

CALIFORNIA ENVIRONMENTAL QUALITY ACT NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control
Site Mitigation and Restoration Program
700 Heinz Avenue
Berkeley, CA 94710

Project Title: Proposed RCRA Corrective Action Remedy Selection for the Contra Costa Power Plant

Project Location: 3201, 3210-C, and 3225 Wilbur Avenue, Unincorporated (5 miles east of Antioch)

County: Contra Costa

Project Applicant: Pacific Gas & Electric Company

Approval Action Under Consideration by DTSC: Corrective Measures Study/Statement of Basis

Statutory Authority: California Health and Safety Code, Chapter 6.5

Project Description: The California Department of Toxic Substances Control (DTSC) determined corrective actions were required to address the release or potential release of hazardous waste or hazardous waste constituents into the environment from the Contra Costa Power Plant (Facility), in accordance with California Health and Safety Code Section 25187. The Statement of Basis details the development and evaluation of corrective measures alternatives that may be taken at the Facility to address releases of hazardous waste and/or hazardous waste constituents. The Statement of Basis recommends the corrective measures to be taken at the Facility that are protective of human health and the environment. The proposed corrective actions at the Facility include institutional controls in the form of a deed restriction, limited excavation and offsite disposal of total petroleum hydrocarbon (TPH) impacted soil, and groundwater well management and demolition.

Background: The Facility occupies 169 acres on the south shore of the San Joaquin River in Contra Costa County. The Facility is located approximately 5 miles east of Antioch, California, bordered by Wilbur Avenue to the south and the San Joaquin River to the north. Currently, the Facility consists of five parcels of varying ownership and operational status, summarized in Table 1. At its peak, the original Contra Costa Power Plant (CCPP) consisted of seven generating units with a combined capacity of 1,243 megawatts. Each generating unit could burn either natural gas or fuel oil, although natural gas was the primary fuel used after the mid-1970s. The CCPP is currently inactive, but able to return to service (cold shutdown). The 720-megawatt Marsh Landing Generating Station (MLGS) was brought online in 2013 and remains in operation today. The simple-cycle, four-turbine-unit MLGS is powered exclusively by natural gas. The 530-megawatt Gateway Generating Station (Gateway GS) was brought online in 2009 and remains in operation today. The combined-cycle, air-cooled Gateway GS is also powered exclusively by natural gas. The switchyard was constructed at the same time as the initial construction of the CCPP and remains in operation today.

Table 1. Parcel Ownership and Operational Status

Parcel Name	Assessor's Parcel Number (APN)	Current Owner	Current Operational Status
Contra Costa Generating Station (CCGS)	APN 051-031-020 ^a	NRG Delta, LLC (GenOn) ^b	The former CCPP, renamed CCGS, is currently inactive, but able to return to service (cold shutdown)
Marsh Landing Generating Station (MLGS)	APN 051-031-018	Marsh Landing, LLC	The MLGS is currently in operation
Gateway Generating Station (Gateway GS)	APN 051-031-016 and APN 051-031-021	PG&E	The Gateway GS is currently in operation
Switchyard	APN 051-031-015	PG&E	The switchyard is currently in operation

^a Previously APN-051-031-019. This parcel was subdivided to create a small parcel (APN 051-031-021) within the larger original parcel. The remaining larger parcel was assigned a new APN (APN 051-031-020).

^b NRG Delta, LLC is a wholly owned subsidiary of GenOn Holdings, Inc., formerly GenOn Energy, Inc. which was itself a wholly owned subsidiary of NRG Energy, Inc.

Project Activities: The proposed corrective action at the Facility encompasses the following elements:

- Institutional Controls;
- Limited excavation and offsite disposal of TPH-impacted soil;
- Installation of one groundwater monitoring well for post excavation monitoring; and
- Management and demolition of groundwater wells

Institutional Controls: The use of institutional controls, in the form of a deed restriction, is proposed to address several exposure scenarios identified in the Human Health Risk Assessment and as an interim measure to address the currently inaccessible areas of the Facility. A Land Use Covenant (LUC) was recorded with Contra Costa County in 1999 for the CCGS, MLGS and Gateway GS parcels, but not the switchyard parcel. The 1999 LUC prohibits the development or use of those parcels for permanent or temporary lodging (including hotels, motels, and residential development), hospital or other healthcare facility, school, daycare center for children, park, playground, or other recreational use. The 1999 LUC also prohibits the use of groundwater under those parcels for any domestic or similar purposes, including drinking, cooking, washing, showering, or bathing.

A new LUC will be recorded over all the parcels with the same land and groundwater use restrictions. Additional restrictions would restrict:

- (a) Extraction or removal of groundwater without a Groundwater Management Plan pre-approved by the Department in writing.
- (b) Any subsurface construction activities within Corrective Action Area B/AOC 40 without a Groundwater Management Plan pre-approved by the Department in writing.
- (c) Activity that may alter, interfere with, or otherwise affect the integrity or effectiveness of, or the access to, any investigative, remedial, monitoring, operation or maintenance system (e.g., cap, vapor extraction system, monitoring system, groundwater extraction system) or activity required for the Property without prior written approval of the Department.

Several areas were inaccessible for purposes of collecting characterization information. These inaccessible areas are located beneath power plant infrastructure, which is still in place and/or operational. Inaccessible areas are located on both PG&E-owned parcels and GenOn- and Marsh Landing, LLC-owned parcels. Because the inaccessible areas will remain inaccessible until the owner demolishes the structures, the corrective action for the Facility will include institutional controls as an interim measure to control disturbance of soil during future construction within the inaccessible areas. The agreement will allow PG&E to monitor development plans for the Facility. When soil beneath the structures in the inaccessible areas becomes accessible, an investigation will be conducted to determine whether corrective measures are required to address any localized, Facility-related contamination beneath the structures. This institutional control would apply to the two parcels (CCGS and switchyard) where there are inaccessible areas.

Excavation and Offsite Disposal: It is estimated that approximately 105 in-place cubic yards (yd³) of soil will be removed from the excavation at AOC 39, resulting in the transport and disposal of approximately 130 yd³ of soil, accounting for expansion during excavation. The waste would be transported to one or more offsite disposal facilities using 18-wheeler end-dump trucks. Based on an assumed average truck capacity of 20-24 tons, approximately 6 to 8 truckloads of soil and rubble will be removed. It is estimated that excavation activities will take approximately 5 workdays. The excavated areas will be backfilled with approximately 6-8 truckloads of clean, imported soil. Prior to bringing fill material onsite, soil quality data will be reviewed to confirm the imported fill is below the screening criteria and free of contamination and debris. Backfill material will be placed within the excavation and graded to the appropriate subgrade required for surface restoration. Additional excavation and truck trips (up to 55) may be required if analytical results deems it necessary.

Post Excavation Monitoring: One new groundwater monitoring well will be installed following the excavation. The monitoring well will be installed in the general location of well AOC39-MW-01, towards the downgradient boundary of the excavation. The monitoring well will be identified as AOC39-MW-01R and will be screened at the same interval as the existing well (7-12 feet bgs). AOC39-MW-01R will be installed using hollow stem auger drilling techniques and will be constructed using 2-inch diameter, Schedule 40 polyvinyl chloride (PVC). The well screen will be sand packed using 20/40 sieve size sand pack to a depth that corresponds to 2 feet above the top of the well screen. At a minimum, a 3-foot bentonite seal will be placed on top of the sand pack in the annulus of the borehole. If necessary, the bentonite seal will be hydrated with potable water. The well will be completed with a lockable, steel, flush-mount road cover rated for vehicle traffic and placed in a 2-foot by 2-foot concrete pad. Groundwater samples will be collected from the new monitoring well on a quarterly basis for a period of one year to monitor the efficacy of the excavation in removing the TPH-diesel source and to achieve acceptable risk levels.

Groundwater Well Management and Demolition: 28 groundwater monitoring wells (27 existing and one new) owned by PG&E will be demolished in a manner consistent with the requirements and standards of Contra Costa County Ordinance 414-4 and the California Department of Water Resources Bulletin 74. Following removal of the well boxes and surface materials, a hole will be excavated around the well casing to a depth of 6 feet below groundwater surface and the well casing perforated or removed to the bottom of the well. Sealing material will then be placed in the well extending from the bottom of the well to within 6 inches of the ground surface, and the surface will be restored to match existing surrounding surface material. Contra Costa County Environmental Health staff will inspect the placement of sealing material. Waste generated during the groundwater monitoring well demolition will be managed and disposed of in compliance with state and local waste management regulations.

Best Management Practices (BMPs) will be adhered to during implementation of the above project activities to minimize potential impacts to the workers, the community, the environment, and biological and cultural resources. BMPs include:

- Health and Safety Plan (HASP). A site-specific HASP will be prepared and outline the general requirements such as for worker training, medical surveillance and incident notification, reporting and investigation. The HASP will identify the potential physical, chemical, and biological hazards associated with the work, will identify hazard controls, and will specify requirements for monitoring and PPE. The HASP will also identify emergency response and spill containment protocols and procedures.
- Dust Control. Dust mitigation measures will be implemented during soil disturbing activities. BMPs include:
 - Applying a water mist to dust-generating sources as necessary to minimize fugitive dust emissions
 - Periodically sweeping work areas and haul routes to prevent dust generation during soil hauling activities
 - Covering stockpiled soil and other areas of exposure with plastic sheets, if necessary
 - Covering or tarping all trucks prior to leaving the site
- Minimizing the generation of greenhouse gas emissions by:
 - Reducing heavy equipment idling time
 - Reducing truck idling time
 - Using properly sized and maintained equipment
- Minimizing the potential for stormwater runoff and erosion by:
 - Excavated soil will either be loaded directly onto trucks and hauled offsite, or stockpiled. Stockpiles will be bermed and covered while awaiting characterization prior to disposal.
 - The work area will be swept clean on a regular basis, at a minimum of daily during excavation, soil handling, and backfill activities.
 - Straw wattles and silt fencing will be installed to minimize offsite migration of sediment-laden water.
 - If dust and dirt is tracked onto paved roads, the affected areas will be swept with water sweepers.
 - Storm drain inlets located at or near the excavation area will be protected with temporary structures such as sand or gravel bags in conjunction with filter fabric, as appropriate, or waterproof covers.
 - Temporary controls will be inspected regularly to confirm proper placement and integrity.
 - If dust control is applied (such as spray mist), precautions will be taken to prevent ponding and/or offsite migration of the dust control agent.
- Biological resources. Pre-construction surveys, including nesting bird surveys, will be conducted prior to soil removal activities to determine the presence of any special-status wildlife species that may occur onsite during construction activities. Special focus will be placed on Mason's lilaopsis, which is a protected state-listed rare plant species that has a high potential to occur along the San Joaquin River. While excavation activities will be predominantly within the developed area, the excavation may extend to and beyond the fence line. If excavation is proposed to extend beyond the fence to within the banks of the San Joaquin River, then a pre-construction floristic survey will be conducted during the species' blooming period to determine their presence. If the preconstruction floristic survey confirms that Mason's lilaopsis is present adjacent to the excavation area, then biological monitoring during construction activities will occur and excavation limits and associated construction activities modified to avoid the location of any Mason's lilaopsis and eliminate the need for an Incidental Take Permit from CDFW.
- Cultural and Paleontological Resource. DTSC conducted Tribal outreach and did not receive requests for consultation regarding the project. However, it is possible that buried cultural resources may be present in the excavation area. High Class-A paleontologically sensitive rock units have been recorded within 10-foot depth within the Facility. As a result, a qualified archaeologist will be retained to respond to potential discoveries during the excavation activities. The qualified archaeologist will conduct cultural resource orientation for the construction site workers. In the event of a cultural resource discovery, corrective action work will cease and DTSC will be notified. A qualified archaeologist will investigate the significance of the find and implement the appropriate action to record and/or protect the resource.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: Pacific Gas & Electric Company

Exempt Status: Common Sense Exemption [14 CCR, Sec. 15061(b)(3)]

Reasons Why Project is Exempt:

DTSC has determined with certainty that there is no possibility that the activities in question may have a significant effect on the environment because the project would not result in "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

The administrative record for this project is available to the public by appointment at the following location:

Department of Toxic Substances Control
File Room
Site Mitigation and Restoration Program
700 Heinz Avenue
Berkeley, CA 94710

Additional project information is available on EnviroStor:

https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=80001830

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TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: