Invitation to Comment Draft Remedial Plan for the Tank Farm Area and Draft Risk Management Plan for the Development Area



FORMER POTRERO POWER PLANT 1201 ILLINOIS STREET, SAN FRANCISCO

September 2020

INTRODUCTION

The California Regional Water Quality Control Board, San Francisco Bay Region (Water Board), is announcing a 30-day public comment period on 1) the draft Remedial Plan for the Tank Farm Area and 2) the draft Risk Management Plan (RMP) for the Development Area for the Former Potrero Power Plant Site at 1201 Illinois Street, San Francisco (the Site). The Water Board is the lead agency for environmental cleanup at the Site.

The Water Board invites you to review and comment on the draft Remedial Plan and draft RMP. Information below explains how you can comment and review documents.

THIS FACT SHEET WILL INFORM YOU ABOUT:

- Site History and Background
- Environmental Investigations and Remediations
- Draft Remedial Plan for the Tank Farm Area
- Draft Risk Management Plan for Development Area
- Intent to Issue Certificate of Completion
- Next Steps

PUBLIC COMMENT PERIOD SEPTEMBER 16 to OCTOBER 16, 2020

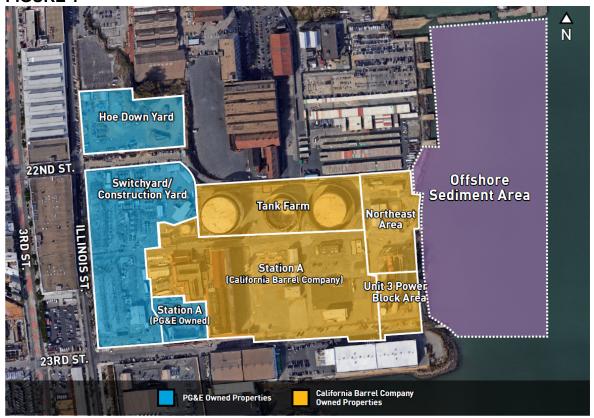
Draft Remedial Plan for the Tank Farm Area and Draft RMP for the Development Area

Public comments can be submitted orally or in writing any time during the public comment period. Please submit your comments on the draft Remedial Plan for the Tank Farm Area and draft RMP for the Development Area no later than 5 p.m. on October 16, 2020. Comments shall be submitted to: Mark Johnson, Regional Water Quality Control Board, San Francisco Bay Region, 1515 Clay St., Suite 1400, Oakland, California 94612. You may submit comments by email to: mark.johnson@waterboards.ca.gov or by calling (510) 622-2493.

SUMMARY

The Site had been used for industrial activities since the mid-1800s, including a manufactured gas plant and electric power plant, resulting in environmental impacts to soil, soil vapor, and groundwater. For purposes of investigative and remedial planning, the Site was divided into seven operational areas (Areas) as shown on Figure 1. This allowed cleanup of one Area to move forward as others were still under the investigation phase. Remedies have been adopted and implemented for six of the seven Areas, with the Tank Farm Area being the final remaining Area to be addressed.

FIGURE 1



Approximate boundaries shown. Map not to scale.

Following active cleanup operations, such as soil stabilization in the Northeast Area or dredging of the Offshore Sediment Area, each of the remedies for the six Areas have also included institutional and engineering controls. The institutional controls are in the form of Land Use Covenants (LUCs) recorded with the property deeds. The LUCs prohibit certain land uses, groundwater use and require compliance with an RMP. The RMPs set forth engineering controls, which include the maintenance of a Durable Cover over the surface to prevent uncontrolled exposure to underlying existing soil. A Durable Cover can be either hardscape, such as pavement, sidewalks, buildings, etc. or softscape, which includes the placement of four feet of clean fill soil over a marker liner that separates it from existing soil on the Site.

The RMP also describes other risk management procedures to be followed during construction and maintenance activities when digging through the Durable Cover is necessary. These engineering controls would include dust control, air monitoring, soil handling protocols, etc. These measures are intended to protect human health and the environment during current use of the Site, future construction or redevelopment, and following redevelopment.

The draft Remedial Plan for the Tank Farm Area has been prepared and selects a similar remedy as the other six Areas of the Site. Specifically, the selected remedy for the Tank Farm Area consists of a Durable Cover, LUC, and associated RMP.

As the investigation/remediation phase for all seven Areas within the Site is nearly completed and the Site moves towards redevelopment, the draft RMP for the Development Area has been prepared to cover the Tank Farm Area in addition to the portions of Station

A, Unit 3, Northeast, and the northern portion of the Switchyard/General Construction Yard Areas that will be redeveloped (as shown on Figure 2). The draft RMP for the Development Area will replace and combine into a single document the current RMPs for the Areas of the Site planned for development.

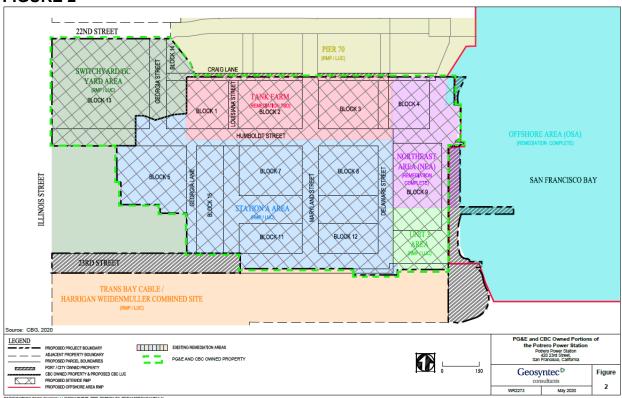
SITE HISTORY AND BACKGROUND

The Site is located in San Francisco's Central Waterfront at 1201 Illinois Street and covers 34 acres onshore, and the 23 acres offshore. It is bordered by 23rd Street to the south, Illinois Street to the west, Pier 70 to the north, and the San Francisco Bay to the east.

The Site and adjacent areas have been used for industrial activities since the mid-1800s. Some of the historical uses on and near the Site included ship building and repair, foundries, sugar refining, and barrel making. A manufactured gas plant (MGP), which used coal and oil to produce a form of natural gas, operated in the northern portion of the Site from the 1870s to 1930. The Site's electric generating Potrero Power Plant was originally built in the 1910s and later upgraded and expanded in the 1960s. The power plant was permanently retired in March 2011.

In 1999, PG&E divested 22 acres of the Site, including the electric power generation facilities, and kept 12 acres of it for its on-going transmission, gas loading, and materials handling operations. In 2016, PG&E purchased back 1 acre of the original 13-acre Station A property to build a Gas Insulated Substation, which is located on 23rd Street. California Barrel Company (CBC) currently owns 21 of the 34 acres and intends to redevelop the Site into a mixed-use development. The planned development area includes the CBC-owned 21 acres and an additional 8 acres currently owned by PG&E and the Port of San Francisco (Port). The planned development area is shown on the Figure 2 below.

FIGURE 2



ENVIRONMENTAL INVESTIGATIONS AND REMEDIATIONS

The Site's long history of industrial use resulted in environmental impacts. Between 1998 and 2019, environmental investigations conducted by PG&E at the Site have identified subsurface impacts to soil, soil vapor, and groundwater as the result of filling operations, past electric power generation, and manufactured gas generating activities. These impacts include metals; petroleum hydrocarbons; volatile organic compounds (VOCs), including benzene, toluene, ethylbenzene, and xylenes (BTEX); polycyclic aromatic hydrocarbons (PAHs); polychlorinated biphenyls (PCBs); and naturally occurring asbestos.

Following the environmental investigations in each Area, remedies were developed to address the environmental impacts and mitigate potential health risks and potential impacts to the environment.

To date, remedies have been adopted and implemented for six of the seven Areas, with the Tank Farm Area being the final Area to be addressed. A summary of the Water Boardapproved remedies for the six Areas is provided below:

Station A and Unit 3 Areas – The Water Board-approved remedy provides institutional controls requiring maintenance of a Durable Cover, implemented by an LUC and compliance with an RMP. The Durable Cover is in place, and the RMP was completed for both the Station A and Unit 3 Areas. The LUC has been recorded for Station A Area, and the recording of the LUC for Unit 3 Area will be included with the approval of the draft RMP of the Development Area.

Switchyard/General Construction Yard and Hoe Down Yard Areas - The Water Board-approved remedy includes institutional controls requiring maintenance of a Durable Cover, implemented by an LUC, and compliance with a Soil Management Plan (SMP). The Durable Cover is in place, the SMP was completed, and the LUCs were recorded.

Northeast Area – The Water Board-approved remedy includes soil solidification to treat the MGP impacts deep below the ground surface. Following the soil solidification, the approved remedy provides for institutional controls requiring maintenance of a Durable Cover, implemented by an LUC, and compliance with an RMP. The soil solidification remedy and installation of the Durable Cover has been completed, and finalization of the RMP and recording the LUC will be included with the approval of the draft RMP for the Development Area.

Offshore Sediment Area – The Water Board-approved remedy includes dredging and capping with enhanced monitored natural recovery to address the MGP impacts to the Bay sediments. Following the dredging and capping, the approved remedy included institutional controls requiring maintenance of the capped material, implemented by an LUC, and compliance with a Risk Management and Monitoring Plan (RMMP) for the shoreline and Offshore Sediment Area. The dredging and capping of the Bay sediments remedy has been completed, with finalization of the RMMP and recording the LUC in progress.

DRAFT REMEDIAL PLAN - TANK FARM AREA

The draft Remedial Plan for the Tank Farm Area outlines a similar approach as the other six Areas of the Site, as described below.

A human health risk assessment (HHRA) was conducted for the Tank Farm Area in 2019 and concluded that the Tank Farm Area does not presently pose a risk to human health or

the environment as it is fenced, the soil covered, and the land vacant. The HHRA also concluded that if (as is planned) development activities occur on the Site, impacts in soil, soil vapor, and groundwater would require some remediation or other forms of risk management to protect the health of future construction and maintenance workers and future buildings occupants.

Therefore, consistent with the remedial approaches for other Areas of the Site, and in consideration of CBC's planned redevelopment of portions of the Tank Farm Area, the draft Remedial Plan for the Tank Farm Area consists of the following components:

- Maintenance of an existing Durable Cover over the Tank Farm Area, to physically isolate and prevent exposure to impacted subsurface soil, soil vapor, and groundwater.
- Compliance with an RMP that includes procedures for land disturbing activities; requirements for soil removal handing and management; procedures for removal/replacement of Durable Covers; environmental controls (e.g., air emissions and stormwater discharges) to be implemented during construction; and requirements/specifications for engineering controls (e.g., Durable Covers, vapor mitigation, etc.).
- Compliance with an Operation and Maintenance Plan (O&M Plan) intended to provide for the effective operation and maintenance of engineering and institutional controls, such as the Durable Cover and vapor intrusion mitigation systems.
- Compliance with an LUC that prohibits certain uses/activities (i.e., groundwater use), requires implementation of engineering controls (e.g., Durable Covers, vapor mitigation, etc.), and incorporates an associated RMP to protect human health and the environment.

The Durable Cover that currently exists in the Tank Farm Area will remain until it is disturbed or removed by CBC for redevelopment construction. At the completion of the redevelopment construction, a new Durable Cover will be in place and will be maintained.

DRAFT RISK MANAGEMENT PLAN FOR THE DEVELOPMENT AREA

The draft RMP for the Development Area has been created through a collaborative effort by PG&E and CBC and will apply to the Development Area, which includes the Tank Farm, Station A, Unit 3, Northeast, and the northern portion of the Switchyard/GC Yard Areas (as shown on Figure 2). The shoreline and offshore portions of the Development Area are addressed by the Offshore Area RMMP. The existing RMPs for the Station A, Unit 3, and Switchyard North Areas will be replaced by this draft RMP for the Development Area, which includes the protocols and requirements of the existing individual RMPs. The PG&E portion of Station A, the southern portion of the Switchyard, and the Hoe Down Yard Areas are not part of the Development Area and will continue to operate under their own separate RMPs.

The draft RMP for the Development Area includes protocols and requirements for engineering controls that apply to the Development Area collectively, as well as certain protocols that apply only to the Tank Farm Area, Northeast Area, and planned residential development blocks. The draft RMP for the Development Area also describes how risks such as vapor intrusion to indoor air will be mitigated and managed during and following the redevelopment. Vapor intrusion to indoor air can occur when residual chemical vapors present in soil or groundwater move up through the soil and into enclosed spaces such as buildings, thereby exposing the occupants. The draft RMP for the Development Area also

includes protocols for implementing measures that must be followed to demonstrate that the Site remains safe for the intended land uses.

CERTIFICATE OF COMPLETION

Following approval of the Remedial Plan for the Tank Farm Area and RMP for the Development Area, the LUCs will be finalized and recorded. At this point, all seven Areas will have completed all necessary investigations and remediations and the Site will move into risk management, pursuant to the LUCs and RMPs. Once this has occurred, the Water Board will consider issuing a Certificate of Completion for the entire Site. The public will be notified and allowed to comment on this proposed action by the Water Board.

NEXT STEPS

The public is encouraged to submit comments on the draft Remedial Plan for the Tank Farm Area and the draft RMP for the Development Area.

Online Community Question & Answer Session for the draft Remedial Plan for the Tank Farm Area and draft RMP for the Development Area has been scheduled for Wednesday, September 23, from 6:00 – 7:00 PM via Zoom meeting. The Zoom meeting can be accessed with the following link: https://zoom.us/j/91776331976.

This online session is an opportunity for members of the community to ask questions, learn more about the project, and provide comments to the Water Board.

The Water Board will not make a final decision to approve the documents until all public comments have been reviewed and considered. Following the review of the public comments provided during the Public Review Period, the Water Board will issue a Responsiveness Summary. The Responsiveness Summary is the Water Board's formal written response to all comments received. It will be available to the public and will also be placed in the administrative record.

ELECTRONIC DOCUMENTS

The draft Remedial Plan and the draft RMP for the Development Area are available under the "Site Cleanup" link on the <u>Water Board's Public Notices website</u> at: http://www.waterboards.ca.gov/sanfranciscobay/public_notices/.

Documents and other technical information for the Site are available electronically on the <u>GeoTracker website</u> at: https://geotracker.waterboards.ca.gov. Click on the search bar and enter **Case ID number: 38S0038**.

CONTACT INFORMATION

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