



Alan C. Lloyd, Ph.D.
Agency Secretary
Cal/EPA



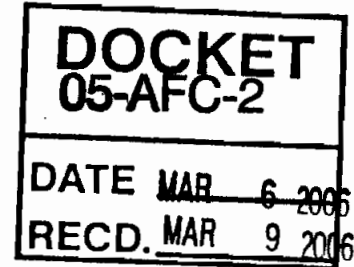
Department of Toxic Substances Control



Maureen F. Gorsen, Director
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Glendale, California 91201

Arnold Schwarzenegger
Governor

MEMORANDUM



TO: Ellie Townsend-Hough
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California Energy Commission
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Sacramento, California 95814

FROM: Curtis P. Plotkin
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Department of Toxic Substances Control - Glendale Office

REVIEWED BY: Jennifer Jones
Unit Chief
Southern California Cleanup Operations, Glendale Office

DATE: March 6, 2006

SUBJECT: REVIEW OF WALNUT CREEK ENERGY PARK APPLICATION
FOR CERTIFICATION AND APPENDICIES; SUPPLEMENT TO
APPLICATION FOR CERTIFICATION

DTSC has reviewed the aforementioned documents as well as the Phase I and Phase II Environmental Assessments for the proposed Walnut Creek Energy Park. DTSC concurs with the findings of these reports and recommends, following building demolition, the following:

1. Based on the presence of chlorinated volatile organic compounds (VOCs) detected in groundwater, a comprehensive soil gas survey should be conducted following the DTSC-Regional Water Quality Control Board Guidance Document.
2. Given the proposed development for the site, an indoor air quality assessment should be conducted using the DTSC Guidance For The Evaluation And Mitigation Of Subsurface Vapor Intrusion To Indoor Air.

3. A statistically significant number of soil samples should be collected from the footprint of the warehouse. DTSC recommends using the Visual Sampling Plan, available free from the DOE <http://dgo.pnl.gov/index.htm>.
4. Additional soil sampling should be conducted in areas where elevated VOCs are detected in soil gas. Soil samples should be collected using EPA Method 5035 so that there is a minimum of five feet (5') of clean material (non-detection) from the any sample where VOCs, semi-VOC or metals are detected. For efficiency, a mobile laboratory should be utilized on-site to analyze the soil gas samples and subsequent soil samples for VOCs in 'real-time'.
5. Evaluation of SVOCs, including PAHs, should be performed in areas where elevated VOCs are detected in soil gas.
6. Analysis of soil samples should include Title 22 metals.
7. Groundwater wells should be installed to establish baseline water quality prior to construction of the power plant. At least one well should be placed up-gradient of the site and two wells down-gradient of the site (See DTSC Guidance Documents).

DTSC appreciates the opportunity to review and comment on this project. If you have any questions, please do not hesitate to contact me at (818) 551-2862.