



## Department of Toxic Substances Control

**Jared Blumenfeld**  
Secretary for  
Environmental  
Protection

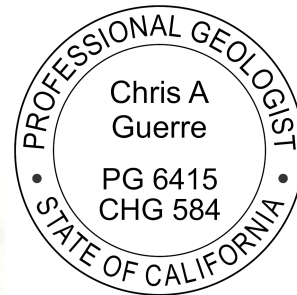
**Meredith Williams, Ph.D.**  
Director  
5796 Corporate Avenue  
Cypress, California 90630

**Gavin Newsom**  
Governor

### MEMORANDUM

**TO:** Aaron Yue  
Senior Hazardous Substances Engineer  
Project Manager  
Site Mitigation and Restoration Program

**FROM:** Chris Guerre, CH.G.  
Senior Engineering Geologist  
Geological Services Unit (GSU)



**DATE:** January 22, 2020

**SUBJECT: HYDRO-6A MITIGATION MEASURES SUBMITTAL  
PACIFIC GAS AND ELECTRIC COMPANY (PG&E)  
TOPOCK COMPRESSOR STATION  
NEEDLES, CALIFORNIA (EPA ID NO. CAT 080011729)**

PCA 22120 SITE CODE 540015 WP 48

#### DOCUMENT REVIEWED

At the request of Department of Toxic Substance Control (DTSC) project manager Aaron Yue, the GSU reviewed and prepared comments on the following technical memorandum dated December 17, 2019 and prepared by Jacobs Engineering Group Inc. (Jacobs) on behalf of PG&E: *Report of June 2019 Private Well Reconnaissance and Recommendations for Subsequent Environmental Impact Report Mitigation Measure Hydro-6a* (Memo).

#### BACKGROUND

The Memo presents information collected for compliance with the April 2018 Final Subsequent Environmental Impact Report (SEIR) Mitigation Measure HYDRO-6a. HYDRO-6a is intended to minimize potential impacts to non-Project water supply wells

(e.g., wells Topock-2, Topock-3, Marina-1, Marina-1A, Sanders, Smith (Allen), GSRV-2) that could potentially be affected during groundwater remedy implementation. HYDRO-6a does this by requiring the establishment of a groundwater monitoring program consisting of water supply and/or monitoring wells to assess site conditions at and around nearby water supply wells that are all currently located in Arizona.

The Memo comments on the status of obtaining well permission for accessing and sampling groundwater wells, summarizes observations made during June 2019 site visits, and makes recommendations for actions proposed for each private well subject to obtaining owner permission.

## COMMENTS

The GSU review of the Memo has identified the following items below and requests that they be adequately addressed by PG&E in a timely manner:

1. Since access has not been granted at the Sanders or Smith/Allen water wells, it is requested that one new monitoring well be installed in the vicinity of these two wells, ideally at a location equidistant between the two wells. Potential locations have been previously discussed with PG&E. PG&E should determine an optimal location and provide the proposed location(s) and well design for agency approval. A schedule to accomplish this work should be established immediately.
2. The Memo proposes to remove water well GSRV-2 from the program as the owner cannot be contacted and since it is located furthest away from the remedy. It is requested that increased efforts be made to locate the owner using additional PG&E resources/departments. The well is of interest as it has yielded some of the highest hexavalent chromium concentrations in the region and, therefore, represents elevated chromium to the north of the project. Additionally, the well is reported as currently unsecured in Table 2 of the Memo and could be vandalized or used for illegal disposal. However, well GSVR-2 is of more interest if the Site B well is utilized in future.
3. Table 1 - This table and Section 2 of the Memo indicate that permission is pending for most of the wells, including wells owned by PG&E (i.e., Site B and PGE-9N/S). PG&E needs to promptly complete the pending access agreements. Failure to complete the access agreements in a timely manner may require that additional monitoring wells be installed to proxy for those wells that cannot be accessed.
4. Table 2 - Private Well Construction and Usage Summary: Data in Table 2 of the Memo should be compared to conflicting data contained in the 2009 background study (Table 2.1) and 2004 draft background study work plan (Table 1). Differences were noted for the Sanders and Topock-2 wells. Discrepancies between the data tables should be evaluated and resolved.

Wells HNWR-1 and HNWR-1A should be added to Table 2.

5. Table 3 and Section 4.1 of the Memo need to be modified to comply with Mitigation Measure HYDRO-6A. Specifically, all wells should to be sampled quarterly for the first two years to establish baseline conditions and evaluate seasonal variations prior to remedy start up. These HYDRO-6a wells include: Site B, MTS-1, MTS-2, HNWR-1, HNWR-1A, Hydro-6-30, Hydro-6-100, Hydro-6-175, Topock-2, Topock-3, Marina-1, Marina-1A, PGE-9N, and PGE-9S. The new well discussed in Comment 1 above should also be added to this list. As the owner of the Sanders well has refused participation, it appears that Table 3 and Figure 1 should be corrected to remove that well from the monitoring program. Additionally, it is confusing that the Smith/Allen well is proposed for water level monitoring, even though the owner has not been contacted.
6. Figure 1 should include the MW-56 slant well cluster located in Arizona and text should indicate that it will be sampled as part of remedy monitoring.
7. Wells Hydro-6-30, -100, and -175 should also be incorporated into the HYDRO-6a water level and sampling program as intended.
8. The Memo prepared by Jacobs is not signed and stamped. It should be signed and stamped by the person in responsible charge.

The GSU notes that the recommendations presented in this memorandum are site specific and should not be applied to other projects without consultation with the project geologist. If you have any questions or comments, please contact Chris Guerre at (714) 484-5422 or [Christopher.Guerre@dtsc.ca.gov](mailto:Christopher.Guerre@dtsc.ca.gov).

Peer reviewed by Jose Marcos, P.G.

cc: Alfredo Zanoria, C.E.G., CH.G.