



Department of Toxic Substances Control



Terry Tamminen
Agency Secretary
Cal/EPA

Edwin F. Lowry, Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

February 9, 2004

Via Facsimile and U.S. Mail

CERTIFIED MAIL

7003 0500 0003 8926 5565

Ms. Linda Gonsalves, P.E.
Senior Project Manager
Pacific Gas and Electric Company
375 N. Wiget Lane
Walnut Creek, California 94598-2412

Dear Ms. Gonsalves:

REQUEST FOR INTERIM MEASURE WORKPLAN No. 2 (CONVERSION OF EXISTING GROUNDWATER MONITORING WELLS TO EXTRACTION WELLS): PACIFIC GAS AND ELECTRIC COMPANY, TOPOCK COMPRESSOR STATION, NEEDLES, CALIFORNIA (EPA ID NO. CAT080011729)

The purpose of this letter is to require Pacific Gas and Electric Company (PG&E) to prepare and submit Interim Measures Workplan No.2 (IM Workplan No. 2) to immediately begin pumping, transport and disposal of groundwater from existing monitoring wells at the MW20 cluster at the Topock Compressor Station in Needles, California. This immediate action is required in order to prevent and/or mitigate any possible future impacts to the beneficial water resource (Colorado River).

Pursuant to required weekly sampling, the Department of Toxic Substances Control (DTSC) has received information from PG&E on February 3, 2004 that reports concentrations of hexavalent chromium of one-hundred-eleven (111) parts per billion (PPB) in groundwater from monitoring well MW34-80. This monitoring well is located approximately 150 feet from the edge of the Colorado River - a major drinking water resource. DTSC considers this a significant occurrence that requires immediate attention to mitigate any future impacts to the river. Therefore, DTSC has determined that this activity is exempt from the California Environmental Quality Act (CEQA) requirements in accordance with the Implementing Guidelines for California Code of Regulations, title 14, Division 6, Chapter 3, Section 15269(c).

DTSC is directing PG&E to prepare and submit IM Workplan No.2 in order to immediately begin pumping, transport and disposal of groundwater from the above-

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referenced wells. PG&E shall demonstrate reversal of the groundwater gradient away from the river. If pumping from the above-referenced monitoring wells does not immediately demonstrate groundwater gradient reversal away from the river, PG&E shall convert and begin pumping from additional wells and/or install additional monitoring or extraction wells as necessary to demonstrate groundwater gradient reversal away from the river. This immediate action is required in addition to the submission of initial Interim Measures Workplan (which shall be known as IM Workplan No.1) due to DTSC on February 11, 2004.

Pursuant to Section IV.A. of the Corrective Action Consent Agreement, signed by PG&E and DTSC in February 1996, DTSC directs PG&E to submit IM Workplan No.2. Because of the need for immediate action, IM Workplan No. 2 shall be submitted to DTSC for review and approval by February 17, 2004. DTSC anticipates that PG&E will obtain all appropriate permits and right-of-way access agreements such that groundwater extraction will commence no later than February 27, 2004, subject to the approval from applicable federal agencies. DTSC requests that PG&E submit a written response to this letter indicating PG&E's acknowledgement and acceptance of these additional interim measures requirements by February 11, 2004.

In addition, DTSC is directing PG&E to immediately begin monthly sampling of surface water sampling locations R-22, R-27, R-28, RRB, CON and I-3. DTSC also requests an additional river sampling point upstream of CON along the main course of the Colorado River. This monthly surface water sampling shall commence during the scheduled February 18 and 19, 2004 groundwater sampling event. PG&E should expedite the laboratory analysis for these monthly surface water sampling events and report the findings to DTSC as soon as possible.

If you have any questions regarding this letter, please contact Mr. Norman Shopay at (510) 540-3943.

Sincerely,



Karen Baker, C.E.G., C.H.G., Chief
Geology, Permitting and Corrective Action Branch

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