

DTSC comments about the 24 acres

From: Dong, Yang@DTSC <Yang.Dong@dtsc.ca.gov>
Sent: Friday, October 20, 2023 3:33 PM
To: [REDACTED]
Cc: White, Duane@DTSC <Duane.White@dtsc.ca.gov>
Subject: RE: Question re: the Morro Bay Power Plant property

Hi [REDACTED],

This is Yang Dong, the new project manager at the Morro Bay Power Plant site. I received an email from [REDACTED] yesterday and believe I can address your questions.

Regarding your first question, based on our current data, if the owner decides to remediate the contaminated soil for Area of Concern (AOC) 1, it is recommended that they excavate the top 2 feet of the soil. The soil within the top 2 feet in the Former Tank Farm of AOC 1 contains the highest concentrations of Total Petroleum Hydrocarbons (TPH) at MBPP, with concentrations of up to 20,000 milligrams per kilogram (mg/kg) within the former tank footprints. Residential screening levels for TPH are set at 2600 mg/kg for TPH-metals, 12000 mg/kg for TPH-residuals, and 2600 mg/kg for TPH-unleaded. TPH concentrations outside of the tank footprints and deeper than 2 feet below the ground surface are below residential screening levels. If contaminants are found at depths greater than 2 feet during or before excavation, it is essential to continue digging deeper until all the contaminants are below the residential screening level.

Regarding your second question, soil excavated from the top 2 feet may be considered hazardous waste. The excavated soil should be sampled for waste characterization to evaluate waste disposal options. Soil containing non-hazardous concentrations of the constituents contained in soil, can be disposed of at a properly permitted and approved municipal solid waste landfill. If the excavated soil is categorized as hazardous waste, it will need to be disposed of at a permitted hazardous waste landfill, following the specific landfill acceptance criteria. A landfill with an RCRA permit that can accept commercial hazardous waste may be the Kettleman Hills Facility, located at 35251 Old Skyline Road in Kettleman City. There is another landfill named Clean Harbors Buttonwillow LLC with an RCRA permit located at 2500 West Lokern Road in Buttonwillow city.

You can also check the San Luis Obispo County website, where you'll find information about three landfills in the county [https://www.slocounty.ca.gov/Departments/Public-Works/Services/Programs-Outreach/Solid-Waste Resources/Residents.aspx](https://www.slocounty.ca.gov/Departments/Public-Works/Services/Programs-Outreach/Solid-Waste%20Resources/Residents.aspx). Each of these landfills may have permits, which, while not necessarily RCRA permits, could allow them to accept specific types of hazardous waste. The entity responsible for soil removal can contact these landfills to inquire about their ability to accept and manage the wasted soil.

Thank you for your interest in the site. Hope you have a nice weekend.

Yang

Yang Dong (*She/Her/Hers*)

Project Manager

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