



# Department of Toxic Substances Control



Arnold Schwarzenegger  
Governor



Linda S. Adams  
Secretary for  
Environmental Protection

Maureen F. Gorsen, Director  
700 Heinz Avenue  
Berkeley, California 94710-2721

June 23, 2006

Mr. Ken Strelo  
City of Pittsburg  
65 Civic Avenue  
Pittsburg, California 94565

Dear Mr. Strelo:

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Environmental Impact Report (EIR) of May 8, 2006 for the Proposed Trans Bay Cable Project (SCH #2004082096). 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 California Environmental Quality Act (CEQA) 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.

The project involves installation of a submarine transmission cable and associated onshore facilities to provide a connection between electrical power resources in the East Bay near Pittsburg and distribution facilities in San Francisco. The Draft EIR discusses in Section 1.2.13 that development of the San Francisco HWC Converter Station site would require excavation and remediation of subsurface contaminated soil and groundwater. Development of the Pittsburg Standard Oil Converter Station site would involve excavation of potentially contaminated soil. The Draft EIR provides limited information about the scope of these activities and the contamination found at these sites in Table 1-1 under Potentially Significant Impacts and Proposed Mitigation Measures HAZ-2, HAZ-4, and HAZ-7. Section 1.2.13 indicates that substantial remediation would be required at the San Francisco HWC Converter Station site, and Proposed Mitigation Measure HAZ-4 states that the estimated amount of excavated soil that would need to be disposed offsite is 15,000 cubic yards. More information on the nature, levels, and extent of the contamination and the scope of remedial activities at both the San Francisco and Pittsburg sites needs to be provided for us to assess whether the proposed mitigation measures will adequately address the potentially significant impacts associated with the contaminated soil and groundwater.

9-1

9-2 Proposed Mitigation Measure HAZ-2 discusses how excavated soils will be managed during construction. This mitigation measure indicates that staining and odor will be used as a basis for identifying previously uncharacterized soils as potentially contaminated. However, contaminated soils may not have staining or odor, particularly those contaminated with metals. Laboratory analysis of soil samples should be performed for all areas where historical activities may have caused contamination.

9-3 Proposed Mitigation Measure HAZ-2 indicates that previously characterized non-hazardous soils shall be stockpiled for reuse or offsite disposal as needed. The human health risk or ecological risk-based criteria that would be used to determine whether soils can be reused without restrictions should be identified along with soil and groundwater cleanup levels that would be used in areas to be remediated. If there is contamination by metals such as arsenic that occur naturally above human health risk-based screening levels for unrestricted land use, the background levels that would be used as the basis for reuse criteria or cleanup levels should be identified.

9-4 The potential human health risk from vapor intrusion into future buildings that are to be constructed should also be considered if volatile organic compounds are found in any of the project areas.

9-5 Proposed Mitigation Measure HAZ-2 discusses the Soil and Groundwater Management Plan and Health and Safety Plan. These documents would be prepared to address the storage, transportation, and disposal options for soil and groundwater and worker safety during converter station construction. If residual contaminated soil and groundwater are to remain in areas of the project site after construction, institutional controls such as environmental deed restrictions need to be put in place. These controls ensure the periodic inspection and maintenance of any barriers and ensure worker safety and the proper management of contaminated soil and groundwater during any future subsurface work.

9-6 Potential impacts associated with the remediation activities should also be addressed by the EIR. If the remediation activities include soil excavation, the EIR 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.

9-7 DTSC can assist your agency in overseeing characterization and cleanup activities through our Voluntary Cleanup Program. A fact sheet describing this program is enclosed. We are aware that projects such as this one are typically on a compressed schedule, and in an effort to use the available review time efficiently, we request that

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DTSC be included in any meetings where issues relevant to our statutory authority are discussed.

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

9-8

Sincerely,



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

Enclosure

cc: without enclosure

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