



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
FISH AND WILDLIFE SERVICE
BUREAU OF RECLAMATION



ELECTRONIC SUBMISSION

December 15, 2009

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

Subject: PG&E Topock Compressor Station Remediation Site – Work Plan for Time-Critical Removal Action at AOC 4, *Topock Compressor Station, Needles, California*.

Dear Ms. Meeks:

The Department of the Interior, on behalf of itself and the Bureau of Land Management, the U.S. Fish and Wildlife Service, and the Bureau of Reclamation (collectively referred to as “DOI”) are in receipt and acceptance of the redline version of the “Work Plan for Time-Critical Removal Action at AOC 4, PG&E Topock Compressor Station” for DOI review and approval. The redline version has incorporated input received from DOI during comment resolution teleconferences on December 3 and 7.

DOI is in agreement with all revisions to the work plan and thereby approves all portions of the document, excluding Appendix A – Health and Safety Plan, for implementation at the Site. Although we have reviewed and commented on Appendix A, it is not within our authority to approve this portion of the plan as it pertains to the requirements for PG&E and their contractors to comply with California Occupational Safety and Health Administration (Cal/OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations found at Title 8 of the California Code of Regulations Section 5192 (8 CCR 5192).

BLM conducted Section 106 consultation on the Time Critical Removal Action (“TCRA”) work plan for AOC 4. Comments were received from the Fort Mohave, Yavapai, Hualapai and Colorado River Indian Tribes. The Tribes expressed their interest and general support of the removal action but have continued concern regarding the

cultural significance of the area. In order to address potential effects to significant cultural spiritual and archaeological values associated with this TCRA undertaking and the cultural landscape surrounding the Maze, the following conditions have been developed in response to consultation with Tribes and other consulting parties. These conditions are inherent to the DOI approval of the work plan for implementation. PG&E shall adhere to these conditions in implementing the AOC 4 TCRA.

1. Means for protecting cultural and historic properties:
 - a. Provide training to equipment operators and others working in the contaminated zone in understanding the cultural resource values associated with this area, what cultural materials to look for, responsibility for immediately reporting suspected cultural materials to monitors, and procedures for suspension of all work in the area of discovery where cultural materials are located. The Tribes will participate in this training.
 - b. Provide temporary barriers and/or temporary fencing at archaeological sites CA-SBR-11993, a rock shelter, and CA-SBR-11864, a lithic assay station, to insure that no undertaking activities occur at these two locations. The placement of the fencing or barriers shall be monitored by Tribal and archaeological monitors. The temporary barriers or fencing shall be monitored weekly and will be immediately repaired or reinstalled as needed and removed once removal action has been completed.
 - c. The current undertaking as proposed is to have minimal effects to the natural contours of the land through removal of debris and deposited soils. Any deviation from planned activities will require additional consultation with all parties.


2. Implementation of undertaking:
 - a. Six staging areas have been proposed for this undertaking all of which currently exist and have been utilized for similar activities in the past. One staging area will be utilized to store the contaminated debris and fill material in closed containers. This staging area, Staging Area 4, is located within the boundaries of the Topock Compressor Station. Staging Area 5, which is also within the boundaries of the Topock Compressor Station, will be utilized for the loading of containers with contaminated materials for transport to an appropriate disposal area offsite. The containers will be transported from Staging Area 4 for loading.
 - b. BLM shall assure that activities are being confined to the six staging areas and are being utilized as identified in the attached use descriptions.
 - c. Per means 1a, provide training to equipment operators in understanding the cultural resource values associated with the area, what cultural materials to look for, responsibility for immediately reporting suspected materials to monitors, and procedures for continuance of work in the discovery area where cultural materials are located.

- d. Tribal and archaeologist monitors will not be allowed to enter the contaminated area [designated as the exclusion zone during TCRA implementation]. Suspected cultural materials will be brought to the monitors in an uncontaminated area for inspection. If the materials are contaminated, photos of the suspected cultural materials shall be brought to the monitors for inspection.
- e. If cultural materials are identified during undertaking implementation, all work in the area of discovery will cease until such time as BLM in consultation with the Tribal and archaeologist monitors can determine where work will be limited. BLM shall notify the Tribes, SHPO and Advisory Council within 24 hours of the discovery with a plan for treatment. The Advisory Council shall have 48 hours to provide comments on the treatment plan per 36 CFR § 800.13(b)(3).

We appreciate PG&E's cooperation in providing the necessary health and safety training to the tribal monitors to allow for their participation in oversight of the TCRA. The safety of all those involved with this action is paramount. DOI will continue to work closely with all involved parties as this important action moves forward.

If you have any questions, please contact me at (303) 445-2502.

Sincerely,



Pamela S. Innis
DOI Topock Remedial Project Manager

cc: Christina Hong, CH2MHill
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