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February 6, 2008

Aaron Yue Project Manager 5796 Corporate Avenue Cypress, CA 90630

Ms. Kris Doebbler U.S. Department of the Interior BLM WO-360D Building 50 Denver Federal Center Denver, Colorado 80225

Subject: Interim Measures No. 3 Closure Planning - Baseline Soil Sampling Work Plan PG&E Topock Compressor Station, Needles, California

Dear: Mr. Yue and Ms. Doebbler:

This letter transmits the technical memorandum *Baseline Soil Sampling at the PE-1 Pipeline, Interim Measure No. 3 at Pacific Gas and Electric Company (PG&E) Topock Compressor Station.* The technical memorandum presents soil data collected from the vicinity of the PE-1 pipeline at the time of startup of operations of this stretch of pipeline in January-February 2006. The PE-1 pipeline baseline soil data are considered to be representative of baseline conditions near the PE-1 pipeline that may be used during a future pipeline closure evaluation or other future floodplain activities. The PE-1 pipeline baseline soil data were collected concurrently with installation of groundwater monitoring wells for the floodplain in situ pilot study authorized by the Department of Toxic Substances Control (DTSC) and the United States Bureau of Land Management (BLM).

In addition, this letter serves as a request to rescind the remaining portions of the *Interim Measures Number 3 (IM-3) Closure Planning - Baseline Soil Sampling Work Plan for the PG&E Topock Compressor Station* dated February 3, 2006. The February 3, 2006 work plan superseded previous versions of the work plan dated July 5, 2005 and January 5, 2006, and incorporated comments on the previous versions of the work plan from DTSC and BLM.

The objective of the Interim Measure No. 3 (IM No. 3) soil baseline sampling was to determine naturally occurring background concentrations of metals and other inorganic compounds in soil in the immediate vicinity of the IM No. 3 treatment system at the time of startup of IM No. 3¹. These baseline data were intended to be used to determine the appropriate level of site restoration and to guide remediation efforts (if necessary) during future closure activities of the IM No. 3 treatment

¹ While the PE-1 pipeline segment started operations in January 2006, the remainder of the IM No. 3 system started operations in July 2005.

and distribution system or in the event of a release of waste water and/or treatment chemicals from the treatment and conveyance system.

PG&E is proposing to rescind the remaining portions of the *Interim Measures Number 3 (IM-3) Closure Planning - Baseline Soil Sampling Work Plan for the PG&E Topock Compressor Station,* dated February 3, 2006, because the proposed data are no longer considered useful for assessing IM No. 3 baseline conditions since the treatment plant has been in operation since July 2005. In addition, a more representative and comprehensive background study is being conducted as part of the RCRA facility investigation/remedial investigation (RFI/RI) soil investigation program. The RFI/RI soil background study includes sample locations within the lithologic units that were proposed for the IM No. 3 baseline sampling outside of the floodplain. The background values calculated in the RFI/RI background study will be used as the baseline data for IM No. 3 to assess the need for and/or level of remediation in the event of a release or during future closure activities at the IM No. 3 treatment plant outside of the floodplain.

The data collection activities proposed in the IM No. 3 baseline soil sampling work plan are not a requirement of DTSC or the United States Department of the Interior (DOI); this sampling is considered a discretionary activity that PG&E previously proposed to implement. While DTSC provided comments on the work plan, DTSC has not yet approved the work plan. The DOI did provide an approval of the work plan in a letter dated February 12, 2007; however, DOI did not approve the portions of the work plan proposing sample collection within Bat Cave Wash.

PG&E appreciates your consideration of the enclosed technical memorandum and PG&E's proposal to rescind the remaining portions of the work plan. Please contact me at 805/234-2257 with any questions or concerns.

Sincerely,

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Yvonne Meeks Topock Project Manager

cc: Chris Guerre/DTSC

Baseline Soil Sampling at the PE-1 Pipeline, Interim Measure No. 3 at Pacific Gas and Electric Company, Topock Compressor Station, Needles, California

PREPARED FOR:

Pacific Gas and Electric Company

DATE:

February 6, 2008

Introduction

The following provides a summary of the sample implementation, analytical results, and data quality review for the February 2006 baseline soil sampling at the PE-1 pipeline, Interim Measures (IM) No. 3, Pacific Gas and Electric Company (PG&E) Topock Compressor Station, Needles, California.

The PE-1 pipeline is an approximately 500-foot subsurface pipeline segment (including electrical and control conduits) in the floodplain of the Colorado River that connects extraction well PE-1 to the MW-20 bench. The PE-1 pipeline alignment is shown on Figure 1. The PE-1 pipeline is constructed of double-contained high-density polyethylene pipe with an outer diameter of 6 inches (the inner pipe is 3 inches in diameter). The pipe is buried approximately 3 to 5 feet below ground surface (bgs). The pipeline is equipped with a leak-detection sensor station to detect leaks in the inner conveyance pipe. The PE-1 pipeline conveys untreated groundwater from the extraction well (PE-1) to the MW-20 bench where it is combined with the groundwater extracted from well TW-3D and/or TW-2D. At Valve Vault #1 at the MW-20 bench, the PE-1 pipeline is connected to the IM No. 3 influent pipeline to the IM-3 treatment plant.

Construction of the PE-1 pipeline was initiated in mid-December 2005 and was completed late January 2006. Startup of the PE-1 extraction well and pipeline was authorized by the California Department of Toxics Substances Control (DTSC) on January 26, 2006.

The PE-1 pipeline is one of four primary components of the IM No. 3 system for baseline soil sampling, as discussed in the *Interim Measures No. 3 Closure Planning – Baseline Soil Sampling Work Plan,* dated February 3, 2006 (CH2M HILL, 2006). As described in the work plan, the primary objective of the baseline soil sampling is to determine naturally-occurring concentrations of metals, including hexavalent chromium [Cr(VI)], total chromium, and other inorganic compounds in soil in the immediate vicinity of the IM No. 3 system. As part of future IM No. 3 closure activities, or in the event of a release of wastewater and/or treatment chemicals from the treatment system or pipelines during operations that necessitates some cleanup prior to closure, the baseline data could be used to assess impacts, determine the appropriate level of site restoration, and guide remediation efforts (if necessary). As described in the work plan, the PE-1 pipeline sampling portion of the baseline soil sampling was performed concurrent with installation of groundwater monitoring wells for the floodplain *in-situ* pilot study. Installation of the groundwater

monitoring wells for the floodplain *in-situ* pilot study was authorized by the Department of Toxic Substances Control (DTSC, 2005) and the United States Bureau of Land Management (BLM, 2005).

Sample Implementation

The sections below describe the PE-1 baseline soil sample implementation including sample collection, sample analysis, and analytical results summary.

Sample Collection

Between February 7 and February 11, 2006, 15 samples were collected from three sample locations in the vicinity of the PE-1 pipeline. These samples were collected concurrently with installation of groundwater monitoring wells for the floodplain *in-situ* pilot study. Soil sample locations (PT-2, PT-4, and PT-5) are shown on Figure 1. At each location, samples were collected from five depths: the surface (0 to 0.5 bgs), 3, 6, 10, and 20 feet bgs. Table 1 presents sample collection date, time, and depth.

A sonic drilling rig was used to collect soil samples by driving a core sampling tube into soil at each sample location. The core sampling tube was surrounded by an outer casing to obtain a minimally disturbed soil sample. After the retrieval of the inner core sampling tube, the sample cores were logged. Boring logs for these sample locations are presented in Appendix A. Information pertaining to additional data collected during the *in-situ* pilot study is presented in the August 1, 2006 *60-day Status Report for the Floodplain Reductive Zone In Situ Pilot Test, PG&E Topock Compressor Station* prepared by Arcadis G&M, Inc (Arcadis G&M, 2006). Soils within the first 20 feet of these boring locations were described as poorly graded, fine-grained sand. A clay layer was noted at location PT-5 from 18 to 19 feet bgs. Soil samples were collected at the desired depth interval. Soil samples were placed into new, 8-ounce glass jars and were labeled with unique sample identification numbers. Sample identifications, collection date, and time were recorded on a chain of custody. At the end of the day, soil samples were shipped by Federal Express to STL Laboratories (STL) Los Angeles, California for analysis.

Decontamination

The core sampler was decontaminated between sample locations. After the sample was removed, any debris was brushed from the sampler. The sampler was then scrubbed with a synthetic bristle brush and an Alconox and tap water solution. The sampler was rinsed with tap water and then with deionized water.

Sample Analysis

All samples were also shipped to STL to undergo analysis for the following analytes or analyte class: Title 22 metals were analyzed for using United States Environmental Protection Agency (USEPA) Method 6010/7000); mercury was analyzed for using Method SW7471; Cr(VI) was analyzed for using USEPA7199; and specific conductance was analyzed for using USEPA9050.

Analytical Result Summary

Analytical results are presented in Table 2. Barium, total chromium, lead, and zinc were detected in all soil samples. Barium was detected at concentrations ranging from 40 to 110 milligrams per kilogram (mg/kg), total chromium was detected at concentrations ranging from 1.9 to 4.4 mg/kg, lead was detected at concentrations ranging from 3.2 to 5.8 mg/kg, and zinc was detected at concentrations ranging from 8.0 to 19 mg/kg. Arsenic was detected in 14 of 15 samples at concentrations ranging from 1.0 to 1.6 mg/kg. Vanadium was detected in nine of 15 samples at concentrations ranging from 5.1 to 8.4 mg/kg. Copper was detected in only one sample at a concentration of 4.8 mg/kg. The remaining metals were not detected above the laboratory reporting limits. Specific conductance ranged from 230 to 9,600 microSiemens per centimeter.

Analytical Data Quality Review

The laboratory analytical data generated from the February 2006 PE-1 Pipeline baseline soil sampling was independently reviewed by project chemists to assess data quality and to identify deviations from analytical requirements. The quality assurance and quality control requirements are outlined in the *PG&E Program Quality Assurance Project Plan* (CH2M HILL, 2004) or the *Addendum to the Topock Quality Assurance Project Plan* (CH2M HILL, 2005). Fifteen soil samples were submitted to STL for analysis of specific conductance, antimony, arsenic, barium, beryllium, cadmium, total chromium, cobalt, copper, Cr(VI), lead, mercury, molybdenum, nickel, selenium, silver, thallium, vanadium, and zinc. A summary discussion of data quality for the PE-1 pipeline baseline soil sampling data is presented below. Additional detail is provided in the data validation reports, which are kept in the project file and are available upon request.

Matrix Spike Samples

Two samples had matrix spike and matrix spike duplicate results that were recovered outside the lower control limit for antimony (SW60210B). The non-detected sample result from PT-02-00 and PT-05-02 were qualified as estimated and flagged "UJ." All other matrix spike acceptance criteria were met.

Quantitation and Sensitivity

All samples were reported from non-diluted samples aliquots, and the method/analyte combinations meet the project reporting limit requirements.

Holding Time Data Qualification

Holding-time exceedances can result in the possible loss of target analytes due to degradation or chemical reactions that usually cause a negative bias to sample results. For the February 2006 PE-1 baseline soil results, all holding-time criteria were met.

Field Duplicates

No field duplicates samples were collected for this event.

Method Blanks

All method blank acceptance criteria were met.

Equipment Blanks

No equipment blanks were collected.

Laboratory Duplicates

All laboratory duplicate acceptance criteria for the methods were met.

Calibration

Initial and continuing calibrations were performed as required by the methods. All calibration criteria were met.

Conclusion

For the February 2006 PE-1 Pipeline baseline soil sampling, the completeness objectives were met for all method and analyte combinations. The analyses and data quality met the Quality Assurance Project Plan and laboratory method quality control criteria except as noted above. Overall, the analytical data are considered acceptable for the purpose of the baseline sampling.

Summary

This technical memorandum presents soil data collected from the vicinity of the PE-1 pipeline approximately 12 to 14 days after startup of the PE-1 pipeline. Soil samples were collected of the floodplain material between the surface and 20 feet bgs in three locations along the PE-1 pipeline segment. The data reported here are considered to be representative of baseline conditions of the floodplain material at the time of startup of the PE-1 pipeline and will be available in the future for future pipeline closure evaluation or other future floodplain activities, as necessary. Statistical evaluation of the data reported here will not be performed until the ultimate use of these data is defined.

References

Arcadis G&M, Inc. 2006. 60-day Status Report for the Floodplain Reductive Zone In Situ Pilot Test, PG&E Topock Compressor Station. August 1.

California Department of Toxic Substances Control. 2005. Letter to Yvonne Meeks/PG&E. "Approval of Floodplain In Situ Workplan dated August 2005 and Technical Addendum dated December 8 2005, Pacific Gas and Electric Company, Topock Compressor Station, Needles, California." December 12.

CH2M HILL. 2004. PG&E Program Quality Assurance Project Plan. November.

___. 2005. *Quality Assurance Project Plan Addendum, PG&E Topock Program.* July 7.

_____. 2006. Interim Measures No. 3 Closure Planning – Baseline Soil Sampling Work Plan. February 3.

United States Bureau of Land Management (BLM). 2005. Letter to Yvonne Meeks/PG&E. "Bureau of Land Management (BLM) Authorization to Proceed with the PE-1 Pipeline and the *In Situ* Floodplain Pilot Study Workplan." December 9.

Tables

Sample Depth Sample Sample Time (feet below ground Identification (24-hour clock) surface) Sample Date PT-02-00 02/07/2006 11:25 0.5 3 PT-02-03 02/07/2006 11:30 PT-02-06 6 02/07/2006 11:35 PT-02-10 02/07/2006 11:40 10 PT-02-20 20 02/07/2006 11:45 PT-04-00 0.5 02/11/2006 12:12 PT-04-03 02/11/2006 12:15 3 PT-04-06 12:16 6 02/11/2006 PT-04-10 02/11/2006 12:20 10 PT-04-20 02/11/2006 13:00 20 PT-05-00 02/09/2006 11:55 0.5 PT-05-03 3 02/09/2006 11:58 PT-05-06 02/09/2006 12:03 6 PT-05-10 02/09/2006 12:10 10 PT-05-20 02/09/2006 12:40 20

TABLE 1

Soil Sample Collection Information Baseline Soil Sampling at PE-1 Pipeline - Interim Measures No. 3 PG&E Topock compressor Station, Needles, California

TABLE 2 Soil Sample Results - Metals Baseline Soil Sampling at PE-1 Pipeline - Interim Measure No. 3 PG&E Topock Compressor Station, Needles, California

			Specific Conductance) (µS/cm)	Metals by SW6010B/SW7199/SW7471 in mg/kg																	
Locatior	Sample I on Date (Depth (ft bgs)		Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Hexavalent Chromium	Cobalt	Copper	Lead	Mercury	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
PT-2	2/7/2006	0.5	540	ND (6.0) J	1.30	51.0	ND (0.5)	ND (0.5)	2.30	ND (0.4)	ND (5.0)	ND (2.5)	3.20	ND (0.1)	ND (4.0)	ND (4.0)	ND (0.5)	ND (1.0)	ND (1.0)	5.10	8.00
	2/7/2006	3	750	ND (6.1)	1.40	110	ND (0.51)	ND (0.51)	2.40	ND (0.41)	ND (5.1)	ND (2.5)	3.50	ND (0.1)	ND (4.1)	ND (4.1)	ND (0.51)	ND (1.0)	ND (1.0)	5.90	8.90
	2/7/2006	6	1400	ND (6.1)	1.60	47.0	ND (0.51)	ND (0.51)	1.90	ND (0.4)	ND (5.1)	ND (2.5)	3.60	ND (0.1)	ND (4.0)	ND (4.0)	ND (0.51)	ND (1.0)	ND (1.0)	ND (5.1)	9.20
	2/7/2006	10	2100	ND (6.1)	1.20	61.0	ND (0.51)	ND (0.51)	2.50	ND (0.41)	ND (5.1)	ND (2.5)	3.50	ND (0.1)	ND (4.1)	ND (4.1)	ND (0.51)	ND (1.0)	ND (1.0)	ND (5.1)	12.0
	2/7/2006	20	790	ND (6.0)	1.50	92.0	ND (0.5)	ND (0.5)	2.20	ND (0.4)	ND (5.0)	ND (2.5)	3.30	ND (0.1)	ND (4.0)	ND (4.0)	ND (0.5)	ND (1.0)	ND (1.0)	5.60	8.60
PT-4	2/11/2006	0.5	550	ND (6.0)	1.20	81.0	ND (0.5)	ND (0.5)	2.10	ND (0.4)	ND (5.0)	ND (2.5)	3.70	ND (0.1)	ND (4.0)	ND (4.0)	ND (0.5)	ND (1.0)	ND (1.0)	5.10	8.40
	2/11/2006	3	230	ND (6.2)	1.20	93.0	ND (0.51)	ND (0.51)	2.20	ND (0.41)	ND (5.1)	ND (2.6)	3.60	ND (0.1)	ND (4.1)	ND (4.1)	ND (0.51)	ND (1.0)	ND (1.0)	5.50	8.20
	2/11/2006	6	270	ND (6.2)	1.30	120	ND (0.51)	ND (0.51)	2.60	ND (0.41)	ND (5.1)	ND (2.6)	4.20	ND (0.1)	ND (4.1)	ND (4.1)	ND (0.51)	ND (1.0)	ND (1.0)	6.30	9.80
	2/11/2006	10	580	ND (6.0)	1.30	79.0	ND (0.5)	ND (0.5)	2.20	ND (0.4)	ND (5.0)	ND (2.5)	3.60	ND (0.1)	ND (4.0)	ND (4.0)	ND (0.5)	ND (1.0)	ND (1.0)	5.80	8.00
	2/11/2006	20	2200	ND (6.4)	1.50	80.0	ND (0.53)	ND (0.53)	3.20	ND (0.43)	ND (5.3)	ND (2.7)	4.70	ND (0.11)	ND (4.3)	ND (4.3)	ND (0.53)	ND (1.1)	ND (1.1)	6.60	11.0
PT-5	2/9/2006	0.5	600	ND (6.0) J	1.10	40.0	ND (0.5)	ND (0.5)	1.90	ND (0.4)	ND (5.0)	ND (2.5)	4.00	ND (0.1)	ND (4.0)	ND (4.0)	ND (0.5)	ND (1.0)	ND (1.0)	ND (5.0)	9.90
	2/9/2006	3	360	ND (6.1)	1.20	70.0	ND (0.51)	ND (0.51)	2.10	ND (0.41)	ND (5.1)	ND (2.5)	4.10	ND (0.1)	ND (4.1)	ND (4.1)	ND (0.51)	ND (1.0)	ND (1.0)	ND (5.1)	9.20
	2/9/2006	6	1800	ND (6.1)	1.00	79.0	ND (0.51)	ND (0.51)	2.00	ND (0.41)	ND (5.1)	ND (2.5)	3.40	ND (0.1)	ND (4.1)	ND (4.1)	ND (0.51)	ND (1.0)	ND (1.0)	ND (5.1)	8.50
	2/9/2006	10	300	ND (6.0)	1.10	76.0	ND (0.5)	ND (0.5)	2.10	ND (0.4)	ND (5.0)	ND (2.5)	3.60	ND (0.1)	ND (4.0)	ND (4.0)	ND (0.5)	ND (1.0)	ND (1.0)	ND (5.0)	8.40
	2/9/2006	20	9600	ND (7.6)	ND (1.3)	110	ND (0.63)	ND (0.63)	4.40	ND (0.51)	ND (6.3)	4.80	5.80	ND (0.13)	ND (5.1)	ND (5.1)	ND (0.63)	ND (1.3)	ND (1.3)	8.40	19.0

NOTES:

ft bgs feet below ground surface µS/cm microsiemens per centimeter

mg/kg milligrams per kilogram

NĎ

analyte was not detected at the reporting limit listed concentration or reporting limit estimated by laboratory or data validation J

Figure



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Appendix A Boring Logs





















