



## Department of Toxic Substances Control

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Alan C. Lloyd, Ph.D.  
Agency Secretary  
Cal/EPA

5796 Corporate Avenue  
Cypress, California 90630

Arnold Schwarzenegger  
Governor

December 27, 2004

Ms. Laurie Grouard  
California Environmental Protection Agency  
Site Designation Committee  
1001 "I" Street, 25<sup>th</sup> Floor  
Sacramento, California 95814

**DESIGNATED SITE - QUARTERLY STATUS REPORT, RESOLUTION NO. 03-03  
PACIFIC GAS & ELECTRIC, TOPOCK COMPRESSOR STATION, 15 MI E NEEDLES  
ON I40, NEEDLES, CA, 92363**

Dear Committee Members:

The Department of Toxic Substances Control (DTSC) has been designated as the Administering Agency for site investigation and remedial actions necessary to respond to the hazardous materials release at the Pacific Gas and Electric, Topock Compressor Station facility located at 15 miles E Needles on I40, Needles, CA, 92363. This designation was issued by Resolution No. 03-03, dated August 11, 2003, pursuant to the provisions of Health and Safety Code, Division 20, Chapter 6.65 "Unified Agency Review of Hazardous Materials Release Sites" (added by Assembly Bill 2061 of 1993).

Attached is the DTSC quarterly status report dated December 15, 2004. If you have any questions regarding this letter please contact Norman Shopay at 510 540-3943.

Sincerely,

*Lori Hare for*

Norman Shopay, R.G  
Project Manager  
Geology, Permitting and Corrective Action Branch

cc: PG&E Consultative Work Group via e-mail



used at the site. DTSC anticipates that these localized areas of soil contamination will be addressed by PG&E in the Corrective Measures Study and final remedy.

**4. Current Phase of Action:**

During the third quarter of 2004, efforts were focussed on planning, design, and permitting activities for the groundwater extraction, treatment and disposal activities associated with Interim Measures No. 3. IM No. 3 milestones achieved during this quarter included:

- PG&E completed the 30 percent design package in July 2004 and the construction drawings in September 2004. DTSC conditionally approved the IM No. 3 design submittal documents in September 2004.
- PG&E and Metropolitan Water District (MWD) completed the purchase/sale of parcel 650-151-06 in September 2004.
- At direction of DTSC, PG&E began drilling observation wells to collect water quality samples to further characterize the property (in the area of the proposed injection well fields).
- In September 2004 the BLM and SHPO entered into a memorandum of agreement (MOA) which provided clearance for the IM No.3 project pursuant to Section 106 of the National Historic Preservation Act.
- In September 2004 the BLM issued an Action Memorandum which provided federal approval of the IM No.3 project, pursuant to BLM authority under Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).
- Initial construction activities (mobilization and grading) commenced during the last week of September 2004

Other activities during the third quarter of 2004 included:

- Continued implementation of Interim Measures No. 2 and the start-up of treatment operations at the MW-20 bench area. To maintain a landward gradient, groundwater extraction at the MW-20 bench area was increased from 20 gallons per minute at the beginning of the reporting period to 50 gpm at the end of the reporting period. Treated groundwater continued to be transported to a permitted offsite facility in California.
- Continued implementation of the groundwater monitoring program. The well sampling schedule for the weekly, monthly, and quarterly events was modified during this reporting period.

**5. List any Technical Problems:**

Significant effort has been expended to identify biological and cultural resources in the area that may be affected by interim measures construction and operations. Multiple government agencies have coordinated to support natural and cultural resource survey and permitting activities, including the Bureau of Land Management, the State Historic Preservation Office (SHPO), and U.S. Fish and Wildlife Service (USFWS).

**6. Permits Required/Issued to Date:**

Implementation of the IM No.3 project involves the approval of multiple government agencies. Major permitting activities involved natural and cultural resource surveys, supporting reports and analysis, and coordination with BLM, the SHPO, and USFWS.

In August 2004, the *Cultural Resources Investigation* report was finalized and transmitted to the BLM. Subsequently, BLM initiated consultation with SHPO regarding the potential impacts of IM-3 on cultural resources. On September 14, 2004 the BLM and SHPO entered into a memorandum of agreement (MOA), which provided clearance for the IM-3 project pursuant to Section 106 of the National Historic Preservation Act. The MOA included a series of stipulations relating to the IM-3 project, including implementation of a cultural resources management plan (CRMP).

On September 14, 2004 a copy of the final *Biological Resources Investigations for Interim Measures No. 3* was transmitted to BLM. Based on the findings within this report, and informal consultation with USFWS, the BLM determined that "no affect" to sensitive biological species would result from implementation of IM-3. This provided clearance of the IM-3 project under Section 7 of the federal Endangered Species Act.

Following consultation with the USFWS and SHPO, the BLM issued an "Action Memorandum" on September 17, 2004 which provided federal approval of the IM-3 project, pursuant to BLM authority under Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The Action Memorandum provided a list of natural and cultural resource mitigation measures, based on the biological and cultural resources reports and consultation with related agencies.

Other required IM-3 permits and/or approvals obtained during this period included the following:

- Use Permit from the County of San Bernardino, Land Use Services, Current Planning Division

- Air Quality Permit to Construct from the Air Quality Management District (AQMD)
- Storm Water Pollution Prevention Plan (SWPPP)
- Clean Water Act, Section 404 from the US Army Corps of Engineers (determined exempt under CERCLA)
- Clean Water Act, Section 401 from the Regional Water Quality Control Board (CERCLA exempt)
- California Department of Fish and Game (CDFG), 1600 authorization

7. **Pending Permits Issues:** Several permits required for implementation of Interim Measures No. 3 are pending as of September 30, 2004 (see Attachment B).

8. **Oversight Agency Costs Reimbursed to Date (Per Agency):** DTSC labor expenditure for July 2004 – September 2004: DTSC spent 519.45 hours in July, 580.10 hours in August, 435.15 hours in September. DTSC oversight cost for July 2004 to September 2004 is \$166,091.73. Cost information is not available for other agencies.

9. **Additional Comments or Issues:** Face to face CWG meetings are scheduled on the third Thursday of each month. Geo/Hydro Technical Subcommittee meetings are generally held during the same week as the CWG meetings. Agendas and handouts are distributed to the CWG prior to each meeting. Action items and significant issues from the previous meeting are distributed to the group during each meeting for review and comment.

**PG&E Topock Compressor Station  
Quarterly Status Report July 2004 – September 2004**

**ATTACHMENT A - Dates of Consultative Meetings and List of Attendees (Agency)**

**July 15, 2004 – CWG Face-to-Face Meeting**

**Attendees:** Department of Toxic Substances Control, Department of General Services, Pacific Gas and Electric Company and their consultants, CH2M Hill and Lucas Advocates, representatives of Indian Tribes, U.S. Bureau of Land Management, U.S. Bureau of Reclamation, U.S. DOI/Office of the Solicitor, U.S. Fish and Wildlife Service, Arizona Department of Environmental Quality, Colorado River Basin Regional Water Quality Control Board, and Metropolitan Water District and their consultants, Geopentech and Toxics Assessment Group.

**July 16, 2004 - Geo/Hydro Technical Subcommittee Meeting**

**Attendees:** Department of Toxic Substances Control, Pacific Gas and Electric Company consultants CH2M Hill, U.S. Department of the Interior, Office of the Solicitor, U.S. Bureau of Land Management, U.S. Geological Survey, Metropolitan Water District and their consultants Geopentech and Toxics Assessment Group.

**July 22, 2004 - CWG Focus Meeting - On Board Review of IM No 3 Design**

**Attendees:** Department of Toxic Substances Control, Pacific Gas and Electric Company and their consultants, CH2M Hill, and Metropolitan Water District and their consultants, Toxics Assessment Group.

**July 29, 2004 CWG Focused Meeting - On Board Design Review Teleconference**

**Attendees:** Department of Toxic Substances Control, Pacific Gas and Electric and their consultants, CH2M Hill, U.S. Fish and Wildlife Service, U.S. Bureau of Land Management, U.S. Bureau of Reclamation, Metropolitan Water District and their consultants, Toxics Assessment Group.

**August 5, 2004 CWG Focused Meeting - On Board Review of IM No 3 Design**

**Attendees:** Department of Toxic Substances Control, Pacific Gas and Electric and their consultants, CH2M Hill, U.S. Bureau of Land Management, Metropolitan Water District and their consultants, Toxics Assessment Group.

**August 12, 2004 CWG Focused Meeting - On Board Design Review Teleconference**

**Attendees:** Department of Toxic Substances Control, Pacific Gas and Electric and their consultants, CH2M Hill, Metropolitan Water District consultant Toxics Assessment Group.

**August 18, 2004 Geo/Hydro Technical Subcommittee Meeting**

**Attendees:** Department of Toxic Substances Control, Pacific Gas and Electric Company and their consultants CH2M Hill, U.S. Bureau of Reclamation, U.S. Geological Survey, Metropolitan Water District and their consultants Toxics Assessment Group and Geopentech

**August 19, 2004 CWG Face to Face Meeting**

**Attendees:** Department of Toxic Substances Control, Pacific Gas and Electric and their consultants, Lucas Advocates, CH2M Hill, U.S. Bureau of Reclamation, Arizona Department of Environmental Quality, Metropolitan Water District and their consultants, Geopentech and Toxics Assessment Group.

**September 2, 2004 - CWG Teleconference**

**Attendees:** Department of Toxic Substances Control, Pacific Gas and Electric Company and their consultants CH2M HILL, Arizona Department of Environmental Quality, Colorado River Basin Regional Water Quality Control Board, and Metropolitan Water District.

**September 15, 2004 Geo/Hydro Technical Subcommittee Meeting**

**Attendees:** Department of Toxic Substances Control, Pacific Gas and Electric Company consultants, CH2M Hill, Metropolitan Water District and their consultants Geopentech

**September 16, 2004 CWG Teleconference**

**Attendees:** Department of Toxic Substances Control, State Water Resources Control Board. Pacific Gas and Electric and their consultants, Lucas Advocates, CH2M HILL, U.S. Department of the Interior, U.S. Fish and Wildlife Service, U.S. Bureau of Land Management, U.S. Bureau of Reclamation, Metropolitan Water District and their consultants, Geopentech and Toxics Assessment Group, Colorado Indian Tribes

**Attachment B**  
**Status of Permits**  
**Pacific Gas and Electric Company, Topock Compressor Station**  
**Quarterly Status Report July 2004 – September 2004**

<b>PERMIT, APPROVAL, CERTIFICATION</b>	<b>PERMITTED ACTIVITY</b>	<b>ADMINISTERING AGENCY</b>	<b>PERMIT STATUS</b>
<b>Interim Measures No. 3</b>			
CEQA Emergency Project Exemption	Interim Measures No. 3 activities	Department of Toxic Substances Control	CEQA exemption issued
Action Memorandum	Interim Measures No. 3 activities	United States Bureau of Land Management	Action Memorandum issued
Notice of Intent (NOI) and Storm Water Pollution Prevention Plan for Construction Activities (SWPPP), coverage under statewide general permit	Interim Measures No. 3 construction activities	State Water Resources Control Board (SWRCB)/Colorado River Basin Regional Water Quality Control Board (RWQCB)	In progress
Hazardous Materials Business Plan	Construction and operation of treatment facility for IM No. 3	CUPA	Business Plan in progress
Conditional Authorization Notification for hazardous waste treatment	Groundwater treatment (hazardous waste) for IM No. 3	CUPA	Notification package in progress
Authority to Construct (ATC) and Permit to Operate (PTO)	Groundwater treatment for IM No. 3	Mojave Desert Air Quality Management District (MDAQMD)	Permit in progress
401 Certification	Construction and operation of treatment and disposal facilities	RWQCB	Permit exemption confirmed
USFWS, Section 7 Consultation	Construction and operation of treatment and disposal facilities	US Fish & Wildlife Service (USWS)	Biological resources investigations completed. Consultations with USFWS completed.
CDFG 1600 Agreement	Construction and operation of treatment and disposal facilities	California Department of Fish and Game (CDFG)	Received confirmation of emergency project status requiring after-the-fact notification
Section 106 Consultation	Construction and operation of treatment and disposal facilities	State Historic Preservation Office (SHPO)	Cultural resources investigations completed. MOA signed.
Grading Permits	Construction of treatment and disposal facilities	San Bernardino County, Planning Department	Permit issued September 24, 2004
Building Permits	Construction of treatment and disposal facilities	San Bernardino County, Planning Department	Permit in progress
Use Permit	Construction and operation of treatment and disposal facilities	San Bernardino County, Land Use Services Department	Conditional approval on September 10, 2004
Waste Discharge Requirements (WDRs)	Reuse of treated water at Topock Compressor Station	RWQCB	Application submitted
Waste Discharge Requirements (WDRs)	Underground injection of treated water on Metropolitan Water District land	RWQCB	Application submitted
Waste Discharge Requirements (WDRs)	Discharge of treated water to Colorado River	RWQCB	Application submitted
USEPA Identification Number	Interim measures activities	United States Environmental Protection Agency	Completed
404 Permit	Drilling and installing monitoring wells in Bat Cave Wash and floodplain	U.S. Army Corp of Engineers	CERCLA-exemption confirmed, no permit required