



March 8, 2013

Mr. Aaron Yue  
Geology Permitting and Corrective Action Branch  
California Environmental Protection Agency  
Department of Toxic Substances Control  
5796 Corporate Avenue  
Cypress, CA 90630

**Subject:** February 4, 2013 DTSC Letter Requesting Information on Potential Historic Offsite Disposal of Hazardous Substances from the PG&E Topock Compressor Station (CAT080011729)

Dear Mr. Yue:

In a letter dated February 4, 2013, the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) requested that Pacific Gas and Electric Company (PG&E) provide any information it has regarding disposal of potentially hazardous substances in the vicinity of the Golden Shores, Arizona and Needles, California communities beyond the existing boundaries of the PG&E Topock investigation area. During public scoping meetings for the upcoming environmental impact report related to the forthcoming soils investigation, questions were raised by members of these communities regarding past PG&E disposal practices. These questions are addressed in this letter.

Specifically, Golden Shore community members claimed the following:

- Truckloads of wastes and/or contaminated soil were dumped in the vicinity of their community (Pages 25, 26, 27, and 35 of Golden Shores transcripts).
- Debris and ash emanates from burning activities on the Arizona side of the river (Pages 18 and 19 of Golden Shores transcripts).
- Debris that came from the white pipes that go over the river can be seen in the river (Page 28 of Golden Shores transcripts).

A member of the Needles community also claimed that waste historically had been disposed of into the community's manholes (Pages 30 and 31 of Needles transcripts).

As part of the ongoing Topock environmental investigation and cleanup project, PG&E is working with the DTSC and the United States Department of the Interior to investigate potential impacts to soils and groundwater in and around our Topock natural gas compressor station. As part of the cleanup process, PG&E has conducted a thorough review of its operating and disposal practices, including a review of historical records, and has held numerous interviews with multiple former employees.

### **Alleged Disposal of Materials in the Golden Shores Area**

PG&E has no records or information from current or former employees to suggest that PG&E has ever disposed of materials in the Golden Shores area.

## **Alleged Disposal of Materials in Manholes in Needles Area**

PG&E has no records or information from current or former employees to suggest that PG&E has ever disposed of materials into the storm sewers in the Needles area.

## **Alleged Disposal of Debris and Ash from Burning Activities on the Arizona Side of the River**

PG&E has no records or information from current or former employees to suggest that PG&E has ever conducted burning activities on the Arizona side of the Colorado River. PG&E no longer conducts any type of burning activities on PG&E property on the California side of the Colorado River that could potentially result in the release of debris or ash into the atmosphere. Several years ago, limited burning activities for waste disposal and training purposes occurred at the site; these activities ceased in 1997. PG&E provided DTSC with a thorough history of burn activities at the site in a letter dated January 29, 2010.

## **Alleged Presence of Debris Associated with PG&E Pipes in the River**

PG&E assumes the comment regarding the white pipes crossing the river is referring to the Arch Bridge, the bridge that conveys two natural gas pipelines and one water line across the Colorado River. PG&E has not performed surveys of debris in the Colorado River beneath the Arch Bridge and cannot confirm the presence of debris beneath the Arch Bridge. PG&E has no records or information from current or former employees that suggests any debris that may be present would be the result of PG&E activities. The Arch Bridge was built in 1916 and was used as a highway bridge until the mid-1940s. Thereafter, the bridge was sold to PG&E and El Paso Natural Gas to be used as a pipeline bridge. A pipeline was installed and began operation in 1951 (jointly owned by PG&E and El Paso). Since that time, two additional pipelines have been added: a 6-inch water line in about 1960 (owned by PG&E) and an additional gas pipeline in 1991 (owned by El Paso). None of these three pipes is coated with anything other than paint. Portions of the lower structure of the bridge near the waterline are covered with a black coating material. Maintenance on this bridge and the pipelines is conducted by El Paso. The primary maintenance function is repainting the bridge and pipelines periodically. The most recent repainting was completed in the summer of 2012 and was accomplished by El Paso's contractor, who enclosed the bridge with fabric to prevent sandblast material or paint from entering the river.

## **Alleged Widespread Aerial Material Releases**

Additionally, DTSC also requested that PG&E provide any additional information regarding station operations and practices that may contribute to the public's perceptions of widespread aerial material release, including pressure release or venting during maintenance events or flaring of gas. DTSC requested information on the material disposed or released, the location of these activities, the approximate quantity (if known), and the timeframe in which they occurred.

The Topock Compressor Station gas compression system was never equipped for flaring/burning of excess gas; therefore, flaring or burning of vented gas has never occurred at the compressor station. For safety reasons, pursuant to standard natural gas transportation practices throughout the United States, and in compliance with regulatory oversight and approval, pressurized natural gas is periodically vented from the Topock Compressor Station pipelines and compressors through pipes called blowdown stacks during the following events:

- Periodic planned equipment testing and/or maintenance
- Periodic unscheduled maintenance
- Automatic venting for safety purposes if pipeline pressure is near its pressure limit

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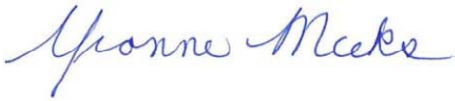
The vented gas is natural gas, which sometimes contains a small amount of pipeline liquids. The pipeline liquids are primarily comprised of various hydrocarbon compounds, the majority of which is compressor lubricating oil. Natural gas is lighter than air and safely dissipates readily into the atmosphere. If a small amount of pipeline liquids are also present, those materials are also dissipated as an aerosol.

Venting occurs multiple times per year. The frequency of venting is determined by the operations, maintenance, and safety needs of the station; therefore, there is no "typical" frequency.

Similarly, the quantity of gas vented varies each year because it is determined by the individual activity being conducted. The amount is a function of the volume of the segment of high-pressure pipe attached to the individual blowdown stack and the pressure of the vented pipeline segment.

Please feel free to call me at 805-234-2257 if you have any questions or comments regarding this submittal.

Sincerely,



Yvonne Meeks  
Topock Project Manager  
Pacific Gas and Electric Company

cc: Danielle Taber/Arizona DEQ  
Pam Innis/DOI  
Karen Baker/DTSC  
Jose Marcos/DTSC  
Chris Guerre/DTSC