



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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



**Gavin Newsom**  
Governor

### **Sent Via Electronic Mail**

August 3, 2022

Mr. Keegan George, P.E.  
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Sacramento Municipal Utility District  
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DTSC REVIEW OF DRAFT REVISED INTERIM REMOVAL ACTION WORKPLAN – JULY 2022, SACRAMENTO MUNICIPAL UTILITY DISTRICT (SMUD), 59TH STREET CORPORATE YARD, 1708 59TH STREET, SACRAMENTO, SACRAMENTO COUNTY, CALIFORNIA (SITE CODE 100402)

Dear Mr. George:

The Department of Toxic Substances Control (DTSC) has reviewed the *Draft Revised Interim Removal Action Workplan* (Revised IRAW – SMUD, July 2022), which was received electronically by DTSC on July 12, 2022. The Revised IRAW was prepared by AECOM Technical Services, Inc. (AECOM) on behalf of the Sacramento Municipal Utilities District (SMUD). The draft Revised 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). DTSC received a draft version of this document on March 31, 2022, and our comments on this draft document were provided in a letter dated May 18, 2022. SMUD provided their responses to our comments in table format for our review and approval on June 15, 2022 - prior to drafting the current Revised IRAW.

The three (3) interim removal action alternatives evaluated 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 proposed removal action is Alternative No. 2. This proposed interim removal action will reportedly address arsenic, lead, and total petroleum hydrocarbons (hydraulic oil and motor oil) contamination in soil. This proposed 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.

Based on our review, the draft Revised IRAW is adequate for public review and comment. The draft Revised IRAW shall be made available for a 30-day public review and comment period. SMUD shall place the draft Revised IRAW, and associated response action documents in the designated information repositories for public access prior to the start of the public comment period. After the formal public comment period ends, DTSC will consider all comments received prior to modifying and/or approving the IRAW. The IRAW may be implemented after it is approved by DTSC and five days following the mail-out and posting of a fieldwork notice.

Pursuant to the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code, division 13, section 21000 et seq), and its implementing guidelines (California Code of Regulations., title 14, section 15000 et seq.) SMUD, as the lead agency for the overall project, has prepared an Initial Study and Mitigated Negative Declaration (IS/MND) to address the building demolition and remediation project. The IS/MND was adopted by SMUD on April 4, 2022. DTSC, acting as a Responsible Agency under CEQA for the IRAW, has determined that the IS/MND adequately assesses the potential impacts of the project, subject to its discretionary approval. DTSC has determined that the potential impacts of the proposed project would be less-than-significant and will prepare a Statement of Findings to document that determination. Following the 30-day public comment period and IRAW approval, DTSC will file a Notice of Determination within five (5) days with the Governor's Office of Planning and Research.

Mr. Keenan George  
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If you have any questions regarding the project, please contact me at (916) 255-3695 or via email at [Peter.Ruttan@dtsc.ca.gov](mailto:Peter.Ruttan@dtsc.ca.gov).

Sincerely,



Pete Ruttan, P.G.  
Northern California Schools Unit  
Site Mitigation and Restoration Program  
Department of Toxic Substance Control

cc: (via email)

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