



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

Sent Via Email

April 4, 2007

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

**CONDITIONAL APPROVAL OF THE IN-SITU HEXAVALENT CHROMIUM
REDUCTION PILOT TEST WORK PLAN – UPLAND PLUME TREATMENT, PACIFIC
GAS AND ELECTRIC COMPANY (PG&E), TOPOCK COMPRESSOR STATION,
NEEDLES, CALIFORNIA (EPA ID NO. CAT080011729)**

Dear Ms. Meeks,

The Department of Toxic Substances Control (DTSC) has reviewed the subject work plan (Workplan), dated September 29, 2006; and considered the comments received from the Fort Mojave Indian Tribe on November 8, 2006 and December 15, 2006; as well as comments from the United States Fish and Wildlife Services on November 6, 2006. In our evaluation of your proposed work plan, DTSC also reviewed your response to comments letter, dated February 28, 2007. As a result of our review, DTSC approves the Workplan with the following clarifications and conditions:

1. Although PG&E will comply with the required monitoring program set forth by the Regional Water Quality Control Board Waste Discharge Requirements for the pilot test and conduct monitoring as proposed in the Workplan, DTSC may require modifications to the sampling program (parameters and frequencies) to properly evaluate the pilot test performance based on on-going monitoring results.
2. In recognition of Fort Mojave Indian Tribe's desire to minimize the number of bore holes and disturbance to the land which is considered sacred to the Fort Mojave Indian Tribe, DTSC is willing to evaluate alternate well designs (e.g. triple completion nested wells) proposed by PG&E as long as the designs meet applicable well standards. DTSC, however, approves the current strategy for well installation except that PG&E shall utilize centralizers along the length of the casings in construction of the nested monitoring wells in accordance with well installation standards.

3. In respect and awareness of the landscape considered sacred to the Fort Mojave Indian Tribe and other tribes with similar views, PG&E shall use established access routes for transportation of personnel and equipment for the Upland In-situ Pilot Test. PG&E shall instruct and refresh all workers at the site to respect the sacred landscape through, at a minimum, work orientations and kick-off meetings.
4. PG&E shall implement proper management controls consistent with standard practices to address the following:
 - a. Incidental trash from site operations will be collected at the end of each shift, and hauled off for proper disposal.
 - b. Storage tanks, piping and all connections associated with this project shall either be double-walled or placed over secondary containment to prevent spills and to contain leaks. All incidental spills shall be immediately controlled. PG&E shall provide timely notification of such spills to DTSC and the landowner. All spills or releases associated with the Upland In-Situ Pilot Test shall be recorded and provided in the quarterly pilot study update report.
5. In consideration of the request for involvement from the Fort Mojave Indian Tribe, and PG&E's response to their request, DTSC will remain open to additional discussions on the reagent to be used for the Upland In-Situ Pilot Test as long as the proposed reagent meets the Waste Discharge Requirements restrictions set by the Regional Water Quality Control Board.
6. PG&E shall work with interested tribes and make a good faith effort to establish a tribal monitor to be present during all site clearance and disturbance work.
7. DTSC believes that the proper management of all investigation derived material, including soil, to be PG&E's responsibility. DTSC understands that the Fort Mojave Indian Tribe has requested PG&E to explore the possibility to leave non-contaminated soil in place. DTSC does not object to this possibility as long as the placement of the soil will not create an adverse impact to human health or the environment, and that it complies with all Federal, State and local laws and requirements. DTSC cautions, however, that until action levels and background concentrations are properly established, impacted soils which are left in place may be subject to future investigation and/or remediation.
8. At project completion, PG&E shall comply with all site restoration requirements as directed by the Havasu National Wildlife Refuge (HNWR). PG&E should also

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consider, to the extent practical and do not conflict with HNWR directions, input from the Fort Mojave Indian Tribe with respect to this matter.

9. PG&E shall not light or conduct night work outside the Topock Compressor Station facility fence line during implementation of the Workplan except under emergency circumstances, such as spill response. If light use is needed due to an emergency response, PG&E will provide prompt notice to the Fort Mojave Indian Tribe and DTSC

As a result of PG&E's response to comments from the United States Fish and Wildlife Services, PG&E has revised Figure 3 and Figure 8A of the work plan to clarify the location of the pilot study and the staging areas respectively. These figures are, hereby, incorporated to the Workplan by reference and are enclosed to this conditional approval letter.

If you have any questions or comments regarding this Workplan approval letter or its conditions, please contact me at (714) 484-5439.

Sincerely,

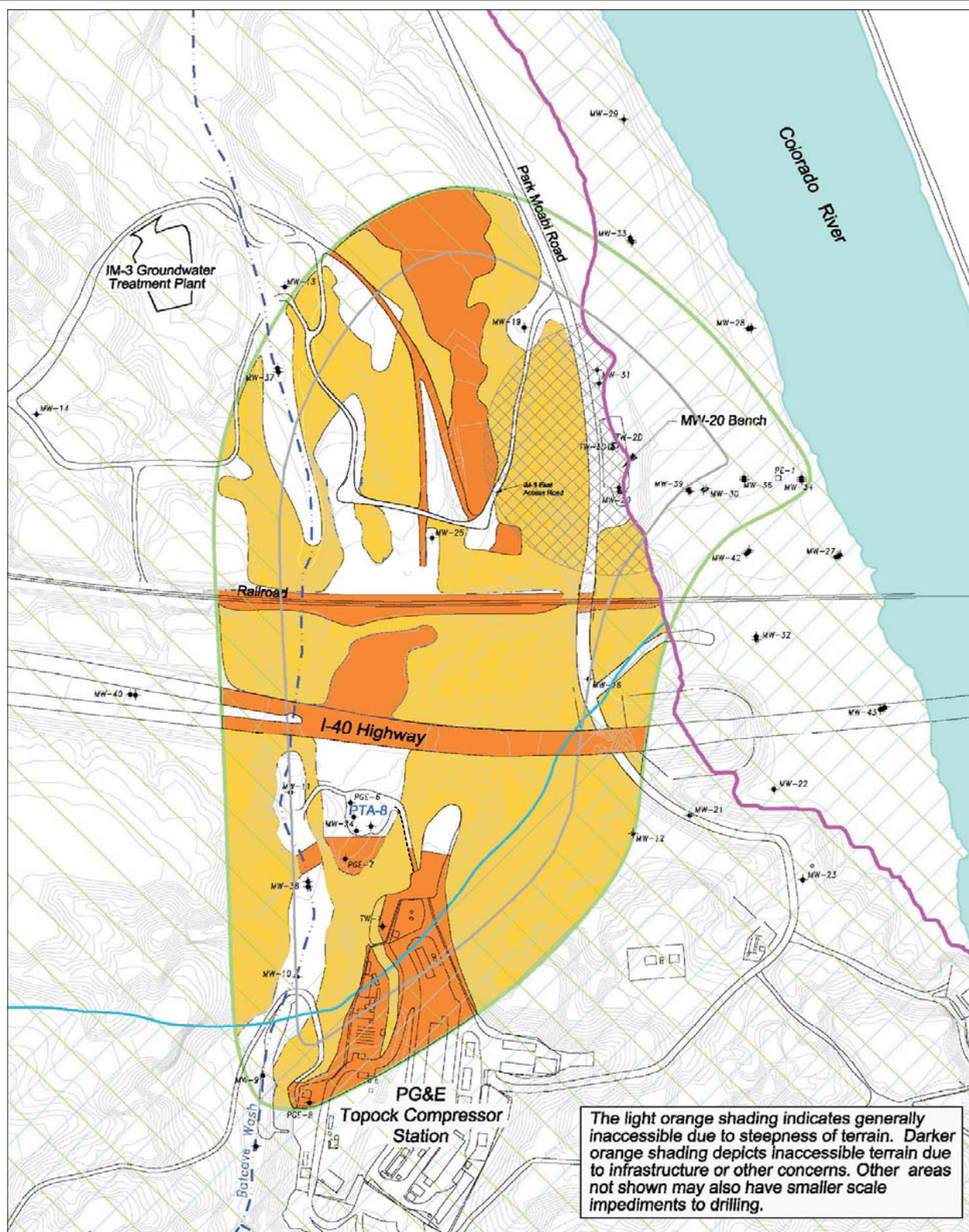


Aaron Yue
Project Manager
Geology, Permitting and Corrective Action Branch

Enclosures

aky:040702C

cc: PG&E Topock Consultative Workgroup Members – Via e-mail
Tribal Representatives in PG&E Contact List – Via e-mail



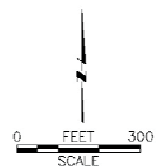
Source: MWH Draft In-Situ Hexavalent Chromium Reduction Pilot Test Work Plan, Upland Plume Treatment, 2006.

Legend

- Monitoring Well Locations
- Extraction Well Locations
- Interpreted Limit of Groundwater with a Concentration of Hexavalent Chromium that Exceeds 50 ppb
- Estimated Boundary Where Fluvial Deposits are Observed
- Estimated Boundary Where the Alluvial Aquifer Contains Less than 50 Feet of Saturated Thickness
- PTA Potential Pilot Test Area

Contours based on March 2005 data

- Area within 400 Feet of Extraction Well TW-30
- Area within 200 Feet of Interpreted Limit of Groundwater with a Concentration of Hexavalent Chromium that Exceeds 50 ppb
- Area with Less than 50 Feet of Saturated Thickness of the Alluvial Aquifer or in Area of Fluvial Deposits
- Access route to pilot test area



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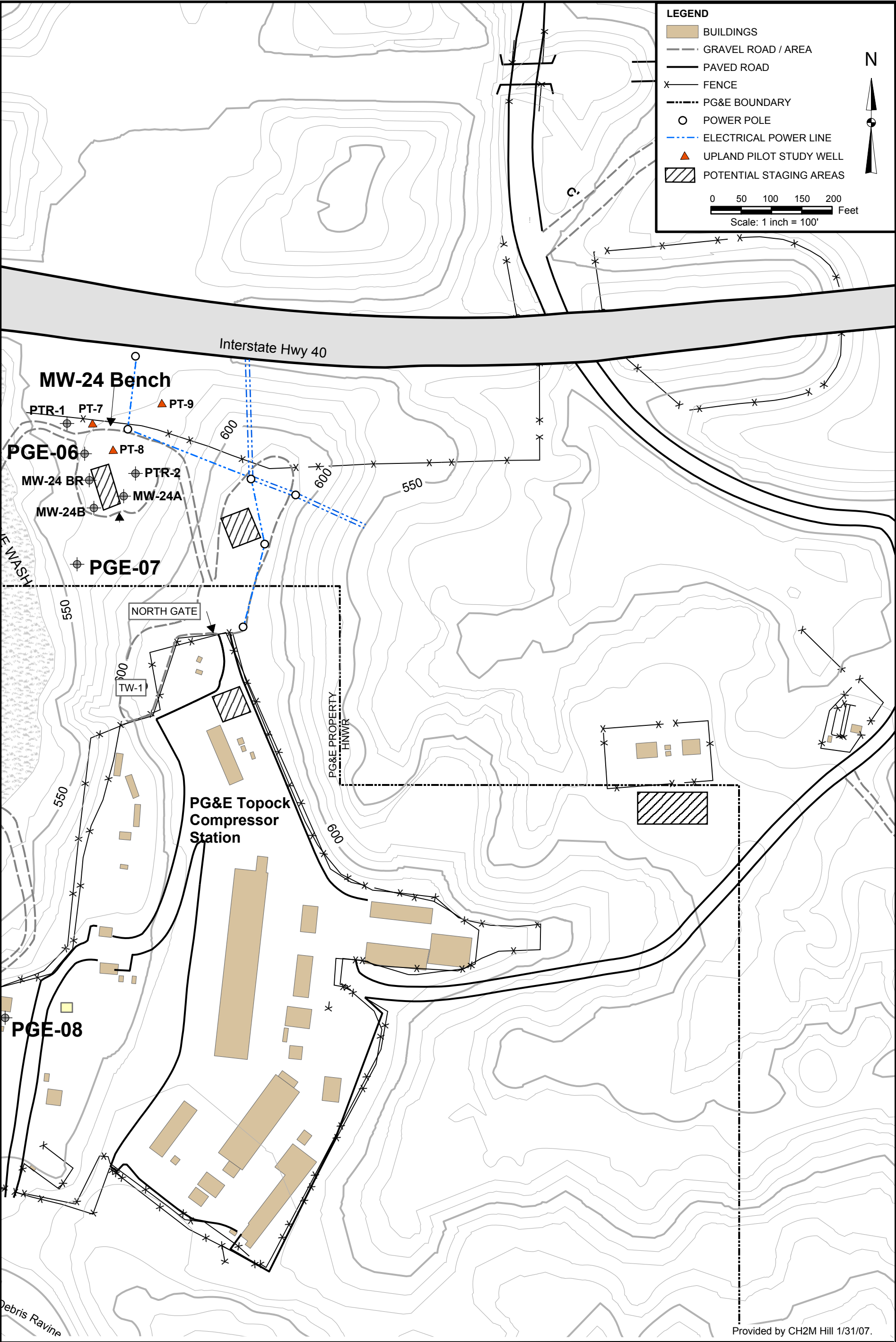



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PROPOSED PILOT TEST AREAS UPLAND AREA

PG&E TOPOCK FACILITY
NEEDLES, CALIFORNIA

PROJECT MANAGER	DEPARTMENT MANAGER
DRAFTER	CHECKED
PROJECT NUMBER	DRAWING NUMBER
RC000689_0001	3



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	N. MORGAN-BUTCHER	J. PETERS			RC000689.0001
	Task Manager	Technical Review			Figure
	H. VOSCOTT				8A
Drawing Date	Drawn By				
31 JAN 07	M. CHIU				