



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

November 19, 2007

Ms. Ellie Townsend Hough
Dockets Unit
California Energy Commission
1516 Ninth Street, MS 4
Sacramento, California 95814

DOCKET
07-AFC-2

DATE NOV 19 2007

RECD. NOV 28 2007

APPLICATION FOR CERTIFICATION (AFC) SUPPLEMENT FOR SAN GABRIEL GENERATION STATION PROJECT.

Dear Ms. Hough:

The Department of Toxic Substances Control (DTSC) has received your submitted AFC document for the above-mentioned project. As stated in your document: "The proposed project will be constructed at the EGS, an existing power plant owned and operated by Reliant Energy Etiwanda, Inc. (a wholly owned subsidiary of Reliant Energy, Inc.). The EGS property (the existing plant location, which will include the proposed project) is bordered by Etiwanda Avenue to the east, an existing SCE switchyard and vacant SCE-owned land to the south (i.e., site of future Rancho Vista subdivision), undeveloped SCE-owned land to the west on which an LM6000 peaker plant is under construction, a parcel to the southwest owned by IEUA containing two water tanks, and Burlington Northern Santa Fe Railroad (BNSF) tracks to the north. The EGS property is approximately 60 acres in size".

Based on the review of the submitted AFC document, DTSC has the following comments:

1. The draft AFC needs to identify and determine whether current or historic uses at the Project site have resulted in any release of hazardous wastes/substances at the Project area.
2. The draft AFC needs to identify any known or potentially contaminated sites within the proposed Project area. For all identified sites, the draft AFC should evaluate whether conditions at the site pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:

National Priorities List (NPL): A list is maintained by the United States Environmental Protection Agency (U.S.EPA).

PROOF OF SERVICE (REVISED 10/19/07) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 11/28/07

CalSites: A Database primarily used by the California Department of Toxic Substances Control.

Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.

Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.

Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.

Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards (RWQCBs).

Local County and City maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.

3. The draft AFC should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If hazardous materials or wastes were stored at the site, an environmental assessment should be conducted to determine if a release has occurred. If so, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. It may be necessary to determine if an expedited response action is required to reduce existing or potential threats to public health or the environment. If no immediate threat exists, the final remedy should be implemented in compliance with state laws, regulations and policies.
4. If the subject property was previously used for agriculture, or if weed abatement occurred, onsite soils could contain pesticide or herbicide residues. Proper investigation and remedial action may be necessary to ensure the site does not pose a risk to the future residents.
5. All environmental investigations, sampling and/or remediation should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous waste cleanup. The findings and sampling results from the subsequent report should be clearly summarized in the AFC.

6. Proper investigation, sampling and remedial actions, if necessary, should be conducted at the site prior to the new development or any construction, and overseen by a regulatory agency.
7. If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the proposed project is within a Border Zone Property.
8. Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. A study of the site overseen by the appropriate government agency might have to be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.
9. If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If so, the facility should obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942.
10. If hazardous wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite, or (c) disposed of onsite, then a permit from DTSC may be required. If so, the facility should contact DTSC at (818) 551-2171 to initiate pre application discussions and determine the permitting process applicable to the facility.
11. Certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.
12. If the project plans include discharging wastewater to a storm drain, you may be required to obtain a wastewater discharge permit from the overseeing Regional Water Quality Control Board.
13. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the AFC should

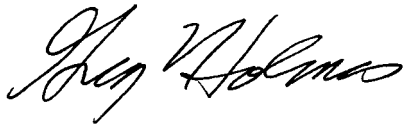
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identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

14. If structures on the Project Site contain potentially hazardous materials, such as; asbestos-containing material, lead-based paint, and mercury- or PCB-containing material, such materials should be removed properly prior to demolition, and disposed of at appropriate landfills or recycled, in accordance with the regulatory guidance provided in California Code of Regulation (CCR) and following the requirements of the Universal Waste Rule (40 CFR part 9).

If you have any questions regarding this letter, please contact Mr. Al Shami, Project Manager, at (714) 484-5472 or at "ashami@dtsc.ca.gov".

Sincerely,



Greg Holmes
Unit Chief
Southern California Cleanup Operations Branch - Cypress Office

cc Governor's Office of Planning and Research
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CEQA # 1901

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE
STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION
FOR THE SAN GABRIEL
GENERATING STATION

Docket No. 07-AFC-2
PROOF OF SERVICE
(Revised 10/19/2007)

INSTRUCTIONS: All parties shall 1) send an original signed document plus 12 copies OR 2) mail one original signed copy AND e-mail the document to the web address below, AND 3) all parties shall also send a printed OR electronic copy of the documents that shall include a proof of service declaration to each of the individuals on the proof of service:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 07-AFC-2
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DECLARATION OF SERVICE

I, April Esau, declare that on November 28, 2007, I deposited copies of the attached The Department of Toxic Substances Control's Comments on the San Gabriel Generating Station Project in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.

April Esau