July 7, 2009

Ellie Townsend-Hough  
Chemical Engineer  
California Energy Commission  
1516 Ninth Street MS 40  
Sacramento, California 95814  
Ellowensn@energy.state.ca.us

PHASE I ENVIRONMENTAL SITE ASSESSMENT FOR AMENDED SALTON SEA  
UNIT 6 PROJECT, IMPERIAL COUNTY

Dear Ms. Townsend-Hough:

The Department of Toxic Substances Control (DTSC) has reviewed your submitted  
Data Requests and CalEnergy’s Responses to the Data Requests for the above  
referenced project. DTSC has the following comments:

1) DTSC provided comments on April 15, 2009 in response to the evaluation of the  
project’s original Application for Certification (AFC). DTSC recommends that  
CalEnergy address those comments for the proposed project.

2) With the Recognized Environmental Conditions (RECs) as mentioned in the  
Phase I Environmental Assessment (ESA) Report and in the absence of soil  
sampling data provided to DTSC, it cannot be confirmed that the site is free from  
contamination by pesticides, herbicides, and other chemicals.

3) Without data for soil sampling and Phase II site investigation, DTSC cannot verify  
the validity of CalEnergy’s responses. Of particular note is the statement pointed  
out in your e-mail, which says, “If the flooding of the tiles under the site  
adequately reduces the concentration of pesticides and herbicides on the  
proposed project site…” Flooding the site may dilute the contamination but will  
not achieve an overall reduction of contaminants. If hazardous waste levels of  
pesticides exist on the site, deliberate flooding of the site may constitute illegal  
treatment of hazardous waste. The potential for hazardous waste levels of  
pesticides can only be determined by soil sampling. If the site is contaminated  
above health-based standards, cleanup may be necessary. Alternatively, if the
If you have any questions regarding this letter, please contact me at (714) 484-5461.

Sincerely,

[Signature]

Greg Holmes
Unit Chief
Brownfields and Environmental Restoration Program - Cypress Office

cc: Governor’s Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@opr.ca.gov

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
1001 I Street, 22nd Floor, M.S. 22-2
Sacramento, California 95814
nritter@dtsc.ca.gov

CEQA#2542