



Alan C. Lloyd, Ph.D
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

700 Heinz Avenue, Suite 100
Berkeley, California 94710-2721



Arnold Schwarzenegger
Governor

January 6, 2006

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

TRANSMITTAL OF RESOURCE CONSERVATION RECOVERY ACT (RCRA) FACILITY ASSESSMENT QUESTIONNAIRE, PACIFIC GAS AND ELECTRIC COMPANY, TOPOCK COMPRESSOR STATION, NEEDLES, CALIFORNIA (EPA ID NO. CAT080011729)

Dear Ms. Meeks:

Hazardous waste management facilities, such as Pacific Gas and Electric Company (PG&E) Topock Compressor Station that have been operating under RCRA Interim Status are subject to the RCRA Corrective Action Program. As an initial step in the RCRA Facility Assessment (RFA) process DTSC requires that PG&E provide the information requested on the enclosed RFA questionnaire and sign the certification. The questionnaire and certification may be completed, and included as an appendix to the Site History Section of the RCRA Facility Investigation (RFI) Report when revised and resubmitted in the future. In addition, PG&E may reference on the questionnaire the corresponding location of information in the RFI Report.

PG&E shall submit in a separate letter, no later than January 30, 2006, the names and contact information of current and former employees who are, or were familiar, with the past historical operational practices at the facility. This information is required in order that DTSC may have the option to conduct independent interviews in the future. If PG&E requests that the names and contact information be considered confidential and excluded from public records, PG&E shall clearly identify this request with the document submitted.

If you have any questions, please contact me at (510) 540-3943.

Sincerely,

Norman Shopay, R.G.
Project Manager
Geology, Permitting and Corrective Action Branch

NTS/196A

Enclosure: RFA Questionnaire

CC: PG&E Topock Consultative Workgroup Members - Via e-mail

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

RCRA FACILITY ASSESSMENT QUESTIONNAIRE

INSTRUCTIONS

Pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA) as amended by the Hazardous and Solid Waste Amendments, and Section 25358.1 of the California Health and Safety Code (H&SC), the Department of Toxic Substances Control requests hazardous waste management facilities that are permitted or operating under Interim Status Documents to provide information in this RCRA Facility Assessment Questionnaire.

Any person handling hazardous waste who fail to provide information requested under the sections cited above within sixty (60) calendar days of the date of receipt of the questionnaire is in violation of hazardous waste laws and regulations and is therefore subject to enforcement actions under Section 3008 of RCRA, and Chapter 6.5, Article 8 of H&SC, and also subject to the revocation of denial (as applicable) of the state and federal hazardous waste facility permits.

All pertinent facility records must be reviewed and all available sources of information investigated in order to obtain the information requested in this questionnaire, including the personal recollection of longtime employees and past owners and operators.

Complete the questionnaire, add pages, and provide self contained documentation, photographs, and drawings as needed. Relevant definitions are provided at the end of the questionnaire.

1. Provide facility information as follows:

Facility Name:
EPA ID. Number:
Location Address:
Mailing Address:

Name of Operator:
Operator Address:

Name of Owner:
Owner Address:

Name of Landowner:
Landowner Address:

2. Are there or have there ever been any of the following solid waste management units (existing or closed) at your facility?

Note: Do not include waste management units currently shown in your most recent Part A or Part B permit applications.

	<u>Yes</u>	<u>No</u>
Landfill(s)	---	---
Surface Impoundment(s)	---	---
Land Farm(s)	---	---
Incinerator(s)	---	---
Storage Tank(s) (above ground)	---	---
Storage Tank(s) (below ground)	---	---
Container Storage Area(s)	---	---
Container Cleaning Areas or Units	---	---
Injection Well(s)	---	---
Waste Water Treatment and Pre-Treatment Units	---	---
Waste Treatment Units	---	---
Transfer Stations and Accumulation Areas	---	---
Waste Recycling Operations	---	---
Waste Piles	---	---
Process Collection Sumps, Collection Basins, etc.	---	---
Loading and Unloading Areas for Solid Wastes	---	---
Coupling and Decoupling Areas for Transfer of Solid Wastes	---	---
Air Emission Control By-product Accumulation Areas	---	---
Other Waste Handling Areas	---	---

3. If there are "Yes" answers to any of the questions in Number 2 above, please:

- a. Provide a description of the wastes that were or are being stored, treated, disposed or otherwise handled in those units.
- b. State whether or not the wastes would be considered hazardous and whether or not they contain hazardous constituents regardless of the dates in which the waste management occurred at the units.
- c. Include any available data on types and quantities of wastes disposed of in the units, if any, and the dates of disposal.
- d. Describe each unit and include information on its capacity, dimensions, and history of installation and modification in chronological order.
- e. If the unit was closed under the oversight of a regulatory agency, submit a letter from that agency showing the acceptance of closure activities conducted.
- f. If the unit was closed without regulatory agency oversight or approval, submit detail procedures and activities conducted for clean closure of that unit.
- g. Show the specific location of every unit at the facility on a topographic map.

- h. Provide any other available information relative to each unit.
- i. Include photographs of these units.

4. Are there or have there ever been any of the following installations for the handling, storage and management of hazardous materials at your facility?

	<u>Yes</u>	<u>No</u>
Underground Storage Tanks	—	—
Above Ground Storage Tanks	—	—
Container Storage Areas	—	—
Accumulation Piles	—	—
Ponds (lined or unlined)	—	—
Process Sumps and Catch Basins	—	—
Loading and Unloading Areas	—	—
Manufacturing Units or Areas	—	—

5. If there are "Yes" answers to any of the items in Number 4 above, please:

- a. Provide a description of each installation.
- b. List all the hazardous materials ever handled at each unit.
- c. Include information on its capacity, dimensions, and history of installation and modification in chronological order.
- d. Show the specific location of every installation at the facility in a map.
- e. If the unit was closed under the oversight of a regulatory agency, submit a letter from that agency showing the acceptance of closure activities conducted.
- f. If the unit was closed without regulatory agency oversight or approval, submit detail procedures and activities conducted to clean closure that unit.
- g. Provide any other available information relative to these units.
- h. Include photographs of these units.

6. For the units noted in Number 2 and Number 4 above and also for those hazardous waste management units indicated in the Part A or Part B permit application, please provide data on any releases of hazardous materials, hazardous wastes, and hazardous constituents to the environment that have occurred in the past or that may still be occurring. A release is defined as any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, or disposing of hazardous waste, hazardous constituents or hazardous materials into the environment (including the abandonment of

barrels, containers, and other closed receptacles containing hazardous wastes, hazardous constituents, or hazardous materials). (Environment includes air, soil, groundwater, surface waters, and subsurface gas.)

Please provide the following information:

- a. Date and type of hazardous wastes, hazardous constituents, or hazardous materials release
 - b. Quantity or volume released
 - c. Describe nature of release (i.e., spills overflow, ruptured pipe or tank, etc.)
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7. For releases listed and described under Number 6 above, provide (for each unit) any analytical data that may be available which would describe the composition, nature and extent of such releases.

 8. Provide the dates and information on locations of other product spills, leaks, drippings and other releases which have occurred or are recurring at your facility and any cleanup operations which have occurred relative to these incidents, if any.

 9. Provide details of any corrective actions or cleanup operations which were carried out or are in progress under the supervision of any federal, state, or local government agencies.

SIGNATURE AND CERTIFICATION

Submittal of this information must contain the certification below signed by the principal executive officer or by a duly authorized representative of that person. All pertinent facility records must be reviewed and all available sources of information investigated in order to obtain the requested information, including the personal recollection of longtime employees and past owners and operators.

A person handling hazardous waste who fails to provide information requested under Section 3007 of RCRA and H&SC Section 25358.1 and Chapter 6.5, Article 8 or H&SC is in full violation of the law and it is therefore subject to enforcement action under Section 3008 of RCRA, and subject to revocation of denial (as applicable) of its hazardous waste facility permit.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name of Operator:
Title:
Name of Company:
Date:

Signature: _____

Name of Owner:
Title:
Name of Company:
Date:

Signature: _____

Name of Landowner:
Title:
Name of Company:
Date:

Signature: _____

DEFINITIONS

"Facility" means all contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage, resource recovery, disposal, or recycling of hazardous waste. A hazardous waste facility may consist of one or more treatment, transfer, storage, resource recovery, disposal or recycling operational units or combinations of these units.

"Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing of hazardous waste (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

"Solid Waste Management Unit" or "SWMU" means any unit at which a hazardous waste facility from which hazardous constituents might migrate, irrespective of whether the units were intended for the management of wastes, including but not limited to: container, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators and underground injection wells.

"Hazardous Waste" means a hazardous waste as defined in the California Code of Regulations (CCR), Title 22, Section 66261.3. Hazardous waste includes extremely hazardous waste, acutely hazardous waste, RCRA hazardous waste, non-RCRA hazardous waste, and special waste.

"Hazardous Constituent" means a constituent that caused the USEPA Administrator to list the hazardous waste in the Code of Federal Regulations (CFR), Title 40, Part 261, Subpart D, or a constituent listed in Table 1 of 40 CFR 261.24.

"Hazardous Material" means any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

"Solid Waste" means any discarded material of any form (e.g., liquid, semi-solid, solid, or gaseous) as defined in 22 CCR 66261.2.