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September 22, 2015

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

Subject: Request for extension to obtain access agreements for the completion of work under the Soil RFI/RI Workplan for the Topock Remediation Project, Needles, California.

Dear Mr. Yue:

In order for Pacific Gas & Electric (PG&E) to implement the Soil RCRA Facility Investigation/Remedial Investigation Workplan (January 2013) and Addendum and Errata (January 2014) for work performed beyond the facility boundary of the Topock Compressor Station, PG&E will obtain access rights from owners and/or right-of-way holders of property impacted by the soil investigation. Under Stipulation XI(2) of the Corrective Action Consent Agreement (CACA) issued in February 1996, PG&E shall "use its best efforts to obtain access agreements necessary to complete work required by this Consent Agreement from the present owners of such property within thirty (30) days of approval of any workplan for which access is required." DTSC issued its approval of the Soil RFI/RI Workplan on August 24, 2015. Because PG&E cannot obtain access within 30 days of workplan approval, in accordance with the CACA, PG&E is submitting this written notification regarding its efforts to obtain access.

PG&E is in the process of seeking and obtaining rights to implement the soil investigation for property under the jurisdiction of the California Department of Transportation (Caltrans), San Bernardino County (County), BNSF, and the Arizona Department of Transportation (ADOT). Although PG&E is not seeking encroachment permits from Caltrans and the County, and instead is relying on the CERCLA permit exemption, PG&E has prepared materials to submit to both entities that describe the location and extent of the soil investigation activities on the subject properties. With submittal of the materials, PG&E will seek concurrence that PG&E may conduct the soil investigation activities within the Caltrans and County road right-of-ways. PG&E will also obtain a temporary private crossing agreement from the BNSF for use of a culvert during soil investigation activities. Although no soil investigation activities occur in Arizona, PG&E is also seeking concurrence from ADOT that PG&E may access its property because the anticipated lane closure requirements from Caltrans will extend into Arizona by approximately 1,600 feet.

Although PG&E was not able to obtain access within 30 days after workplan approval, because PG&E had to first finalize a contract for the work and then prepare the engineering materials applicable to the subject properties, PG&E is seeking to obtain concurrence regarding access from Caltrans, the County, BNSF and ADOT within four weeks of submittal of the relevant materials and/or agreements to these entities. All materials are anticipated to be submitted to the property owners and/or right-of-way holders by September 25, 2015.

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If you have any questions regarding this notification, please contact me at (805) 234-2257.

Sincerely,

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Yvonne Meeks Topock Remediation Project Manager