

**From:** "Yue, Aaron@DTSC" <[Aaron.Yue@dtsc.ca.gov](mailto:Aaron.Yue@dtsc.ca.gov)>  
**Date:** November 19, 2019 at 10:15:03 AM PST  
**To:** "Sheets, Keith/PDX" <[Keith.Sheets@jacobs.com](mailto:Keith.Sheets@jacobs.com)>, "Russell, Curt" <[gcr4@pge.com](mailto:gcr4@pge.com)>  
**Cc:** "Innis, Pamela S" <[Pamela\\_Innis@ios.doi.gov](mailto:Pamela_Innis@ios.doi.gov)>, "Hong, Christina/LAC" <[Christina.Hong@jacobs.com](mailto:Christina.Hong@jacobs.com)>, "Cavaliere, Mike/BAO" <[Mike.Cavaliere@jacobs.com](mailto:Mike.Cavaliere@jacobs.com)>, "Baker, Karen@DTSC" <[Karen.Baker@dtsc.ca.gov](mailto:Karen.Baker@dtsc.ca.gov)>, "Alasti, Isabella@DTSC" <[Isabella.Alasti@dtsc.ca.gov](mailto:Isabella.Alasti@dtsc.ca.gov)>, "Matt Dudley ([mgdb@pge.com](mailto:mgdb@pge.com))" <[mgdb@pge.com](mailto:mgdb@pge.com)>, "Guerre, Christopher@DTSC" <[Christopher.Guerre@dtsc.ca.gov](mailto:Christopher.Guerre@dtsc.ca.gov)>, Rick Bezanson <[RABp@pge.com](mailto:RABp@pge.com)>  
**Subject:** [EXTERNAL] RE: Topock Compressor Station Soil Management Plan (SMP)

Dear Mr. Russell and Mr. Sheets,

DTSC has completed the review of the updated SMP and does not have any additional comments. DTSC now considers the attached November Revision of the SMP to be final. Please ensure PG&E implement the SMP for any soil disturbance activities at the site moving forward as required by the executed Land Use Covenant dated July 18, 2018 and it's re-recording on November 7, 2018. Also as stated in the SMP, should any information change or new findings adopted (e.g. HHERA), this SMP should be revised as necessary.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

Aaron Yue  
Project Manager  
Department of Toxic Substances Control  
Office of Geology

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From: Sheets, Keith/PDX <[Keith.Sheets@jacobs.com](mailto:Keith.Sheets@jacobs.com)>  
Sent: Friday, November 1, 2019 4:36 PM  
To: Yue, Aaron@DTSC <[Aaron.Yue@dtsc.ca.gov](mailto:Aaron.Yue@dtsc.ca.gov)>; Russell, Curt <[gcr4@pge.com](mailto:gcr4@pge.com)>  
Cc: Innis, Pamela S <[Pamela\\_Innis@ios.doi.gov](mailto:Pamela_Innis@ios.doi.gov)>; Hong, Christina/LAC <[Christina.Hong@jacobs.com](mailto:Christina.Hong@jacobs.com)>; Cavaliere, Mike/BAO <[Mike.Cavaliere@jacobs.com](mailto:Mike.Cavaliere@jacobs.com)>; Baker, Karen@DTSC <[Karen.Baker@dtsc.ca.gov](mailto:Karen.Baker@dtsc.ca.gov)>; Alasti, Isabella@DTSC <[Isabella.Alasti@dtsc.ca.gov](mailto:Isabella.Alasti@dtsc.ca.gov)>; Matt Dudley ([mgdb@pge.com](mailto:mgdb@pge.com)) <[mgdb@pge.com](mailto:mgdb@pge.com)>; Guerre, Christopher@DTSC <[Christopher.Guerre@dtsc.ca.gov](mailto:Christopher.Guerre@dtsc.ca.gov)>; Rick Bezanson <[RABp@pge.com](mailto:RABp@pge.com)>  
Subject: RE: Topock Compressor Station Soil Management Plan (SMP)

Hello Aaron –

With the issuance of the updated interim screening level table for the Remedy SMP late last week, the TCS SMP has now been finalized. Per your request, the complete SMP, with all tables, figures, and appendices is attached for your review prior to approval.

If there are no additional edits, we will formally submit the final document -

Thanks much –

Keith Sheets  
Jacobs  
Senior Project Manager  
D 503.872.4612  
M 510.541.8542  
[keith.sheets@jacobs.com](mailto:keith.sheets@jacobs.com)<<mailto:keith.sheets@jacobs.com>>

2020 SW 4th Avenue  
Portland OR 97201  
USA

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From: Yue, Aaron@DTSC <[Aaron.Yue@dtsc.ca.gov](mailto:Aaron.Yue@dtsc.ca.gov)<<mailto:Aaron.Yue@dtsc.ca.gov>>>  
Sent: Tuesday, September 17, 2019 11:42 AM  
To: Sheets, Keith/PDX <[Keith.Sheets@jacobs.com](mailto:Keith.Sheets@jacobs.com)<<mailto:Keith.Sheets@jacobs.com>>>; Curt Russell <[gcr4@pge.com](mailto:gcr4@pge.com)<<mailto:gcr4@pge.com>>>  
Cc: Innis, Pamela S <[Pamela\\_Innis@ios.doi.gov](mailto:Pamela_Innis@ios.doi.gov)<[mailto:Pamela\\_Innis@ios.doi.gov](mailto:Pamela_Innis@ios.doi.gov)>>; Hong, Christina/LAC <[Christina.Hong@jacobs.com](mailto:Christina.Hong@jacobs.com)<<mailto:Christina.Hong@jacobs.com>>>; Cavaliere, Mike/BAO <[Mike.Cavaliere@jacobs.com](mailto:Mike.Cavaliere@jacobs.com)<<mailto:Mike.Cavaliere@jacobs.com>>>; Baker, Karen@DTSC <[Karen.Baker@dtsc.ca.gov](mailto:Karen.Baker@dtsc.ca.gov)<<mailto:Karen.Baker@dtsc.ca.gov>>>; Alasti, Isabella@DTSC <[Isabella.Alasti@dtsc.ca.gov](mailto:Isabella.Alasti@dtsc.ca.gov)<<mailto:Isabella.Alasti@dtsc.ca.gov>>>; Matt Dudley ([mgdb@pge.com](mailto:mgdb@pge.com)<<mailto:mgdb@pge.com>>) <[mgdb@pge.com](mailto:mgdb@pge.com)<<mailto:mgdb@pge.com>>>; Guerre, Christopher@DTSC <[Christopher.Guerre@dtsc.ca.gov](mailto:Christopher.Guerre@dtsc.ca.gov)<<mailto:Christopher.Guerre@dtsc.ca.gov>>>; Rick Bezanson <[RABp@pge.com](mailto:RABp@pge.com)<<mailto:RABp@pge.com>>>  
Subject: [EXTERNAL] RE: Topock Compressor Station Soil Management Plan (SMP)

Keith and Curt,

I think we are there! I just made a small word change in Section 4 from “hazardous or potentially hazardous” to “contaminated.” See attached. The only other thing is that the AOC map with Grid should have a tighter grid spacing so that the potential work area is better defined. As is, the entire compressor station is basically covered in 6 grid squares. The benefit of a tighter spacing would be a reduction of text description of work area. I would recommend doubling the grid spacing within the compressor station (which is the main focus) of the LUC and SMP anyways. Aside from these two items, I would like to see the completed plan with all attachments in place before I sign off and approve. Our Toxicologist is reviewing the new screening levels for the remedy SMP. Since the station SMP will have a subset of the screening level when compared with the remedy list, once that review is complete, the screening numbers can be easily verified for this SMP.

Aaron

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From: Sheets, Keith/PDX <[Keith.Sheets@jacobs.com](mailto:Keith.Sheets@jacobs.com)<<mailto:Keith.Sheets@jacobs.com>>>  
Sent: Tuesday, September 10, 2019 5:54 PM  
To: Yue, Aaron@DTSC <[Aaron.Yue@dtsc.ca.gov](mailto:Aaron.Yue@dtsc.ca.gov)<<mailto:Aaron.Yue@dtsc.ca.gov>>>; Curt Russell <[gcr4@pge.com](mailto:gcr4@pge.com)<<mailto:gcr4@pge.com>>>  
Cc: Innis, Pamela S <[Pamela\\_Innis@ios.doi.gov](mailto:Pamela_Innis@ios.doi.gov)<[mailto:Pamela\\_Innis@ios.doi.gov](mailto:Pamela_Innis@ios.doi.gov)>>; Hong, Christina/LAC <[Christina.Hong@jacobs.com](mailto:Christina.Hong@jacobs.com)<<mailto:Christina.Hong@jacobs.com>>>; Cavaliere, Mike/BAO <[Mike.Cavaliere@jacobs.com](mailto:Mike.Cavaliere@jacobs.com)<<mailto:Mike.Cavaliere@jacobs.com>>>; Baker, Karen@DTSC <[Karen.Baker@dtsc.ca.gov](mailto:Karen.Baker@dtsc.ca.gov)<<mailto:Karen.Baker@dtsc.ca.gov>>>; Alasti, Isabella@DTSC

<[Isabella.Alasti@dtsc.ca.gov](mailto:Isabella.Alasti@dtsc.ca.gov)>>; Matt Dudley  
([mgdb@pge.com](mailto:mgdb@pge.com)>>) <[mgdb@pge.com](mailto:mgdb@pge.com)>>; Guerre,  
Christopher@DTSC <[Christopher.Guerre@dtsc.ca.gov](mailto:Christopher.Guerre@dtsc.ca.gov)>>; Rick  
Bezanson <[RABp@pge.com](mailto:RABp@pge.com)>>  
Subject: RE: Topock Compressor Station Soil Management Plan (SMP)

Hi Aaron,

We are really close now with a Final TCS SMP! We have been working on addressing your last couple comments. The two remaining comments were pertaining to 1) the notification process and 2) the frequency of composite samples for characterization of stockpiled soil. Attached is a MS Word RLSO updated version of the SMP, with proposed modifications to address the last two comments. The original text (black) and revised text (Blue) and DTSC Comment (Itals red) are also repeated below for ease of review. Also attached is the proposed Notification Form and Grid map to be used for locating work.

SMP Excerpts:

#### 2.1 DTSC Notification Process

PG&E shall provide at least 48-hours notice to DTSC of soil-disturbing activities at the Property, except in cases of emergency response in which case such notice shall be provided within twenty-four (24) hours of emergency response necessitating soil disturbance.

DTSC Comment: This is more of a notification statement. What is the process? Please identify who will contact whom, what is the content of notification, and how will notification be made. Will notification be in the form of an email, telephone call, list of activities, etc? Recommend development of a notification form for email transmission including info such as: date of activity, specific area impacted with generic site figure for marking of work area, brief description of work to be completed, safety procedure/equipment for activity (can be quick checklist), anticipated soil management (e.g. excavated soil to be returned to hole, drummed for analysis and disposed, held for reuse at another location, etc.)

PG&E Added Text: The notification process will be as follows:

- The PG&E Topock Remediation Project Manager or Topock Site Operation Manager will send an e-mail to the DTSC Topock Project Manager informing DTSC of soil disturbing activities. The e-mail will contain the Notification of Non-Emergency Soil Disturbance Activities on PG&E Property (APN 650-161-08) form (Attachment A). The form will include the following information:
  - Project name
  - Grid location of work. A gridded map of the PG&E Topock property has been developed (Attachment B)
  - Description of work including safety procedures and anticipated equipment to be used
  - Soil Management – anticipated handling and planned disposition of soil
  - Notification Record – Who made notification, when notification was made, record of follow-up

phone call to DSTC confirming receipt of Notification Form

- Stockpiles:
- One four-point composite sample shall be collected per 250 cubic yards.

DTSC Comment: Unlike other areas outside of TCS, the TCS is assumed contaminated (although at non-haz levels). 250 cy is too large for a contaminated site with densely located AOCs/ SWMUs. DTSC expects characterization sample to be gathered either at each pot hole location for smaller excavations or at approximately every 150 CY (corresponding to an excavation of about 5'x5'x6')

PG&E Response: A 5'x5'x6' excavation is only 5.5 CYs (It IS 150 cubic feet).... For small potholes and trenches, soil would only be temporarily stored next to the pothole, and in most cases replaced back into the hole. Stockpiling of soil would only be performed for large, long term projects. A 150 CY stockpile would correspond to a stockpile of approximately 25 feet x 25 feet x ~7-8 feet high and sloped.

Revised Text in yellow

- Stockpiles:
  - o One four-point composite sample shall be collected per 150 cubic yards

Please let us know if a call would be helpful to resolve any remaining items with the SMP –

Keith Sheets  
Jacobs  
Senior Project Manager  
D 503.872.4612  
M 510.541.8542  
[keith.sheets@jacobs.com](mailto:keith.sheets@jacobs.com)<<mailto:keith.sheets@jacobs.com>>

2020 SW 4th Avenue  
Portland OR 97201  
USA

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From: Yue, Aaron@DTSC <[Aaron.Yue@dtsc.ca.gov](mailto:Aaron.Yue@dtsc.ca.gov)<<mailto:Aaron.Yue@dtsc.ca.gov>>>  
Sent: Tuesday, July 23, 2019 5:06 PM  
To: Sheets, Keith/PDX <[Keith.Sheets@jacobs.com](mailto:Keith.Sheets@jacobs.com)<<mailto:Keith.Sheets@jacobs.com>>>>; Curt Russell <[gcr4@pge.com](mailto:gcr4@pge.com)<<mailto:gcr4@pge.com>>>>  
Cc: Innis, Pamela S <[Pamela\\_Innis@ios.doi.gov](mailto:Pamela_Innis@ios.doi.gov)<[mailto:Pamela\\_Innis@ios.doi.gov](mailto:Pamela_Innis@ios.doi.gov)>>>; Hong, Christina/LAC <[Christina.Hong@jacobs.com](mailto:Christina.Hong@jacobs.com)<<mailto:Christina.Hong@jacobs.com>>>>; Cavaliere, Mike/BAO <[Mike.Cavaliere@jacobs.com](mailto:Mike.Cavaliere@jacobs.com)<<mailto:Mike.Cavaliere@jacobs.com>>>>; Baker, Karen@DTSC <[Karen.Baker@dtsc.ca.gov](mailto:Karen.Baker@dtsc.ca.gov)<<mailto:Karen.Baker@dtsc.ca.gov>>>>; Alasti, Isabella@DTSC <[Isabella.Alasti@dtsc.ca.gov](mailto:Isabella.Alasti@dtsc.ca.gov)<<mailto:Isabella.Alasti@dtsc.ca.gov>>>>; Matt Dudley

([mgdb@pge.com](mailto:mgdb@pge.com)<<mailto:mgdb@pge.com>>) <[mgdb@pge.com](mailto:mgdb@pge.com)<<mailto:mgdb@pge.com>>>; Guerre, Christopher@DTSC <[Christopher.Guerre@dtsc.ca.gov](mailto:Christopher.Guerre@dtsc.ca.gov)<<mailto:Christopher.Guerre@dtsc.ca.gov>>>>  
Subject: [EXTERNAL] RE: Topock Compressor Station Soil Management Plan (SMP)

Keith,

I think we are very close to a final SMP. I only have a couple of edits and a comment that requires additional thought (see attached). However, I did not fully compare the revised screening numbers for all the constituents, I'll assume PG&E has picked up the latest numbers for now.

Aaron

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From: Sheets, Keith/PDX <[Keith.Sheets@jacobs.com](mailto:Keith.Sheets@jacobs.com)<<mailto:Keith.Sheets@jacobs.com>>>>  
Sent: Tuesday, July 16, 2019 4:49 PM  
To: Yue, Aaron@DTSC <[Aaron.Yue@dtsc.ca.gov](mailto:Aaron.Yue@dtsc.ca.gov)<<mailto:Aaron.Yue@dtsc.ca.gov>>>>; Curt Russell <[gcr4@pge.com](mailto:gcr4@pge.com)<<mailto:gcr4@pge.com>>>>  
Cc: Innis, Pamela S <[Pamela\\_Innis@ios.doi.gov](mailto:Pamela_Innis@ios.doi.gov)<[mailto:Pamela\\_Innis@ios.doi.gov](mailto:Pamela_Innis@ios.doi.gov)>>>; Hong, Christina/LAC <[Christina.Hong@jacobs.com](mailto:Christina.Hong@jacobs.com)<<mailto:Christina.Hong@jacobs.com>>>>; Cavaliere, Mike/BAO <[Mike.Cavaliere@jacobs.com](mailto:Mike.Cavaliere@jacobs.com)<<mailto:Mike.Cavaliere@jacobs.com>>>>; Baker, Karen@DTSC <[Karen.Baker@dtsc.ca.gov](mailto:Karen.Baker@dtsc.ca.gov)<<mailto:Karen.Baker@dtsc.ca.gov>>>>; Alasti, Isabella@DTSC <[Isabella.Alasti@dtsc.ca.gov](mailto:Isabella.Alasti@dtsc.ca.gov)<<mailto:Isabella.Alasti@dtsc.ca.gov>>>>; Matt Dudley <[mgdb@pge.com](mailto:mgdb@pge.com)<<mailto:mgdb@pge.com>>> <[mgdb@pge.com](mailto:mgdb@pge.com)<<mailto:mgdb@pge.com>>>>; Guerre, Christopher@DTSC <[Christopher.Guerre@dtsc.ca.gov](mailto:Christopher.Guerre@dtsc.ca.gov)<<mailto:Christopher.Guerre@dtsc.ca.gov>>>>  
Subject: RE: Topock Compressor Station Soil Management Plan (SMP)

Hello Aaron,

Attached please find the following:

- \* PDF of Draft Topock Compressor Station SMP with DTSC 2/20/19 comments and PG&E Responses embedded in the PDF
- \* MSWord RLSO Version of Revised TCS SMP - to allow easy review of revisions made to the SMP since DTSC review
- \* Updated Figure 2-1 – flowchart (Updated per DTSC comments)
- \* Updated Tables – (Table 2-1 – SMP screening levels updated per DTSC comments)

A finalized complete PDF of the TCS SMP will be prepared and submitted as final after DTSC reviews the RTCs and revisions to the attached documents.

If you have any questions please contact Curt Russell at (760) 791-5884 or myself at (510)-541-8542.

Keith Sheets  
Jacobs  
Senior Project Manager  
D 503.872.4612  
M 510.541.8542  
[keith.sheets@jacobs.com](mailto:keith.sheets@jacobs.com)<<mailto:keith.sheets@jacobs.com>>

2020 SW 4th Avenue  
Portland OR 97201  
USA

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From: Yue, Aaron@DTSC <[Aaron.Yue@dtsc.ca.gov](mailto:Aaron.Yue@dtsc.ca.gov)<mailto:Aaron.Yue@dtsc.ca.gov>>  
Sent: Wednesday, February 20, 2019 2:36 PM  
To: Sheets, Keith/PDX <[Keith.Sheets@jacobs.com](mailto:Keith.Sheets@jacobs.com)<mailto:Keith.Sheets@jacobs.com>>; Curt Russell <[gcr4@pge.com](mailto:gcr4@pge.com)<mailto:gcr4@pge.com>>  
Cc: Innis, Pamela S <[Pamela\\_Innis@ios.doi.gov](mailto:Pamela_Innis@ios.doi.gov)<mailto:Pamela\_Innis@ios.doi.gov>>; Hong, Christina/LAC <[Christina.Hong@jacobs.com](mailto:Christina.Hong@jacobs.com)<mailto:Christina.Hong@jacobs.com>>; Cavaliere, Mike/BAO <[Mike.Cavaliere@jacobs.com](mailto:Mike.Cavaliere@jacobs.com)<mailto:Mike.Cavaliere@jacobs.com>>; Baker, Karen@DTSC <[Karen.Baker@dtsc.ca.gov](mailto:Karen.Baker@dtsc.ca.gov)<mailto:Karen.Baker@dtsc.ca.gov>>; Alasti, Isabella@DTSC <[Isabella.Alasti@dtsc.ca.gov](mailto:Isabella.Alasti@dtsc.ca.gov)<mailto:Isabella.Alasti@dtsc.ca.gov>>; Matt Dudley <[mgdb@pge.com](mailto:mgdb@pge.com)<mailto:mgdb@pge.com>> <[mgdb@pge.com](mailto:mgdb@pge.com)<mailto:mgdb@pge.com>>; Christopher.Guerre <[Christopher.Guerre@dtsc.ca.gov](mailto:Christopher.Guerre@dtsc.ca.gov)<mailto:Christopher.Guerre@dtsc.ca.gov>>  
Subject: [EXTERNAL] RE: Topock Compressor Station Soil Management Plan (SMP)

Curt and Keith,

Attached are DTSC's comments on the SMP. Overall, it is a good SMP, just need to clarify a few things. Also, we need to work the LUC notification into the SMP as discussed between Curt and I.

Aaron

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From: Yue, Aaron@DTSC  
Sent: Wednesday, November 21, 2018 11:25 AM  
To: 'Sheets, Keith/PDX' <[Keith.Sheets@jacobs.com](mailto:Keith.Sheets@jacobs.com)<mailto:Keith.Sheets@jacobs.com>>  
Cc: Innis, Pamela <[pamela\\_innis@ios.doi.gov](mailto:pamela_innis@ios.doi.gov)<mailto:pamela\_innis@ios.doi.gov>>; Curt Russell <[gcr4@pge.com](mailto:gcr4@pge.com)<mailto:gcr4@pge.com>>; Hong, Christina/LAC <[Christina.Hong@jacobs.com](mailto:Christina.Hong@jacobs.com)<mailto:Christina.Hong@jacobs.com>>; Cavaliere, Mike/BAO <[Mike.Cavaliere@jacobs.com](mailto:Mike.Cavaliere@jacobs.com)<mailto:Mike.Cavaliere@jacobs.com>>; Baker, Karen@DTSC <[Karen.Baker@dtsc.ca.gov](mailto:Karen.Baker@dtsc.ca.gov)<mailto:Karen.Baker@dtsc.ca.gov>>; Alasti, Isabella@DTSC <[Isabella.Alasti@dtsc.ca.gov](mailto:Isabella.Alasti@dtsc.ca.gov)<mailto:Isabella.Alasti@dtsc.ca.gov>>; Matt Dudley <[mgdb@pge.com](mailto:mgdb@pge.com)<mailto:mgdb@pge.com>> <[mgdb@pge.com](mailto:mgdb@pge.com)<mailto:mgdb@pge.com>>; Guerre, Christopher@DTSC <[Christopher.Guerre@dtsc.ca.gov](mailto:Christopher.Guerre@dtsc.ca.gov)<mailto:Christopher.Guerre@dtsc.ca.gov>>  
Subject: RE: Topock Compressor Station Soil Management Plan (SMP)

Thanks Keith,

DTSC will review the SMP and notify PG&E of any comments or approval of the SMP. Have a happy Thanksgiving.

Aaron

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From: Sheets, Keith/PDX <[Keith.Sheets@jacobs.com](mailto:Keith.Sheets@jacobs.com)<mailto:Keith.Sheets@jacobs.com>>  
Sent: Wednesday, November 21, 2018 9:57 AM  
To: Yue, Aaron@DTSC <[Aaron.Yue@dtsc.ca.gov](mailto:Aaron.Yue@dtsc.ca.gov)<mailto:Aaron.Yue@dtsc.ca.gov>>

Cc: Innis, Pamela <[pamela\\_innis@ios.doi.gov](mailto:pamela_innis@ios.doi.gov)<[mailto:pamela\\_innis@ios.doi.gov](mailto:pamela_innis@ios.doi.gov)>>; Curt Russell <[gcr4@pge.com](mailto:gcr4@pge.com)<<mailto:gcr4@pge.com>>>; Hong, Christina/LAC <[Christina.Hong@jacobs.com](mailto:Christina.Hong@jacobs.com)<<mailto:Christina.Hong@jacobs.com>>>; Cavaliere, Mike/BAO <[Mike.Cavaliere@jacobs.com](mailto:Mike.Cavaliere@jacobs.com)<<mailto:Mike.Cavaliere@jacobs.com>>>>  
Subject: Topock Compressor Station Soil Management Plan

On behalf of PG&E, attached please find the Pacific Gas and Electric Company (PG&E) Topock Compressor Station Soil Management Plan (SMP). PG&E has entered into a Land Use Covenant (LUC) with California Department of Toxic Substances Control (DTSC) that defines and restricts current and future land uses for PG&E Property associated with the Topock Compressor Station (TCS) in San Bernardino County near Needles, California. The property subject to the LUC and this Soil Management Plan totals approximately 65 acres, identified as County of San Bernardino, Assessor Parcel Number 0650-161-08 (Property) and is shown on Figure 1-1.

The LUC states that no activities that will disturb the soil (e.g., excavation, grading, removal, trenching, filling, earth movement, mining, or drilling) shall be allowed at the Property without a Soil Management Plan (SMP) pre-approved by DTSC. This SMP includes procedures and protocols for the management and disposal of potentially contaminated soil or materials displaced during planned and unplanned construction activities, operation and maintenance (O&M) activities, and emergency operations on the Property. Potentially contaminated soil and/or materials may be encountered within and near the boundaries of the Soil RCRA Facility Investigation (RFI)/Remedial Investigation (RI) Investigation Areas and operational areas in the vicinity of the TCS.

If you have any questions please contact Curt Russell at (760) 791-5884 or myself at (510)-541-8542.

Keith Sheets  
Jacobs  
Senior Project Manager  
D 503.872.4612  
M 510.541.8542  
[keith.sheets@jacobs.com](mailto:keith.sheets@jacobs.com)<<mailto:keith.sheets@jacobs.com>>

2020 SW 4th Avenue  
Portland OR 97201  
USA