



## Department of Toxic Substances Control

Maureen F. Gorsen, Director  
5796 Corporate Avenue  
Cypress, California 90630



Arnold Schwarzenegger  
Governor



Linda S. Adams  
Secretary for  
Environmental Protection

Sent Via Email

October 21, 2008

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

COMMENTS ON JULY 2008 RCRA FACILITY INVESTIGATION AND REMEDIAL INVESTIGATION REPORT, VOLUME 2 AT 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 our review of the *July 2008 Final RCRA Facility Investigation and Remedial Investigation Report, Volume 2* (Report). In general, the Report is well written and contains the required information necessary to support the evaluation of a final remedy for the groundwater plume at the site. DTSC, however, notes several significant issues with respect to the identification of contaminants of potential concerns at the site and other minor discrepancies within the report. Our comments on the Report are enclosed in a memorandum from Mr. Christopher Guerre of the Geological Services Unit. DTSC also received formal comments from several stakeholders (listed below) from their review of the Report. These comments are also enclosed. As the lead agency, DTSC agreed to provide PG&E with directions with respect to management and responses to stakeholder comments. Except where noted below, DTSC directs PG&E to fully review and respond to all comments received.

Comments on Report:

1. DTSC GSU Memo – Please respond to all comments
2. Bert Koch, Metropolitan Water District of Southern California, August 14, 2008 – Please respond to all comments.
3. Leo S. Leonhart, Hargis + Associates, Inc., August 27, 2008 – Please respond to all comments except:

Ms. Yvonne Meeks  
October 21, 2008  
Page 2 of 2

Specific Comments 1. DTSC believes the statements currently in the Report reflect the importance of the area to all tribes. Additional clarifications of cultural significances of the area by specific Native American Tribes should be a topic of documentation for the up coming Environmental Impact Report.

4. Nancy Shopay, Envirometrix Corporation, September 4, 2008 – Please respond to all comments except:

Comment 3. The discussion of the settlement agreements with the Fort Mojave Indian Tribes is not specifically RFI/RI related. This topic should be addressed outside of the Report.

Comment 5. The issue of responsible party is not specifically RFI/RI related. This topic should be addressed outside the Report.

Comment 8. The questions raised by Ms. Shopay are valid and PG&E should provide a response to the comment. Please note that DTSC provided a response letter to the CRIT on September 17, 2008 and has directed PG&E to provide additional information. The findings from PG&E will be shared with the Consultative Workgroup.

5. Tom Vandenberg, Regional Water Quality Control Board, Colorado River Basin Region, September 5, 2008 – Please respond to all comments.

If you have any questions regarding our comments or this letter, please feel free to contact me at (714) 484-5439.

Sincerely,



Aaron Yue  
Project Manager  
Geology and Remediation Engineering

Enclosures

aky: 100802A

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