From: Ellie Townsend-Hough
To: Jeri Scott
Date: 2/1/2007 8:29:18 AM
Subject: Russell City Energy Center.doc

Attached are the comments from Janet Niato of DTSC. She would like us to pass them on to the applicant. I will figure out what I can do with these comments.

Ellie Townsend-Hough
Chemical Engineer
California Energy Commission
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Sacramento 95814
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GENERAL COMMENTS:

1. If contaminants will remain at the Site above levels appropriate for unrestricted use of the Site, then appropriate land use restrictions should be recorded for the property to limit future uses to those evaluated in the risk assessment as being safe. If land use restrictions are recorded, steps should be put in place to ensure that the restrictions will be monitored and any required operation, maintenance and/or monitoring activities are performed. This can include a requirement for financial assurance.
2. The Phase II ESA Report has to be signed and stamped by the person in responsible charge.
3. It would be useful if we could review the Appendices to the Phase II ESA Report. These were not included in the electronic copy of the document provided to DTSC for review.
4. It would be useful to specify the dimensions of the areas where soil removal is proposed, confirmation sampling plans and the criteria to be used to determine when sufficient soil has been removed.
5. The Alameda County Water District should be consulted to determine whether groundwater in this area is naturally high in selenium.

***DRAFT Phase I Environmental Site Assessment, 3810 Depot Road, Hayward, California* prepared by LFR Levine-Fricke and dated September 13, 2006**

1. The report has to be signed and stamped by the person in responsible charge.
2. To meet the general industry standard, this report should have been prepared in general conformance with the American Society for Testing and Materials (ASTM) Standard Practice E 1527-05 for Phase I Environmental Site Assessments. Although this reference is noted on page 2, it is only discussed in the context of providing a reference for the 180 day period of reliance.
3. It would be useful to indicate when the greenhouse was installed.
4. Page 3, Section 2.2. Please clarify the identity of the two property owners referenced. Section 2.1 indicates that the property is owned by Aladdin Depot Partnership.
5. The rationale for not including onsite structures (e.g., greenhouse, office buildings, storage structures) as potential recognized environmental concerns should be provided. For example, there could be recognized environmental conditions associated with onsite buildings such as lead-based paint, light ballasts, mercury switches, pesticide use, asbestos-containing materials, etc.
6. Photo No. 17. Please clarify where the soil stockpile is located.
7. No pictures were provided for the concrete area where automobile dismantling activities occur. Please clarify whether there was cracking

on the concrete pad or evidence of repairs. It would also be useful to clarify what direction precipitation or liquids would flow.

8. It was unclear from the description and the picture whether there was staining underlying the motor storage area. It would be useful to locate this on a figure.
9. It would be useful to clarify if any hazardous substances were stored in trailers, sheds and buildings located on the southern portion of the property.
10. Please clarify where tires and batteries were stored at the auto wrecking facility.
11. The Phase I ESA indicates that liquids generated from auto dismantling activities conducted at 4000 Auto Wreckers is stored in drums inside a hazardous waste storage shed. Please indicate what the bottom of the storage shed consists of and whether there was staining noted within and/or adjacent to the storage shed.

REVISED DRAFT Phase II Environmental Site Assessments at 3810 Depot Road and 3700 Enterprise Avenue, and Additional Soil and Groundwater Sampling Activities at 3862 and 3878 Depot Road, Hayward, California **prepared by LFR Levine-Fricke and dated November 8, 2006**

1. DTSC notes that there is the potential for additional potential recognized environmental conditions to be identified in our comments on the Phase I ESA. Therefore, additional site characterization may be appropriate associated with the following:
   a. Concrete pad where the automobile wrecking activities take place.
   b. Storage areas for car parts and liquids.
   c. Greenhouse
   d. Diesel tanks
   e. Drums noted in photos shown in the Phase I ESA in Photos 4, 5, 6, 9, 12 and 18
   f. Stored electrical poles
   g. Lead-based paint, light ballasts, mercury switches, pesticide use and asbestos-containing materials associated with site buildings.
2. As there was limited soil samples collected and surficial staining of soil was noted in the Phase I Report in numerous areas, it would be useful to analyze groundwater for petroleum hydrocarbons.
3. Soil samples were collected at one foot below ground surface and three feet below ground surface. Therefore, DTSC cannot assess what someone may be exposed to if they came directly into contact with soil at this Site. Additional sampling of surface soil is appropriate unless there are plans to remove the top foot of soil and dispose of it at an appropriate offsite disposal facility.

***Phase I Environmental Site Assessment, Two Parcels on Enterprise Avenue, Hayward, California* prepared by LFR Levine-Fricke and dated October 21, 2005**

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1. If there were two small structures located on the southern parcel and this parcel was in agricultural use, this could have been where pesticides and farming equipment were stored. Therefore, this could be a recognized environmental condition.
2. Soil samples were collected at one foot below ground surface and three feet below ground surface. Therefore, DTSC cannot assess what someone may be exposed to if they came directly into contact with soil at this Site. If the one foot sample represents the first encountered soil due to impacts from the drying biosolids, this should be indicated. Since boring logs were not included, the depth to first encountered soil could not be evaluated. Otherwise, additional sampling of surface soil is appropriate unless there are plans to remove the top foot of soil and dispose of it at an appropriate offsite disposal facility.
3. It would be useful to clarify whether contaminant levels in groundwater could migrate and impact adjacent properties and/or nearby surface water bodies.
4. It would be useful to clarify whether contaminant levels in soil could impact the adjacent wildlife refuge; requiring an evaluation of potential ecological risks.
5. Sufficient data has not been presented to determine whether selenium is from an onsite source or naturally-occurring.

***Phase I Environmental Site Assessment, 3862 and 3878 Depot Road, Hayward, California*, prepared by LFR Levine-Fricke and dated December 2, 2004**

***Limited Soil and Groundwater Sampling Report, 3862 and 3878 Depot Road, Hayward, California* prepared by LFR Levine-Fricke and dated April 8, 2005**

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2. PCBs were detected in several locations. The U.S. Environmental Protection Agency (implementing Agency for the Toxic Substances Control Act) has specific requirements for soil containing PCBs above 1 milligram per kilogram (mg/kg), along with specific requirements for confirmation sampling.
3. PCBs were detected at soil samples collected from 0.5 to 1 foot below the ground surface. Therefore, there is the potential for higher concentrations to be present at the ground surface. Therefore, additional surface soil samples should be collected from sampling location 1, 6, 9 and 13 to determine the lateral and vertical extent of PCB contamination.
4. The conditions of operations of Outback Systems were not investigated during the Phase I due to access constraints, nor was the building inspected during the sampling events. Therefore, this is a data gap in the information provided.
5. Please clarify whether wood treatment chemicals could be a potential chemical of concern at wood working facilities such as Bay Area Lumber and All Good Pallets. If so, please clarify whether samples were tested for these chemicals.
6. Please clarify where the painting activities took place on the All Good Pallets property so that we can determine whether samples were collected that would detect any releases from this area.
7. No samples appear to have been collected below the floor at the Metal Masters Building where floors were noted in the Phase I as being soaked with cutting and/or lubricating oils.
8. Please clarify why, except for in the former UST area, groundwater was not tested for petroleum hydrocarbons. Groundwater was detected at location 6 at four feet below the ground surface.
9. Please clarify why the 2006 surface soil samples were collected at 1 to 2 feet below the ground surface (bgs) and the 2004 surface soil samples

were collected at 0.5 feet bgs. Additionally, as this site is not paved, the rationale for not collecting surficial samples (ground surface to 0.5 feet bgs) and analyzing these samples for non-volatile constituents of concern should be provided.

10. Please clarify whether the UST was installed following application for the permit in 1989. If this is the UST referenced Please also clarify where the spills occurred on the Metal Masters and All Good Pallets properties. As the Phase I indicates that the spills were cleaned up, please clarify what criteria was used to determine this. If samples were collected and analyzed, this data should be included.
11. The Phase I indicates that a groundwater monitoring well was present at the 3878 Depot Road property and that this well was installed in 2003. The Alameda County Water District should be consulted to determine whether they permitted this well and to determine if they have data reports for this parcel. It would also be useful to sound this well to determine its total depth and to sample the well as it was reportedly installed as part of a groundwater investigation.
12. It would be useful to provide boring logs for the borings installed. These were not included in the April 2005 report.
13. Please clarify whether methylene chloride is a component of any of the products used or produced at the Site. If so, its presence can not be attributed to laboratory contamination unless quality assurance/quality control (QA/QC) samples indicate that it was due to laboratory contamination. In that instance, this should be discussed in the text.

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