



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 9, 2007

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

**COMMENTS ON THE RCRA FACILITY INVESTIGATION/ REMEDIAL INVESTIGATION, VOLUME 1 – SITE BACKGROUND AND HISTORY REPORT, 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 completed the review of the Volume 1, RCRA Facility Investigation Report (RFI) and the response to comments, dated September 6, 2006. As a result of our review, DTSC notes areas of the RFI report which will need additional clarifications and edits. Enclosed is a memorandum generated by Mr. Greg Neal of the DTSC Geological Services Unit which details our concerns on the RFI report.

As part of our review, DTSC also observed areas of inconsistencies between the text of the report and PG&E response to comments from the Department of Interior (DOI). These issues are noted and are also outlined in the memorandum for your consideration. DTSC understands that DOI is satisfied with PG&E's response to their comments and has already provided approval of this RFI Volume I report. As such, DTSC understands that DOI may not require PG&E to formally provide additional revisions. DTSC, however, believes it is beneficial for completeness of the RFI document to reconcile any inconsistencies noted in the report and requests that PG&E provide an erratum on these items along with our comments on the remaining issues outlined in the memorandum.

For clarification, DTSC understands from our telephone conference of May 8, 2007 that PG&E may defer the discussions on the strategies for investigation to subsequent volumes of the RFI report. Therefore, DTSC understands that our general comment number 2, as detailed in the memorandum, may not be fully addressed in the final Volume I RFI report. DTSC also understands that PG&E will provide the relevant

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laboratory data discussed in Volume I of the RFI report in electronic form for reference as requested in our memorandum. Finally, DTSC agrees that the discussion of subgrade flow with respect to comment S4-49 can be addressed in Volume II of the RFI report.

To assist us in the review of revisions resulting from our enclosed memorandum, DTSC request that PG&E provide a redline, strike-out version of the modifications to the RFI report, and certify that the changes made to the September 6, 2006 document are limited to specific revisions in the response to comments erratum package to be submitted. DTSC requests that PG&E submit the modification certification, the redlined modifications and the erratum package to DTSC by June 30, 2007.

If you have any questions or comments regarding this letter or the content of the enclosed memorandum, please contact me at (714) 484-5439.

Sincerely,



Aaron Yue  
Project Manager  
Geology, Permitting and Corrective Action Branch

Enclosure

aky:050702B

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