

January 27, 2014

## **Addendum and Errata - Soil RCRA Facility Investigation/ Remedial Investigation Work Plan, Pacific Gas and Electric Company Topock Compressor Station, Needles, California.**

This submittal provides minor revisions and additional information to supplement Sections 2.1.3 and 2.1.4 of the Soil RCRA Facility Investigation/Remedial Investigation (RFI/RI) Work Plan, submitted January 14, 2013.

### **Additional Information on Marking Boundaries of Staging and Investigation Areas**

The State of California Department of Toxic Substances Control (DTSC) has requested clarification on how soil investigation activities will be constrained to defined project areas. Many of the staging areas have been used for staging during previous RFI/RI related activities, and all are located in previously disturbed and existing operational areas with either existing natural topographic boundaries or fencing that defines the staging area boundaries. Fencing is in place around the compressor station, the evaporation ponds, and the Interim Measure (IM)-3 treatment plant. A combination of fencing and topographic boundaries defines the staging area on the Transwestern bench below the Compressor Station. Topographic boundaries (steep slopes) define the staging areas near the Route 66 sign, on the MW-20 Bench, and along the roadway leading from the MW-20 Bench to the IM-3 Treatment Plant. The staging along Park Moabi Road is only partially defined by topography. In areas where natural boundaries or fencing are not sufficient to define the staging area, PG&E will temporarily mark the boundaries of the staging areas with traffic cones, caution tape, or straw wattles. During the operation of IM-3 injection wells, the tribes expressed a preference for unobtrusive, low-visibility boundary markers, so straw wattles were used as the primary means of boundary marking, with other delineation devices used only in strategic locations. It is anticipated that placement of straw wattles will likely be the preferred way of marking staging area boundaries for the soils investigation work.

Traffic cones and caution tape will be the primary means of marking boundaries around investigation areas that are not defined by topography, or, in the case of Area of Concern (AOC)-1 near the mouth of Bat Cave Wash, dense vegetation. In areas where sampling locations are adjacent to the project boundary and there are no natural features that mark the boundary, temporary cones and caution tape will be put in place during the sampling work and the sampling crew will be briefed on the need to remain inside the boundaries of the project area.

All activities related to the Topock remediation project are performed with a heightened awareness and sensitivity by all workers regarding activities and access in the area. All field workers will be specifically directed to stay within the project area boundaries. Workers are also required to participate in cultural sensitivity training, training which the Tribes are invited to participate. The soil investigation will be directed by experienced Topock field workers, who know the requirements for working at Topock, and understand the importance of staying on the defined access routes and paths. Soil Work Plan Section 5.3 - Archeological Surveys and Reviews describes the culturally sensitive nature of the area, the proposed pre-investigation survey field verifications will be performed prior to soil investigation activities, and

workers are required to attend cultural sensitivity training. Standard procedure will include a field verification of the archaeological and historical site survey to ensure all archaeological and historical sites are avoided.

### **Additional Information on Activities in Staging Areas**

Staging areas will generally be used for parking of vehicles and other equipment such as drilling rigs, excavators, and equipment trailers. Because it is not known what other activities will be occurring at the same time as the soil sampling, it is not possible to precisely plan which staging areas will be used or define what activities will take place in each individual staging area. There may be various types of vehicles or equipment parked at different staging areas at different times during the investigation. Although soil sampling does not require large stockpiles of materials, staging areas may be used for storage of bentonite and/or cement used to seal boreholes. These materials would typically be in bags, stored on pallets, and covered with tarps or plastic sheeting. It is anticipated no more than 6 pallets would be stored on site at any one time during this investigation.

As described in Section 2.1.4 of the work plan, displaced soil resulting from activities presented in this work plan and identified for long-term storage will be stored within the PG&E parcel (if soil originated from within the compressor station fence line) and at the Compressor Station evaporation ponds (if the soil originated from outside the compressor station fence line). Decontamination of large equipment will be conducted on the existing decontamination pad in the staging area on the Transwestern Bench, as shown in Figure 2-2 of the work plan. (Decontamination of small sampling tools will be conducted at the sample sites, with all decontamination water contained in portable containers and transferred to the decontamination pad at the end of the work day).

### **Revisions to Access Routes on Figures 2-1 and Figure 2-2**

The following revisions were made to the access routes shown on Figure 2-1 and 2-2:

1. The access route from the IM-3 Treatment Plant down into Bat Cave Wash was revised to show that it follows an existing path.
2. The access route from IM-3 Treatment Plant along National Trails Highway west toward the IM-3 Injection Wells was removed because there is no anticipated need for travel along this route.
3. An access route to sample locations AOC-28a and AOC-28b was added.



