risk assessments prepared for the MUNI project and for the Port of San Francisco (that includes the 4-acre SFERP site) will be evaluated as a starting point for the updated risk evaluations. A draft Updated Human Health Risk Assessment will then be provided to the San Francisco DPH, SFBRWQCB, and DTSC for review and comment and to the CEC for review and approval. If the updated risk assessment concludes that current site conditions could result in unacceptable risks to human health during SFERP construction or operation, Applicant will move forward with Task 3 as described below.

Task 3—Removal Action Plan Preparation and Implementation

In previous submittals to the CEC, Applicant has indicated that it is working with the SFBRWQCB to ensure that the current Risk Management Plan and Site Management Plan (RMP/SMP) for the SFERP site are adequate and fully

implemented. Under the RMP/SMP, the following general risk management practices must be taken before construction, during construction, and after development of the SFERP:

- Provide site security during construction and facility operation
- Develop and implement a site-specific health and safety plan prior to any development activities at the site addressing mitigation measures (e.g., personnel protective equipment, dust controls) for site construction workers
- Minimize groundwater contact by construction workers
- After site development, maintain covering on the site (asphalt or two feet of clean fill), implement management protocols for future subsurface development, maintain groundwater use restrictions, and agency notification in the event of a change in property use.

If the risk assessments performed under Task 2 and the general management practices required by the RMP/SMP, described above, still indicate an unacceptable risk that cannot be mitigated to acceptable levels, a Removal Action Plan will be prepared. The Removal Action Plan will indicate the lateral extent of contamination, methods used during excavation to determine that the contamination has been addressed, storage procedures to be implemented while samples of the excavated materials are being analyzed and characterized, and procedures to be used for ultimate waste disposition at a State-permitted waste treatment, storage, or disposal facility. The Removal Action Plan will also contain a site-specific Health and Safety Plan that will be used during soil excavation and storage.

Ecological Risk Assessment

Staff has requested the City undertake an Ecological Risk Assessment to assess impacts on marine life in the Bay. The City is still reviewing the propriety and need for such an Assessment. Staff has based its concerns solely on pre-existing contamination and has not alleged that the project will create any new ecological risk to the Bay nor has Staff articulated to the City a connection between the proposed project and increased-ecological risks, rather the proposed project will likely reduce ecological risks by capping the proposed site. Moreover, prior Ecological Risk Assessments of the Western Pacific Area have concluded that there are no significant risks in light of existing and ongoing risk management practices (provided as an attachment to the initial summary work plan submitted on December 16, 2005). These Assessments are being reviewed by the agencies with jurisdiction. Finally, the City hass not been persuaded that any LORS

Provide the basis for an Ecological Risk Assessment; such an assessment is not a requirement under Article 22A.

Notwithstanding the above, as noted in Task 1, the City will collect and analyze groundwater samples. The City intends to share its analysis of the groundwater samples with the SFBRWQCB. In addition, in an attempt to address Staff's concerns, the City will undertake a Tier 1 screening of the results from the groundwater sample analysis in accordance with the February 2005 report by the SFBRWQCB: "Screening for Environmental Concerns at Sites with Contaminated Soils and Groundwater," Table B on page 80. The City will provide the results of this screening exercise to the SFBRWQCB for its information and guidance on further requirements for ecological protection. The City will undertake the screening exercise during the same timeframe as it conducts Task 1.

Please call me at 415-934-5735, if you have any questions.

Sincerely yours,

John Carrier for

Karen Kubick, PE
Power Enterprise
Manager of Infrastructure Development

cc: Service List

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION FOR THE SAN FRANCISCO ELECTRIC RELIABILITY PROJECT

Docket No. 04-AFC-01
PROOF OF SERVICE
Revised 8/03/05

DOCKET UNIT

Instructions: *Send an original signed document plus 12 copies* ***or*** *an electronic copy plus one original paper copy to the address below:*

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 04-AFC-01
DOCKET UNIT, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Also send a printed ***or*** *electronic copy of all documents to each of the following:*

APPLICANT

Barbara Hale, Power Policy Manager
San Francisco Public Utilities Commission
1155 Market Street, 4th Floor
San Francisco, CA 94102
BHale@sfwater.org

Karen Kubick
Applicant Project Manager
SF Public Utilities Commission
1155 Market St., 8th Floor
San Francisco, CA 94103
kkubick@sfwater.org

APPLICANT'S CONSULTANTS

Steve De Young
De Young Environmental Consulting
4155 Arbolado Drive
Walnut Creek, CA 94598
steve4155@astound.net

John Carrier
CH2MHill
2485 Natomas Park Drive, Suite 600
Sacramento, CA 95833-2943
jcarrier@ch2m.com

COUNSEL FOR APPLICANT

Jeanne Sole
San Francisco City Attorney
City Hall, Room 234
1 Dr. Carlton B. Goodlet Place
San Francisco, CA 94102-4682
Jeanne.sole@sfgov.org

INTERESTED AGENCIES

Emilio Varanini III
Special Counsel
California Power Authority
717 K Street, Suite 217
Sacramento, CA 95814
drp.gene@spcglobal.net

Electricity Oversight Board
770 L Street, Suite 1250
Sacramento, CA 95814

*** Donna Jordan**
CA Independent System Operator
151 Blue Ravine Road
Folsom, CA 95630
djordan@caiso.com

*** Dept. of Water Resources**
SERS
Dave Alexander
3301 El Camino Avenue, Ste. 120
Sacramento, CA 95821-9001

INTERVENORS

Jeffrey S. Russell
Vice President, West Region Operations
Mirant California, LLC
1350 Treat Blvd., Suite 500
Walnut Creek, CA 94597
Jeffrey.russell@mirant.com

Michael J. Carroll
Latham & Watkins LLP
650 Town Center Drive, Suite 2000
Costa Mesa, CA 92626
michael.carroll@lw.com

Potrero Boosters Neighborhood Association
Dogpatch Neighborhood Association
Joseph Boss
934 Minnesota Street
San Francisco, CA 94107
joeboss@joeboss.com

San Francisco Community Power
c/o Steven Moss
2325 Third Street # 344
San Francisco, CA 94107
steven@sfpower.org

Californians for Renewable Energy, Inc. (CARE)
Michael E. Boyd, President
5439 Soquel Drive
Soquel, California 95073
michaelboyd@sbcglobal.net

Lynne Brown – Member, CARE
Resident, Bayview Hunters Point
24 Harbor Road
San Francisco, California 94124
L_brown123@yahoo.com

Robert Sarvey
501 West Grantline Road
Tracy, CA 95376
sarveyBob@aol.com

DECLARATION OF SERVICE

I, Evelyn M Johnson declare that on December 27, 2005, I deposited copies of the attached Letter from SFPUC; Revised Summary Work Plan Regarding Additional Site Characterization Activities for San Francisco Electric Reliability Project, in the United States mail at Sacramento, California with first class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above. Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. I declare under penalty of perjury that the foregoing is true and correct.

Evelyn M Johnson

[signature]

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JAMES D. BOYD, Commissioner
Presiding Member
MS-34

JOHN L. GEESMAN, Commissioner
Associate Member
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Stan Valkosky
Hearing Officer
MS-9

Bill Pfanner
Project Manager
MS-15

Dick Ratliff
Staff Counsel
MS-14

Margret J. Kim
Public Adviser
MS-12