



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D., Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Gavin Newsom
Governor

Sent Via Electronic Mail

September 26, 2022

Mr. Keegan George
Senior Civil Engineer, Environmental Services
Sacramento Municipal Utility District
6201 S Street, Mail Stop B209
Sacramento, California 95817
Keegan.George@smud.org

INTERIM REMOVAL ACTION WORKPLAN - APPROVAL FOR IMPLEMENTATION,
SACRAMENTO MUNICIPAL UTILITY DISTRICT (SMUD), 59TH STREET
CORPORATE YARD, 1708 59TH SREET, SACRAMENTO, SACRAMENTO COUNTY,
CALIFORNIA (SITE CODE: 100402)

Dear Mr. George:

The Department of Toxic Substances Control (DTSC) approves the Final Interim Removal Action Workplan for implementation (Final IRAW – AECOM Technical Services, Inc. (AECOM), September 2022). The Final IRAW was received electronically on September 22, 2022. The Final IRAW was prepared by AECOM on behalf of the Sacramento Municipal Utility District (SMUD). The Final IRAW presents an evaluation of three (3) interim removal action alternatives for soil contamination at the former SMUD Corporation Yard Site located at 1708 59th Street, Sacramento, California (Site).

The three (3) interim removal action alternatives were evaluated to address contaminated soil at the Site; these include:

- Alternative No.1 – No Action;
- Alternative No. 2 – Soil Excavation/Off-Site Disposal; and
- Alternative No. 3 – Limited Soil Excavation/Off-Site Disposal, Soil Containment/Capping-in-Place, and Land Use Controls.

Based on evaluation and comparison of the interim removal action alternatives with each other, the removal action chosen is Alternative No. 2. This interim removal action

will address arsenic, lead, and total petroleum hydrocarbons (hydraulic oil and motor oil) contamination in soil. This interim removal action also is expected to reduce high concentrations of volatile organic compounds in soil gas at suspected potential source areas until an appropriate soil gas cleanup level is developed and a final remedy for the Site is selected. A subsequent Remedial Action Plan will be developed to address the full extent of soil gas contamination and any residual soil contamination at the Site not addressed by this proposed interim remedy.

A 30-day public comment period for the draft IRAW was held from August 12, 2022 through September 12, 2022. DTSC received comments from five parties during the public comment period. The comments were reviewed and evaluated with respect to the scope of the IRAW. Based on the comments received, DTSC determined that modification of the IRAW was not necessary. The enclosed DTSC Responsiveness Summary to public comments will be provided to the parties who submitted comments.

As a Responsible Agency under the California Environmental Quality Act (CEQA), DTSC will file a Notice of Determination (NOD) with the Office of Planning and Research (PRC Section 21108 and Guidelines Section 15075(c)) to comply with CEQA as part of the approval process for this response action. A Responsible Agency is defined in CEQA Guidelines (14 CCR Section 15381) as a public agency which proposes to carry out or approve a project, for which the lead agency is preparing or has prepared an Environmental Impact Report or Negative Declaration. While DTSC is a Responsible Agency under CEQA for the overall construction project, DTSC will also be the lead agency which approves or determines the need to carry out a response action for which a mitigated negative declaration was adopted.

A Work Notice (in both English and Spanish) will be prepared and provided to those individuals/organizations on the public distribution list at least five days prior to the start of fieldwork activities. In addition, the work notice shall be placed in plain sight visible from public right-of-ways throughout the duration of the response action. Following completion of the removal action activities, a Interim Removal Action Completion Report must be submitted to DTSC for review and approval.

Please place the approved IRAW, the NOD and this letter in the designated information repositories for public access.

If you have any questions regarding this letter, please contact Mr. Pete Ruttan, DTSC Project Manager at (916) 255-3695 or via email at Peter.Ruttan@dtsc.ca.gov.

Sincerely,

Daniel V. Ziarkowski

Daniel V. Ziarkowski, Branch Chief
Cleanup Program Legacy Landfills
Site Mitigation and Restoration Program
Department of Toxic Substances Control

Enclosures: *DTSC Responsiveness Summary*
Notice of Determination

cc: (via email)

Mr. René Toledo
Environmental Compliance Supervisor
Sacramento Municipal Utility District
Rene.Toledo@smud.org

Emily Bacchini
Manager, Environmental Services
Sacramento Municipal Utility District
Emily.Bacchini@smud.org

Mr. Joe Schofield
Deputy General Counsel - Corporate Legal
Sacramento Municipal Utility District
Joe.Schofield@smud.org

Mr. José Salcedo, P.E., Unit Chief
Site Mitigation and Restoration Program
Department of Toxic Substance Control
Jose.Salcedo@dtsc.ca.gov

Mr. Thomas Booze, Ph.D.
Staff Toxicologist
Human and Ecological Risk Office
Department of Toxic Substance Control
Thomas.Booze@dtsc.ca.gov

Mr. Dave Kremer, P.G.
Engineering Geologist
Geological Service Branch - Sacramento
Department of Toxic Substance Control
David.Kremer@dtsc.ca.gov

Mr. Farrukh Ahmad, Ph.D., P.E.
Hazardous Substances Engineer
Engineering and Special Projects Office
Farruhk.Ahmad@dtsc.ca.gov

Ms. Jennifer Baily, CIH
Sr. Industrial Hygienist
Health & Safety Program
Department of Toxic Substances Control
Jennifer.Bailey@dtsc.ca.gov

Ms. Tammy Pickens
Public Participation Specialist
Office of Environmental Equity
Department of Toxic Substance Control
Tammy.Pickens@dtsc.ca.gov

Mr. Keegan George
September 26, 2022
Page 4

Mr. Pete Ruttan
Sr. Engineering Geologist
Northern California School Unit
Department of Toxic Substances Control
Peter.Ruttan@dtsc.ca.gov

**DTSC RESPONSIVENESS SUMMARY
DRAFT INTERIM REMOVAL ACTION WORKPLAN
SACRAMENTO MUNICIPAL UTILITY DISTRICT (SMUD)
SMUD CORPORATE YARD
1708 59TH STREET, SACRAMENTO, CALIFORNIA
PROJECT CODE 100402**

I. INTRODUCTION

The Department of Toxic Substances Control (DTSC) regulates environmental response actions to ensure they are performed in compliance with state statutes and regulations, and in accordance with recognized standards. If environmental contamination from the mishandling of hazardous materials is identified, the impacted site must be cleaned up to a level that is protective for the intended use of the property (i.e., residential, or commercial/industrial). The subject Draft Interim Removal Action Workplan (IRAW) was prepared in compliance with California Health and Safety Code section 25356.1, the First Amendment to Corrective Action Consent Agreement, Docket HWCA P1-13/14-007 2018), and DTSC's 1998 memorandum titled Removal Action Workplans and 2008 Proven Technologies and Remedies Guidance - Remediation of Metals in Soil, Appendix C3 Removal Action Workplan Sample.

II. SITE BACKGROUND

The former SMUD Corporate Yard (Site) is located at 1708 59th Street in Sacramento, California, approximately 5 miles east of downtown Sacramento. The Site encompasses 19.74 acres in an area of varied land use. Residential neighborhoods are situated to the west, commercial developments are situated to the north, and U.S. Highway 50 is located south of the Site. A California Department of Transportation laboratory is located east of the Site. The Site is bisected by the Sacramento Regional Transit light rail Gold Line and a buried 10-inch diameter petroleum product pipeline beneath the light rail right-of-way.

SMUD has operated the Corporation Yard since 1947, when it was purchased from the Pacific Gas and Electric Company (PG&E). The Corporation Yard served as a central storage area for hazardous and non-hazardous wastes generated on-site and at other off-site SMUD facilities or sites. Historical uses of the yard by SMUD and PG&E appear to have been the same. The SMUD Corporation Yard managed three waste streams. The major waste stream consisted of polychlorinated biphenyls (PCBs) and associated electrical transformers, which accounted for approximately 95 percent of wastes managed onsite. A second waste stream consisted of Resource Conservation and Recovery Act (RCRA)-regulated wastes, which primarily consisted of spent solvents generated by several shops located on the Site. A third waste stream consisted of wastes generated at SMUD's various off-site locations within the service area that were transferred to the main yard for consolidation and appropriate disposal. These wastes included asbestos used for insulation of underground electric lines, herbicides and pesticides used for right-of-way weed control and pest management, wood products (poles and cross members) treated with pentachlorophenol and creosote, and occasional sulfur wastes from SMUD's geothermal projects. Since 2013, the Site had been used for office space and warehouse storage only, but as of December 2021, the Site has been vacant. Redevelopment plans for the Site include creation of a mixed-use urban community consisting of a combination of small lot single-family homes, multi-family rental units, and commercial space.

Based on previous investigations, soil across portions of the Site is impacted with arsenic at concentrations exceeding the calculated Site-specific arsenic background concentration of 17.53 milligrams per kilogram (mg/kg). In addition, lead, and total petroleum hydrocarbons (TPH - identified as motor oil and hydraulic oil) are present at concentrations exceeding DTSC's 80 mg/kg and 2,400 mg/kg residential screening levels (SLs), respectively. Therefore, further action is required at the Site due to these elevated concentrations of arsenic, lead, and TPH. Previous Site investigation results also indicate that soil gas is impacted with volatile organic compounds (VOCs); however, further studies are needed to better characterize, develop soil gas cleanup levels, and ultimately establish a cleanup level for the soil gas. Until soil gas cleanup levels are developed, SMUD is implementing this interim removal action to address arsenic, lead, and TPH contamination in soil; this removal action will also aid in reducing VOC concentrations in select source areas with soil gas contamination. The final remedy for the Site will be selected in a subsequent removal action plan (RAP) that will address the full extent of soil gas contamination and any residual soil contamination not addressed by this interim removal action work. The purpose of the remedial options evaluated in this IRAW is to mitigate the exposure risk of arsenic, lead, and TPH in soil through inhalation, dermal absorption, and ingestion and reduce VOC concentrations in the soil gas contamination source area.

III. INTERIM REMOVAL ACTION WORKPLAN (IRAW)

The following remedial action objectives (RAOs) were developed for soil within the portions of the Site identified as having an unacceptable risk.

- *Prevent direct human contact with, inhalation of, and ingestion of arsenic concentrations in soil exceeding the site-specific background concentration.*
- *Prevent direct human contact with, inhalation of, and ingestion of unacceptable lead concentrations in soil.*
- *Prevent direct human contact with, inhalation of, and ingestion of unacceptable levels of TPH concentrations in soil.*
- *Reduce VOC concentrations in the soil gas contamination area by removing VOC mass from the source area identified at the north of the Tool Issue Building.*

The proposed interim removal action work at the Site includes the excavation and offsite disposal of the arsenic, lead, and TPH contaminated soil located outside of the existing building footprints. The interim removal action includes the following key activities.

- **Excavating and Transporting Impacted Soil:** It is estimated that the total in-place volume of impacted soil for excavation is approximately 8,400 bank cubic yards. The excavation in the southeast corner of the Site near the Warehouse Building will extend to deeper than 10 feet below ground surfaces (bgs). The soil will be removed using standard earthmoving equipment (e.g., excavator, front end loader). Excavated soil will be segregated and stockpiled within the property boundaries based on previous sampling data and other evidence, such as x-ray fluorescence (XRF) soil analyzer results, into three separate stockpiles: (1)

potentially reusable fill stockpile (e.g., soil from excavation side slopes); (2) soil potentially requiring disposal as non-hazardous waste at a Class II or III landfill; and (3) soil potentially requiring disposal as California (non-RCRA)-hazardous waste at a Class I landfill. If not directly loaded into trucks, the excavated soil will either be stockpiled or placed in covered soil bins until characterization and disposal arrangements are completed. Non-RCRA hazardous stockpiled soil will be placed on plastic sheeting and covered with plastic sheeting when not actively being worked on and at the end of each workday in compliance with the requirements of staging piles in 40 CFR 264.554 and remediation waste staging in California Health and Safety Code 25123.3 (a) (2). Sandbags, or other weights, will be used to keep the plastic covers over the stockpiles in place.

- **Backfilling:** Excavations will be backfilled to, at or near, the pre-excavation grade. All backfill material will be placed in uniform horizontal layers not greater than 8 inches in loose thickness and thoroughly compacted in place with suitable equipment (i.e., sheepfoot roller).
- **Confirmation Sampling:** Soil samples from the sides and bottom of the completed soil excavation will be collected to verify that cleanup levels have been met and remedial action objectives (RAOs) for the Site have been achieved. Confirmation samples will also be used to determine whether arsenic-impacted soil extends off-Site and beneath the Warehouse Building. If arsenic-impacted soil extends off-Site and beneath the Warehouse Building, this soil would be addressed in a final remedial action plan (RAP) for the site.
- **Site Restoration:** The Site will be graded to promote positive drainage and prevent excessive ponding. The Site surface will be restored to a compacted Class II aggregate surface. Temporary fencing and work zone delineation will be removed.
- **Institutional Controls (ICs):** Under federal and state laws, ICs are non-engineered instruments such as administrative and legal controls that help minimize the potential for human exposure to contamination and/or protect the integrity of a selected remedy(s). A Land Use Covenant (LUC, a.k.a. Land Use Restrictions) is an IC and a tool that the DTSC utilizes when exposure to contamination can be controlled through specifically defined restrictions on a property. It should be noted that a “land use control” is not the same as a land use covenant (which shares the same acronym – “LUC”). SMUD instituted self-imposed land use controls that require perimeter fencing with security gates, routine security patrols, and review by SMUD environmental staff for all construction/maintenance projects at the Site. SMUDs self-imposed land use controls will remain in place until cleanup goals, that will be established in the future RAP, are achieved.

Excavation operations will generate dust. Dust control measures will comply with SMAQMD Rules 401, 402, and 403 to protect onsite and off-site receptors from chemicals in soil and nuisance dust. Suppressant, water spray, and other forms of dust control may be required during excavation, and workers may be required to use

personal protective equipment to reduce exposure to contaminants. Sloping excavation sidewalls may result in increased volume of soil requiring excavation. Confirmation soil sampling and analysis would be conducted to verify that cleanup criteria are met at the excavation bottom and sidewalls. Excavation may require soil stockpiling prior to disposal. To achieve the RAOs, soil across the Site requires removal to a depth of approximately 3 feet in most locations and to a depth of greater than 10 feet bgs in the southeast corner of the Site near the Warehouse Building. Any residual soil contamination not addressed by this interim remedy would be addressed by the final remedy that will be selected in the final RAP.

IV. SUMMARY OF COMMENTS AND DTSC RESPONSES TO COMMENTS

DTSC held a public comment period from August 12, 2022, through September 12, 2022. DTSC received four written emails and one phone call during the public comment period. DTSC appreciates the time and efforts of those who reviewed the draft IRAW and supporting documents and provided comments. A summary of the community-based comments and the DTSC's responses to those comments are provided below.

Comment 1, email: *“My only comment concerning the site is that if the work will take 8 to 12 weeks that you do the work from June 16, 2023 - August 30, 2023. There is a school nearby on Folsom Blvd that is open enrollment and pulls students from across the city to our campus. 59th Street is a bottleneck as it is in the mornings and afternoons when students are coming and going from the Phoebe Hearst campus. Additionally, there is a 7-12 High School, two private schools, and a college campus nearby. Please do the work in the summer.”*

Response to Comment 1: DTSC appreciates the commenter's concerns regarding the timing of the work. The redevelopment proposed by SMUD has been in the works for several years and the current construction schedule does not accommodate an approximate one-year delay. However, SMUD and DTSC are aware of the nearby schools and the proposed work considers the effects that it will have on the schools regarding traffic and air quality. Prior to project construction within or adjacent to public roadways, SMUD's construction contractor will develop a traffic control plan for the project and submit the plan to the City of Sacramento's Department of Public Works. The plan shall identify temporary lane, sidewalk, bicycle lane, and transit stop closures and provide information regarding how access and connectivity will be maintained during construction activities. The plan shall include details regarding traffic controls that would be employed, including signage, detours, and flaggers. The traffic control plan shall be implemented by the contractor during construction to allow for the safe passage of vehicles, pedestrians, and cyclists along the project route. Details regarding how health, safety, and environmental risk will be minimized during site cleanup are found in Appendix C-Transportation Plan of the IRAW.

In addition, the health and safety of neighborhood, including students and faculty are important to us. During the cleanup activities, air quality control measures will be implemented. During excavation activities, depending on soil conditions, there is potential to generate airborne dust. Dust emissions will be managed and controlled during all phases of the project in accordance with the Dust Control and Air Monitoring

Plan (Appendix D of the IRAW). To mitigate off-Site dust impacts to neighboring properties, watering of the active excavation areas will be conducted throughout the removal action. Factors considered in providing fugitive dust, vapor, and odor control measures will include wind direction, wind speed, and available dust control and dust suppression methods. Air monitoring for particulates will be performed during the excavation activities at the perimeter of the property. Best management practices (BMPs) will be implemented throughout the project. BMPs include wetting active remediation areas, minimizing or ceasing activities during periods of high wind, sweeping or wetting paved areas, wetting unpaved areas, application of dust suppressant materials, application of vapor suppressant foams, and covering stockpiles.

Comment 2, email: *"I have read your excellent COMMUNITY UPDATE for this month. Well written and generally clear. The one issue I want to raise is about "safety and dust control" at the bottom of page one and top of page two. You clearly state "Trucks will not be entering residential areas or neighborhoods." Thank you. However, that implies that they will either be traveling on 50 or on Folsom Blvd, t[o] access dumps. Is this a correct conclusion?"*

The former, being under construction has some constricted entrances and is generally a very busy, fast moving road. If this is going to be a major travel route, do you have further details. If the route is Folsom Blvd., it too is experiencing some work with narrowed lanes and often is congested, esp. near shopping areas. Thus while I welcome your heavy trucks not traveling on local streets, more clarity about your chosen or preferred routes would be helpful."

Response to Comment 2: Thank you for your comment. A detailed Transportation Plan (Appendix C) is included in the IRAW. This plan includes the proposed truck routes that will be used to enter and exit the Site and general area. During soil transport activities, trucks will enter the Site through the central gate located on 59th Street. During times of heavy traffic, a flag person will be located at the site to assist the truck drivers to safely drive onto the site. Prior to exiting the Site, the vehicle will be swept to remove any extra soil from areas not covered or protected. As the trucks leave the site, the flag person will assist the truck drivers so that they can safely merge with traffic on 59th Street and then onto Highway 50. Truck traffic along Folsom Boulevard is not anticipated for this project.

Comment 3, email: *"My comment is RE: the section entitled "Safety & Dust Control" "Evacuated soil would be placed on and covered with THICK PLASTIC SHEETS when temporarily stockpiled." Though I appreciate your efforts to eliminate dust and contaminants, we, as a community need to eliminate the use of single-use plastic. Where does this contaminated plastic go when done? Into a landfill I suppose? I encourage your team to utilize the "ROLL-OFF BINS" equipped with lids, and for those bins without lids, the use of canvas or other eco-friendly/biodegradable tarps. Another potential alternative is using cardboard (lord knows we have enough of that!) covered with hay and placing the contaminated soil on top of that, then covering the piles with canvas, or other eco-friendly/biodegradable tarps."*

Response to Comment 3: Thank you for your comment. DTSC agrees plastic use should be minimized when necessary. If not directly loaded into trucks, the excavated soil will either be stockpiled or placed in covered soil bins until characterization and disposal arrangements are completed. Non-RCRA hazardous stockpiled soil will be placed on plastic sheeting and covered with plastic sheeting when not actively being worked on and at the end of each workday in compliance with the requirements of staging piles in 40 CFR 264.554 and remediation waste staging in California Health and Safety Code (H&SE) 25123.3 (a) (2) described below. Specifically, H&SC 25123.3 (a)(2)(A) states for remediation waste staging, *“The hazardous waste is accumulated on an impermeable surface, such as high density polyethylene (HDPE) of at least 20 mils that is supported by a foundation, or high density polyethylene of at least 60 mils that is not supported by a foundation.”* Unfortunately, the use of canvas, biodegradable tarps, or cardboard would not provide the level of permeability needed to ensure the waste remains contained prior to disposal.

Comment 4, phone call:

DTSC’s public participation Specialist Tammy Pickens received a phone call on September 6, 2022, from a local residential broker for Coldwell Banker. The broker inquired about the cleanup regarding its effect on nearby housing prices. The broker also stated a seller received documents about the project but did not keep.

Response to Comment 4:

Experience suggests that cleanup up of contaminated sites situated near residential communities does not negatively affect housing prices. Housing prices, either rising or declining, are typically affected by supply and demand. However, one can infer that a community free of adverse environmental concerns would have only a positive effect on housing. Ms. Pickens has offered to send a copy of the SMUD documents (i.e. the community update) via email to the broker for review. A copy of the community update and public notice was sent to the broker, who was added to our mailing list to receive all future documents pertaining to SMUD.

Comment 5 – 9/9/2022 email: *“We appreciate the fact California DTSC will be monitoring the clean-up of the SMUD site in preparation for re-development. Monitoring the air quality, using tarps to cover contaminated soil and water trucks to control toxic dust is a good start. However, those measures don’t go far enough as they will not actually stop dust from migrating into the surrounding neighborhoods. A current example of migrating dust is the Highway 50 expansion project which has increased the amount of dust in our neighborhood. The prevailing wind is from the southwest and the dust moves quite easily even with water trucks and street sweepers. A better idea for the SMUD project would be to require a tent be erected over the site. While an extra cost, it will be a physical barrier to contain the dust- toxic dust in this case. Moving large volumes of soil with heavy equipment is not a neat or clean process. Less dust escaping will mean cleaner air and surfaces for the surrounding neighborhoods and better health outcomes for the residents.*

In addition to safeguarding residents' health by tenting the project, both SMUD and DTSC will likely field fewer complaints and legal challenges to the operation during the project."

Response to Comment 5: Thank you for this comment. The current mitigation measures presented in the IRAW provide adequate dust control and air monitoring requirements to reduce the potential for fugitive dust drifting beyond the work areas. In addition to water trucks and street sweepers, active spraying of water directly onto the areas where there is soil disturbing is considered an appropriate best management practice to significantly mitigate the potential for fugitive dust to escape site boundaries. The work will be performed under the supervision of a SMUD Construction Management Inspector to ensure that these mitigative dust controls and monitoring measures are being followed. These measures include: multiple perimeter air monitoring stations, with real-time air monitoring alert levels that trigger stop-work (to ensure that 24-hour health risk action levels are never exceeded for the project); work restrictions based on measured wind speeds and visible dust emissions; and dust suppression best management practices. The Site is an approximate 20-acre property. The use of a "tent" erected across the Site (as suggested) would need to be engineered to withstand potential extreme weather conditions, and a temporary structure as such has the potential to put worker safety at risk. There are no plans to tent the Site for this work.

CALIFORNIA ENVIRONMENTAL QUALITY ACT NOTICE OF DETERMINATION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control
Site Mitigation and Restoration Program
8800 Cal Center Drive
Sacramento, CA 95826

Subject: FILING OF NOTICE OF DETERMINATION IN COMPLIANCE WITH SECTION 21108 OF THE PUBLIC RESOURCES CODE

Project Title: Interim Removal Action Workplan for Sacramento Municipal Utility District's 59th Street Former Corporation Yard

State Clearinghouse Number: 2022010239

Project Location: 1708 59th Street, Sacramento

County: Sacramento

Project Applicant: Sacramento Municipal Utility District (SMUD)

Project Description: The purpose of the approved Interim Removal Action Workplan (IRAW) is to address soil at portions of the 59th Street Corporation Yard (Site) that are impacted with arsenic, lead, and total petroleum hydrocarbons as hydraulic oil and motor oil (TPH C17-C32 aromatic high or simply "TPH").

Project activities include the excavation and offsite disposal of the contaminated soil to a permitted landfill to prevent human exposure from the impacted soil and to protect groundwater. It is estimated that the total in-place volume of impacted soil for excavation is approximately 8,400 bank cubic yards. Soil across the Site requires removal to a depth of approximately 3 feet below ground surfaces (bgs) in most locations and to a depth of greater than 10 feet bgs in the southeast corner of the Site near the Warehouse Building. Excavations will be backfilled to at or near the pre-excavation grade and the Site will be graded to promote positive drainage and prevent excessive ponding. The project also includes continued compliance with existing institutional controls/restrictions (perimeter fencing with security gates, routine security patrols, and review by SMUD environmental staff for all construction/maintenance projects at the Site) designed to prevent contact with the contaminated soil until a time when a final remedy for the site has been achieved. Any residual soil contamination not addressed by this interim remedy would be addressed by the final remedy that will be selected in the final remedy Removal Action Plan.

Dust control measures will comply with SMAQMD Rules 401, 402, and 403 to protect onsite and off-site receptors from chemicals in soil and nuisance dust. Suppressant, water spray, and other forms of dust control may be required during excavation, and workers may be required to use personal protective equipment to reduce exposure to contaminants.

DTSC has determined that all of the potential environmental impacts associated with the project activities detailed in the IRAW were analyzed as part of the SMUD's Initial Study completed for this project.

As Responsible Agency under the California Environmental Quality Act (CEQA), DTSC approved the above-described project on September 26, 2022 and has made the following determinations:

1. The project will not have a significant effect on the environment.
2. A Mitigated Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures were made a condition of project approval.
4. A Statement of Overriding Considerations was not adopted for this project.
5. Findings were made pursuant to the provisions of CEQA.

The administrative record for this project is available to the public by appointment at the following location:

Department of Toxic Substances Control
Site Mitigation and Restoration Program
8800 Cal Center Drive
Sacramento, CA 95826

Additional project information is available on EnviroStor: www.envirostor.dtsc.ca.gov/public/

Contact Person
Peter Ruttan

Contact Title
Senior Engineering Geologist

Phone Number
916-255-3695

Approver's Signature:

Daniel V. Ziarkowski *EPM I*

Date:

September 26, 2022

Approver's Name
Daniel V. Ziarkowski

Approver's Title
Environmental Prog Manager I (Sup)

Approver's Phone Number
916-798-6430

TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: