



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maziar Movassaghi
Acting Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

Sent Via Email

September 3, 2009

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

CONDITIONAL APPROVAL OF MODIFICATIONS TO THE COMPLIANCE
MONITORING PROGRAM, 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 your letter of July 3, 2008 proposing modifications to the Groundwater Monitoring Plan for Interim Measures (IM) No. 3 Injection Area Compliance Monitoring Program (CMP). The proposal reduces CMP sampling, analytical, and reporting frequencies. This includes reducing the sampling and water level measurement frequencies at observation wells located near IM No. 3 injection wells and dropping middle and deep observation wells from the CMP entirely.

A portion of PG&E's July 3, 2008 CMP modification proposal pertaining to utilizing field pH measurements and trigger levels for groundwater rather than laboratory based pH values was already approved by DTSC via email on December 12, 2008 (enclosed). With regards to the remaining proposals, DTSC is in general agreement with PG&E's proposed changes and approves them with the following conditions:

- DTSC does not concur with PG&E's proposal to drop intermediate- and deep-screened observation wells entirely from the CMP (see last paragraph of the Sampling Frequency section on the middle of page 5 of PG&E's July 3, 2008 letter as well as the first bullet on page 8 of the Summary section). DTSC directs PG&E to retain wells OW-1M, OW-1D, OW-2M, OW-2D, OW-5M, OW-5D and to sample them for the full analytical suite on a triennial (once every three years) schedule. One of the three well clusters (middle and deep wells only) should be

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sampled each year until all three clusters are sampled over a three year period. For example, OW-1M and D could be sampled on year one, OW-2M and D sampled on year 2, and OW-5M and D on year three. If this portion of the CMP is not modified after three years, the three year sampling cycle would repeat. This approach will allow for reduced monitoring, yet provide for early detection of any unexpected changes or upset in groundwater chemistry due to continued injection of newly treated water. The shallow wells in these clusters should continue to be sampled for the limited analytical suite on a semi-annual basis as specified in the July 3, 2008 letter.

- Per CH2M Hill's August 24, 2009 email request, the following language is included in the CMP plan regarding the timing of CMP manual water level measurements and IM-3 injection operation:

" Manual water level measurements at CMP wells will be performed only after verifying that the IM3 plant was operating normally for the day prior to and the day of the measurements. If within that time frame the IM3 injection flow rate was not within normal flow range, if backwashing was performed on an injection well, or if an unplanned shutdown occurred, then the water level measurement will be rescheduled. "

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

Sincerely,



Aaron Yue
Project Manager
Geological Services Branch

Enclosure

aky:090901A

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

From: Christopher Guerre
To: YJM1@pge.com
CC: Aaron Yue; Cliff Raley, CREQCB; Jay Piper, CH2M Hill; mbarackm@ch2m.com;
pbertucc@ch2m.com
Date: Friday - December 12, 2008 6:44 PM
Subject: PG&E Topock: pH Modification to the CMP

Yvonne,

DTSC has reviewed the portion of PG&E's July 3, 2008 letter requesting to modify the pH range utilized in the contingency plan for the IM3 injection area Compliance Monitoring Program. DTSC approves using a new trigger level range of 6.2 to 9.2 pH units that will be utilized with field pH data.

DTSC will respond to the other requests contained in the July 3rd letter at a later date.

Please call or email me if clarification is required.

Sincerely,

Chris A. Guerre, CHG
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