



**Pacific Gas and  
Electric  
Company**

**Yvonne J. Meeks**  
Topock Project Manager  
Chromium Remediation Project Office  
Gas Transmission & Distribution

6588 Ontario Road  
San Luis Obispo, CA 93405

*Mailing Address*  
4325 South Higuera Street  
San Luis Obispo, CA 93401

805.546.5243  
Internal: 664.5243  
Fax: 805.546.5232  
E-Mail: YJM1@pge.com

July 27, 2007

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

Subject: Updates and Modifications to the PG&E's Topock Interim Measures Performance  
Monitoring Program  
PG&E Topock Compressor Station, Needles, California

Dear Mr. Yue:

This letter documents the updates and modifications to the Interim Measures Performance Monitoring Program (PMP) at the Pacific Gas and Electric Company (PG&E) Topock Compressor Station discussed during the meeting held July 10, 2007 between representatives of the California Department of Toxic Substances Control (DTSC) and PG&E.

The updates and modifications to the Groundwater and Surface Water Monitoring Program (GMP) that were discussed at the July 10, 2007 meeting were documented in separate correspondence dated July 20, 2007.

#### **1. Revise Monthly PMR Submittal Format**

The purpose and content of the Monthly IM performance monitoring reports (PMRs) was discussed during the July 10, 2007 meeting and DTSC agreed that continuing routine Monthly PMRs was not warranted based on the current IM operations strategy (maintaining the target pumping goal of 135 gpm throughout the year) and the successful performance during the past 2-3 years of IM operation. The existing submittal schedule and content of the Quarterly and Annual PMRs will not be changed.

DTSC and PG&E further discussed the need for and provision for submitting a **notification letter report** to document any monthly reporting period in which the IM extraction system was offline for an extended period. Based on analysis of current pumping capture during low river stage, a period of extraction system shutdown, that exceeded 20% of any reporting month, was defined as an "extended offline period" that would require a notification report. The notification letter report would fully describe the time and duration of the shutdown periods, the reasons for shutdown, and provide the performance monitoring data (flow rate and hydraulic data/gradients measured, etc) for the reporting period. It would be submitted by the 20<sup>th</sup> of the month following the reporting period, in line with the current schedule established for monthly reporting.

The revised reporting format and timing for PMRs will take effect upon DTSC approval. Note: the data collected for the July reporting period is included in the 2<sup>nd</sup> Quarter 2007 PMR and therefore a separate monthly PMR for July is not prepared under the current schedule. DTSC approval of this change is requested by September 1, 2007 to affect the reporting format for the monitoring data collected in August 2007.

## **2. Use More Optimally-located Well Pairs for Reporting Landward Gradients**

During August-September 2006, initial discussions between DTSC and PG&E were held to discuss selection and use of more optimally-located wells pairs for measuring landward gradients for the current dual-pumping IM extraction system (TW-3D and PE-1). PG&E's 2006 Annual PMR described and presented rationale for using three well pairs (MW-31-135/MW-33-150, MW-45-95/MW-34-100, and MW-45-95/MW-27-85) for reporting the monthly average landward gradients produced by pumping from TW-3 and PE-1 system. It was agreed during the July 10 meeting that future PMRs should report measured gradients for the three well pairs proposed in the 2006 Annual PMR. Although not specifically documented in the 2006 Annual PMR, the three well pairs currently used for gradient measurement/reporting (see 2006 Annual PMR) would be used in the event that pumping from PE-1 was no longer occurring.

The use of the modified set of gradient control wells for PMP reporting for the dual-well pumping system will take effect upon approval of this modification. The monthly average gradients for the modified well pairs will be maintained and reported in the future Quarterly and Annual PMRs, under the new schedule defined in Item #1 above.

## **3. Modify requirement for Installation and Operation of additional IM Extraction Wells.**

In July 2006, PG&E requested DTSC approval to modify the requirement for immediate installation and operation of additional IM extraction wells as a contingency if the current IM extraction wells were not able to maintain landward gradients. This requirement was originally stated in DTSC's February 14, 2005 IM directive letter. At that time, the current IM pumping system had only operated for a brief time and there were limited data available regarding its effectiveness. Subsequently, the current IM pumping system has consistently demonstrated the ability to maintain landward gradients. Therefore, there is less concern about the possible need for an immediate contingency response to install additional extraction wells.

Consequently, DTSC agreed on July 10, 2007 that the requirements of DTSC's February 14, 2005 letter Enclosure A, Item V.2.c for installation and operation of additional extraction wells within 30 days and 45 days, respectively, no longer apply. Instead, these requirements are modified so that in the event additional extraction wells are required, PG&E and DTSC will immediately develop a project-specific schedule to complete required work plan(s), permitting, well installation, and pipeline construction activities.

## **4. Do Not Incorporate New California Slant Wells in PMP Hydraulic Monitoring**

The Work Plan for the California slant drilling project proposed incorporating the new slant monitoring wells (MW-52 and MW-53) into the PMP hydraulic data collection program. Due to the uncertainty inherent in measuring water levels with the high degree of accuracy needed for PMP monitoring, it is not practical to incorporate the new California slant wells into the PMP

Mr. Aaron Yue

July 27, 2007

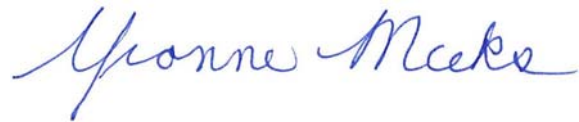
Page 3 of 3

hydraulic monitoring program. In addition, the water levels in the vertical monitoring wells in the MW-43 cluster provide adequate control on water levels in this portion of the site.

Consequently, during the July 10, 2007 meeting, DTSC agreed with the recommendation to not incorporate the California slant wells into the PMP hydraulic monitoring program.

Please call me at (805) 234-2257 if you have any questions or would like additional information.

Sincerely,

A handwritten signature in blue ink that reads "Yvonne Meeks". The signature is written in a cursive, flowing style.

Enclosure

cc: Chris Guerre/DTSC  
Karen Baker/DTSC  
Kevin Sullivan/PG&E