



Department of Toxic Substances Control



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MEMORANDUM

TO: Aaron Yue
Project Manager
Geology, Permitting and Corrective Action Branch

FROM: Greg Neal, P.G. *Greg Neal*
Engineering Geologist
Southern California Geologic Services Unit
Geology, Permitting and Corrective Action Branch

DATE: May 1, 2007

SUBJECT: RESPONSE TO COMMENTS ON "RCRA FACILITY INVESTIGATION/
REMEDIAL INVESTIGATION, VOLUME 1 – SITE BACKGROUND AND
HISTORY, PG&E TOPOCK COMPRESSOR STATION, NEEDLES,
CALIFORNIA"

PCA 22120 SITE CODE 540015 WP 48 MPC 36 640160

As requested, the Geological Services Unit (GSU) has reviewed the "RCRA Facility Investigation/ Remedial Investigation, Volume 1 – Site Background and History, PG&E Topock Compressor Station, Needles, California" (RFI Report) to evaluate Pacific Gas and Electric (PG&E) response to comments provided by consultative work group (CWG) on the draft version of the document. The document is dated September 2006 and prepared by CH2MHILL.

The GSU has reviewed the responses to comments and has identified the following areas which do not completely address the initial comment or that the revisions to the text of the RFI Volume 1 are unclear with respect to the responses to comments. It should also be noted that responses to comments S1-1 through S1-4 and S1-7 through S1-25 by the Arizona Department of Environmental Quality (AQEQ) and comments 18 through 56 and 81 through 178 from the Department of the Interior (DOI) will be addressed in subsequent RFI volumes pertaining to groundwater and soil, and are specifically not addressed in the RFI Volume 1.

General Comments

1. The list of constituents of potential concern (COPCs) identified in this version of the RFI Volume 1 appears to be a limited subset of the list previously provided by DTSC

in memoranda dated March 29, 2006. The list of COPCs for each solid waste management unit (SWMU) and area of concern (AOC) should include those which were previously provided by DTSC and discussed with PG&E during the monthly coordination meetings. If PG&E does not agree with the identified COCs previously discussed, it is acceptable for PG&E to identify an abbreviated COPC list if PG&E also includes statements in each appropriate location that indicates "DTSC also identified the following COPCs for this unit as well...". This will allow for completion of the RFI Volume 1 without further discussion of the agreed upon COPC list.

2. The discussion of limiting COPC (e.g. VOCs and SVOCs) analysis in AOCs on the east or south sides of the facility based on analytical data from the lower yard is inappropriate. The likelihood of COPC transport from the lower yard to AOCs on the east side of the facility (e.g. AOC 9) is very slim due to the topography of the area. Further discussion regarding the findings in the upper yard and sample analyses in the AOCs east and south of the site can be postponed until the RFI Volume III Workplan, Part A.

Commenter: Luce Forward

Comment	Issue
LO1-9	The updated and revised versions of the Public Participation Plan and Communications Plans should be referenced in the RFI Volume 1. The DTSC recognizes that the completion date of this document (September 2006) is prior to finalization of the Public Participation Plan and Communication Plans, however, based on the likely revisions necessary resulting from the comments provided in this memo, the final version of this RFI Volume should reference those documents.

Commenter DTSC (Greg Neal)

Comment	Issue
1	The discussion of VOC sample analysis in AOCs located offsite based on analyte detections in the lower yard should be included in each of the appropriate areas in Section 4.1.
General 1	The provided response indicates that laboratory data sheets will be provided to DTSC as requested, however no clarification was provided as to the format they would be provided. This information

should be clarified in Volume 1 so that all interested parties can locate them.

5 The intent of the original comment was to conduct ongoing identification of white powdery residue throughout the RFI activities such that any new areas of residue uncovered through further investigation or natural processes would be identified. The process of continual evaluation should be carried forward for the remainder of the RFI activities.

12 Although DTSC will consider the issue closed since no further information was obtained regarding the destruction methods for wells PGE1 and PGE2, the text of the document should indicate that further evaluation may be necessary if information is obtained for these wells in the future.

From Table 2

SWMU 2 DTSC previously identified SWMU 2 as a unit requiring no further evaluation. Discussion of SWMU 2 does not appear in Section 5 of Volume 1 which is the section describing closed units. Please provide rationale for removing this SWMU from Section 5 but not including it in the RFI Volume II.

Commenter ADEQ

Comment	Issue
S1-5	The provided response to comments indicates a revision to the Executive Summary will be made to reference Figure 4-1; however, the text does not appear to reflect this revision. Please revise the Executive Summary as indicated.
S1-6	For clarity, the total volume of wastewater injected into PGE-08 should be implicitly stated in Section 3.1.4.4. Subtotals are presented and a total can be calculated. To completely respond to the comment, please specify the total volume.
S1-26	Land ownership does not appear to be discussed in the Executive Summary as indicated by the response to comments. Please revise either the response to comments or Executive Summary so that they are in agreement.

Commenter DTSC (Kate Burger)

- S4-42 The location of text revisions that were made (fifth paragraph in section 3.1.1.2) is not accurate. The change to the text was made in Section 3.1.4.4. Please revise the response to comments.
- S4-48 The response to this comment references Table 3-14, however, Table 3-14 contains data from soil samples in Bat Cave Wash rather than East Ravine. Please provide the appropriate reference for the requested data.
- S4-49 The response to comment does not appear to be related to the original comment regarding subgrade flow in the ravine. The response specifically discusses surface water. Please provide a response to the issue of subgrade flow as requested in the comment.

Commenter DOI

Comment	Issue
13	The boundaries of the Refuge appear unchanged from the original draft. Please provide an updated map appropriately depicting each of the land owners and each respective property boundary.
65	The text of the document should indicate that no approvals for clean up of incidental releases has occurred. These are conducted as part of maintenance activities and are not regulated activities.
78	The revisions to this comment appear to have been placed in section 5.1.3.2 rather than 5.1.4.2 as indicated in response. Please revise the response to comments.
79	No Table 5-11 appears to be present in the document (nor a Table 6-7 which was revised from the first draft Volume 1). Please provide clarification.
179	The suggested revision does not appear in the 1 st paragraph of Section 1 in the revised RFI Volume 1. Please provide a revised location of the text revision.

180 The suggested revision does not appear in Section 1 of the revised RFI Volume 1. Please provide a revised location of the text revision.

Commenter MWD

Comment Issue

S2-73 Please revise the response to this comment by identifying floor drains as an AOC within the active portion of the operating facility and note that its investigation will be addressed as part of future corrective action activities.

Recommendations

The GSU recommends revision of the RFI Volume 1 in accordance with the comments identified above. If PG&E fully addresses the above comments and provides certification of the changes made, the GSU recommends the approval of the document.

If you have any questions, please contact me by telephone me at (714) 484-5455 or by e-mail at gneal@dtsc.ca.gov.

cc: Alfredo Zanoria, C.E.G, C.HG.