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

May 1, 2007

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

APPROVAL OF WORK PLAN FOR ANAEROBIC CORE SAMPLES AT 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 June 2, 2006 *Work Plan for Testing of Anaerobic Core Samples* (Work Plan) and the email from your contractor, CH2M Hill, dated April 20, 2007, requesting a change in the cores to be tested under the proposed work plan. The proposed replacement cores are collected during the California Slant Drilling project and will be substituted for cores collected during installation of monitoring wells MW-44 and MW-47.

As a result of our review, DTSC is in general agreement with the proposed Work Plan and the proposed core substitution. DTSC also notes that the Work Plan was circulated to the PG&E Technical Work Group for review and comment on June 5, 2006, but no comment was received as a result of the solicitation. Although DTSC, by this letter, approves the Work Plan with the core substitution and directs PG&E to implement the core tests, DTSC requests PG&E to take notes of several concerns noted below during the implementation of the Work Plan and modify the procedures as necessary. DTSC further requests that PG&E provides clarification of these issues in the resulting Anaerobic Core Test report to be submitted to DTSC at the conclusion of the tests to ensure that the interpretation of the results would be clear.

1. For uptake test in Tasks 6 and 7, the proposed procedure specified a 30-min agitation after charging the samples with anaerobic groundwater of known hexavalent chromium mass. Although the agitation time in the proposed procedure

seems to be consistent with the previous testing procedure in April 2005, DTSC is uncertain that 30 minutes is a sufficient reaction time from the previous test.

2. Adding anaerobic de-ionized water in Task 8 for sampling purpose would cause dilution. The dilution effect should be taken into consideration. Instead, DTSC suggests that PG&E consider adding a sample in previous steps with high enough of initial hexavalent chromium concentration such that the condition, as mentioned in the first sentence of the 2nd bullet in Task 8, would not occur.

3. It is not clear in Section 5 how data from Tasks 7 and 8 will be differentiated and integrated for interpretation. Although initial TOC and Fe concentrations were analyzed, the changes of TOC and Fe(II)/Fe(III) do not seem to be tracked in Tasks 7 and 8 to substantiate the uptake capacity, re-bound and/or continuous Fe-pair reaction.

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

Sincerely,

Aaron Yue
Project Manager
Geology, Permitting and Corrective Action Branch

aky:050701C

cc: PG&E Topock Consultative Workgroup Members – Via e-mail

PG&E Topock Technical Workgroup Members – Via e-mail

Native American Tribal Contacts for PG&E Topock project – Via e-mail