CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. R2-2012-0029

RESCISSION OF SITE CLEANUP REQUIREMENTS (ORDER NO. 94-182) FOR:

PACIFIC GAS AND ELECTRIC COMPANY

For the property located at

PETALUMA "A" SUBSTATION
175 1ST STREET
PETALUMA, SONOMA COUNTY, CA

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter the Regional Water Board), finds that:

1. **Regional Water Board Orders:** The Regional Water Board adopted Site Cleanup Requirements for this site on December 15, 1994 (Order No. 94-182).

2. **Summary of Investigation and Remediation Activities:** This 1/3 acre Site is an operating electrical substation located adjacent to the Petaluma River. The site was part of a larger parcel that was the former location of a manufactured gas plant which operated from approximately 1885 until 1902. Gas manufacturing operations were reportedly conducted exclusively on an adjacent site, located across D Street. The Discharger purchased the property in 1908.

   A preliminary assessment conducted in 1986 found low to moderate concentrations of polynuclear aromatic hydrocarbons (PAHs) and arsenic in shallow soil. Subsequent sampling in 1988 and 1991 found elevated concentrations of arsenic, lead, cadmium, copper, and zinc. Only relatively low concentrations of PAHs and diesel range hydrocarbons were found. Based on these preliminary findings the Regional Board issued Order No. 94-182 to perform additional investigation and cleanup as needed. After an additional investigation in 1995, PG&E concluded that groundwater and sediments had not been adversely affected by site soils.

   A Remedial Action Plan (RAP) was submitted in December 1995 with the objectives of eliminating the dispersal of affected shallow soil due to erosion by wind or run-off and to reduce or eliminate the potential human health risks associated with future residential development. However, implementation of the RAP was not completed as PG&E abandoned their original plans to close the

substation and potentially convert to residential use. PG&E has decided to retain the site as an electrical substation. A revised RAP was approved on March 7, 2011.

The revised RAP included installing a polyethylene liner covered with clean gravel over about one-half of the site. Additional areas of the site were paved, and a small area of the site was graded so that ponding no longer occurs. An asphalt berm surrounds most of the site that is not available for capping/paving. The site is surrounded by a locked fence. The old water supply well and the monitoring wells were properly destroyed. PG&E also prepared a soil management plan to be followed if soil disturbing activities are performed in the future. Finally, a deed restriction was prepared to prevent the potential use of the site for residential or other higher risk uses.

3. **Basis for Rescission:** Rescission of Order No. 94-182 is appropriate because implementation of the Order's tasks is no longer needed and the site qualifies for low-threat closure.

Four of the Order's tasks have been completed:

- Submittal of an acceptable work plan on March 10, 1995, for groundwater and sediment sampling;
- Submittal of a technical report documenting groundwater and sediment sampling and summarizing nearby available data. The July 21, 1995, report concluded that the groundwater and sediment was not impacted from the site;
- Submittal of a Remedial Action Plan (RAP) on December 21, 1995. A revised RAP was submitted March 7, 2011;
- Submittal on September 7, 2011, of a technical report documenting the implementation of the revised RAP. As part of the RAP a soil management plan was prepared and a deed restriction was recorded by Sonoma County on November 16, 2011.

The final task of the Order, annual reports evaluating the remedial actions, is no longer needed. There is no longer any active remedial action, and implementation of the soil management plan is required by the deed restriction, a self-implementing mechanism.

The site qualifies for low-threat closure for the following reasons:

- The site has been adequately characterized;
- Exposure pathways, receptors, and potential risks, threats, and other environmental concerns have been adequately evaluated;
- There is no groundwater plume emanating from the site;
- There are no unacceptable risks to human health, ecological health, and sensitive receptors, considering current and reasonable future land and water uses.

4. **CEQA**: This action rescinds an Order to enforce the laws and regulations administered by the Regional Water Board. Rescission of the Order is not a project as defined in the California Environmental Quality Act (CEQA) and revocation of site cleanup requirements is exempt from CEQA. There is no possibility that the activity in question may have a significant effect on the environment. (Cal. Code Regs., tit. 14, §§ 15061, subd. (b) (3) and 15321 subd. (a).)

5. **Notification**: The Regional Water Board has notified the dischargers and all interested agencies and persons of its intent under California Water Code Section 13304 to rescind site cleanup requirements for the discharge, and has provided them with an opportunity to submit their written comments. No written comments were received.

6. **Public Hearing**: The Regional Water Board, at a public meeting, heard and considered all comments pertaining to this discharge.

IT IS HEREBY ORDERED, pursuant to Section 13304 of the California Water Code, that Order No. 94-182 is rescinded.

I, Bruce H. Wolfe, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on April 11, 2012.

for

Bruce H. Wolfe
Executive Officer

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FAILURE TO COMPLY WITH THE REQUIREMENTS OF THIS ORDER MAY SUBJECT YOU TO ENFORCEMENT ACTION, INCLUDING BUT NOT LIMITED TO: IMPOSITION OF ADMINISTRATIVE CIVIL LIABILITY UNDER WATER CODE SECTIONS 13268 OR 13350, OR REFERRAL TO THE ATTORNEY GENERAL FOR INJUNCTIVE RELIEF OR CIVIL OR CRIMINAL LIABILITY
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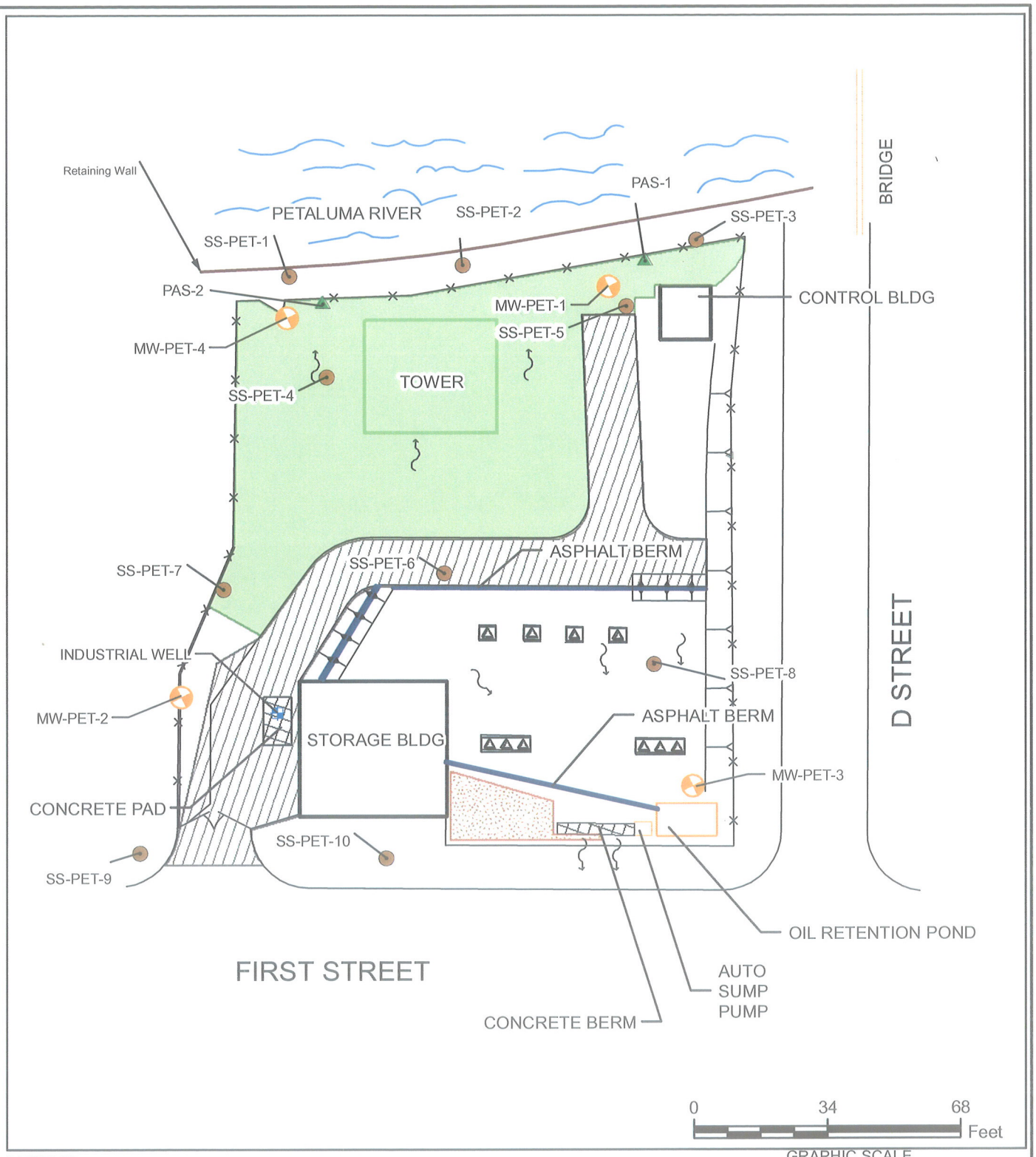
Attachment: Site Map



LEGEND:

- 1995 SURFACE SOIL SAMPLE LOCATION
- 2006 SUBSURFACE SOIL SAMPLE LOCATION
- FORMER MONITORING WELL LOCATION (DESTROYED MAY 2011)
- INDUSTRIAL WELL LOCATION (DESTROYED DECEMBER 1995)
- ASPHALT PAVED SITE ACCESS ROAD
- GRADED AREA (JULY 2011)
- AREA OF LINER (INSTALLED JUNE-JULY 2011)
- DIRECTION OF SHEET FLOW
- BRIDGE
- FENCE
- TRANSFORMER

NOTES:

SOURCE: PGE SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN.

ALL LOCATIONS ARE APPROXIMATE.

PACIFIC GAS AND ELECTRIC COMPANY
PETALUMA, CALIFORNIA

CORRECTIVE ACTION PLAN COMPLETION REPORT
PETALUMA A SUBSTATION

CORRECTIVE ACTIONS IMPLEMENTED MAY - JULY 2011

ARCADIS

FIGURE 3

CITY: San Francisco DIV/GROUP: ENV/IM DB: K ERNST LD: J PETERSON PIC: PM: TM: TR:
Project #: 92281.0001 Task 2
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