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Secretary for
Environmental Protection



Department of Toxic Substances Control

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Acting Director
5796 Corporate Avenue
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Arnold Schwarzenegger
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Sent Via Email

May 15, 2009

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

DIRECTION TO SAMPLE SELECT GROUNDWATER WELLS FOR CONTAMINANTS RECENTLY DETECTED IN SOIL SAMPLES AND REQUEST TO DOCUMENT BURN ACTIVITIES WITHIN THE AREA OF CONCERN 4 (AOC-4) DEBRIS RAVINE AREA. 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) is hereby directing PG&E to sample for recently detected contaminants discovered during soil sampling activities. This letter documents our verbal directive to PG&E on April 28, 2009 to sample several wells (Wells MW-9, MW-10, MW-12, MW-57M, and MW-59) for dioxins/furans to assess potential groundwater impacts as a result of its detection in burn ash sources within AOC 4, Debris Ravine. In addition, DTSC evaluated the recently received Part A soils data provided by PG&E to DTSC via email in March and April 2009. The Part A data indicate that there are soil contaminants detected at elevated concentrations which prompt additional groundwater evaluation. These contaminants are: polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), total petroleum hydrocarbons (TPH), and select semi-volatile organic compounds (SVOCs). The predominant organic compounds detected during the Part A, Phase I investigation are summarized in the table provided on the next page. Additionally, elevated metals were also noted, especially for AOC-4 samples. Based on these results, DTSC is directing PG&E to analyze for those organic compounds identified on the table in wells MW-9, MW-10, MW-12, MW-57M, and MW-59. Metals analyses are also requested in well MW-9. The sampling event should be conducted concurrent with the upcoming June monthly sampling event (scheduled for the week of June 8, 2009).

According to PG&E, the initial groundwater samples for dioxin/furan analysis were collected on May 4-5, 2009 and were submitted to the laboratory for analysis on May 6, 2009. The dioxin/furans results and the results of the other analyses requested shall be provided to DTSC within 30 days of submission of the samples to the laboratory for analysis.

SOIL CONTAMINANT	LOCATION(S) DETECTED	DEPTH
Dioxins/Furans	AOC 4 (only analyzed at AOC 4)	0 to 4'
Polycyclic Aromatic Hydrocarbons	AOC 4. Also AOC 1, 9, 10, 11, 14	0 to 10'
Polychlorinated Biphenyls	AOC/SWMU 1, AOC 4, 9, 10, 11, 12	0 to 6'
Total Petroleum Hydrocarbons	AOC 4. Also AOC/SWMU 1, AOC 9,10, 11, 14, 300B	0 to 10/15'
1-Methylnaphthalene (8270SIM)	AOC 4, AOC 9	0 to 3'
2-Methylnaphthalene (8270SIM)	AOC 1, AOC 4, AOC 9	0 to 10'
Pesticides	AOC 9, AOC 11, AOC 14	0 to 0.5'
Bis (2-ethylhexyl) phthalate (8270C)	AOC 4. Also AOC 1, 300B	0 to 6'
Naphthalene (8270SIM)	AOC 4, AOC 9, SWMU 1	0 to 10'

As a result of soil sampling activities at AOC-4 (Debris Ravine) during the last quarter of 2008, PG&E acknowledged a burn dump operation at AOC 4 by a PG&E employee named Tony. As this new information has not been documented in any PG&E submittals to DTSC, including the RFA questionnaire certified by PG&E, DTSC is requesting that a formal description of this burning operation as well as a search for additional undocumented operations that may lead to environmental impacts (e.g. debris disposal at MW-24 bench) be submitted to DTSC within 90 days of receipt of this letter. PG&E's response should include, but not be limited to, answering the following questions: What materials/wastes were burned at the Topock Compressor Station?; What years did burning occur and how often was it conducted?; Where did the burning occur and was it limited only to AOC-4? Please note that during a site visit on May 7, 2009, DTSC staff also noted a small amount of potential burn debris in the freeway road cut at the west end of AOC 14, Railroad Debris site. PG&E should also provide info on how the burning operation was conducted?; and, Was the residual ash and burn waste always left in place after burning? Answers to these questions should be similarly provided for any additional waste management activities that PG&E discovers as part of this directive. Finally, in addition to submission of this information to DTSC in a letter or report, the same information should be documented in the history of waste

Ms. Yvonne Meeks
May 15, 2009
Page 3 of 3

management activities at PG&E Topock within the RFI/RI Volume 1 addendum to be submitted in the future in accordance with the current project schedule.

If you have any questions regarding this letter please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Aaron Yue', with a stylized flourish extending to the right.

Aaron Yue
Project Manager
Geology and Remediation Engineering

Enclosures

aky:050901B

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