

**Sonoma 101 Widening & Soundwall Construction (Wilfred to Route 12)
Final Negative Declaration/Final Environmental Assessment**

COMMENT #29 - LETTER (page 1 of 2)



Department of Toxic Substances Control

Jesse R. Huff, Director
700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721



Pete Wilson
Governor

November 13, 1998

Peter M. Rooney
Secretary for
Environmental
Protection

Ms. Kathleen McBride
Office of Environmental Planning, North
Caltrans, District 4
P.O. Box 23660
Oakland, California 94623-0660

Dear Ms. McBride:

**INITIAL STUDY/ENVIRONMENTAL ASSESSMENT (PROPOSED NEGATIVE
DECLARATION) HIGHWAY 101 WIDENING AND SOUNDWALL CONSTRUCTION
IN SONOMA COUNTY FROM THE WILFRED AVENUE INTERCHANGE TO THE
ROUTE 101/12 SEPARATION, SCH NUMBER 98102056**

Thank you for the opportunity to comment on the Initial Study/Environmental Assessment for the subject site. The Department of Toxic Substances Control (DTSC) reviewed the document and has the following questions and comments:

1. The document states that a site investigation will be conducted in the future to determine the extent of hazardous materials. The document does not state what actions will be conducted after the extent of contamination is determined, and does not evaluate the potential impacts that may occur from those actions. Without this information, DTSC is unable to fully evaluate the document.
2. The document refers to an initial site assessment (ISA) as the basis for stating that there is potential soil and groundwater contamination; however, the specific chemicals detected, concentrations and media in which they were found are not presented.
3. Page 16, Section 3.6, Hazardous Materials:
 - a. This section states that a re-evaluation of the site will be conducted to determine if any site conditions have changed, and a preliminary site investigation will follow. Please clarify what regulatory agency(ies) will be working with Caltrans to develop, review and approve these documents, and what regulatory process will be followed.
 - b. Caltrans received a variance from DTSC in June 1995 that addresses the management of lead contaminated soil found along Caltrans' right-of-ways. The variance expires on June 7, 2000. DTSC suggests that this document be cited and the conditions

A

B

C

D

California Environmental Protection Agency
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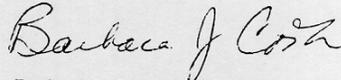
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November 13, 1998
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of the variance be discussed if Caltrans plans to rely on the variance for this project.

If you have any questions regarding this letter, please contact Lynn Nakashima at
(510) 540-3839.

Sincerely,



Barbara J. Cook, P.E., Chief
Northern California - Coastal Cleanup
Operations Branch

cc: Mr. Gunther W. Moskat
Department of Toxic Substances Control
Planning and Environmental Analysis Section
P.O. Box 806
Sacramento, California 95812-0806

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RESPONSE #29 - LETTER

Barbara Cook Department of Toxic Substances Control

| Comment Number | Response |
|----------------|---|
| 29-A | <p>The Initial Site Assessment for this project was completed October 28, 1998. See Section 3.6 Hazardous materials and Section 5.VII Hazards and Hazardous Materials for information on the actions to be taken after the extent of the contamination was determined as well as for an evaluation of potential impacts. Additionally, these sections detail specific chemicals detected, concentrations and media.</p> |
| 29-B | <p>See response to 29-A</p> |
| 29-C | <p>A preliminary site investigation was completed on August 19, 1999. The test results reveal the soil and ground water disturbed by the project are contaminated and they will be handled according to regulatory requirements. Special provisions covering the implementation of a health and safety plan, the handling, and disposal of the contaminated material will be included in the construction contract. If the contamination is due to aerially deposited lead from vehicle emissions, the special handling may include reuse of the material in accordance with the Department of Toxic Substances Control Lead Contaminated Soils Variance dated June 7, 1995.</p> |
| 29-D | <p>Through the public's use of leaded fuel, lead has been aerially deposited on surface soils surrounding Caltrans' roadways. In the more urbanized highway corridors, it is common for the uppermost 2 feet of soil to contain concentrations of lead that, if excavated, would normally be considered hazardous waste. Typically, lead-contaminated soils that are excavated must be managed according to stringent federal and state regulations pertaining to hazardous waste management. Because the Department of Toxic Substances Control (DTSC) found that such soils could be managed in a way that presents no significant risk to human health and the environment, they granted Caltrans District 4 (SF Bay Area) with a variance from specific hazardous waste requirements. This variance only applies to Caltrans highway construction projects that involve the disturbance of soils that would be considered hazardous solely because of lead contamination from leaded fuel emissions.</p> <p>Under the variance, this project qualifies for exceptions that relate to the generation, transportation, storage, and land disposal of hazardous waste. To implement the variance, Caltrans will prepare a variance application and submit it to DTSC who, in turn, will evaluate the application to determine if the variance conditions are met. When the conditions of the variance are met, Caltrans can treat lead-contaminated soil as non-hazardous by essentially burying it within its rights-of-way, a minimum of five feet above the water table and covered with at least two feet of clean soil. Lead-contaminated soils that are retained under the variance must not exceed the total and extractable lead concentrations specified in the variance, and must be covered and managed according to the variance provisions.</p> |