



Department of Toxic Substances Control



Linda S. Adams
Secretary for
Environmental Protection

Maziar Movassaghi
Acting Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

Sent via e-mail

March 10, 2010

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

PART B SOIL INVESTIGATION CLARIFICATION COMMENTS AND ADDITIONAL DIRECTION, PACIFIC GAS AND ELECTRIC COMPANY TOPOCK COMPRESSOR STATION NEEDLES, CALIFORNIA (EPA ID NO. CAT080011729)

Dear Ms. Meeks:

This letter is with regards to the ongoing activities related to the *Draft RCRA Facility Investigation/Remedial Investigation (RFI/RI) Soil Investigation Work Plan Part B* (Part B Workplan), dated December 2007, for the Pacific Gas and Electric Company's (PG&E) Topock Compressor Station. Comments on the draft Part B Workplan were submitted by the Department of Toxic Substances Control (DTSC), the U.S. Department of the Interior (DOI), tribes and stakeholders in 2008. As part of PG&E's evaluation of the comments, PG&E requested clarification regarding some of the comments provided by DTSC and DOI.

DTSC has evaluated your request and provides the following clarifications in the attached document. The first part of the attachment consists of three items while the second portion is composed of a table with four items. The attachment was originally submitted by PG&E and DTSC is now providing clarifying responses either at the bottom of each question/comment or in the corresponding column. DTSC's clarifying comments address only comments directly addressed to DTSC or where DTSC's previous comments are cited. Comments from other agencies or stakeholders where PG&E requested additional clarification are not addressed in this letter.

DTSC and DOI have agreed that the approach for the Part B soils activities should follow the same path as the current Part A soils investigations with respect to having an accepted Data Quality Objectives (DQOs) Technical Memorandum prior to submitting a complete


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revised draft Part B Workplan. This will ensure that actions proposed in the workplan will be consistent with the DQO's for the Part B investigations. PG&E should therefore initiate the preparation of the Part B DQOs Technical Memorandum. DTSC's hope is that the preparation of the Part B DQOs will be conducted expeditiously considering that substantial experience has been obtained in the development of the Part A DQOs. PG&E should update the project schedule reflecting this change.

It should be noted that PG&E is still required to address all comments from DTSC on the December 2007 draft Part B Workplan and ultimately incorporate all applicable revisions in the revised draft Part B Workplan.

DTSC appreciates PG&E's efforts and cooperation regarding this issue. If you have any questions please feel free to contact me at (714) 484-5423 or Jose Marcos at (714) 484-5492.

Sincerely,


for 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

Attachment – Clarifications to Comments

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PG&E Comment #1: DTSC GSU Specific Comment 48 conflicts with DOI Comment 56

DTSC and DOI recommend incompatible approaches regarding monitoring well installation. DTSC and PG&E agreed to install monitoring wells as part of the Part B RFI/RI Soil Investigation to assess additional sources of groundwater contamination other than Bat Cave Wash. Agreement was reached and monitoring well specifications (i.e., number of wells, depths, and locations) were decided during technical meetings between DTSC and PG&E on October 23 and 25, 2007. DTSC Specific Comment 48 further expands the potential number of monitoring wells, and locations and depths for these wells.

DOI Specific Comment 56 states that monitoring wells must be installed in areas of highest and deepest soil contamination results. DOI's approach requires that soil data from the Part B RFI/RI Soil Investigation be used to determine the monitoring well locations. This would result in the monitoring wells being installed during a later phase of investigation.

DTSC Response: As PG&E knows, the path forward regarding well installation on the compressor station has changed since groundwater contamination was detected in bedrock in the East Ravine area. The Part B well installation component will be modified and conducted separately from the rest of the soils investigation. Please note that additional monitoring wells may also need to be installed during a later phase of investigation if warranted based on results of future soils data.

PG&E Comment #2: DTSC's general acceptance of the data quality objectives (DQOs) (HERD Comment 1) conflicts with DOI's extensive comments requesting further details in the DQOs.

DTSC has generally accepted the DQOs as written, after the inclusion of HERD's specific comments, which will not significantly modify the current DQOs. DOI comments request much greater detail and specificity and certainty, including confidence levels on site characterization. Both DTSC and DOI were provided copies of the draft DQO Table (Table 3-1) last summer, and provided comments on the table. These comments were addressed and incorporated into Table 3-1 contained in the Work Plan. Current DOI comments on the work plan include: Detailed comments on DQO Problems Statements 2 and 5 (comments 26 - 38), Comment requesting much more detail on how assurance will be provided that adequate sampling will be conducted (including comments, 1, 12, 14, 19, 22, 23, 40, 45, 46, 48, 50, 67, 82, 84, and 90), Specific comments on how certain steps in the DQOs should be worded (e.g., comments 26, 27, 33, and 34).

DTSC Response: DTSC does not believe that there is any conflict with respect to comments pertaining to the DQOs. Recent discussions with regards to the development of the Part A DQOs, show that independent comments from the different agencies can be adequately

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resolved. PG&E should therefore address all comments from the agencies and take advantage of the experience gained from the recent ongoing discussions for the Part A DQOs.

PG&E Comment #3: FMIT Comments 1 and 4 conflict with overall direction from DTSC and DOI (which requires more investigation than described in the work plan) and CRIT comments 3, 6, 7, and 8.

The main focus of the FMIT comments is to urge DTSC to do everything possible to limit further investigation/intrusion into the sacred ground, and indicate that the proposed sampling in the draft Part B work plan effort is excessive (Comment 1). FMIT Comment 4 specifically opposes the installation of wells. Conversely, both the DTSC and DOI comments request more extensive investigation. The CRIT comments also suggest some additional sampling, and recommend more aggressive sampling now to avoid the delays associated with a phased investigation.

These conflicting directions and approaches are preventing PG&E from responding to these comments, which may impact the overall schedule of the RFI/RI Soil Investigation Work Plan Part B. PG&E requests that DTSC and DOI resolve these conflicts and provide further direction so PG&E can appropriately respond to comments, and complete revisions to the final Part B work plan.

DTSC Response: PG&E should first address all comments based on the technical needs of the project. DTSC is open to approaches that can minimize impacts to the area caused by the characterization activities. However, the initial characterization proposal must be based on sound science. Tribes and stakeholders will have the opportunity to provide input regarding the proposed plan and discuss all of their concerns with the agencies and PG&E. Additional revisions to the proposal are anticipated and will be needed to address comments obtained from the stakeholders. If applicable, DTSC recommends that PG&E reconsider using XRF and other screening techniques to potentially reduce investigation impacts and hopefully also expedite certain phases of the investigation. DTSC understands that PG&E is currently utilizing the XRF for the AOC-4 removal activities.

Agency	Comment No.	Agency Comment	PG&E Question	DTSC Response
DTSC - GSU	Specific 34	<p>Section 5.14.1 – AOC 18 - Combined Wastewater Transference Pipeline</p> <p>Sampling should be conducted on the “outlet” side of the wastewater treatment system. Historic sampling has all occurred on the “inlet” side of the units. For the purposes of the Part B Workplan, samples should be collected from the units to the fence line.</p>	<p>Based on historical research conducted during the RFI Topock Compressor Station – Volume 1, the wastewater transference pipeline only had one outlet (all units were piped together), and discharge was to Bat Cave Wash/Evaporation ponds and portable waste oil storage tank. The Part B work plan proposes sampling in these areas. Why does DTSC recommend sampling from the units to the fence line?</p>	<p>DTSC is concerned that the discharge pipelines could have leaked during the many years it operated. Additionally, the units (e.g., sludge drying beds) could have overflowed and would have likely discharged wastewater towards Bat Cave Wash. Higher contaminant concentrations would be assumed to occur closer to the unit/pipeline when compared to Bat Cave Wash where periodic storm events would mix waste residues.</p>
DTSC - GSU	Specific 51	<p>Section 6.3.4.1 – Monitoring Well Specifications</p> <p>Although the text specifies 2-inch Schedule 40 polyvinyl chloride (PVC) casing for wells less than 300 feet, DTSC may require alternative well construction materials based on site specific conditions.</p>	<p>Can DTSC provide the well specifications prior to the start of monitoring well drilling? This will ensure that the proper well materials are on-site, which will prevent potential delays in field work.</p>	<p>The intent of this comment was to provide flexibility in constructing wells should problems arise and/or in order to minimize the number of boreholes drilled at the site (and eliminate the need for repeating the federal consultative processes). PG&E should list several alternative construction materials and designs to address this concern. Something similar to the East Ravine Work</p>

Agency	Comment No.	Agency Comment	PG&E Question	DTSC Response
DTSC- GSU Photo Comments	8	<p>The Photo File contains a photograph, dated April 16, 1951 (see Photo 4 - PG 86), of excavation activities for the waste oil sump that is located south of the tank farm. The RFI – Volume 1 describes this sump as measuring approximately 15 to 20 feet deep and 6 feet square. It was originally constructed as a concrete sump, but is now equipped with an inner steel liner and the original concrete structure acts as secondary containment (CH2M Hill, 2007). As this large waste sump has been in operation for over 50 years, it is recommended that environmental samples (soil matrix and/or soil gas) be collected to assess potential releases to the environment. Additionally, environmental sampling of the adjacent tank farm may be warranted as it has also been in operation for over 50 years. PG&E should provide information to DTSC regarding the tank farm (e.g., documents of tank conditions, inspections, replacement, releases) to properly assess the need to characterize potential releases from the unit. The complete closure report is also requested for the former scrubber sump to ensure an appropriate analytical suite was used during its closure. PG&E should consider investigation of this area absent</p>	<p>The scrubber sump is not located in the same unit and area south of the tank farm. Was the inclusion of the scrubber sump in this comment intentional?</p>	<p>Plan is requested. Drilling will now also need to address bedrock well installation. The Part B well installation component will be conducted separately from the rest of the soils investigation.</p> <p>For clarity, the last two sentences regarding the scrubber sump, "The complete closure report is also requested for the former scrubber sump to ensure an appropriate analytical suite was used during its closure. PG&E should consider investigation of this area absent information regarding its closure." should be considered a separate comment. DTSC understands the scrubber sump is located in another area (lower yard area).</p>

Agency	Comment No.	Agency Comment	PG&E Question	DTSC Response
DOI	General 87	<p>information regarding its closure.</p> <p>Why is metals data being compared to screening levels? DOI understands that DTSC has requested that the contamination be delineated to background concentrations</p>	<p><i>Our understanding is that the requirement to characterize metals to background is outside the fence line only.</i></p>	<p>DTSC: It may be advantageous to compare site data to background as a general rule even if within the fence line to better understand the distribution of detected contaminants and also in areas near the perimeter that may discharge offsite.</p>