



**Yana Garcia**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D.  
Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

### SENT VIA ELECTRONIC MAIL

September 10, 2024

Bob Botkin  
P.E., CEM  
City of Pasadena Water and Power Department  
150 South Los Robles Avenue Suite 200  
Pasadena, CA 91101  
[rbotkin@cityofpasadena.net](mailto:rbotkin@cityofpasadena.net)

RE: MITIGATED NEGATIVE DECLARATION FOR THE GLENARM BESS PROJECT  
DATED AUGUST 19, 2024, STATE CLEARINGHOUSE NUMBER [2024080720](#)

Dear Bob Botkin,

The Department of Toxic Substances Control (DTSC) received a Mitigated Negative Declaration (MND) for the Glenarm BESS Project (Project). The City of Pasadena Water and Power (PWP) proposes to install a 25-megawatt utility-scale Battery Energy Storage System (BESS) on an approximately 0.59-acre site, within PWP's existing Glenarm Power Plant, located at 52 East Glenarm Street in the City of Pasadena, California. The proposed Project would charge and store electricity, with a minimum storage capability of four hours. Design, construction, and maintenance of the BESS. The proposed Project is located on a DTSC cleanup Site, [City of Pasadena Power Plant](#). DTSC and PWP entered into a Voluntary Cleanup Agreement on 10/8/2013 for DTSC to oversee a limited dioxin focused investigation, based on the review of the Report, on March 5, 2014, DTSC issued a No Further Action with regard to dioxin and indicated that if previously unidentified contamination is discovered at the Site during grading and construction, additional assent, investigation and or cleanup

may be required. The area proposed for installation of the BESS is not part of the previously dioxin investigated area. After reviewing the Project, DTSC recommends the following comments for your consideration:

1. According to Appendix E-4 Phase II Environmental Site Assessment, it suggests soil excavation for lead and total petroleum hydrocarbons (TPH) as diesel range organics (DRP) under a Soil Management Plan (SMP) with City of Pasadena as the lead agency. The Report indicates lead as high as 840 mg/kg Where the proposed Project site has no current land use restriction or cap to prevent potential migration of contaminants via rain. If contaminants in excess of commercial/industrial are to remain in place, DTSC requires to enforce a land use restriction on the property. Although a SMP is recommended to remove contaminated soil, DTSC recommends that any potential contamination should be fully characterized and then remediated under the oversight of an approved [certified local agency resource](#) or DTSC. The SMP alone cannot sufficiently identify and document the potential contaminants that may pose a threat to human health and the environment. If entering into one of DTSC's voluntary agreements, please note that DTSC uses a single standard Request for Lead Agency Oversight Application for all agreement types. Please apply for DTSC oversight using this link: [Request for Agency Oversight Application](#). Submittal of the application is your agreement to pay costs incurred during the agreement negotiation. If you have any questions about the application portal, please contact [DTSC Brownfield Coordinator](#) for your region or contact the [Application Portal Inbox](#)
2. 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 \(PEA\) 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 the prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

3. If buildings or other structures are to be demolished on any Project sites included in the proposed Project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with [DTSC's PEA Guidance Manual](#).

DTSC believes the City of Pasadena must address these comments to determine if any significant impacts under the California Environmental Quality Act (CEQA) will occur and, if necessary, avoid significant impacts under CEQA. If further concerns or impacts surface in light of any forthcoming environmental documents DTSC reserves the right to provide applicable comments at that time.

DTSC appreciates the opportunity to comment on the MND for the Glenarm BESS 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 [email](#) for additional guidance.

Sincerely,

*Tamara Purvis*

Tamara Purvis  
Associate Environmental Planner

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HWMP - Permitting Division – CEQA Unit  
Department of Toxic Substances Control

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cc: (via email)

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