
San Francisco Bay Regional Water Quality Control Board

September 15, 2017
File No. 38S0038 (mej)

Pacific Gas and Electric Company
Environmental Remediation
Attn: Ms. Zeynep Ungun, PE
3401 Crow Canyon Road, Room 177C
San Ramon, CA 94583
ZxU1@PGE.com

SUBJECT: Approval of October 7, 2016, Former Unit 3 Power Generation Facility Investigation and Human Health Risk Assessment Report, Potrero Power Plant, City and County of San Francisco

Dear Ms. Ungun:

Regional Water Board staff have completed their review of the subject investigation and risk assessment report, prepared on behalf of PG&E by Haley and Aldrich. The subject report presents the results of additional investigations and an associated human health risk assessment (HHRA) for the Unit 3 Power Generation Facility Area (Unit 3 Area) of the Potrero Power Plant.

Background

The Unit 3 Area investigations indicate that this area is primarily comprised of fill similar to the Northeast and Station A Areas of the Site. Constituents of potential concern (COPCs) in Unit 3 fill material and in the other fill areas of the Site generally include metals, polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs; specifically benzene, toluene, ethylbenzene, and xylenes [BTEX]), petroleum hydrocarbons, and low levels of polychlorinated biphenyls (PCBs). While some of these COPCs are present due to the nature of the historical fill material, others are likely the result of historical Site operations. Soil vapor within the Unit 3 Area contains low concentrations of VOCs, primarily BTEX and naphthalene.

The HHRA evaluated potential human health risks associated with exposures to COPCs in soil and soil vapor, under both current conditions with ground cover in-place (paved surfaces and existing buildings) and a hypothetical future use without ground cover. While under current conditions the Site does not pose an unacceptable risk, should surface covers be removed and underlying soil be exposed, resulting risk would not be acceptable. To maintain human health protection the HHRA recommends the following be included as part of any future remedy: 1) engineering controls to prevent human exposure to contaminants in soil by the requiring “durable covers”, such as has been approved for Station A and portions of the Northeast Area; 2) a risk management plan (RMP) be developed which sets forth measures and procedures to protect human health during soil disturbing activities, and to assure the protective effectiveness of

durable covers; and 3) a land use covenant be recorded to enforce the engineering controls and RMP.

Approval of Report

Based on our review of the subject report, we find it acceptable and agree with the conclusions and recommendations. The subject report is hereby approved.

Next Steps

As the conditions within the Unit 3 Area are very similar to those within the Station A Area of the Site, we would suggest that remedy for Station A (durable covers, RMP and a land use covenant) be amended to encompass the Unit 3 Area, rather than developing a separate remedy and RMP for the Unit 3 Area. For this to occur, the Station A RMP should be updated to include the Unit 3 Area and a new land use covenant be developed. Please move forward with updating the RMP and developing a new land use covenant.

If you have any questions, please contact Mark Johnson of my staff at 510-622-2493, or via e-mail at mjohnson@waterboards.ca.gov.

Sincerely,

Bruce H. Wolfe
Executive Officer

cc: Mailing List

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