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**Sent:** Tuesday, September 15, 2015 7:00 PM

**To:** Adrienne LaPierre <alapierre@irisenv.com>; Yvonne J Meeks <YJM1@pge.com>; Hong, Christina/LAC <Christina.Hong@CH2M.com>; pamelanna@ios.doi.gov

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**Subject:** RE: Topock RAWP Add 2

Greetings,

It has been brought to my attention that some felt unclear by my email of August 31, 2015 (below) whether DTSC approved the June 2015 *Final Human Health and Ecological Risk Assessment Work Plan Addendum II* (RAWP Addendum II). I apologize if my original email was unclear. The simple answer is yes. DTSC participated fully in the development of the RAWP Addendum II, considered all written and verbal inputs from participating stakeholders and the Tribes during the developmental years beginning with the risk concerns raised in 2012 through the Response to Comment meeting in April 2015 and the subsequent letter dated May 20, 2015 by Dr. Michael Sullivan on the response to comments. Based on the information provided in the June 2015 RAWP Addendum II, DTSC believes that the work plan provided an adequate direction to conduct the up coming Risk Assessment; however, as reflected also in the approval letter from the Department of the Interior (DOI) on September 8, 2015, and our statements in the Response to Comments, DTSC acknowledges that the data collected from the soil investigation will need to be reviewed and evaluated prior completion of the risk assessment to determine if depth and area weighted averaging will be necessary; as well as the appropriate methodologies to evaluate risks between AOCs and SWMUs. Finally, DTSC is in agreement with the representatives for the Tribes and DOI that a key component for future risk management decision will depend on a robust uncertainties analysis for this site. Therefore, DTSC will also be fully engaged in its development.

I hope this clarifies DTSC's position on the status of the June 2015 RAWP Addendum II. If you have any questions, please feel free to contact me.

Regards,

Aaron Yue  
Project Manager  
Department of Toxics Substances Control  
Geological Services Branch

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**From:** Yue, Aaron@DTSC

**Sent:** Monday, August 31, 2015 9:07 AM

**To:** Adrienne LaPierre; Yvonne J Meeks; [Christina.Hong@CH2M.com](mailto:Christina.Hong@CH2M.com)

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**Subject:** RE: Topock RAWP Add 2

Adrienne,

Sorry, I have not officially approved the RAWP addendum 2 up to now. The status is that DTSC has participated in the development of the second Risk Assessment Work Plan (RAWP) addendum and agrees with the RAWP addendum II in concept on the proposed use scenarios as well as how the data will be used and presented in a risk assessment. However, DTSC toxicologists would like to qualify the work plan in that it is premature to fully predetermine the methodologies we can or cannot use for the risk assessment without consideration of the field data (chemicals of concern, concentrations, locations and distributions, etc.). Aside from that, DTSC believes that the RAWP and its two addendum provide a solid frame work for conducting the upcoming risk assessment.

In response to your question about distribution, DTSC agrees that the final RAWP Addendum 2 should be provided to the project stakeholders and Tribal representatives in either hardcopies or electronically based on their individual preference.

Regards,

Aaron Yue  
Project Manager  
Department of Toxic Substances Control  
(714) 484-5439

**From:** Adrienne LaPierre

**Sent:** Wednesday, July 01, 2015 11:11 AM

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**Subject:** Topock RAWP Add 2

Hello all-

On behalf of PG&E, this email transmits the *Final Human Health and Ecological Risk Assessment Work Plan (RAWP) Addendum 2*. Two copies of the report are attached: the first is a word document with changes made since the May 2014 submittal noted in redline, and the second is a clean final PDF version which includes the text, figures, tables and attachments.

The *Final RAWP Addendum 2* considers the comments received from DTSC, DOI and the Tribes, as well as the action items from the April 23, 2015 Risk Assessment (RA) Forum.

On May 20, 2015, Dr. Michael Sullivan, on behalf of FMIT, submitted a letter and a Response to Comments (RTC) Table Annotated by FMIT to DTSC and DOI regarding the *RAWP Addendum 2*. The letter included a list of action items from the RA Forum that are consistent with PG&E's list of action items that resulted from the RA Forum. However, in the RTC Table Annotated by FMIT, FMIT noted expected revisions to the *RAWP Addendum 2* that are inconsistent with PG&E's understanding of the action items from the RA Forum, as discussed with the agencies. The following summarizes these differences:

- FMIT's response to Comment 7 notes "The agencies have agreed to include a discussion of the depth weighting and the criteria for triggering the weighting in the final RAWP".
  - As stated in the RA Forum action item list provided to the agencies, PG&E has provided the trigger criteria for area weighted averaging in the *Final RAWP Addendum 2*. The depth weighting approach was outlined in the May 2014 submittal of the *RAWP Addendum 2* and was discussed at both the September 2013 RA Workshop and the April 2015 RA Forum. Additional discussion of the depth weighting approach has not been included in the *Final RAWP Addendum 2*.
- FMIT's response to Comment 9 notes "The agencies have agreed to include a discussion of the EPC calculations and the criteria for triggering various calculations in the final RAWP".
  - As stated in the RA Forum action item list provided to the agencies, PG&E has provided the trigger criteria for conducting various calculations in the *Final RAWP Addendum 2*. A meeting where EPC calculations will be further discussed will be scheduled with the agencies and Tribes after soil investigation data validation, as noted in PG&E's response to Comment 47.

Please let us know if you have any questions and/or would like hard copies of the *Final RAWP Addendum 2* sent to your office.

Please also let us know if you would like PG&E to send the PDF of the *Final RAWP Addendum 2* to Stakeholders.

Thank you.

Adrienne LaPierre

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