



May 9, 2018

Pamela S. Innis
U.S. Department of the Interior
CHF Remedial Project Manager
One North Central Avenue, Suite 800
Phoenix, AZ 85004-4427

Subject: PG&E Topock Compressor Station Soil Investigation Data Package

Dear Ms. Innis:

Per the U.S. Department of Interior's (DOI's) April 4, 2018 letter request, this soil investigation data package for the PG&E Topock Compressor Station (TCS) has been prepared. The soil investigation package consists of data tables and figures comparing soil investigation results against project screening levels for human and ecological receptors.

The data summarized in this report comprise the Combined Soil RCRA Facility Investigation and Remedial Investigation (RFI/RI) Data Set of soil and sediment samples collected at the TCS. The Combined Soil RFI/RI Data Set spans a wide range of dates, analytical parameters, and data quality from the following existing, validated data sets:

- **Historical data collected prior to 2008.** Historical data collected prior to the soil RFI/RI were evaluated in the *Final Soil and Sediment Data Usability Technical Memorandum, PG&E Topock Compressor Station, Needles, California* (CH2M HILL, Inc. [CH2M], 2008).
- **Part A, Phase 1 soil investigation data (2008).** These data were collected in 2008 during implementation of the Draft Soil Part A Work Plan (CH2M, 2006). These data were validated as presented in the *Soil Investigation Part A Phase 1 Data Gaps Evaluation Report, PG&E Topock Compressor Station, Needles, California* (CH2M, 2012).
- **Data collected during implementation of the Soil RFI/RI Work Plan (CH2M, 2013) and subsequent data gap work plans (CH2M, 2016a-c)**

The Combined Soil RFI/RI Data Set is presented below in a series of "Sample Results" and "Constituent Concentrations in Soil Compared to Screening Values" tables designated Tables 3-1 through 3-35. The Sample Results tables are organized by unit and by the following analytical groups (as appropriate):

- Metals
- Contract Laboratory Program (CLP) inorganics
- Polycyclic aromatic hydrocarbons (PAHs)
- Semivolatile organic compounds (SVOCs) and volatile organic compounds (VOCs)
- Total petroleum hydrocarbons (TPH)
- General chemistry parameters
- Pesticides
- Polychlorinated biphenyls (PCBs)
- Dioxins and furans
- Asbestos

All investigations areas were categorized into two groups: those outside the TCS fence line (Part A investigation units) and those inside the TCS fence line (Part B investigation units). The purpose of this categorization was to group units by their accessibility to potential receptors, which in turn dictates the applicable cleanup goals and screening levels. For units outside the fence line (Part A investigation units), where access is not limited, residential and ecological screening levels apply. For units inside the fence line (Part B investigation units), where access is limited and no ecological receptors are present, only commercial screening levels apply. Background values are relevant to all units.

Eleven investigation areas located outside of the TCS fence line were part of the Part A investigation areas as shown on the attached Figure 2-1:

- Solid waste management unit (SWMU) 1 – Former Percolation Bed
- Area of concern (AOC) 1 – Area Around Former Percolation Bed
- AOC 4 – Debris Ravine (much of AOC 4 is now inside the TCS fence line)
- AOC 9 – Southeast Fence Line
- AOC 10 – East Ravine
- AOC 11 – Topographic Low Areas (including the two new areas)
- AOC 14 – Railroad Debris Area
- AOC 27 – MW-24 Bench
- AOC 28 – Pipeline Drip Legs
- AOC 31 – Former Teapot Dome Oil Pit (investigated in conjunction with the perimeter area sampling program)
- Undesignated area (UA)-1 – Potential Pipe Disposal Area

Twenty-six Part B investigation areas are located inside the TCS fence line, as shown on the attached Figure 2-2:

- SWMU 5 – Sludge Drying Beds
- SWMU 6 – Chromate Reduction Tank
- SWMU 8 – Process Pump Tank
- SWMU 9 – Transfer Sump
- SWMU 11 – Former Sulfuric Acid Tanks
- AOC 4 – Debris Ravine
- AOC 5 – Cooling Tower A
- AOC 6 – Cooling Tower B
- AOC 7 – Hazardous Materials Storage Area
- AOC 8 – Paint Locker
- AOC 13 – Unpaved Areas within the Compressor Station
- AOC 15 – Auxiliary Jacket Cooling Water Pumps
- AOC 16 – Sandblast Shelter
- AOC 17 – Onsite Septic System
- AOC 18 – Combined Hazardous Waste Transference Pipelines
- AOC 19 – Former Cooling Liquid Mixing Area and Former Hotwell
- AOC 20 – Industrial Floor Drains
- AOC 21 – Round Depression near Sludge Drying Bed
- AOC 22 – Unidentified Three-sided Structure
- AOC 23 – Former Water Conditioning Building
- AOC 24 – Stained Area and Former API Oil/Water Separator
- AOC 25 – Compressor and Generator Engine Basements
- AOC 26 – Former Scrubber Oil Sump
- AOC 32 – Oil Storage Tanks and Waste Oil Sump (this is an active unit)

- AOC 33 – Potential Former Burn Area near AOC 17 (investigated as part of AOC 17)
- Units 4.3, 4.4, 4.5 – Oily Water Holding Tank, Oil/Water Separator, Portable Waste Oil Storage Tank

Data for the Part A investigation units (including Perimeter Area samples) were screened against the following residential and ecological screening levels and background values:

- U.S. Environmental Protection Agency (EPA) residential regional screening levels (RRSLs) (EPA, 2017)
- Residential California Department of Toxic Substances Control (DTSC) screening levels (DTSC-SLs) (DTSC, 2017, 2018)
- Ecological comparison values (ECVs) (ARCADIS, 2008a)
- Threshold effect concentrations (TECs) that were obtained from MacDonald et al. (2000) for comparison with sediment results, in accordance with the approved Risk Assessment Work Plan (ARCADIS, 2008b).
- Background values (CH2M, 2009, 2017)
- California Regional Water Quality Control Board (RWQCB) environmental screening levels (ESLs) (RWQCB, 2016) (TPH only)

In addition, an interim screening level (ISL) was selected for each analyte for Part A investigation units. For metals and CLP inorganics, which have robust background datasets, the background value was selected as the ISL. If a background value was not available, then the lower of the ECV, residential DTSC-SL, or EPA RRSL (as available) was selected as the ISL. For TPH, the RWQCB ESL was selected as the ISL. For all other analytes, the lower of the ECV, residential DTSC-SL, or EPA RRSL (as available) was selected as the ISL, unless the background value is higher.

Data for the Part B investigation units were screened against the following commercial screening levels and background values:

- Commercial screening level (lower of commercial DTSC-SL [DTSC, 2018] or EPA commercial regional screening level (RSL) [EPA, 2017])
- RWQCB ESL (RWQCB, 2016) (TPH only)
- Background values (CH2M, 2009, 2017)

AOC 4 – Debris Ravine is unique in that some samples fall outside the fence line and some fall inside the fence line. For this unit, two sets of Sample Results tables are presented—one set screens outside the fence line results against the Part A Investigation screening levels (Tables 3-3a through 3-3f) and one set screens inside the fence line results against the Part B Investigation screening levels (Tables 3-4a through 3-4j).

In addition to the Sample Results tables, a “Constituent Concentrations in Soil Compared to Screening Values” table is presented for each unit with analytical data. These tables provide a statistical summary of the number of locations sampled, frequency of detection, maximum detected value, and the number of screening level exceedances for each analyte evaluated. Only soil and sediment samples are considered. Samples from other matrices such as wood, debris, tar, and white powder are not part of the comparison analyses because they are not necessarily representative of underlying soil conditions. Soil sample counts presented in the statistical summary tables do not include duplicate (quality control) soil samples. At locations where duplicate samples were collected, the higher of the two values were included in the statistical summary tables. The number of exceedances is the number of detections that are equal to or exceed the respective screening/comparison values. For background/ambient values, exceedances are the number of detections exceeding the background/ambient value (that is, if a detected concentration is equal to the background/ambient value, it is considered to be within background or ambient concentrations).

Sample locations for all units are shown on Figure 3-1. Data are presented on Figures 3-2 through 3-17. For the Part A investigation units, a figure is included if an analyte was detected at concentrations exceeding the ISL four

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or more times in a unit. For the Part B investigation units, a figure is included if an analyte was detected above the commercial screening level, RWQCB ESL, or background four or more times in a unit.

To date, the bulk of the RFI/RI has been completed and work to evaluate potential human health threats and ecological risks posed by contamination in soil is progressing to assist risk management decision making on the need for soil remediation. Evaluation of the Combined Soil RFI/RI Data Set and soil parameter data against the Part A and Part B DQOs is ongoing.

If you have any questions or require additional information, please contact me at (760) 791-5884.

Sincerely,



Curt Russell
Topock Project Manager

Enclosures:

Data tables and figures (see complete listing below)

cc:

Bill White/PG&E
Keith Sheets/Jacobs

References:

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Complete listing of attached Soil Investigation data package tables and figures:

Tables

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Table 3-1b	Sample Results: Contract Laboratory Program Inorganics; SWMU 1 – Former Percolation Bed
Table 3-1c	Sample Results: Polycyclic Aromatic Hydrocarbons; SWMU 1 – Former Percolation Bed
Table 3-1d	Sample Results: Total Petroleum Hydrocarbons; SWMU 1 – Former Percolation Bed
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Table 3-1f	Sample Results: Pesticides; SWMU 1 – Former Percolation Bed
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Figure 3-16f	Soil Sample Results, AOC 19, Lead
Figure 3-16g	Soil Sample Results, AOC 19, Molybdenum
Figure 3-16h	Soil Sample Results, AOC 19, Zinc
Figure 3-16i	Soil Sample Results, AOC 19, B(a)P Equivalent
Figure 3-16j	Soil Sample Results, AOC 19, PAH High Molecular Weight
Figure 3-16k	Soil Sample Results, AOC 19, TEQ Human
Figure 3-17a	Soil Sample Results, AOC 22, Arsenic
Figure 3-17b	Soil Sample Results, AOC 22, Lead
Figure 3-17c	Soil Sample Results, AOC 22, TEQ Human