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Secretary for
Environmental Protection



Department of Toxic Substances Control

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Sent Via Email

August 31, 2007

Ms. Yvonne Meeks
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Pacific Gas and Electric Company
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COMMENTS ON SOIL AND SEDIMENT DATA USABILITY ASSESSMENT
TECHNICAL MEMORANDUM, 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) and the Department of Interior (DOI), have reviewed the May 30, 2006 Soil and Sediment Data Usability Assessment Technical Memorandum. DTSC and DOI are jointly offering the comments below for your consideration.

General Comment:

1. Although the Data Usability Assessment Technical Memorandum is meant to evaluate the quality of historic sampling data only, DTSC also cautions PG&E in the use of historic data in that there could also be uncertainty associated with the accuracy in mapping the historic sampling locations.

Specific Comments:

2. Page 1, PG&E proposes that Category 2 data may still be used to support project objectives, including risk assessment, site characterization, etc... as long as the uncertainties are known. DTSC and DOI believe that the use of data for risk assessment purposes should be of a sufficient quality. PG&E should conduct a formal validation of all available laboratory data in this Category to reduce its uncertainties.

3. Page 1, Last paragraph: PG&E should specifically call out and identify, in a separate table, data that should be categorized separately and provide discussion on their uncertainties and limitations on their use. This data set should be introduced with limitation discussions during the Phase 2 DQO process for the Part A Soil Work Plan and not the risk assessment process (as suggested on page 7, Section 4) so that data gaps may be identified prior to Phase 2 sampling.
4. Page 2, Existing Soil and Sediment Data: Due to the loose interpretation of "sediment" in the past, PG&E should properly identify samples that are truly "sediments" and if those samples results were reported as "dry weight."
5. Page 3, Last paragraph: This paragraph described all laboratories to be certified. According to Table 2-1, Twining Lab for the 1988 samples and SCS Environmental Laboratory for the 1993 samples were both "unknown" for laboratory certification. PG&E must reconcile this discrepancy in the Technical Memorandum.
6. Page 6, Data Use Categories and Decision Logic: DTSC and DOI agree that Category 2 and 3 data can be of limited used with care. For investigatory purposes, we agree that these data can be used for qualitative evaluation and for determination of sampling locations; however, these data should be clearly presented in the work plans as data with limitations and uncertainties. DTSC and DOI notes that the previous Part A Soil Sampling Work Plan only identified historic data locations on its figures but did not properly differentiate the quality of the data. PG&E must properly label all future work plans when these data are incorporated or used. Furthermore, Category 3 data should not be presented in sampling reports for data interpretation due to their high degree of uncertainties.
7. Page 7, Last Sentence: Please clarify what is meant by "...data sets will be flagged as estimated in the RFI/RI database..." These data should not be flagged with the standard "J" flags as under data validation since these data have not been validated.
8. Table 2-1, Phases 1 and 2 closure certification report, Mittelhauser: These data should be submitted to laboratory for formal data validation before consideration for risk assessment.
9. Table 2-1, Analytical Data Report, Sediment and Sand Samples: These data should be submitted to laboratory for formal data validation before consideration for risk assessment.

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10. Table 2-1, Report, Site Investigation, Project 62793, Environmental Profiles: According to discussions in Attachment A, these data were recommended as Category 3 instead of Category 2. Agencies concur these data should be Category 3.
11. Table 2-1, Evaporation Pond Closure Report, Allwaste: Due to the lack of quality control, agencies can not accept these data as Category 2. These results should be considered Category 3. DTSC, however, notes that the closed evaporation ponds are not being reconsidered under corrective action; therefore, these data are of little significance to the current project.
12. Table 2-1, RCRA Facility Investigation Report, Ecology and Environment: There is a discrepancy between the superscripts for E&E. Agencies assume that the superscript of "1" in the Primary Laboratory column refers to the ELAC and State of New York Certification footnote. If so, the response under "Primary Laboratory Certification (California)" column should be "No." Please reconcile this discrepancy.
13. Page A-4, Attachment: Typo. Section A.6 should be labeled "A.5"

If you have any questions regarding the joint comments above, please feel free to contact me at (714) 484-5439 or Ms. Kris Doebbler of the Bureau of Land Management at (303) 236-3350.

Sincerely,



Aaron Yue
Project Manager
Geology, Permitting and Corrective Action Branch

aky:080703B

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