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August 8, 2005

Cathy Wolff-White U.S. Bureau of Land Management 2610 Sweetwater Avenue Lake Havasu, AZ 86406

Subject: Draft Monitoring Well 20 Bench Decommissioning Work Plan, PG&E Topock Compressor Station, Needles, California

Dear Ms. Wolff-White:

In conformance with the United States Bureau of Land Management letter dated June 1, 2005, this letter transmits the Draft Monitoring Well 20 Bench Decommissioning Work Plan. As indicated in the Work Plan, PG&E will cease batch treatment operations at the Monitoring Well (MW-20) bench and remove associated treatment chemicals and hazardous wastes by September 5, 2005 previously authorized by BLM Action Memorandum, dated May 20, 2004.

The Work Plan includes the proposed schedule and plan to decommission the batch treatment plant and also identifies those aspects of the ongoing Interim Measure No. 3 (IM-3) project insofar as they are conducted during decommissioning on the MW-20 bench. During the upcoming 2 years, while the performance of the IM-3 treatment plant is monitored through the critical low river stages seasons for the Colorado River, equipment and facilities will remain on the MW-20 bench to provide backup contingency facilities, particularly storage, for the Topock Remediation Program.

PG&E is working in parallel with the BLM and DTSC to strategically plan the MW-20 bench decommissioning. PG&E welcomes BLM and DTSC comments on this work plan. The proposed decommissioning activities can be modified to meet the project needs. If you have any questions, please do not hesitate to call me.

Sincerely,

Teni Herson for Yronne Maets

Cc: Norman Shopay/DTSC Mark Howell/ U.S. BLM Sarah Murray/U.S. BLM

Draft MW-20 Bench Decommissioning Work Plan

Topock Compressor Station Needles, California

Prepared for

United States Bureau of Land Management

On behalf of

Pacific Gas and Electric Company

August 8, 2005

CH2MHILL

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This work plan was prepared under supervision of a California Professional Engineer,

Julie Eakins, PE No. C47243

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A Summary of IM-2 Plant Decommissioning and IM-3 activities on MW-20 Bench

Acronyms and Abbreviations

BLM	United States Bureau of Land Management
CMS	Corrective Measures Study
Cr(T)	total chromium
Cr(VI)	hexavalent chromium
DTSC	Department of Toxic Substances Control
IM	Interim measures
PG&E	Pacific Gas and Electric Company

1.0 Introduction

Pacific Gas and Electric Company (PG&E) is addressing chromium in groundwater at the Topock Compressor Station under the oversight of the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC). An Interim Measure (IM) consisting of a groundwater extraction and treatment system is being implemented to provide hydraulic control of the plume boundaries near the Colorado River.

This work plan describes the planned decommissioning and final deconstruction of batch treatment activities at the MW-20 bench in support of the IM and reconfiguration of equipment and facilities to support IM No. 3 groundwater treatment operations.

1.1 Project Background

The Topock Compressor Station is located in San Bernardino County, approximately 15 miles to the southeast of Needles, California (Figure 1-1). In February 1996, PG&E and DTSC entered into a Corrective Action Consent Agreement pursuant to Section 25187 of the California Health and Safety Code. Under the terms of that agreement, PG&E was directed to conduct a Resource Conservation and Recovery Act facility investigation and to implement corrective measures to address constituents of concern released in the Bat Cave Wash Area near the PG&E Topock Compressor Station. The primary constituents of concern at Topock are hexavalent chromium [Cr(VI)] and total chromium [Cr(T)]. The source of these constituents was Cr(VI) salts historically used as a corrosion inhibitor in the station's cooling towers. DTSC is the lead administering agency for the project. Assisting DTSC and PG&E with the planning and review of interim remedial measures are the members of the Topock Consultative Workgroup, constituted under California's site designation process, and consisting of representatives of DTSC, Colorado River Basin Regional Water Quality Control Board, Metropolitan Water District of Southern California, the various federal agencies who own or manage adjacent property, and other project stakeholders.

As directed by the DTSC under IM No. 2, PG&E has been pumping groundwater since March 2004 at the MW-20 bench along the station access road and above the Colorado River floodplain. PG&E began treating the groundwater at the MW-20 bench in July 2004 using a batch treatment system. Concurrently, in a letter dated June 30, 2004, DTSC directed PG&E to implement IM No. 3 to expand existing groundwater extraction and management facilities to address hydraulic control of the chromium plume at the Topock site. The IM No. 3 project required PG&E to: (1) conduct additional groundwater investigations for further plume delineation; (2) characterize groundwater conditions for the design of IM No. 3 facilities; and (3) proceed with the design and installation of the piping and conveyance of extracted water to a treatment system, the treatment of extracted groundwater using reduction-precipitation-filtration and reverse osmosis, and management of treated water.

PG&E completed construction of the expanded IM No. 3 treatment facilities on parcel 650-151-06 (PG&E property) and commissioned the plant in mid July 2005, upon approval

to begin operations. At that time, batch treatment at the MW-20 bench was discontinued, although the equipment and facilities have been maintained.

1.2 Previous Authorizations

In three Action Memoranda, the Arizona State Director, United States Bureau of Land Management (BLM), authorized PG&E to conduct a time-critical removal action to prevent or abate the release of Cr(VI) into the Colorado River. These memoranda were issued pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (42 USC §§9601 et seq.) and were dated March 3, May 20, and September 17, 2004.

BLM authorized MW-20 bench site activity under an Action Memorandum, dated March 3, 2004 (BLM 2004a), that permitted PG&E to pump and transport extracted groundwater and to site, install, and test new wells as part of the time-critical removal actions (BLM 2004a). On May 20, 2004, BLM issued a second Action Memorandum authorizing PG&E to operate, for a limited period of time, a batch treatment system on the MW-20 bench (BLM 2004b). The purpose of this time-critical removal action was to reduce the volume of hazardous waste being shipped offsite by allowing treatment of groundwater onsite prior to offsite transport and disposal as non-hazardous waste. In a third Action Memorandum, dated September 17, 2004, BLM authorized PG&E to install conveyance piping, conduct the necessary improvements to existing access roads, install additional monitoring wells, and expand facilities on, and transportation from, the MW20 bench to accommodate the potential need to transport treated water and brine (IM No. 3 activities) until more permanent disposal measures are in place (BLM 2004c).

PG&E submitted a request to BLM on April 8, 2005 requesting a 180-day extension to continue batch treatment operations on the MW-20 bench. In a letter dated June 1, 2005, BLM authorized PG&E to continue with the temporary treatment operations at the existing batch plant until September 5, 2005 (BLM 2005). Per the BLM letter of June 1, 2005, this report provides a decommissioning plan for the MW-20 bench existing facilities. In compliance with the BLM letter, PG&E proposes to: (1) discontinue batch treatment and remove hazardous wastes and treatment chemicals, (2) remove unnecessary support facilities, (3) decommission tanks and equipment, (4) maintain those facilities insofar as they are needed to support IM No. 3 operations, and (5) ultimately, deconstruct the MW-20 bench. PG&E is working in parallel with the DTSC to strategically decommission the IM-2 facility.

1.3 Schedule for Decommissioning Activities

The proposed decommissioning of the IM No. 2 facility consists of:

- **By September 5, 2005**: Cease batch treatment operations. Remove treatment chemicals, extracted groundwater (untreated, partially-treated, or batch-treated), and sludge from the site.
- September 5, 2005 though March 31, 2006: Clean and secure tanks and equipment. Remove support facilities from the site. Timeframe corresponds with operating IM No. 3 treatment plant through first low river stage season.

- March 31, 2006 through March 31, 2007: No additional site configurations changes are anticipated.
- **By June 30, 2007**: Decommission batch treatment facilities and re-configure facilities on MW-20 bench to support future IM-3 operations based on 2 years of operational history.

At the direction of DTSC, the conceptual plan for decommissioning involves performance monitoring of the IM No. 3 treatment plant through two critical low Colorado River stage seasons. During this time, the facilities remaining onsite would serve an integral purpose as immediate contingency for water storage for the Topock Remediation Program. Additional information on the activities that will be completed during this time is provided in Section 2.0.

2.1 Decommissioning Activities

The following section describes the batch treatment facilities currently on the MW-20 bench and the proposed plan to cease treatment operations by September 5, 2005. The batch treatment facility will be strategically decommissioned while the performance of the IM No. 3 treatment plant is monitored through two critical low Colorado River stage seasons (approximately 2 years). During this time, the key batch treatment facilities that remain onsite will serve an integral purpose as immediate contingency for water storage for the Topock Remediation Program.

A summary of the decommissioning IM-2 decommissioning activities as well as the IM-3 activities on the MW-20 bench is provided in Attachment A. The following sections describe the activities on the MW-20 bench between September 5, 2005 and June 2007.

2.1.1 Existing Batch Treatment Facility Description

As outlined in the IM Work Plan No. 2 (CH2M HILL 2004), IM No. 2 batch treatment is completed in six steel tanks at the MW-20 bench. Figure 2-1 shows the existing IM facilities on the MW-20 bench.

Tank 6 is a receiving tank for extracted groundwater from extraction wells. Tanks 4 and 5 are retrofitted with internal piping, pumps, instrumentation, and controls to batch-treat extracted groundwater by reducing the hexavalent chromium to the less soluble trivalent form by reaction with ferrous chloride (treatment chemical). Once chrome reduction is complete, sodium hydroxide (treatment chemical) is then added to the batch treatment tank to precipitate iron and trivalent chromium. The water and precipitated solids then are pumped from the batch tanks to a clarifier where the majority of precipitated solids are removed by gravity separation. A dilute polymer is added to the clarifier to enhance settling of solids. Solids separated from the water in the clarifier are periodically transferred to onsite phase separator containers. Batch treated water from the clarifier is then transferred to Tanks 1, 2, and 3 for temporary storage. An onsite 5,000-gallon polyethylene tank is also used to contain excess liquids from the phase separator containers and other off-spec water or liquids that may be generated during operations. All batch treatment facilities are completely contained within a secondary containment system capable of storing the capacity of the largest storage tank (19,500 gallons) plus the 25-year/24-hour storm event of 2.26 inches of rainwater.

Batch-treated water is manifested as a non-hazardous waste and loaded into trucks for offsite disposal. Solids contained in the phase separator containers are also periodically transported offsite for disposal.

2.1.2 Discontinuation of Batch Treatment Operations

Batch treatment operations will no longer be permitted by the BLM after September 5, 2005. The following decommissioning activities will be completed by September 5, 2005:

- Batch treatment chemicals, including ferrous chloride, sodium hydroxide, and polymer, will be removed from the site.
- Any untreated, partially-treated, or treated groundwater will be pumped from the tanks and clarifier. Tanks, pumps, and piping will be flushed with potable water. Tanks will be partially filled with potable water to facilitate future cleaning activities.
- Phase separator containers and sludge will be removed from the site.
- Field laboratory chemicals and test kits will be removed from the site.
- Batch treatment equipment will be de-energized and locked-out/tagged-out.
- Pipe connection(s) to extraction wells will be locked out/tagged out as a physical measure to prevent unintentional use of the facility.

Figure 2-1 shows the IM facilities that will remain on the MW-20 bench after September 5, 2005. Upon completion of these activities, it is assumed that the potential for a release of hazardous materials has been eliminated, and the facility will no longer require 24-hour a day/7-day a week staffing. The site will be monitored by PG&E security and will be inspected by operations staff. PG&E will notify DTSC and BLM when activities described above are complete.

2.1.3 Tank and Equipment Decommissioning and Lay-up

PG&E will commence further cleaning and lay-up of batch-treatment tanks once hazardous materials are removed from the MW-20 bench. It is assumed that these activities will begin shortly after September 5, 2005 and be completed by March 31, 2006. This timeframe corresponds to operating the IM No. 3 treatment plant through the first low river stage season. Lay-up activities include:

- Fully decontaminating onsite tanks and certify as clean (e.g., measures such as power scrubbing and/or cleaning solutions may be required to remove staining and scaling on surfaces).
- Washing all secondary containment with potable water.
- Securing and protecting all batch treatment equipment.

It is assumed that the tanks and equipment will be maintained in this condition through the second low river stage season (assumed to be by March 31, 2007).

2.1.4 Removal of Support Facilities

PG&E will remove the support facilities that are no longer needed at the MW-20 bench after completing the tank and equipment lay-up activities by March 31, 2006. Support facilities that will be removed from the IM No. 2 facilities include:

- Field trailer.

- Field laboratory.
- Equipment storage container and spare parts.
- Trash bins, port-o-potties, hand-wash station, ice machine, etc.
- Potable water tanks.

Figure 2-2 shows the anticipated facilities on the MW-20 bench after March 31, 2006. The security fencing will be relocated, as appropriate, to reduce the footprint on the MW-20 bench. The portable generators will be taken offsite once power supply is no longer required. Local rental options will be identified as a contingency for emergency use.

2.1.5 Deconstruction of Batch Treatment Facilities

After two low river stage seasons, a final plan for re-configuring facilities on the MW-20 bench will be submitted to BLM and DTSC and subject to review and approval. The plan will include:

- Schedule for deconstructing the batch treatment facilities that are still onsite.
- Assessment of water storage requirements for IM No. 3 operations.
- Sampling and analysis plan for areas of MW-20 bench no longer impacted by IM operations (e.g., trucking and loading) to confirm that there are no impacts from batch treatment activities.
- Restoration plan for MW-20 bench. Any restoration would be intended to create of native appearance and discourage use of the bench by the public as a parking area. Restoration may need to be implemented in phases depending on the future IM No. 3 operations on the MW-20 bench.

Figure 2-3 shows a conceptual layout of IM No. 3 facilities on the MW-20 bench after the IM No. 2 facility is deconstructed. The need for additional storage on the bench will be assessed based on 2 years of operational history for the IM No. 3 treatment plant.

2.2 Previously-authorized Activities

2.2.1 Previously-authorized Activities

Activities to temporarily increase the storage capacity on the MW-20 bench and dispose of the brine and potentially-treated water associated with the IM No. 3 activities are authorized under Action Memorandum No. 3, dated September 17, 2004. The Action Memorandum No. 3 provided authorization to convey extracted groundwater from the MW-20 bench to the new treatment facility.

Also, in accordance with the IM No. 3 directive from DTSC, in early 2005 PG&E moved forward with the design and installation of new extraction well PE-1. Installation and operation of new extraction wells and associated pipelines were authorized under Action Memorandum No. 3.

Additionally, BLM's Action Memorandum No. 1 dated March 3, 2004 authorizes PG&E to use the MW-20 bench to provide storage and trucking of untreated water. Under this scenario, the tanks remaining onsite would be placed into service, with concurrence of BLM

and approval by DTSC. PG&E does not anticipate using the MW-20 bench in this capacity unless: (1) DTSC directs to pump above the IM No. 3 treatment capacity (i.e., 135 gallons per minute) to achieve the IM objective or (2) the IM No. 3 treatment plant is unexpectedly shut down, and DTSC requires continued pumping and trucking while IM No. 3 is repaired.

2.2.2 Tanks, Equipment, and Materials

As shown on Figure 1, PG&E will be using three storage tanks (placed within secondary containment around IM No. 3 Valve Vault No. 1) to manage reverse osmosis concentrate (i.e., brine) and/or potentially-treated water (if needed due to a temporary operational upset) from the IM No. 3 treatment facility. The storage tanks are also equipped with level sensors to prevent overfilling of the tanks. The reverse osmosis brine and/or treated water will be transported via tanker trucks from the MW-20 bench to an offsite waste disposal facility or other appropriate facility. Loading and trucking facilities will be conducted at the MW-20 bench as shown on Figure 2-1.

The volume of brine that is generated will vary depending on treatment rates and injection discharge limits for total dissolved solids. Preliminary estimates of brine anticipated from the IM No. 3 treatment plant range from 7,000 to 14,000 gallons per day. Based on these estimates, three storage tanks (an approximate 52,500-gallon operational capacity) are sufficient to provide temporary storage of the brine under normal operating conditions. If needed, increased brine storage would accommodate unexpected operating conditions. For clarity, the tanks remaining onsite would provide sufficient additional holding capacity (no new facilities would be required at the MW-20 bench for this purpose). Examples of extra storage scenarios include:

- High pumping periods or periods when the disposal facility cannot accept the waste (e.g., holidays).
- Special transportation and disposal arrangements (e.g., no trucking over weekends).
- Short-term construction periods on the MW-20 bench where designated IM No. 3 brine tanks may be temporarily relocated to facilitate construction (e.g., PE-1 conveyance piping, installation of backup extraction well(s)).

Under a previous Action Memorandum, dated September 17, 2004, BLM has authorized these activities.

2.3 Potential Activities to Support IM No. 3 Operations That May Require Future Authorization

During the decommissioning period, the MW-20 bench facility will serve as an immediate contingency to the IM No. 3 treatment facility while the facility is operated and hydraulic data are gathered to assess the performance of the system. It is anticipated that the MW-20 bench could provide a temporary contingency for the Topock Remediation Program. This contingency potentially may be conducted as part of the Interim Measures and would be subject to a new Action Memorandum. In the event that prolonged extraction rates above the IM No. 3 treatment plant capacity are required to meet the interim measure objective, PG&E may request authorization from BLM and DTSC to re-start batch treatment

operations. Under Action Memorandum No. 2, these activities were initiated to reduce the human health and environmental risks associated with transporting large quantities hazardous materials to offsite disposal facilities.

At this time, PG&E does not foresee a need to request future authorization to conduct such work.

2.4 Indemnity

PG&E agrees to indemnify and hold harmless BLM, its agents, and employees from any and all claims or causes of action arising from or on account of acts or omissions of PG&E, its employees, successors, agents, contractors, subcontractors, or other persons, in carrying out activities under this IM decommissioning work. PG&E further agrees that the United States, and its agencies and employees, shall not be held as a party to any contract entered into by PG&E in carrying out activities under this work plan.

3.1 Project Management

Decommissioning of the MW-20 bench will be managed so as to ensure a direct and continuous line of communication among DTSC, the PG&E project team and BLM. PG&E will facilitate effective and efficient coordination and management of the various decommissioning tasks. The work will be conducted on time and in compliance with the requirements of BLM.

3.2 Mitigation Measures

Decommissioning of the MW-20 bench will be managed as outlined in previous work plans and mitigation measures in effect for previously authorized activities remain in effect (stipulations listed by the BLM Lake Havasu Field Office in Action Memorandum No. 3). The MW20 bench lies within a larger area of significant cultural, biological, and tribal sacred site resources and all activities must be conducted in a manner which recognizes and respects these resources. In addition, the Colorado River itself is of spiritual and cultural importance to local tribes. All decommissioning work will be planned, coordinated, and conducted in a manner consistent with the importance of these resources.

3.3 Permits and Authorizations

The following permits and authorizations apply to the activities on the MW-20 bench during the decommissioning phases.

Agency	Filings and Authorizations
United States Bureau of Land Management	Action Memoranda of March 3, May 20, and September 17, 2004 authorizing Interim Measures No. 2 and No. 3 activities on BLM land.
Facility/Generator Identification Number	The United States Environmental Protection Agency Identification No. for the site is CAR00015118 for managing and tracking hazardous waste.
Business Emergency/Contingency Plan(s)	Business Emergency/Contingency Plan(s) in place for IM No. 2 and IM No. 3. The Certified Unified Program Agency should be notified of operational change at IM No. 2 plant and retain coverage until final decommissioning is complete.
Permit to Operate from the Mojave Desert Air Quality Management District [specific to portable generators at IM No. 2 facility]	Generators at the IM No. 2 facility are registered as portable generators with the state. Additionally, an application was filed to obtain a Permit to Operate after it was determined that work would extend beyond 1 year. Mojave Desert Air Quality Management District has the application but has not fully processed it at this time.

Permit to Operate from the Mojave Desert Air Quality Management District (continued).	Nonetheless, a request to close the permit for these generators will be submitted after they are removed from the site.
Industrial Storm Water Pollution Prevention Plan	A Storm Water Pollution Prevention Plan is in place for the site, including IM No. 2 and IM No. 3.

4.0 References

- CH2M HILL. 2004. Interim Measures No. 2 Work Plan, PG&E Topock Compressor Station, Needles, California. March 3.
- United States Bureau of Land Management (BLM). 2004a. *Time Critical Removal Action, Pacific Gas and Electric Topock Compressor Facility*. March 3.

______. 2004b. *Time Critical Removal Action No. 2, Pacific Gas and Electric Topock Compressor Facility*. May 20.

______. 2004c. *Time Critical Removal Action No. 3, Pacific Gas and Electric Topock Compressor Facility*. September 17.

_____. 2005. Letter to Yvonne Meeks/PG&E from Timothy Smith. June 1.

Figures



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320703.IM.03.00_FIG 2 BTF Emergency Escape Route Map _8/8/05_ccc



Attachment 1

ATTACHMENT 1

Summary of IM-2 Plant Decommissioning and IM-3 activities on MW-20 Bench *Pacific Gas and Electric Company, Topock Compressor Station, Needles, California*

COMPLETION DATE	DECOMMISSIONING PHASE	IM-2 DECOMMISSIONING ACTIVITIES	IM-3 OPERATIONS ON MW-20 BENCH	
BY 09/05/05	Initial IM-3 treatment Plant Operations	 Batch treatment operations cease. Complete IM-2 plant lay up activities as listed below. Remove treatment chemicals (e.g. ferrous chloride)) Remove remaining sludge and phase separator containers Empty tanks with untreated and/or batch treated water. Field Laboratory chemicals and equipment are removed from the site. De-energize equipment (e.g., pumps) Tanks and equipment may be stored 'wet' with clean water or 'dry' as appropriate. Pipe connection(s) to extraction wells will be locked out/tagged out as a physical measure to prevent unintentional use of the facility. NOTE: Residual contamination in piping and tanks (e.g. scaling) still present at this time. Hazardous liquids and sludge are offsite. 	 IM-3 Facilities on the MW-20 Bench include: Pipeline vaults Valve Vault No. 1 Three painted storage tanks for brine and/or water not suitable for injection w/in secondary containment Truck loading station(s) Ongoing use of gravel drive by trucks Security fencing Routine IM-3 activities include: Daily loading of trucks Monitoring the transfer of brine from IM-3 plant to MW-20 bench. Materials that will be handled on MW-20 bench include: Routine management of brine water Periodic management of potable, treated water, or treated water not suitable for injection Staging area for future drilling and sampling work under separa BLM authorization.	
BY 3/31/06	1 st Season of Low River Levels	 Remove unneeded general support facilities, including: Field trailer, Field laboratory, equipment connex, trash bins, porta-potties, etc. Onsite Tanks are fully decontaminated (e.g. sandblasted may be necessary). Secure and protect equipment. Generators are removed from site. Identify local rental options for emergency use. NOTE: The activities noted above would likely occur throughout this time. Items, such as tank cleaning may occur early to allow all six tanks to be used for water storage.	As above	
BY 3/31/07	2 nd Season of Low River Stage	IM-2 facilities maintained in current layup condition.	As above	
By 6/30/07	Successful Operation of IM-3 Expanded Treatment Plant during two annual low river stages is complete.	Fully decommission and remove the IM-2 facilities. Evaluate the capacity of the three IM-3 tanks against the two years of operating history, and potentially re-deploy one or more IM-2 tanks for IM-3 water storage use. Remove all other tanks, piping, pumps, clarifier, and secondary containment. Partial site restoration of MW-20 Bench. Any restoration should be designed to discourage the use of the bench as a 'parking area' and maintain a native appearance. Restoration measures could include mechanically grading the soil (although this could have cultural resource implications), native vegetation, and natural barriers.	As above	

SITE STATUS

IM-2 Facility: The following uses of the IM-2 facility are assumed during this time:

- <u>Water Storage:</u> Three 'clean' tanks would provide about 52,500 gallons of storage (assuming operational capacity of 17,500 gallons per tank). Other 3 tanks used for untreated water storage and batch treatment may require further cleaning.
- <u>Treatment Contingency:</u> Facility piping and equipment used for batch treatment are maintained such that the capability to treat up to 70 gpm (100,800 gpd) is available as a contingency. Under no circumstances would treatment be considered without BLM involvement and authorization.
- **IM-3 Facility:** Activity for brine, treated or water not suitable for injection and truck loading.

Site Monitoring: PG&E security subcontractor and/or onsite operators will patrol MW-20 bench.

IM-2 Facility: The following uses of the IM-2 facility are possible during this time:.

- <u>Water storage</u>: Provides an immediate contingency for about 100,800 gallons of onsite storage once all six tanks area cleaned assuming operational capacity of 17,500 gallons per tank.
- <u>Treatment Contingency</u>: As above. Additional time would be needed to fully re-start batch treatment operations. Under no circumstances would treatment be considered without BLM involvement. and authorization.

IM-3 Facility and Site Monitoring: As above.

As above

IM-2 Facilities: Fully deconstructed and removed from MW-20 bench.

IM-3 Facilities: Water storage capacity could be modified after the two years of operating history.

Site Monitoring: As above.