



Yvonne J. Meeks
Site Remediation - Portfolio Manager
Environmental Affairs

6588 Ontario Road
San Luis Obispo, CA 93405

Mailing Address
4325 South Higuera Street
San Luis Obispo, CA 93401

805.546.5243
Internal: 664.5243
Fax: 805.546.5232
E-Mail: YJM1@pge.com

August 8, 2006

Christopher Guerre
Project Manager
California Department of Toxic Substances Control
Permitting and Corrective Action Branch
5796 Corporate Avenue
Cypress, California 90630

Robert Perdue
Executive Officer
California Regional Water Quality Control Board
Colorado River Basin Region
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260

Subject: Interim Measures Compliance Monitoring Program
Update to the Contingency Plan for Interim Measure No. 3 Groundwater Injection
PG&E Topock Compressor Station, Needles, California

Dear Mr. Guerre and Mr. Perdue:

Attached to this letter is a revised contingency plan flowchart for groundwater quality changes associated with the Interim Measures No. 3 injection system at the PG&E Topock site. The contingency plan flowchart was originally submitted as a part of the *Interim Measure No. 3 Injection Well Operations and Maintenance Plan Addendum*, dated June 3 2005, prior to operation of the injection system. PG&E has reviewed the first year of monitoring results and has updated the flowchart portion of the plan to clarify the triggering mechanisms. Additionally, the flowchart has been simplified to clarify probable contingency processes.

This flowchart replaces Figure 1 of the *Interim Measure No. 3 Injection Well Operations and Maintenance Plan Addendum*, dated June 3 2005. These clarifications do not change the contingency plan requirements on well rehabilitation or groundwater hydraulic changes.

PG&E looks forward to continued discussions with DTSC and RWQCB on refining the appropriate triggering mechanisms and contingency responses associated with the IM-3 injection system. PG&E will implement the contingency plan for groundwater quality changes associated with the injection system as shown in the attached flowchart until any further revisions are defined.

Please contact me at (805) 546-5243 if you have any questions on this or other aspects of the performance monitoring program.

Mr. Christopher Guerre
Mr. Robert Perdue
August 08, 2006
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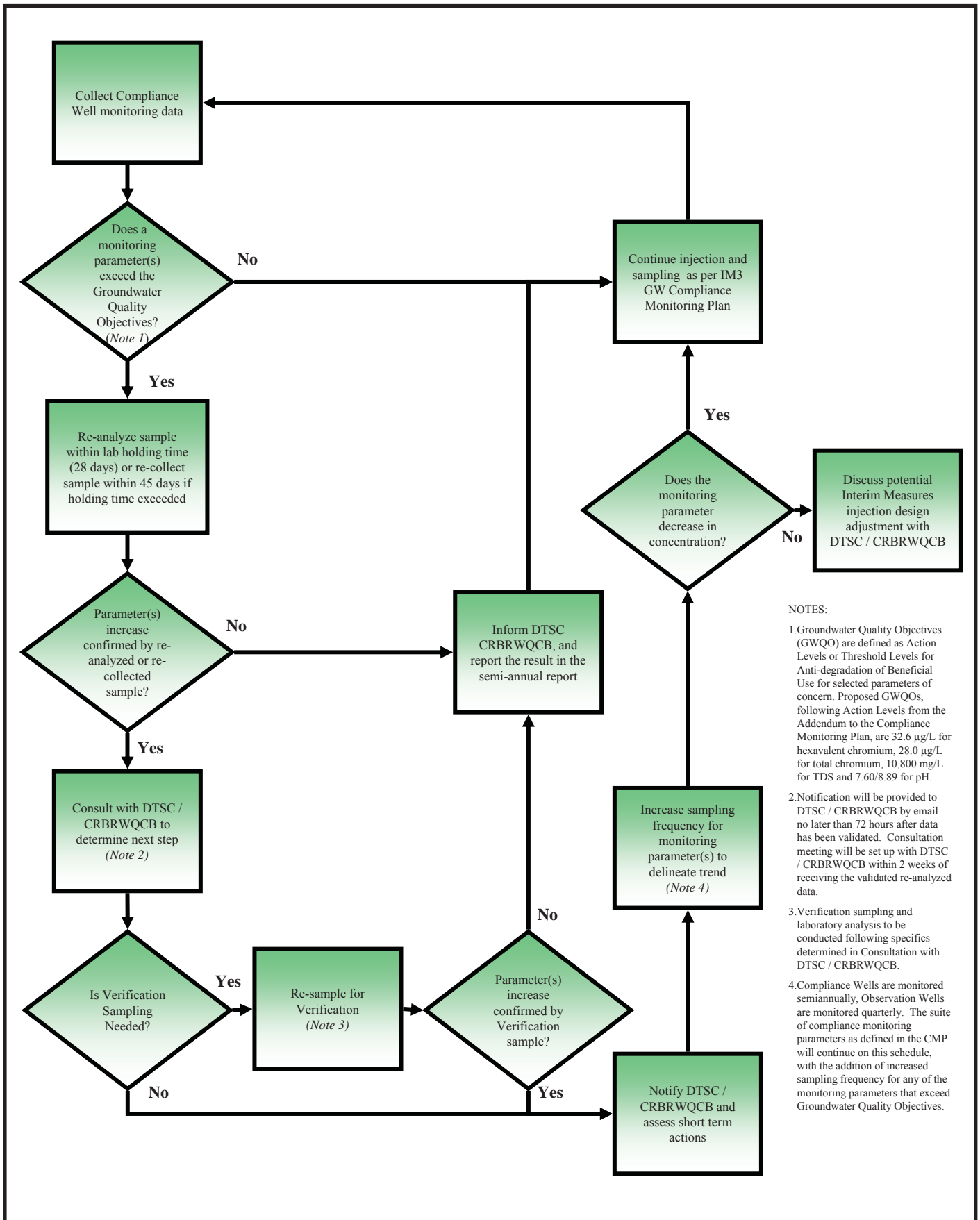
Sincerely,

A handwritten signature in blue ink that reads "Julia Eaters for Yvonne Meeks". The signature is written in a cursive, flowing style.

Yvonne Meeks
Pacific Gas and Electric Company
Senior Environmental Consultant - Onsite

cc. Jose Cortez, RWQCB
Liann Chavez, RWQCB
Kate Burger, DTSC

Enclosure



- NOTES:
1. Groundwater Quality Objectives (GWQO) are defined as Action Levels or Threshold Levels for Anti-degradation of Beneficial Use for selected parameters of concern. Proposed GWQOs, following Action Levels from the Addendum to the Compliance Monitoring Plan, are 32.6 µg/L for hexavalent chromium, 28.0 µg/L for total chromium, 10,800 mg/L for TDS and 7.60/8.89 for pH.
 2. Notification will be provided to DTSC / CRBRWQCB by email no later than 72 hours after data has been validated. Consultation meeting will be set up with DTSC / CRBRWQCB within 2 weeks of receiving the validated re-analyzed data.
 3. Verification sampling and laboratory analysis to be conducted following specifics determined in Consultation with DTSC / CRBRWQCB.
 4. Compliance Wells are monitored semiannually, Observation Wells are monitored quarterly. The suite of compliance monitoring parameters as defined in the CMP will continue on this schedule, with the addition of increased sampling frequency for any of the monitoring parameters that exceed Groundwater Quality Objectives.

FIGURE 1
CONTINGENCY PLANNING FOR IM3 GW INJECTION, AUGUST 2006
 INTERIM MEASURES NO. 3 INJECTION WELL
 OPERATION AND MAINTENANCE PLAN ADDENDUM,
 PG&E TOPOCK COMPRESSOR STATION, NEEDLES, CALIFORNIA