



# United States Department of the Interior

**BUREAU OF LAND MANAGEMENT**  
**FISH AND WILDLIFE SERVICE**  
**BUREAU OF RECLAMATION**



## ELECTRONIC SUBMISSION

September 8, 2015

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

Subject: PG&E Topock Compressor Station Remediation Site – Conditional Approval of the *Final Human Health and Ecological Risk Assessment Work Plan Addendum 2, Pacific Gas and Electric Company Topock Compressor Station, Needles, California* dated June 2015.

Dear Ms. Meeks:

The Department of the Interior, on behalf of itself and the Bureau of Land Management (BLM), the U.S. Fish and Wildlife Service (USFWS), and the Bureau of Reclamation (collectively referred to as “DOI”), has completed the review of the *Final Human Health and Ecological Risk Assessment Work Plan Addendum 2, Pacific Gas and Electric Company Topock Compressor Station, Needles, California* (RAWP Addendum II) dated June 2015 and approve this important document with the conditions discussed below. The Work Plan Addendum is meant to supplement the Human Health and Ecological Risk Assessment Work Plan finalized in August 2008 and RAWP Addendum finalized in 2009. It provides changes, clarifications and supplemental detail regarding risk assessment approaches that will be applied to soils.

The development of the RAWP Addendum II took place over several years beginning with the scoping in 2012. The Department of Toxic Substance Control (DTSC) and DOI worked closely with stakeholders and interested Tribes throughout this process in addressing issues associated with both human health and ecological risk assessment. Key elements of the scoping included a literature search regarding plant uptake with a focus on arrowweed, development of the tribal use

scenario, development of DOI exposure assumptions for the recreational use, and inclusion of the desert bighorn sheep to the list of representative receptors.

It is the expectation of DOI that the risk assessment forum will reconvene after the soil investigation is complete. It is acknowledged that depth and area-weighted averaging will be better assessed after all data has been collected and the data evaluation step has begun. A representative data set from an Area of Contamination (AOC) where data from multiple sampling events were collected (presumably AOC 1) will be used to initiate the process of exposure point concentrations (EPCs) development. If it is determined that another method is required, in order to obtain a more representative estimate of the EPC, it will be evaluated in a phased manner with input from interested parties. DOI and DTSC will then provide further direction to PG&E to proceed with the risk assessment of the remaining AOCs and SWMUs utilizing information gained in this step.


The risk assessment forum will also discuss and develop details regarding the level of effort that will go into the uncertainty analysis of the soil risk assessment. Factors to consider in the analysis will include data outliers/hot spots, exposure scenario applicability to AOCs and SWMUs, as well as representativeness of the aggregated data and the extent that spatial averaging will support risk management decisions.

Additionally, information gained in the recent bat surveys indicates that several species are potentially present at the site. DOI recognizes that it is not feasible to evaluate exposures and risks for each species therefore PG&E shall propose a representative species for bats potentially present in the Topock project area.

DOI recognizes the importance of moving the risk assessment forward and is committed to working with PG&E, DTSC, Tribes and stakeholders throughout this process.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Pamela S. Innis".

Pamela S. Innis  
DOI Topock Remedial Project Manager

Cc: Consultative Work Group Members  
Technical Review Committee