



Department of Toxic Substances Control

Matthew Rodriguez
Secretary for
Environmental Protection

Deborah O. Raphael, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Edmund G. Brown Jr.
Governor

April 10, 2014

Mr. William White
Pacific Gas and Electric Company
3401 Crow Canyon Road, Room 177G
San Ramon, California 94583

REMEDIAL ACTION PLAN, PACIFIC GAS AND ELECTRIC COMPANY FORMER MANUFACTURED GAS PLANT SITE, RED BLUFF, CALIFORNIA

Dear Mr. White:

The California Department of Toxic Substances Control (DTSC) received the revised draft Feasibility Study / Risk Assessment / Remedial Action Plan (RAP) dated February 2014 and held a 30-day public comment period to solicit the public's input prior to approving the final RAP. The RAP was submitted by your consultant, CH2M Hill, for the Pacific Gas and Electric (PG&E) former Manufactured Gas Plant (MGP) located at 600 Rio Street, Red Bluff, California (Site). DTSC and PG&E signed a Voluntary Cleanup Agreement (VCA), Docket No. HSA-VCA 08/09-145 on May 19, 2009 for DTSC oversight in development and implementation of a RAP. The revised RAP addresses DTSC comments. The public comment period started Friday, February 7, 2014 and ended Monday, March 10, 2014. A display advertisement appeared in the local newspaper announcing the public comment period. A repository was established to allow the public to review the major documents (i.e., RAP, fact sheet [FS], California Environmental Quality Act [CEQA] documents, etc). DTSC also held a public meeting on Thursday, February 20, 2014 to address the public's comments. DTSC prepared the Response to Comments Report (Report) to respond to all written comments received during the comment period. DTSC received comments that require minor editorial changes to the RAP. Since the comments do not require any significant changes, DTSC approves the RAP provided CH2M Hill makes the following revisions to the RAP as discussed in the Report.

DTSC prepared and enclosed a Mitigated Negative Declaration and Notice of Determination (NOD) as the appropriate document under the CEQA. The Initial Study evaluated the potential environmental effects from the remediation project and concluded that mitigation measures were necessary to reduce the potential environmental impacts to less than significant. DTSC will file the NOD to start the 30-day statute of limitations on court challenges to the approval under CEQA.

The PG&E MGP operated from 1874 until the mid-1940s. Contamination from the former MGP plant has impacted the soil and groundwater on the PG&E site, the adjacent parcels owned by the U.S. Department of the Interior, Bureau of Reclamation (USBR), and up to the adjacent California Department of Transportation right-of-way. The RAP proposes remedial activities to address elevated levels of volatile organic compounds (VOCs) and polycyclic aromatic hydrocarbons (PAHs) in soil, soil vapor and groundwater at the Site and lead in the soil. The RAP and CEQA documents proposed the following activities:

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1. Excavation of approximately 18,500 cubic yards of contaminated soil and off site transport to an approved landfill. Although the soil contamination is primarily located on the site, the contamination extends on to the USBR property along the Sacramento River. PG&E will excavate approximately less than an acre on the USBR property. Excavation will remove soil contaminated with total petroleum hydrocarbons as diesel and oil and polycyclic aromatic hydrocarbons and naphthalene from surface to 10 feet below the ground surface (bgs).
2. Injecting cement and adding stabilizing reagents into the remaining soil contamination from 10 feet to 35 feet bgs to physically and chemically immobilize hazardous constituents within the treated material (called In-situ solidification / stabilization) on site. The volume of material to be treated by In-situ solidification / stabilization is estimated to be 9,000 cubic yards.
3. Approximately 18,500 cubic yards of clean fill material will be brought in from an off-site source to fill the excavated areas. The site will be graded after the backfill is completed.
4. Natural attenuation (biodegradation) of groundwater contamination will be monitored in the shallow water bearing zone to measure the effectiveness of the remedy. PG&E will collect on-going groundwater samples from several monitoring wells located on and off the PG&E parcel until the remedial goals are achieved.
5. PG&E will record a land use covenant on the PG&E parcel to restrict the groundwater use and to require an assessment for vapor intrusion if a building is constructed.

CH2M Hill should submit a hard copy and electronic copy of the final RAP with the changes as noted in the Report and with the enclosures in an appropriate appendix in the RAP within 30 days from the date of this letter.

If you have any questions, please contact Mr. Duane White at (916) 255-3585 or via email at duane.white@dtsc.ca.gov.

Sincerely,



Fernando Amador, P.E. Chief
Sacramento Responsible Party Unit
Brownfields and Environmental Restoration Program

Enclosures

cc: See next page.

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cc: Ms. Julie Eakins, P.E.
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