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Agency Secretary
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Department of Toxic Substances Control

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DOCKET
04-AFC-1
DATE MAR 20 2006
RECD. MAR 22 2006

March 20, 2006

Mr. Bill Pfanner
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, California 95814-5504

Dear Mr. Pfanner:

The Department of Toxic Substances Control (DTSC) has reviewed the *Agency Information Letter, Supplement B: Revised Process Water Supply* of February 7, 2006 for the San Francisco Electric Reliability Project Application for Certification (AFC). As you may be aware, DTSC oversees hazardous substance cleanup and regulates hazardous waste pursuant to the California Health and Safety Code, Division 20, Chapters 6.5 and 6.8. As a potential Responsible Agency, DTSC is submitting comments to ensure that the documentation prepared for this project adequately addresses any management of hazardous waste and remediation of hazardous substance releases that might be required as part of the project.

Supplement B discusses a proposed change to the location of the process water source from a raw wastewater source at a collection box on Marin Street to a secondary effluent source at a pressurized manhole on Tulare Street. The new source is located 2,600 feet from the project site and a pipeline of this length is to be constructed. The proposed pipeline is to be installed in a trench with a seven foot excavation depth, located above an abandoned outfall pipe for the portion of the new pipeline alignment along Marin and Third Streets.

DTSC recommends that soil and groundwater along the proposed pipeline route be sampled and analyzed in order to identify any subsurface contamination that might be encountered during construction. The presence of soil or groundwater contaminants in the path of the pipeline may necessitate additional health and safety planning to protect workers from chemical exposure. In addition, any contaminated soils excavated in the course of the project may require management as hazardous waste.

If sampling shows contaminated soils are present, the potential impacts associated with the excavation and handling should also be addressed in the AFC. The AFC should include: (1) an assessment of air impacts and health impacts associated with the excavation activities; (2) identification of any applicable local standards which may be exceeded by the excavation activities, including dust and noise levels; (3) transportation

impacts from the removal or remedial activities; and (4) risk of upset should there be an accident during cleanup.

Please contact Eileen Belding at (510) 540-3844 if you have any questions. Thank you in advance for your consideration of our comments.

Sincerely,

Mark Piros

Mark Piros, P.E., Unit Chief
Northern California - Coastal Cleanup Operations Branch

cc: Governor's Office of Planning and Research
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