



Hualapai Department of Cultural Resources
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VIA ELECTRONIC MAIL

August 19, 2017

HDCR2017-225

**Ms. Pamela S. Innis
Topock Remedial Project Manager
Office of Environmental Policy and Compliance
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Arizona State Office
One North Central Avenue, Suite 800
Phoenix, AZ 85004-4427**

Re: *Ambient/Background Study of Dioxins and Furans at the Pacific Gas and Electric Company Compressor Station, Needles, California.*

Dear Ms. Innis,

Thank you for taking a few moments to review our comments. On July 20, 2017, PG&E distributed their draft Technical Memorandum (TM) titled *Ambient/Background Study of Dioxins and Furans at the Pacific Gas and Electric Company Compressor Station, Needles, California*. This letter provides comments on this TM on behalf of the Hualapai Tribe.

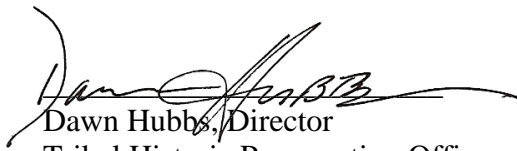
The Hualapai supports the determination of regional dioxin/furan background concentrations in soil and generally agrees with the conclusions presented within the TM. It is the Hualapai's position that the complete background dataset is appropriate for use in both risk assessment and remediation decisions. All sample locations included in the background data set were selected during field visits and were selected to represent locations that would not be impacted by the Topock Compressor Station (TCS). In addition, the purpose of collecting samples from many different areas around the TCS was to provide sufficient samples to understand what is 'ambient' in the TCS area. Therefore, Hualapai supports the use of the full dataset in calculating a single ambient background concentration for the dioxin and furan compounds.

It is the Hualapai's opinion that any increase in field activity, which was not accounted for in the Soil Investigation EIR, potentially increases the project impact. Recognizing this, the Hualapai requested a consultation with DOI, prior to the approval of this dioxin/furan work plan, to discuss the locations of the background samples and to ensure that the impact of additional soil collection was recognized and reduced where possible. While it is understood that the background soil sample locations proposed within the TM are all contained on federal lands, the background values are intended to be used as a general background number for the risk

assessment. This will be in support of both the State Resource Recovery Act (RCRA) and the Federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) requirements. The Hualapai is concerned over every single field activity and expect that collected samples will be used for their intended purpose. Therefore, the Hualapai requests that DOI solicit DTSC's commitment to characterizing and utilizing this dioxin/furan background data so all areas of the project site will benefit from this new data.

We appreciate working with the Department of the Interior through the Office of Environmental Policy and Compliance while involved with the Topock Remediation Project. Thank you for taking time to address our concerns. If there are any questions please feel free to contact our office at 928-769-2223 and we will be happy to assist.

Sincerely,



Dawn Hubbs, Director
Tribal Historic Preservation Office

Cc: Dr. Damon R. Clarke, Chairman Hualapai Tribal Council
Mr. Philbert Watahomigie, Sr., Vice Chairman Hualapai Tribal Council
Ms. Karen Baker, DTSC
Mr. Aaron Yue, DTSC
Ms. Nora McDowell, FMIT
Mr. Steven Escobar, Councilman Chemuevi Tribal Council
Mr. Ron Escobar, Councilman Chemuevi Tribal Council
Ms. Toni Carlyle, CRIT c/o Mr. Estitty (CRIT Acting THPO)
Mr. Doug Bonamici, CRIT
Ms. Jill McCormick, Cocopah
Mr. Edgar Castillo, Cocopah