

Juan M. Jayo Attorney at Law Law Department 77 Beale Street, B30A San Francisco, CA 94105

Mailing Address: P. O. Box 7442 San Francisco, CA 94120

415.973.2193 Fax: 415.973.5520 E·Mail: JMJ8@pge.com

September 7, 2011

Pamela S. Innis
DOI Topock Remedial Project Manager
U.S. Department of the Interior
Office of Environmental Policy and Compliance
P.O. Box 2507(D-108)
Denver Federal Center, Building 56
Denver, CO 80225-0007

Thomas A. Vandenberg, Esq. Colorado River Basin Regional Water Quality Control Board 73-720 Fred Waring Drive, Suite 100 Palm Desert, CA 92260

Re: Applicable or Relevant and Appropriate Requirements (ARARs) for the Waste Discharge associated with the Interim Measure 3 Facility at PG&E's Topock Compressor Station

Dear Mr. Vandenberg and Ms. Innis:

Pacific Gas and Electric Company (PG&E) is in receipt of Mr. Vandenberg's letter, dated July 26, 2011, regarding the applicable or relevant and appropriate requirements (ARARs) for waste discharges associated with the Interim Measure 3 (IM-3) facility operated as a component of the response action being undertaken at the Topock Compressor Station near Needles, California. We are also in receipt of the letter that Ms. Innis sent in response, dated August 18, 2011 concurring with these ARARs.

Pursuant to your request, I write to confirm that PG&E intends to comply with the ARARs for the IM-3 facility, as may be amended by the regulatory agencies, for as long as the Department of Toxic Substances Control requires PG&E to operate the IM-3 facility. PG&E agrees to be governed by the terms of the Administrative Consent Agreement, dated July 11, 2005, including applicable enforcement provisions, with respect to these ARARs.

Sincerely,

Pacific Gas and Electric Company



cc:

Robert Perdue, RWQCB Karen Baker, DTSC Casey S. Padgett, Esq., DOI Melissa Derwart, Esq., DOI Robert Lucas, Lucas Advocates Yvonne Meeks, PG&E

Janice Schneider, Esq., Latham & Watkins LLP