



**United States Department of the Interior  
California Department of Toxic Substances Control**



**ELECTRONIC SUBMISSION**

May 29, 2020

Mr. Curt Russell  
Environmental Remediation  
Pacific Gas and Electric Company  
77 Beale Street, B28P  
San Francisco, California 94105

Subject: ACCEPTANCE OF THE HUMAN HEALTH AND ECOLOGICAL RISK ASSESSMENT AND ERRATA,  
PACIFIC GAS AND ELECTRIC COMPANY, TOPOCK COMPRESSOR STATION  
NEEDLES, CALIFORNIA (EPA ID CAT080011729)

Dear Mr. Russell,

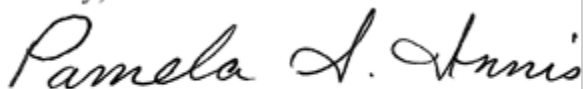
The United States Department of the Interior (U.S. DOI) and the California Department of Toxic Substances Control (DTSC) have completed our evaluation of the October 2019 Final Human Health and Ecological Risk Assessment (HHERA) and its associated February 2020 HHERA Errata. In following the April 2016 Clearinghouse Taskforce comment resolution protocol leading up to the final report, the response to comments table on the draft HHERA was provided to all Consultative Workgroup Members for review and comment on October 22, 2019. Subsequently, the Fort Mojave Indian Tribe submitted a letter for the administrative record on November 8, 2019 with support from the Chemehuevi Indian Tribe, the Cocopah Indian Tribe, and the Quechan Indian Tribe, detailing their concerns regarding the development of the HHERA. The same concerns were reiterated by the Fort Mojave Indian Tribe and the Quechan Indian Tribe in their April 9 and April 10 respective letters in response to the February 2020 HHERA Errata review. These letters, along with the U.S. DOI response on April 21, 2020 and DTSC's response on May 7, 2020 have also been placed in the administrative record.

A recurring concern from the Tribes is that some of the parameters used in the risk evaluation may overestimate risks for individual areas of concern. DTSC, however, is skeptical with the use of unconventional averaging methodologies for parts of the risk assessment, and takes exception to the conclusion that Area of Concern (AOC) specific evaluations "are not suitable as a sole basis for conclusions... or risk management decisions going forward." DTSC notes that there are potential sources of contamination within some AOCs that were not specifically considered in the risk assessment

(e.g. some waste samples within AOC-13) or sampled. Moreover, the HHERA did not fully consider the contaminant migration potential, especially from the compressor station to outside the compressor station or soil contamination as a source to groundwater impacts. Nevertheless, the U.S. DOI and DTSC conclude that the HHERA and the associated Errata have sufficiently considered the full gamut of potential exposures at the site and that the evaluations adequately presented a range of potential risks that would inform future risk management decisions at the Pacific Gas and Electric Company (PG&E), Topock Compressor Station and its surrounding lands. Therefore, the agencies hereby accept the HHERA and the associated errata. Please note that the HHERA and the errata were prepared as a site-specific evaluation of the PG&E Topock Compressor Station project. Application of the methodologies, exposure values or conclusions at any other site is discouraged.

If PG&E has any questions regarding this HHERA acceptance, please feel free to contact either Ms. Pamela Innis of the U.S. DOI or Mr. Aaron Yue of the DTSC.

Sincerely,



Pamela S. Innis  
DOI Topock Remedial Project Manager



Aaron Yue  
Project Manager  
Department of Toxic Substances Control

cc: PG&E Topock Consultative Workgroup Members  
PG&E Topock Geo/Hydro Technical Workgroup Members  
Tribal Representatives in PG&E Project Contact List