



**SAN FRANCISCO PUBLIC UTILITIES COMMISSION**

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December 23, 2005

<b>DOCKET</b> <b>04-AFC-1</b>
DATE DEC 23 2005
REC'D. DEC 23 2005

Mr. William Pfanner  
Siting Project Manager  
California Energy Commission  
1516 Ninth Street, MS-15  
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**SUSAN LEAL**  
GENERAL MANAGER

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*

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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 has not been persuaded that any LORS

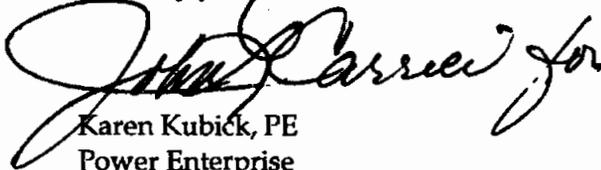
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Provide the basis for an Ecological Risk Assessment; such an assessment is not a requirement under Article 22A.

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,

A handwritten signature in black ink, appearing to read "Karen Kubick for". The signature is fluid and cursive, with a large initial "K".

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

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**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.

  
\_\_\_\_\_  
[signature]

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Parties DO NOT mail to the following individuals. The Energy Commission Docket Unit will internally distribute documents filed in this case to the following:

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