



*Pacific Gas and
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August 17, 2007

Aaron Yue
Project Manager
California Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, CA 90630

Subject: Proposal for Addendum to the RCRA Facility Investigation/Remedial Investigation, Volume 1 – Site Background and History Report, Pacific Gas and Electric Company, Topock Compressor Station, Needles, California (EPA ID NO. CAT080011729)

Dear Mr. Yue:

This letter documents Pacific Gas and Electric Company's (PG&E's) proposal to implement the California Department of Toxic Substances Control (DTSC) requirement (DTSC's letter dated July 11, 2007) to include the MW-20 bench and the Interim Measures (IM) No. 3 treatment plant within the RCRA Corrective Action effort at the PG&E Topock Compressor Station.

As discussed between DTSC and PG&E in a conference call on July 18, 2007, PG&E proposes that the mechanism to add additional solid waste management units (SWMUs) or areas of concern (AOCs) to the RCRA Corrective Action effort is through an addendum to the Resource Conservation and Recovery Act (RCRA) Facility Investigation/Remedial Investigation (RFI/RI), Volume 1 – Site Background and History Report, Pacific Gas and Electric Company (PG&E), Topock Compressor Station, Needles, California. Adding additional SWMUs or AOCs that may be identified in the future (due to the ongoing operations of the Compressor Station and remedial facilities) through addenda would allow the RCRA Corrective Action process to move forward for the currently identified SWMUs and AOCs.

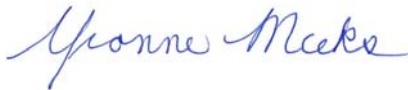
Specifically the addendum to the RFI/RI Volume 1 is proposed to include operational history information similar to the other identified SWMUs and AOCs at the Topock Compressor Station documented in RFI/RI Volume 1. Types of information to be reviewed for the addendum would include operational records of materials types and quantities, material storage facilities, construction drawings and specifications, photographs, and employee interviews. Based on a review of this information, the addendum will conclude whether the closure process is complete, or whether the facilities will be carried forward in the RCRA Corrective Action process. Because operations at these facilities are being modified and may be

further modified in the future and the addendum should encompass all site operations, PG&E proposes to submit the addendum addressing the MW-20 bench, the IM No. 3 treatment plant, and other SWMUs and AOCs (if any) to DTSC in mid 2009. It is likely that any addendum prepared before this time would necessitate an addendum to the addendum, resulting in a less clear record of documentation.

It should be noted that, similar to other SWMUs and AOCs at the Compressor Station, there are ongoing operations at the MW-20 bench and IM No. 3 treatment plant. Should the addendum conclude that these facilities are to be carried forward in the RCRA Corrective Action process, the appropriate time for investigation and cleanup (as necessary) would be when they are no longer operating facilities, and when there is unobstructed access for investigation and potential remediation.

Please contact me at (805) 234-2257 if you have any questions regarding the proposed plan and schedule for the RFI/RI Volume 1 addendum.

Sincerely,



Yvonne Meeks

cc: Karen Baker/DTSC
Kris Doebbler/DOI