



**Pacific Gas and
Electric Company®**

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December 3, 2005

Norman Shopay
California Department of Toxic Substances Control
Geology and Corrective Action Branch
700 Heinz Avenue
Berkeley, California 94710

Subject: Addendum to Revised Pore Water and Seepage Study Work Plan
PG&E Topock Compressor Station, Needles, California

Dear Mr. Shopay:

Enclosed is an addendum to the *Revised Pore Water and Seepage Study Work Plan* for the Pacific Gas and Electric Company (PG&E) Topock Compressor Station. The addendum is a revision to Section 8.1 of the work plan, contingency plan for responding to the pore water sampling results. The contingency plan reflects revisions described in condition 4 in the Department of Toxic Substances Control comment letter dated November 14, 2005.

Please contact me at (805) 546-5243 if you have any questions or if you need additional information.

Sincerely,

Enclosure

cc: Kate Burger, DTSC
Karen Baker, DTSC
Aaron Yue, DTSC

8.1 Contingency Plan

In the event that Cr(VI) is detected in pore water in the downgradient sampling locations, the PWSS Contingency Plan will be implemented. Figure 8-1 presents the events that would occur in the event of a Cr(VI) detection in pore water downstream of the Topock site. DTSC, Regional Water Quality Control Board, and Arizona Department of Environmental Quality will be notified of any Cr(VI) detection in pore water at a downgradient sampling location within 48 hours of data validation completion. Any Cr(VI) detection in pore water at a downstream location in the absence of any Cr(VI) detections upstream will trigger resampling to confirm downstream detections and further define the distribution of Cr(VI) in the pore water of the river bottom. If Cr(VI) is detected in pore water at both upstream and downstream locations, the Wilcoxon Rank Sum Test will be performed to determine whether there is a statistically significant upward shift in the downstream concentrations relative to the upstream concentrations, as indicated by a 90% confidence interval for the test ($P < 0.10$ for a one-tailed test). Since many of the results will likely be non-detects, it may be necessary to provide a single proxy value for non-detects. Ordinarily, a proxy value of one-half of the detection limit would be applied; however, if the detection limits vary considerably, the scatter of the proxy values might become more dominant in the calculations than the level of detected values. In this event, a review of the data will be conducted to determine if it would be more appropriate to choose a single proxy value rather than use one-half of the detection limit. The results of the statistical analyses will be reported to DTSC within 14 days of the receipt of all the validated data from the initial pore water sampling.

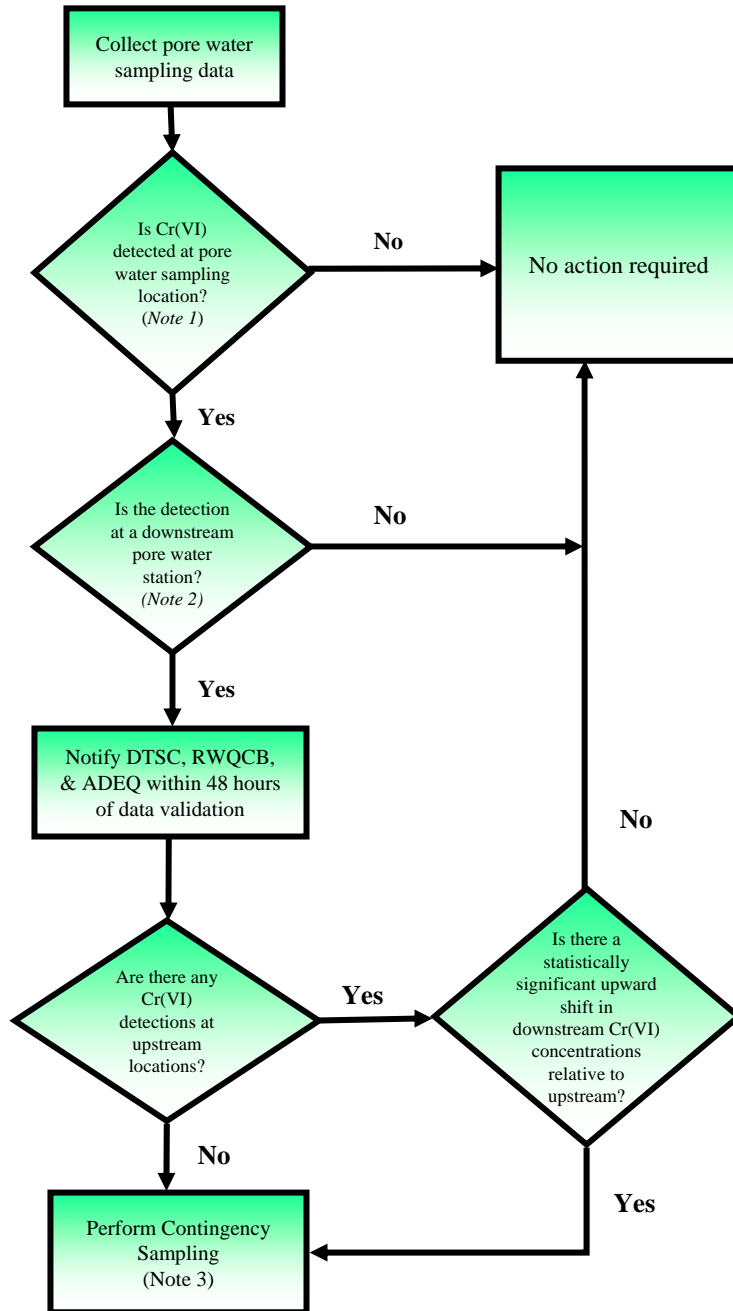
Pore water resampling will be performed if Cr(VI) is detected at a downstream location in the absence of any Cr(VI) detections upstream or if Cr(VI) concentrations at downstream locations are demonstrated to be statistically significantly greater than upstream concentrations. The contingency sampling would involve:

- Re-sampling pore water at location(s) where there was a significant Cr(VI) detection.
- Sampling pore water 20 feet from the location of the significant detection in four directions. Samples will be collected at the depth of the original detection.
- Collecting a surface water sample above the pore water detection to determine if Cr(VI) is present in the river channel. Surface water samples will be collected in accordance with the *Revised Sampling Plan and Standard Operating Procedure for Depth-Specific Surface Water Sampling* (CH2M HILL 2005f).

Contingency Planning for Pore Water Sampling

December 2005

Rev 1



NOTES:

1. The trigger concentration is assumed to be any concentration greater than non-detect (above the reporting limit using USEPA Method 7199).
2. Downstream locations are those located to the south of the Bat Cave Wash outlet (Figure 1-1).
3. Contingency sampling as outlined in Section 8.1 of this Work Plan.

FIGURE 8-1

CONTINGENCY PLAN

PORE WATER AND SEEPAGE STUDY WORK PLAN
PG&E TOPOCK COMPRESSOR STATION
NEEDLES, CALIFORNIA