



**Linda S. Adams**  
Acting Secretary for  
Environmental Protection



## Department of Toxic Substances Control

---

Leonard E. Robinson  
Acting Director  
5796 Corporate Avenue  
Cypress, California 90630



**Edmund G. Brown Jr.**  
Governor

Sent Via E-mail

January 31, 2011

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

**CORRECTIVE MEASURES DECISION FOR THE GROUNDWATER OPERABLE UNIT AT SWMU 1/ AOC 1 AND AOC 10, PACIFIC GAS AND ELECTRIC COMPANY (PG&E), TOPOCK COMPRESSOR STATION, NEEDLES, CALIFORNIA (EPA ID NO. CAT080011729)**

Dear Ms. Meeks:

The Department of Toxic Substances Control (DTSC) has selected a remedial alternative for the Corrective Measures for the Groundwater Operable Unit at SWMU 1/ AOC 1 AND AOC 10 at the Pacific Gas and Electric Company (PG&E) Topock Compressor Station (Station). DTSC publicly noticed the draft Statement of Basis and Draft Environmental Impact Report (EIR) from June 4, 2010 to July 19, 2010. During this period, public meetings/open houses were held on June 22, 2010 in Parker, Arizona; June 23, 2010 in Lake Havasu City, Arizona; June 29, 2010 in Needles, California; and June 30, 2010 in Topock, Arizona. The Statement of Basis documents the rationale for DTSC's preferred remedial alternative which is Alternative E - In Situ Treatment with Freshwater Flushing (the Project) as recommended by PG&E in the final December 2009 Corrective Measure Study/ Feasibility Study document. The Draft EIR identified and considered the potentially significant adverse environmental effects of actions associated with Alternative E, as well as other potentially feasible alternative remedies available for the investigation and remediation of groundwater contamination at, and in the vicinity of PG&E Topock Compressor Station.

During the public comment period, DTSC received over 600 comments on the proposed cleanup Project and Draft EIR. After careful consideration of all comments received and the potential environmental impacts as documented in the EIR, DTSC put forth a resolution for the certification of the Final EIR and a Statement of Decision and Resolution

of Approval along with the final Statement of Basis. These documents collectively were evaluated, approved and adopted as part of the Staff Report enclosed.

As a result, DTSC hereby notifies PG&E of the approval of Alternative E as the groundwater remedy, subject to mitigation measures and conditions of approval including:

- (1) For this project, several potentially significant and unavoidable impacts were identified in the EIR. Therefore, as required by the California Environmental Quality Act (CEQA), mitigation measures have been adopted to mitigate or avoid significant environmental effects of the project. These measures are identified in the enclosed Mitigation Monitoring Reporting Program (Exhibit 2 of the adopted Statement of Decision and Resolution of Approval).
- (2) PG&E shall rent or otherwise obtain a single new primary 320 kW generator, of similar make and model of the existing generator (Isuzu Model 6WG1X), for purposes of providing backup electricity when needed at the site for implementation of the approved project.
- (3) The total number of extraction and monitoring wells within the project area shall not exceed a total of 170, not including replacement wells which will be installed on an as needed basis with priority given to previously drilled locations.
- (4) PG&E shall comply with financial assurance within 45 days of this project approval. The initial financial assurance funding shall be equal to the high range estimate of the project alternative present value in the final December 2009 CMS/FS. PG&E shall refine the cost estimate with each iteration of the remedy design (Preliminary [30%], Intermediate [60%], Pre-final, and As-built) for DTSC approval and PG&E shall update the financial assurance annually for the life of the project.
- (5) PG&E shall negotiate in good faith with DTSC all necessary land use covenants and restrictions required for the protection of the remedy, and file all such required restrictions with the County Recorder.
- (6) Consistent with the Settlement Agreement Between Fort Mojave Indian Tribe and DTSC in the matter of Fort Mojave Indian Tribe v. Department of Toxic Substances Control (Sacramento County Superior Court Case No. 05CS00437) (1/30/06), and prior to adoption of a final remedy design, DTSC shall verify and ensure that a detailed Title Search and GPS/GIS Mapping, consistent with Subdivision III (H)(1) and (2) of the terms of the Settlement Agreement, have been conducted including a radius of one mile beyond the physical perimeter of Site No. CA-SBr-219A, B, and C.

As required pursuant to the Corrective Action Consent Agreement between DTSC and PG&E, PG&E has ninety (90) days from receipt of this approval to submit to DTSC a

Ms. Yvonne Meeks  
January 31, 2011  
Page 3

Corrective Measures Implementation Workplan. DTSC expects that during the project design phase, locations of remedial structures will be determined by PG&E through communication and discussions with Interested Tribes, landowners and/or other entities with rights-of-way. In addition, as further described in the Mitigation Monitoring Reporting Program, during selection of the design and specific locations for physical remediation facilities, PG&E shall, in communication with the Interested Tribes, and to the maximum extent feasible, as determined by DTSC, give: (1) priority to previously disturbed areas for the placement of new physical improvements; and (2) priority to re-use existing physical improvements, such as, but not limited to, wells and pipelines, but not including IM-3 facilities. Finally, during development of the final design PG&E shall carry out all remediation activities, including all supporting operations and maintenance activities, in ways that avoid, minimize, and mitigate significant adverse effects to historically significant cultural and historic resources.

If you have any questions or comments regarding this letter, please contact me at (714) 484-5423.

Sincerely,

A handwritten signature in blue ink that reads "Karen Baker". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Karen Baker, Performance Manager  
Office of Geology

Enclosure

cc: PG&E Topock Consultative Workgroup Members – Via e-mail  
PG&E Topock Geo/Hydro Technical Workgroup Members – Via e-mail  
Tribal Representatives in PG&E Contact List – Via e-mail