



Linda S. Acams
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

July 2, 2009

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

PACIFIC GAS AND ELECTRIC COMPANY PROPOSAL TO DEFER THE PART B SOIL INVESTIGATION AT THE TOPOCK COMPRESSOR STATION, NEEDLES, CALIFORNIA (EPA ID NO. CAT080011729)

Dear Ms. Meeks:

The Department of Toxic Substances Control (DTSC) has evaluated the proposal by Pacific Gas and Electric Company (PG&E) as outlined in the September 30, 2008 letter to defer site characterization activities within the fence-line of the Topock Compressor Station until the facility ceases operations. PG&E is obligated to evaluate all activities that may impact human health or the environment as part of the Resource Conservation and Recovery Act corrective action compliance.

In December 2007, PG&E submitted the *Draft RCRA Facility Investigation/Remedial Investigation (RFI/RI) Soil Investigation Work Plan Part B* which describes the proposed investigation within the compressor station fence line. In March 2008, comments on the Part B Work Plan were transmitted to PG&E from DTSC, the Fort Mojave Indian Tribe, the Colorado River Indian Tribe and the US Department of Interior. A draft response to comments document was provided by PG&E in May 2008 but PG&E subsequently requested the deferral of the RFI/RI Part B investigations.

PG&E proposes to take the following actions in lieu of full site characterization at the compressor station:

Continue documenting historical chemical usage at the compressor station as new information is obtained.

Documenting measures to ensure protection of worker health for current and future workers at the compressor station.

Preventing off-site migration of potential contaminants from the compressor station.

Establishing an appropriate land use covenant restricting land within the compressor station fence line to industrial use.

Providing financial assurance for any liabilities associated with phasing investigative activities, and to complete soil characterization and the final remedy upon decommissioning the compressor station.

Amending the Corrective Action Consent Agreement to reflect the schedule for phasing the Part B RFI/RI soil investigation.

In order to assess the potential for off-site migration of contaminants, PG&E proposes to collect surface soil samples and install three groundwater monitoring wells on-site, and if needed, remove affected soils or cover/stabilize such soils in place.

DTSC believes that characterizing the nature and extent of on-site contamination sooner, rather than later, is necessary for the following reasons:

- Currently, there is a lack of understanding regarding the relationship between on-site contaminant sources and off-site contamination, the nature and extent of on-site contamination must be adequately characterized to understand the dynamics between on-site sources and off-site contamination.
- The nature and extent of on-site contamination must be adequately characterized to properly determine if there is an existing or potential threat to human health (i.e., on-site workers) and the environment, including groundwater and offsite ecological receptors.
- The planned removal of debris from AOC-4 brings forward the importance of thoroughly understanding the existing on-site sources of contamination to determine if there is a need to take immediate action to mitigate the migration of and/or exposure to on-site contamination.
- By understanding the nature and extent of on-site contamination, PG&E can be better informed to prepare effective health and safety protocols so that site workers would not be inadvertently exposed to or relocate contamination during routine site operation and maintenance.

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- A more accurate financial assurance estimate can be achieved with a better understanding of the on-site contamination.

PG&E previously mentioned that certain on-site locations may be difficult to access due to piping and other features. DTSC notes that PG&E has historically been able to perform operational repair and maintenance activities involving careful removal of soils to significant extent and depth. PG&E's experience with soil removal for these maintenance/repair activities should enable PG&E to sample most areas that are normally difficult to access.

After careful evaluation of PG&E's proposal, DTSC has determined that the best course of action is to continue to proceed with the established RFI/RI Part B investigation as originally proposed by PG&E in 2007. PG&E shall move forward by coordinating with DTSC and all the other parties involved in addressing all the comments provided on the draft RFI/RI Part B Work Plan and the subsequent implementation of the work plan. DTSC directs PG&E to submit a modified site schedule to re-establish all Part B activities by August 3, 2009.

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