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Secretary for
Environmental Protection



Department of Toxic Substances Control

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Acting Director
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Arnold Schwarzenegger
Governor

Sent via e-mail

December 10, 2009

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

HISTORIC BURN ACTIVITIES AND DISPOSAL PRACTICES
PACIFIC GAS AND ELECTRIC COMPANY TOPOCK COMPRESSOR STATION
NEEDLES, CALIFORNIA (EPA ID NO. CAT080011729)

Dear Ms. Meeks:

The Department of Toxic Substances Control (DTSC) has evaluated the letters dated August 14, 2009 and October 15, 2009 from Pacific Gas and Electric Company (PG&E) regarding historic burning and waste disposal activities at the PG&E Topock Compressor Station. In your letters, you provide general information regarding several historic burning activities and the disposal of 55-gallon drums in a trench.

DTSC acknowledges PG&E's cooperation during the course of the environmental investigations at the site, however, DTSC is concerned that these historic activities are only now being reported to DTSC. It should be made clear that one of the objectives of the RCRA Facility Investigation/Remedial Investigation (RFI/RI) is to obtain a comprehensive understanding of all historic and current site activities that may have released hazardous substances at or near the site. DTSC is surprised to be informed of these newly discovered historic burn activities and waste disposal practices at this stage of the site characterization.

DTSC understands that new information will occasionally surface during the course of site investigations. To ensure a timely transfer of information, PG&E shall notify DTSC of any newly discovered historic releases within 48 hours of discovery. After the notification, PG&E shall provide DTSC with a letter report describing the activity and associated observations within ten working days of the new discovery. All newly discovered releases and/or historic/current activities/areas that may have released hazardous substances at or near the site shall be addressed in the RFI/RI.

Ms. Yvonne Meeks
December 10, 2009
Page 2 of 6

DTSC understands that PG&E previously reviewed the site's historical records for the RFI/RI. However, due to the recent discovery of these historic waste disposal practices, PG&E should evaluate if an additional historical review should be performed. DTSC reminds the facility that part of the RFI/RI process involves a comprehensive review of all historic and current site activities that may have released hazardous substances at or near the site. All newly discovered information should be incorporated and addressed in the RFI/RI.

Your letters indicate that several former and current PG&E employees were contacted and other employees will be contacted in the future regarding historic site activities. DTSC requests all the information from the interviews be submitted to DTSC. Please also inform DTSC of the schedule for future interviews.

According to your August 14, 2009 letter, materials from the site were burned and pushed over a ravine before PG&E started taking trash to the Needles Landfill in the 1970's. Based on this new information, DTSC is concerned with the waste disposal practices at the site prior to the 1970's. DTSC requests detailed information on how waste was disposed at the site prior to PG&E's usage of the Needles Landfill. All areas where waste may have been stored, treated and/or disposed of shall be included as areas of concern and properly investigated.

The following areas are described in your letter:

- Periodic burning of waste at a location between the water tanks and the debris ravine;
- Burning of waste near the edge of the debris ravine, then pushing it over the edge;
- Yearly fire training exercises involving the burning of scrap lumber, pallets, stacked wood, power poles, siding from the cooling towers, natural gas pipe and diesel oil at the bottom of the hill near the compressor station access road, in the flat area near the location of the current decon pad and the Transwestern Intertie Station;
- Yearly fire training exercises associated with the above item located east of the wash rack near the current visitor parking;
- 55-gallon drums were disposed in a shallow trench just south of the compressor station fence line, near the debris ravine.

Having a good understanding of where the noted activities took place is critical to the upcoming soil data gap evaluation which is scheduled to begin in January 2010. DTSC therefore requests that PG&E provide maps showing the locations of each of these areas at an appropriate scale that allows for accurate delineation of the former disposal/waste activity by January 15, 2010. PG&E shall perform additional research regarding these areas and shall evaluate if these areas should be considered as new areas of concern. All these areas shall be incorporated into the RFI/RI and properly investigated for all relevant contaminants.

Ms. Yvonne Meeks
December 10, 2009
Page 3 of 6

During a site tour by PG&E for DTSC staff on May 28, 2009, stockpiles of soil were observed adjacent to the access road east of the Interim Measure 3 (IM-3) building (photo below). DTSC understands that these are drill cuttings that are temporarily stockpiled in this area. DTSC requests additional information and documentation regarding these soil stockpiles. The source and usage of the soils from these stockpiles should be determined. If these stockpiles are sourced from investigation areas or other areas of potential contamination, then the soil stockpile area may be considered as an area of concern. Furthermore, measures should be taken to properly contain, profile, and manage the potentially contaminated soils.



Soil stockpiles east of IM-3

Ms. Yvonne Meeks
December 10, 2009
Page 4 of 6

On April 11, 2008 another soil stockpile was noted by DTSC on the north side of the road leading to the IM-3 treatment plant in the general vicinity of well MW-25 (see photograph). As with the above-discussed stockpiles, DTSC also requests information regarding this stockpile.



Soil stockpile north of MW-25 - view to east

Ms. Yvonne Meeks
December 10, 2009
Page 5 of 6

During a site visit on May 7, 2009, DTSC staff identified two areas of interest in the vicinity of the Topock Compressor Station. First, as illustrated in the two following photographs, black slag or slag-like waste and tan refractory brick were observed north of the PG&E access road in the vicinity of the old crossing of the former Redrock Bridge. The waste was exposed over a significant portion of the surface of the north facing slope. DTSC requests information if the waste is related to PG&E activities.



Refractory brick and black slag



Black slag at the surface

Ms. Yvonne Meeks
December 10, 2009
Page 6 of 6

Finally, DTSC field observations at the Railroad Debris Site (AOC-14) identified potential burn material along the I-40 road cut near the southwest corner of AOC-14. DTSC requests that PG&E revisit this area and sample this area for a comprehensive suite of constituents as part of the RFI/RI.

DTSC appreciates PG&E's efforts in obtaining a comprehensive understanding of the historic and current site activities which is necessary to properly investigate the site. If you have any questions please feel free to contact me at (714) 484-5423 or Jose Marcos at (714) 484-5492.

Sincerely,



Karen Baker, CHG, CEG
Performance Manager
Geological Services Branch

cc: PG&E Topock Consultative Workgroup Members – Via e-mail
PG&E Topock Technical Workgroup Members – Via e-mail
Native American Tribal Contacts for the PG&E Topock Project – Via e-mail