ADDENDUM TO SOIL MANAGEMENT PLAN (May 28, 2019)

Final Groundwater Remedy
PG&E Topock Compressor Station, Needles, California

2.4 Handling and Storage of Clean Soil

Non-hazardous clean displaced soil (i.e., soil below interim screening levels or project-specific cleanup goals [once established]) will be stockpiled at the work site, if practicable, and recorded in an inventory as described in Section 5.0. Clean soil that was removed from trenches or excavations will be reused as backfill into the same trench or excavation area, if practicable. Clean soil that cannot be immediately used as backfill may be reused in other areas within the APE, or stockpiled for future reuse within the APE. Displaced soil that is stockpiled for future use will be managed following the BMPs described in Section 3.1.2 below, the BMPs Plan presented in Appendix C, the Construction/Remedial Action Work Plan, and the Groundwater Remedy Industrial SWPPP (Appendix E of Volume 1 of this O&M Manual).

Consistent with the special handling procedures requested by Tribes for displaced material generated from clay beds (this does not include clay-containing sediment mixtures, only clay beds), if clay bed(s) are encountered during construction, the clay material will be set aside and stored separately from other displaced soils (see attached figure). In addition, clay material will only be stockpiled and not containerized in 55-gallon drums/small containers or roll-off bins. The method for stockpiling of clay will be similar to that for other displaced soils as described in Section 3.1 (Methods to Store Soil). For the purposes of this project the identification of a "clay bed," and therefore the application of this special handling procedure, will be based on the practicability for the clay material to be separated from other excavated soils or drill cuttings. For example, when trenching with a backhoe it may be possible to identify relatively thin beds of clay material (e.g., less than a foot) and separate it from the rest of the excavated soil, but when drilling with a method that doesn't retrieve cores that can be closely observed and precisely separated (e.g., hollow-stem auger), a relatively thin clay bed might not be identified or the clay material might become mixed with the rest of the cuttings to the point where it cannot be practicably separated. In the event clay material is encountered, PG&E will document the event in the monthly progress reports (during construction) or the quarterly compliance reports (during O&M). Further, salvage of topsoil during installation of trenches will be done where the proposed excavation will occur in areas where undisturbed topsoil may be present. In such areas, the upper 4 inches of soil will be carefully removed and placed near the excavation. The remaining subsurface-soil will then be excavated and stored separately from the topsoil. Following the installation of piping/conduits and backfilling of the trench, the topsoil will be replaced over the trench. Therefore, there will be no need for long-term storage of undisturbed topsoil. The rest of the excavated soil that is not undisturbed topsoil consists of desert soils that are generally low in nutrients and organic matter. Desert soil that has been subject to disturbance typically loses a large percentage of the available nutrient supply and important soil biota. Therefore, salvage of soil from disturbed areas will not occur and there will be no specific actions related to protecting biological integrity while these soils are being stored.

