

August 27, 2015

ERM West, Inc (AN# 26510)
Public Notice Response BAAQMD, Engineering Division
939 Ellis Street
San Francisco, CA 94109
Attn: Ms. Flora Chan, via email to: fchan@baaqmd.gov



Protecting Marin Since 1934

Dear Ms. Chan:

Marin Conservation League appreciates the opportunity to comment on BAAQMD's public notice concerning the remediation plan to excavate the site of the former San Rafael Manufactured Gas Plant at 999 Third St. MCL has been active for more than 80 years in preserving, protecting and enhancing Marin's natural assets. Our concerns include protecting the quality of the urban environment as well as that of the natural environment. Therefore, we are encouraged that the legacy of contamination of the historic site of the MGP will finally come to an almost complete conclusion within approximately one year's time. We have two points of particular concern in the remediation project – the population at risk of exposure to contaminated fugitive dust and traffic; and the future responsibility for pollutants that will remain under streets after completion of this project.

MCL has tracked the series of actions taken by PG&E to remediate the 17-acre site of the former MGP. The majority of the work was completed several years ago, leaving the three-acre site between Second, Third, Brooks, and Lindero Streets still to be remediated. According to PG&E project information, the clean-up process will take up to a year, during which time underground structures will be removed and about 35,000 cubic yards of contaminated soil will be excavated and loaded onto trucks at the rate of three to five per hour, maximum 35 per day, for transport and disposal elsewhere. Trucks will then bring in clean soil to backfill the site. A total of some 2,200 trucks over a year are expected to enter and exit the site, and join existing traffic on Second and Third Streets. Most of the excavation will take place under tents fitted with negative pressure and a ventilation system to capture pollutants and odors and thereby minimize potential human health risks from the fugitive dust. Air quality will be monitored regularly at the perimeter of the site.

Exposed population

The project will take place in an area of central San Rafael in which the population at risk of exposure has grown significantly in recent years. Relatively isolated only two decades ago, the area has been drawn into downtown San Rafael by virtue of significant growth in high density housing developments and a major job center. Second and Third Streets together constitute one of the most heavily traveled, often congested, east-west corridors in the county, used by pedestrians as well as cars and trucks. The site is only blocks away from a major transit center. Two schools lie at the southern and northern limits of the general project area. In other words, unlike the earlier remediation activity, this one is now almost surrounded by a resident and

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working population, as well as frequent traffic congestion. It calls for extraordinary precautions during the year of activity. Mitigation measures have been spelled out – traffic management, dust management, noise moderation, etc. MCL urges PG&E and the City of San Rafael, together with responsible state agencies, to enforce these measures diligently, to monitor air quality and cease operations if safe levels are exceeded, and maintain traffic flows as feasible. Further, we request that the project schedule include opportunities for regular check-in for the public (through the City of San Rafael?) to track how the mitigation measures are performing – for example, where are dust monitors located relative to vulnerable populations, and have safe levels been exceeded.

Residual Contamination

Maps of the toxic soil plume under the site have shown that it extends off the site and under Second and Third Streets. It will not be remediated as a part of this project since it is capped by street paving. As long as those streets are not dug up for widening, realignment, or replacement, that is an acceptable solution. However, the anticipated increased traffic load in the area due to further office and housing development could call for changes in local roadways at some future time. Will PG&E be held responsible for remediation in that event, and will the City and/or the DTSC and San Francisco Regional Water Quality Control Board reserve the right to require additional remediation for street works planned or executed in the area?

We would appreciate a response to these questions and to our request for public communication.

Sincerely,



Kate Powers, President

cc: Kevin McGowan , Acting Director, Department of Public Works, City of San Rafael
Dot Lofstrom, Deputy Director, California Department of Toxic Substances
Ralph Lambert, San Francisco Regional Water Quality Control Board