



**Yana Garcia**  
Secretary for  
Environmental Protection



**Department of Toxic Substances Control**

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Katherine M. Butler, MPH, Director  
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[dtsc.ca.gov](http://dtsc.ca.gov)



**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

May 9, 2025

Julie Moore  
Principal Environmental Planner  
San Francisco Planning Department  
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[Julie.Moore@sfgov.org](mailto:Julie.Moore@sfgov.org)

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR PG&E POWER ASSET ACQUISITION PROJECT DATED MARCH 19, 2025, STATE CLEARINGHOUSE NUMBER [2023060769](#)

Dear Julie Moore,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for PG&E Power Asset Acquisition Project (Project). The City and County of San Francisco (City) is proposing to purchase Pacific Gas and Electric Company (PG&E) owned electrical transmission and distribution assets in San Francisco and San Mateo County that are needed to provide electricity service to customers within the city. After the City completes its acquisition of the Assets, the City would own, operate, and maintain the electricity grid in San Francisco. This project does not include the purchase of PG&E's natural gas facilities; thus, PG&E would continue providing natural gas services to customers in San Francisco. The change in ownership would not result in physical changes to the environment requiring environmental review; however, construction would be needed to physically separate PG&E's existing electric system into two separate systems (generally divided along the San Francisco/San Mateo county border), to allow both systems to be safely, reliably, and independently

operated by the City and PG&E. DTSC recommends and requests consideration of the following comments:

1. Appendix A, Initial Study, Section E.18 Hazards and Hazardous Materials, Page 226. The Initial Study finds that “Groundwater extraction from dewatering of the excavations could result in contaminated water that would require appropriate handling and disposal. Contaminated water could be disposed of into the sanitary sewer in accordance with the requirements of the Bayshore Sanitary District or it would require onsite treatment to remove contaminants prior to disposal in accordance with a NPDES permit.”
2. DTSC reiterates that significant polycyclic aromatic hydrocarbon (PAH) and volatile organic compound (VOC) contamination exists within the groundwater beneath OU-2 of the PG&E Martin Service Station site. As such, a groundwater management plan should be prepared alongside the soil management plan discussed in the body of the EIR. The groundwater management plan should include containerization of potentially impacted groundwater collected during dewatering activities and the chemicals the wastewater would be analyzed for prior to disposal. DTSC recommends that the analytical program include the following analytes:
  - a) Total Oil and Grease and Non-polar Oil and Grease by EPA Method 1664 with silica gel treatment.
  - b) Benzene, toluene, ethylbenzene, and o-, m- and p-xylenes (BTEX) by EPA Method 8260.
  - c) PAHs by EPA Method 8270C
  - d) Nine metals, total (not dissolved) concentrations: arsenic (As), cadmium (Cd), chromium (Cr), copper (Cu), lead (Pb), mercury (Hg), nickel (Ni), silver (Ag), and zinc (Zn) by EPA 6010.
  - e) Sulfide and pH by EPA Test Method 9030 series and 9040B, respectively.

3. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment Guidance Manual](#).

Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

DTSC would like to thank you for the opportunity to comment on the DEIR for PG&E Power Asset Acquisition Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via our [CEQA Review email](#) for additional guidance.

Sincerely,

*Tamara Purvis*

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Julie Moore  
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