



**Matthew Rodriguez**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Miriam Barcellona Ingenito  
Acting Director  
5796 Corporate Avenue  
Cypress, California 90630



**Edmund G. Brown Jr.**  
Governor

Via Electronic Mail

October 7, 2014

Ms. Yvonne Meeks  
Portfolio Manager – Site Remediation  
Pacific Gas and Electric Company  
4325 South Higuera Street  
San Luis Obispo, California 93401

GROUNDWATER REMEDY INFRASTRUCTURE SITE VERIFICATION FIELD WORK  
AND REQUEST TO REDUCE ARCHAEOLOGICAL SITES FOR UPCOMING ANNUAL  
MONITORING AT PACIFIC GAS AND ELECTRIC COMPANY (PG&E), TOPOCK  
COMPRESSOR STATION SITE, NEEDLES, CALIFORNIA (EPA ID NO.  
CAT080011729)

Dear Ms. Meeks,

The Department of Toxic Substances Control (DTSC) appreciates the opportunity for our contract archaeological representative, Ms. Susan Wilcox, to participate in the subject preconstruction field verification of archaeological and historical sites conducted by PG&E on September 9 to September 13, 2014. DTSC believes the subject field verification to be vital in determining the appropriateness of the current groundwater design as it pertains to compliance with the required measures to protect historic and pre-historic resources within the proposed project area. As a result of observations noted during the field work and reported to DTSC, we have some concerns with PG&E's approach during this archaeological reconnaissance fieldwork. These concerns, which were discussed with you on October 2 and 6, 2014, are related to the availability of site maps for participants, the performance of the Global Positioning System (GPS) unit used, and access to locked areas during field verification.

As you are aware, the implementation of the proposed final groundwater remedy is subject to adopted mitigation measures that afford tribal monitoring (CUL-1a-3) and protocols for review of cultural resource-related documents (CUL-1a-8) as part of the Mitigation Monitoring and Reporting Program (MMRP). The intent of these measures is

Ms. Yvonne Meeks

October 7, 2014

Page 2 of 2

to facilitate cooperation between PG&E and Tribal evaluation of activities that may impact Tribal cultural resource. However, DTSC believes that the issues observed during the recent fieldwork may hamper the effectiveness of this objective. In the spirit of the MMRP and to maximize the effectiveness of future archaeological and historic sites field verification and monitoring events, DTSC is directing PG&E to prepare a Field Procedures and Protocol to be used in future monitoring and/or verification activities associated with corrective action at the Topock Compressor Station. PG&E should submit a draft of the proposed Field Procedures and Protocol to DTSC and the U.S. Department of Interior by October 23, 2014.

Finally, in a related matter, PG&E has provided a reduced list of archaeological sites proposed for the upcoming annual monitoring in compliance with CUL-1a-3a. DTSC cannot agree with reducing the site list without proper justification. DTSC understands that Ms. Wilcox has discussed the need for this information with Mr. Glenn Caruso of PG&E on September 9, 2014, but PG&E did not indicate an agreement to submit the requested rationale except an offer to meet with Ms. Wilcox at the site to review those locations. DTSC is willing to meet with PG&E via Ms. Wilcox after receipt of the written justification and rationale for each site proposed to be eliminated from the annual monitoring event. DTSC requests that this written rationale be submitted within 14 days from receipt of this letter. If you have any questions regarding the issues outlined in this letter, please contact me at (714) 484-5423.

Sincerely,



Karen Baker, Chief, CHG, CEG  
Office of Geology  
Department of Toxic Substances Control

aky: 101401C

cc: PG&E Topock Consultative Workgroup Members  
PG&E Topock Geo/Hydro Technical Workgroup Members  
Tribal Representatives in PG&E Project Contact List  
Technical Review Committee