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April 8, 2022

Ms. Pamela Innis U.S. Department of the Interior CHF Remedial Project Manager One North Central Avenue, Suite 800 Phoenix, AZ 85004-4427

Mr. Aaron Yue California Department of Toxic Substances Control 5796 Corporate Avenue Cypress, CA 90630

Subject: March 2022 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup, PG&E Topock Compressor Station, Needles, California (Document ID: TPK_Monthly_Progress_Rpt_March_2022_20220410)

Dear Ms. Innis and Mr. Yue:

In compliance with the *1996 Corrective Action Consent Agreement* (CACA) (Attachment 6, Part E, Section 9a and Attachment 7) and the *2013 Remedial Design/Remedial Action Consent Decree* (CD) (Paragraph 32 and Appendix C, Section 5), and pursuant to the *Construction/Remedial Action Work Plan* (C/RAWP) (Section 2.6.3.1), this monthly report describes activities taken at Pacific Gas and Electric Company's (PG&E's) Topock Compressor Station in February 2022, as well as activities planned for the next six weeks (April 3 to May 14, 2022), and presents available results from sampling and testing performed in the reporting period.

This report also discusses material deviations from the approved design documents and/or the C/RAWP, if any, that PG&E has proposed to DTSC and DOI, or that have been approved by DTSC and DOI. This report highlights key personnel changes, if any, and summarizes activities performed and activities planned in support of DOI's 2012 Community Involvement Plan and DTSC's 2019 Community Outreach Plan, as well as contacts with the local community, representatives of the press, and/or public interest groups, if any. This report also includes data from samples collected as part of the sitewide groundwater monitoring program within 60 days of sample collection, as required by the Condition of Approval # xi in DTSC's approval letter dated August 24, 2018.

Please note that since activities conducted to comply with the project's Applicable or Relevant and Appropriate Requirement (ARARs) and the Subsequent Environmental Impact Report (SEIR) mitigation measures are currently reported in separate compliance reports, this information is not repeated in the monthly reports. Monthly progress reports will be submitted to DTSC and DOI by the 10th day of the following month during construction and start-up of the groundwater remedy at the Topock Compressor Station which officially began on October 2, 2018. This is the 42nd monthly progress report. Please contact me at (760) 791-5884 if you have any questions or comments regarding this submittal.

Sincerely,

Schussell

Curt Russell Topock Project Manager

Topock Project Executive Abstract

| Document Title: March 2022 Monthly Progress Report for the Groundwater Remedy Construction and Startup, PG&E Topock Compressor Station, Needles, California Submitting Agency: DOI, DTSC Final Document? <u>X</u> YesNo | Date of Document: 04/10/2022 Who Created this Document?: (i.e. PG&E, DTSC, DOI, Other) PG&E |
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| Priority Status:HIGHMED X_LOW | Is this time critical? Yes <u>X</u> No |
| Type of Document: Draft <u>X</u> Report Letter Memo Other / Explain: | Action Required: X Information OnlyReview and Input Other / Explain: |
| What does this information pertain to? | Is this a Regulatory Requirement? <u>X</u> Yes <u>No</u> If no, why is the document needed? |
| What is the consequence of NOT doing this item? What is the consequence of DOING this item? The consequence for not doing this item is PG&E will be out of compliance with the 1996 Corrective Action Consent Agreement (CACA) and the 2013 Remedial Design/ Remedial Action Consent Decree (CD), as well as the Construction/Remedial Action Work Plan (C/RAWP). | Other Justification/s: Permit Other / Explain: |
| Brief Summary of attached document: This monthly report describes activities taken in March 2022 as wel 2022) and presents available results from sampling and testing in th deviations from the approved design documents and/or the <i>Constru</i> has proposed to the California Department of Toxic Substances Co that have been approved by DTSC and DOI. This report also highlig performed and activities planned at the Topock Compressor Station DTSC's 2019 Community Outreach Plan, as well as contacts with le interest groups, if any. Written by: Pacific Gas and Electric Company | ne reporting period. In addition, this report discusses material <i>action/ Remedial Action Work Plan</i> (C/RAWP), if any, that PG&E introl (DTSC) and the U.S. Department of the Interior (DOI) or ghts key personnel changes, if any, and summarizes activities in support of DOI's 2012 Community Involvement Plan and |
| Recommendations: Provide input to PG&E. | |
| How is this information related to the Final Remedy or Regulatory R This submittal is required in compliance with the CACA, CD, and pu | - |
| Other requirements of this information? None. | |



March 2022 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup

PG&E Topock Compressor Station Needles, California

Document ID: TPK_Monthly_Progress_Rpt_March_20220410

April 2022

Prepared for U.S. Department of the Interior and California Department of Toxic Substances Control

On Behalf of Pacific Gas and Electric Company





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Acronyms and Abbreviations

| Acronym | Definition |
|---------|--|
| µg/m³ | microgram(s) per cubic meter |
| AOC | Area of Concern |
| ARAR | applicable or relevant and appropriate requirement |
| BLM | U.S. Bureau of Land Management |
| BMP | best management practice |
| CACA | Corrective Action Consent Agreement |
| C/RAWP | Construction/Remedial Action Work Plan |
| CD | Consent Decree |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CH2M | CH2M HILL, Inc. |
| CHQ | Construction Headquarters |
| COC | Constituents of Concern |
| CRWQCB | California Regional Water Quality Control Board, Colorado River Basin Region |
| DOI | United States Department of the Interior |
| DTSC | California Department of Toxic Substances Control |
| ERTC | Environmental Release to Construct |
| FCR | field contact representative |
| IM-3 | Interim Measure No. 3 |
| IRZ | in-situ reactive zone |
| LOC | level of concern |
| NTH | National Trails Highway |
| PG&E | Pacific Gas and Electric Company |
| RCRA | Resource Conservation and Recovery Act |
| RPWC | Remedy-Produced Water Conditioning |
| SEIR | Subsequent Environmental Impact Report |
| SMP | Soil Management Plan |
| SPY | Soil Processing Yard |
| SWPPP | Stormwater Pollution Prevention Plan |
| SWRCB | State Water Resources Control Board |
| TCS | Topock Compressor Station |
| TRC | Technical Review Committee |
| USEPA | U.S. Environmental Protection Agency |
| USFWS | U.S. Fish and Wildlife Service |
| WEAT | Worker Environmental Awareness Training |
| WVR | Work Variance Request |
| | |



1. Introduction

Pacific Gas and Electric Company (PG&E) is implementing the final groundwater remedy to address chromium in groundwater near the PG&E Topock Compressor Station (TCS), located in eastern San Bernardino County 15 miles southeast of the city of Needles, California. The U.S. Department of the Interior (DOI) is the lead federal agency overseeing remedial actions at the TCS. PG&E and the United States executed a Remedial Design/Remedial Action Consent Decree (CD), on behalf of the DOI, under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) in 2012, which was approved by the U.S. District Court for the Central District of California in November 2013 (DOI, 2013). Paragraph 32 and Appendix C (Section 5) of the CD requires PG&E to submit to DOI monthly electronic progress reports during construction of the remedial action, and to submit progress reports on a quarterly basis after the selected remedy has been implemented and demonstrated to be operating as intended.

The California Department of Toxic Substances Control (DTSC) is the lead state agency overseeing corrective actions at the TCS. Remedial activities are being performed in conformance with the requirements of the Resource Conservation and Recovery Act (RCRA) Corrective Action pursuant to a Corrective Action Consent Agreement (CACA) entered into by PG&E and the DTSC in February 1996 (DTSC, 1996). Attachment 6, Part E, Section 9a and Attachment 7 of the CACA require PG&E to provide certain information in monthly progress reports during construction of the corrective action.

In compliance with the CACA and CD requirements, PG&E proposed a template for the monthly progress reports in Exhibit 2.6-2 of the Construction/Remedial Action Work Plan (C/RAWP) (CH2M HILL, Inc. [CH2M], 2015b). The C/RAWP was approved by DOI on April 3, 2018 (DOI, 2018) and DTSC on April 24, 2018 (DTSC, 2018a).

This is the 42nd of the monthly progress reports that will be submitted to DOI and DTSC for the duration of the remedy construction and startup. This monthly progress report documents activities during March 2022, and follows the content and format described in Exhibit 2.6-2 of the approved C/RAWP. The report is organized as follows:

- Sections 2.1 through 2.7 describe completed construction activities; data collected, generated or received; nature and volume of waste generated; waste handling/disposal; issues encountered; actions taken to rectify problems/issues; personnel changes; and Work Variance Requests (WVRs; i.e., material deviations from the design documents, the C/RAWP, or other approved work plans), if any, as well as agencies' actions on those requests, and potential schedule impacts.
- Sections 2.8 through 2.9 summarize key project personnel changes, if any, contacts with
 representatives of the press, local community, or public interest groups during the reporting period,
 other activities provided to assist DTSC and/or DOI in support of the Community Outreach Plan
 (DTSC, 2019) and/or Community Involvement Plan (DOI, 2012), respectively, and anticipated nearterm (approximately next six weeks) activities in support of the Community Outreach and Community
 Involvement Plans.
- Section 2.10 provides information relating to the construction schedule progress, sequencing of activities, information regarding percentage of completion, unresolved delays encountered or anticipated that may affect the future schedule, and a description of efforts made to mitigate those delays or anticipated delays, if any.
- Section 2.11 presents validated data from samples collected as part of the sitewide groundwater monitoring program within 60 days of sample collection, as required by the Condition of Approval # xi in DTSC's approval letter dated August 24, 2018 (DTSC, 2018a).
- Section 3 lists the references cited in this report.



Please note that since activities conducted to comply with the project's Applicable or Relevant and Appropriate Requirement (ARARs) and the Subsequent Environmental Impact Report (SEIR) (DTSC, 2018b) mitigation measures are currently reported in separate compliance reports, the same information is not repeated in the monthly reports.

2. Monthly Update

2.1 Work Completed

Phase 1 remedy construction, which began on October 2, 2018, is substantially complete in January 2022. Phase 1 includes the National Trail Highway (NTH) Insitu Reactive Zone (IRZ) with 22 remediation wells (for injection and/or extraction) and a robust network of 75 monitoring wells (for measuring water levels and quality), as well as a network of over 74,000 linear feet of water conveyance piping and 41,000 feet of electrical conduits that connect the remediation wells to the power supply system, the carbon amendment building, and the Remedy-Produced Water Conditioning (RPWC) system.

Phase 1 systems and components have been integrated and tested to make sure they function properly. On December 22, 2021, PG&E initiated injection of ethanol into the groundwater at select NTH IRZ wells using temporary power (i.e., portable generator). On March 24, 2022, the permanent power system (from TCS) was fully operational. At the time of this report, the RPWC system inside TCS is going through final commissioning steps and is anticipated to be in operation in April 2022.

Concurrently, after receipt of DTSC's and DOI's approvals, PG&E turned off the IM-3 extraction wells (TW-2D and TW-3D) on December 21, 2021 and started to prepare IM-3 for layup. The preparation for lay-up was completed on March 21, 2022. PG&E notified the agencies that IM-3 is in lay-up mode on March 22, 2022. When the IM-3 system is in a lay-up condition, the system will be left in a safe, secure, and preserved state and will not operate again until agency approval is received for decommissioning and removal of the system.

Starting in February 2022, PG&E initiated the planning for Phase 2 remedy construction. An online Phase 2 Construction Project Initiation Meeting was conducted on February 23, 2022 with representatives from PG&E, PG&E contractors, agencies, and other stakeholders. A second version of the Phase 2 Construction Project Initiation Meeting was scheduled for March 2, 2022 as a face-to-face onsite meeting. Phase 2 includes additional wells (located in Bat Cave Wash/East Ravine/TCS, on the Transwestern Bench, and along historic route 66), and pipelines connecting some of the additional wells as well as a pipeline connecting the previously installed Riverbank (RB) wells.

Additional highlights of key activities related to the construction of the groundwater remedy completed during the reporting period include the following (in chronological order):

- On July 13, 2018, PG&E sent via email the first weekly six-week look-ahead schedule for the remedy construction field work. The weekly emails provide highlights of field activities in the previous week, field activities scheduled for the next week, and planned activities for the next six weeks. Recipients of the weekly emails are DOI, DTSC, the U.S. Fish and Wildlife Service (USFWS), the California Regional Water Quality Control Board, Colorado River Basin Region (CRWQCB), the Metropolitan Water District of Southern California, Tribes, and the Technical Review Committee (TRC). PG&E continues to send these weekly emails to date. As of March 31, 2022, a total of 196 six-week look-ahead schedule emails have been sent. Of those, four six-week look-ahead schedule emails were sent in March 2022 (on March 6, 13, 20, and 27).
- On August 10, 2018, PG&E issued the first Environmental Release to Construct (ERTC) to contractors. As of March 31, 2022, a total of 88 ERTCs were issued for mobilization, construction, site restoration, and revegetation/mitigation planting activities. The ERTCs are listed in Tables 2-1a and 2-1b. In March 2022, the following ERTCs and Addendums were issued:



- On March 13, Addendum 1 to ERTC #5ar was issued for drilling of wells TWB-1 and TWB-2 at the TW Bench. A Last Look for well drilling was combined with the Last Look for site preparation, and was conducted on March 3 prior to the start of site preparation work.
- On March 14, ERTC #5at was issued for the site preparation and drilling of wells TCS-1 and TCS-2 inside the Compressor Station. A Last Look was conducted on March 15, 2022.
- On March 17, Amendment 1 to ERTC #17 was issued for fence installation and planting in the floodplain revegetation areas. A Last Look for this activity was combined with the Last Look conducted for the overall revegetation area in the floodplain on December 17, 2022.
- On March 18, ERTC #5as was issued for the site preparation and drilling of wells ER-1 and ER-2 along historical route 66. A Last Look was conducted on March 30, 2022, prior to the start of work.
- Starting on October 4, 2018, PG&E has published a daily construction activities list and discussed the
 list at the morning tailboards with Tribes and agency representatives. This daily list is intended to
 inform and facilitate observation by Tribes and agency representatives on site on that day. PG&E
 continues to publish these daily lists and discuss the list at the daily morning tailboards to date. In
 March 2022, a total of 27 daily construction activities lists were published and discussed at the
 morning tailboards.
- In March 2022, PG&E performed the following construction activities (note that Figures 2-1 and 2-2 show the locations of key areas and wells, and Table 2-2 presents the changes in well nomenclature):
 - Attachment A includes select photos of activities during this reporting period.
 - Attachment B presents all water analytical results from Phase 1 well drilling. Phase 1 well drilling is complete. Groundwater sampling to establish baseline concentrations at those wells is ongoing and their results are reported Attachment G of this report.
 - February 27 to March 5 activities:
 - Continued system electrical installation and evaluation. Continued Remedy electrical system testing by powering with a generator at TCS.
 - Continued installing canopy panels at Nodes 2 and 4.
 - Continued functional testing of SCADA system.
 - Continued IRZ circulation and ethanol injection O&M activities.
 - Continued irrigation system O&M activities.
 - Continued IM-3 tank cleaning and completed bollard removal from injection field location.
 - Continued stormwater improvement project for Pipeline B area.
 - Conducted last look and initial site prep for TWB well site.
 - Continued new office trailer installation at Soil Processing yard.
 - Removed office trailer and connex boxes from Transwestern Bench.
 - Continued moving mats in the floodplain area and groomed floodplain.
 - Conducted groundwater sampling at various locations.
 - March 6 to 12 activities:
 - Continue system electrical installation, testing, and commissioning. Continue Remedy electrical system testing by powering with a generator at TCS.
 - Continue functional testing of MW-20 Bench, IRZ well controls, and at the tank farm area.
 - Continue IRZ circulation and ethanol injection O&M activities.
 - Continue stormwater improvement project for Pipeline B area.



- Continue irrigation system O&M activities and collect soil samples at planting locations.
- Continue IM-3 system cleaning activities.
- Commence site preparation activities at TWB-1 site.
- Conduct groundwater sampling and transducer downloads at various locations.
- March 13 to 19 activities:
 - Continue stormwater improvement project for Pipeline B area.
 - Continue functional testing of MW-20 Bench, IRZ well controls, and at the tank farm area.
 - Conduct quarterly groundwater sampling and transducer downloads at various locations.
 - Continued planting prep, initial weed abatement and fencing installation at planting location.
 - Continue IM-3 system cleaning activities.
 - Conducted TCS-1 site prep.
 - Continue drill activities at TWB-1 site.
 - Continue irrigation system O&M activities and collect soil samples at revegetation locations.
 - Continued moving mats in the floodplain area and groomed floodplain.
 - Conducted offsite transportation of asphalt grindings.
- March 20 to 26 activities:
 - Continued stormwater improvement project for Pipeline B area.
 - Continued functional testing of MW-20 Bench, IRZ well controls, and at the tank farm area.
 - Conducted power system power connection, testing, and maintenance activities. Remedy power system is now connected to TCS system.
 - Continued fencing installation at planting location and commenced planting.
 - Concluded IM-3 system cleaning and layup preparation activities. IM-3 is now in layup.
 - Conducted ER-1 and FW-2 site prep.
 - Continued drilling pilot hole to 127 feet at TWB-1.
 - Commenced drilling pilot hole to 102 feet at TWB-2.
- Remedy Baseline/Opportunistic Soil Sampling in March 2022:
 - Pursuant to the Baseline Soil Sampling and Analysis Plan (Appendix A of the Soil Management Plan [SMP] [which is Appendix L of the C/RAWP]), the following baseline soil samples were collected:
 - On March 9, 2022, one soil sample was collected at one foot below ground surface (bgs) at ER-1 and ER-2 well locations.
 - On March 10, 2022, one soil sample was collected at one foot below ground surface (bgs) at TWB-1 and TWB-2 well locations.
 - On March 18, 2022, one soil sample was collected at one foot bgs at FW-2 well location.
 - On March 31, 2022, one soil sample was collected at one foot below ground surface (bgs) at TCS-1 well location.
 - Attachment C includes a figure showing all soil sampling locations (since the start of remedy construction) and an excel spreadsheet with soil analytical results available to date.



Fugitive Dust Monitoring/Perimeter Air Sampling in March 2022 (below are highlights, details are in Attachment D):

- In March 2022, 40 real time dust observation/monitoring events were conducted at the perimeter of the work areas (outside of the exclusion zone). No exceedance of the action level for fugitive dust monitoring (100 µg/m³) was observed in March 2022.
- Two air sampling events for hexavalent chromium were conducted at the SPY on March 18 and March 22, 2022. Data will be reported in future monthly reports when available.
- For brevity, starting with this report (March 2022), Tables D-1a and D-1b of **Attachment D** present all analytical results from air sampling events conducted during Phase 2 remedy construction available at this time. Analytical results from air sampling events conducted during Phase 1 remedy construction are available in the February 2022 Monthly Progress Report.
- Noise Monitoring in March 2022 (below are highlights, details are in Attachment E):

In March 2022, the following monitoring events were conducted:

- Eleven events at a location west of the mobile home park at Moabi Regional Park.
 Construction activities closest to this monitoring location include activities at the SPY and CHQ, as well as construction traffic on NTH. The sound level typically varied between 41 and 56 dBA, with an average and median of 45-47 dBA.
- Ten events at a location in the Upland just off the IM-3 access road, and near the top of the hill closest to the NTH and MW-20 Bench. Construction activities closest to this monitoring location include activities at the MW-20 Bench and construction traffic on the IM-3 access road. The sound level varied between 47 and 55 dBA, with an average and median of 50 dBA.
- Eleven events at the old restaurant location west of NTH. Construction activities closest to this monitoring location include construction traffic on NTH and construction traffic in the north floodplain. The sound level varied between 46 and 58 dBA, with an average and median of 52 dBA.
- Nine events at a location on a bluff below TCS, just south of I-40 and east of the Topock Maze. Construction activities closest to this monitoring location are associated with site preparation for drilling of FW-02 well location in Bat Cave Wash, site preparation for TCS-1 drilling, and drilling of well TCS-1. The sound level typically varied between 53 and 59 dBA, with an average and median of 56-57 dBA.

2.2 Freshwater Usage, Waste Generation, and Management

As of March 31, 2022, the volumes of freshwater used for remedy construction and waste streams generated from remedy construction (starting on October 2, 2018), IRZ start-up and initial operation (starting on December 22, 2021), and revegetation/mitigation planting (starting with site preparation on December 20, 2021) are as follows:

2.2.1 Freshwater and Wastewater

- As of March 31, 2022, an approximate total of 8,916,962 gallons (27.37 acre-feet) of freshwater have been used, of which approximately 27.21 percent was for pilot boring/well installation/well testing and general construction, 7.5 percent was for hydrostatic testing of pipeline and piping/mechanical components inside well vaults, 57 percent was for fugitive dust suppression, and 8.3 percent for revegetation (salt leaching). Of this amount, approximately 546,004 gallons was used for leaching of soluble salts from soil at the revegetation areas in the floodplain, 43,500 gallons was for fugitive dust control, 24,000 gallons for well drilling, and 50,500 gallons for general construction in March 2022.
- As of March 31, 2022, an approximate total of 112,325 gallons of hydrostatic testing water has been discharged to land (used for dust control). All water discharged to land was in compliance with the



substantive requirements of State Water Resources Control Board (SWRCB) Water Quality Order 2003-0003-DWQ.

No hydrostatic testing activity occurred in March 2022, therefore, there was no discharge to land from hydrostatic testing.

- As of March 2022, approximately 154,893 gallons of injectivity testing water has been discharged to land. No injection testing was conducted in March 2022.
- IM-3 treated an approximate total of 22,241,409 gallons of remedy wastewater (generated from drilling operations, well testing, aquifer testing) up to December 28, 2021. The treatment at IM-3 was terminated on December 28, 2021. IM-3 is now in lay-up mode.
- As of March 31, 2022, an approximate total of 1,387,952 gallons of wastewater generated from drilling operations were discharged to Compressor Station evaporation pond #4. Between November 2020 and the week of July 19, 2021, no remedy wastewater was transported to Pond #4 as PG&E prepared for and removed sludge from the pond. After sludge was removed from the pond, during the week of July 26, 2021, PG&E disposed of approximately 14,000 gallons of wastewater generated from PGE-9 wells (part of SEIR Hydro-6 wells) to Pond #4. No remedy wastewater has been discharged to TCS ponds since August 2021.
- As of March 31, 2022, an approximate 59,210 gallons of remedy-produced water (e.g., IRZ backwash water, well sampling purge water, and stormwater pumped from vaults/secondary containment) was generated. Of which, an approximate 21,516 gallons of remedy-produced water (19,279 gallons backwash water, 272 gallons purge water, and 1,965 gallons stormwater) was generated in March 2022.

Backwash water was stored in the frac tanks at the MW-20 Bench. While commissioning of the Remedy-produced Water Conditioning system at the TCS is being finalized, the IRZ backwash water is filtered at the MW-20 Bench, through the same filter as in the final design. The filtered water is stored in the conditioned water frac tank at the MW-20 Bench and per the remedy O&M contractor, the filter water is sampled in accordance with the approved sampling plan in the O&M Plan.

To date, about 55,098 gallons (or 93%) of the remedy-produced water (after filtration) was reinjected into the aquifer. Analytical data for remedy-produced water is included in Attachment G (see page 7 of 25).

2.2.2 Displaced Materials/Soils/Clay

 As of March 31, 2022, approximately 13,041 cubic yards of displaced materials/excess soils were generated from remedy construction activities. Of those, approximately 10 cubic yards of excess soils was generated from drilling on the Transwestern Bench (i.e., wells TWB-1 and TWB-2), on the TCS (i.e., well TCS-1), and along historic route 66 (i.e., well ER-1) in March 2022. Excess soils from drilling activities will be brought back to the SPY when the bins are near full.

The displaced materials/soils are tested, processed (if needed), and managed in accordance with the Soil Management Plan (which is Appendix L of the C/RAWP). To date, approximately 89.8% of the materials were classified as clean, suitable for reuse onsite. The remaining 10.2% of the materials (total weight of 1,517 tons or 1,250 cubic yards) were deemed not suitable for reuse onsite and were disposed of at US Ecology in Beatty, Nevada.

- Clean materials are often processed to remove rocks/boulders and plastics prior to reuse. Approximately 82% was fine materials and 18% was rocks/boulders.
- During the sorting of soil piles at the SPY (starting in October 2021), approximately 3 cubic yards of clay from Soil Pile #139 were identified, recovered, and stockpiled in the vicinity of the existing clay pile. In addition, approximately 1 cubic yard of clay from Soil Pile #140 was also recovered and stockpiled. Soil sorting and processing at the SPY was temporarily paused when the vegetation and debris cleanup started for the revegetation project. The recovered clay will be sampled after the completion of sorting of Soil Pile #139 in accordance with the Soil Management Plan.



• It is noted that during the soil processing/screening activities at the SPY, concrete debris was removed and separated from the processed soil. Encased, non-friable transite pipes are present inside several concrete chunks. Therefore, the concrete debris was properly profiled and will be disposed of in accordance with the profile approved by PG&E and US Ecology in Beatty, Nevada.

2.2.3 General Construction Waste, Sanitary Waste, and Recyclables

- As of March 31, 2022, approximately 2,044 cubic yards or 1,840 tons of general construction waste (assume density of 1800 pounds (0.9 tons) per cubic yard for dump debris, wetted for dust suppression), 277 tons of construction debris, 38 cubic yards of milled asphalt from NTH repair work, 2,062 tons of green waste, and 276 cubic yards of recyclables were generated from remedy construction activities. Of which, an approximate 4.6 tons of general construction waste/trash in March 2022. In addition, 125.17 tons of broken concrete with encased non-friable pipe and milled asphalt were hauled offsite to US Ecology in Beatty, Nevada, in March 2022.
- In April 2021, approximately 40 cubic yards of asphalt was sent offsite for recycling at Kern Asphalt facility in Bakersfield, California. In September 2021, an approximate 27 cubic yards of old asphalt was removed from paving work along NTH. In addition, an approximate 1 cubic yard of old asphalt was removed from recent stormwater BMPs work at the TWB. These old asphalts were sent offsite for recycling on November 2, 2021.
- A total of nine tires were recovered during construction along Pipeline B/J and disposed of at Mohave Valley landfill in Fort Mohave, Arizona for disposal. No additional tires were encountered since February 2020.
- Sanitary waste from construction trailers/portable toilets is hauled offsite as needed.
- Starting in September 2019, recycling at the site was ceased due to the high costs of local recycling.

2.3 Worker Training and Education

- In March 2022, PG&E continues to implement health-protective practices at the site in response to
 the emergent broader public health threat posed by the COVID-19 virus, in accordance with guidance
 received from federal and state public health departments, and included, for example, implementation
 of social distancing protocols and increasing the frequency of cleaning of the common work areas. In
 addition, during the morning tailboards, on-site workers were provided with updated guidance relating
 to the mitigation of the risks of viral exposure and transmission. All new or returning workers or
 visitors are required to take a mandatory COVID-19 protocol briefing and complete a daily selfdeclaration form. In addition, starting in March 2022, Covid-19 training is combined with the
 mandatory Site Health and Safety Training.
- PG&E continues to provide the mandatory Site Health and Safety Training for its employees and contractors on a daily basis. As of March 31, 2022, a total of 325 health and safety training sessions were held and 902 employees and contractors received the training. Of those, in March 2022, 5 sessions were conducted and 50 employees/contractors/visitors were trained. After the training, the attendees signed the training roster.
- PG&E continues to provide the mandatory Worker Environmental Awareness Training (WEAT) to its employees and contractors that will be involved in the remedy construction project. The self-administered WEAT (which was formally rolled out on March 1, 2022) is a self-study course and is available 24/7 and can be taken anywhere at any time. After the training, the WEAT attendees took a quiz and signed the WEAT Completion Form. As of March 31, 2022, 993 employees and contractors received the training. Of those, in March 2022, 46 employees/ contractors were trained or retrained. Educational brochures are made available to attendees of the training; they are designed to reinforce the key topics and highlight the take-aways discussed during the training.
- PG&E's onsite biologist also trained Field Contact Representatives (FCRs), who will be responsible for compliance with biological avoidance and mitigation measures. As of March 31, 2022, a total of 21 FCR training sessions were conducted. No FCR session was conducted in March 2022.



• Training records are kept electronically and at the temporary construction trailer at the SPY. The records are available upon request.

2.4 Status of Work Variance Requests (WVRs)

There was no proposed WVRs in March 2022. For reference, Table 2-3 includes information regarding activities related to approved and proposed WVRs (i.e., material deviations from the design documents, the C/RAWP, or other approved work plans), and agencies' actions on those requests.

2.5 Use of Future Activity Allowance

There was no proposed use of Future Activity Allowance (FAA) in March 2022. To date, the only use of FAA was associated with the TW-01 Aquifer Test, which is documented below.

In May 2021, DTSC prepared and adopted an addendum to the Groundwater Subsequent Environmental Impact Report (SEIR) for the TW-01 aquifer test activities. As part of the approval of the TW-01 aquifer test work plan, DTSC has also determined that the proposed additional water conveyance pipeline and power pole are considered future activities allowance (FAA) considered in the SEIR. DTSC and DOI approved the TW-01 aquifer test work plan on April 8, 2021. DTSC directed PG&E to track and record the additional infrastructures associated with TW-01 aquifer test as required by the SEIR mitigation measure CUL-1a-14. To date, the following additional infrastructures were associated with implementation of the TW-01 aquifer test:

An approximate 2,090 linear feet (If) of aboveground and 56 If of belowground conveyance pipeline were installed. In addition, a trench (50 ft long x 3 ft deep x 3 ft wide) was excavated for piping installation under the access road on the MW-24 bench. A trench (6 ft long x 4.5 ft deep x 4 ft wide) was excavated to connect with the IM-3 spare pipe on the MW-20 bench. One temporary electrical pole was installed by Needles Electrical to provide electrical power needed for the TW-01 aquifer test.

2.6 Issues Encountered and Actions Taken to Rectify Issues/Problems

- PG&E continues to commission the electrical system to provide permanent power (from TCS) to the groundwater remedy. After an effort to bring on the permanent power system was unsuccessful in January 2022, PG&E continued to test the entire remedy electrical system during February using portable generators. Some failed electrical parts were identified and repaired or replaced. In mid-March, some electrical parts associated with Nodes 2 (floodplain) and 4 (along C14 access road) failed and were repaired. During the third week of March, PG&E operated the NTH IRZ using permanent power from TCS.
- On March 23, 2022, a hydraulic line came loose or broke during the process of retrieving stuck drill casing from the TWB-2 borehole on PG&E's property within the Transwestern Bench. Hydraulic fluid leaked onto the soil hopper, mud tub, and well casing. Due to height of the drill head at the time of the release, wind blew some droplets of hydraulic fluid onto surrounding gravel. Some hydraulic fluid also got into the mud tub under the drill rig. The drill crew was directed to pick up the gravels stained with hydraulic fluid and to soak up the hydraulic fluid in the mud tub with absorbent pads and place them into a 5-gallon bucket. The volume of oily absorbents and impacted gravels was approximately 1 gallon. Compliance personnel then took the oily solid waste to IM3, placed the waste in the designated 55-gallon drum, and logged the quantity/date. A notification was sent to DTSC and DOI on March 23, 2022.
- On March 29, 2022, a large storm event occurred at the site and caused damages to the erosion control measures (under construction at the time of the storm event) along Pipeline B access road as well as flooded some well vaults along NTH. PG&E is in the process of evaluating options to repair the damages.

March 2022 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup



2.7 Key Personnel Changes

There was no change in key PG&E personnel in March 2022.

2.8 Communication with the Public

There was no communication with the public in March 2022.

2.9 Planned Activities for Next Six Weeks

The planned activities for next six weeks (April 3 to May 14, 2022) include the following:

- Continue fence installation and planting in the floodplain revegetation areas.
- Start fence installation and planting in the upland revegetation areas (also called the UHR-1 area).
- Continue site preparation for and drilling Phase 2 wells.
- Start installation of Phase 2 pipelines.
- Conduct opportunistic soil sampling associated with the repaving project inside TCS.
- Conduct baseline soil sampling in accordance with the approved Groundwater Remedy Baseline Soil Sampling and Analysis Plan.
- Continue to conduct noise and dust monitoring and inspection of SWPPP BMPs, as needed.
- Continue to manage displaced soil per the approved SMP.

Attachment G contains the six-week look-ahead schedule available at this time. Any adjustments to the schedule will occur as needed via the weekly emails (sent at the end of each week) and/or the daily list of construction activities (published daily and discussed with agency and Tribal representatives on site on that day).

2.10 Construction Schedule Review

Table 2-4 presents a summary of the percent completeness for key Phase 1 construction and site restoration activities as of March 31, 2022. In addition, the latest project schedule including remedy construction can be downloaded from the <u>project website</u>.

Percent completeness for key Phase 2 construction activities will be included in the monthly reports, starting with the April 2022 report.

2.11 Available Sitewide Groundwater Monitoring Data (DTSC Condition of Approval xi)

Pursuant to Condition of Approval # xi in DTSC's approval letter dated August 24, 2018 (DTSC, 2018a), PG&E is required to report data from samples collected as part of the sitewide groundwater monitoring program within 60 days of sample collection. In compliance with this requirement, PG&E submitted validated data to DTSC via monthly emails. For ease of recordkeeping and to minimize the number of ad-hoc compliance reports/emails, PG&E has included validated data in each monthly progress report starting with the November 2018 monthly report. The validated data are included in Attachment G of this report.

2.12 IM-3 Shutdown and Preparation for Layup

On December 20, 2021, pursuant to the 2012 Settlement Agreement between the California Department of Toxic Substances Control (DTSC) and the Fort Mojave Indian Tribe (FMIT), Article 5b of Exhibit A, Additional Settlement Terms – Criteria for Decommissioning of IM-3, PG&E notified the FMIT that the IM-



3 system is ready to be turned off since Phase 1 groundwater remedy equipment and facilities are in place, and ready to begin start-up.

Subsequent to the notification to the FMIT, pursuant to Section 7.3.3 (Implementation of Transition Plan) of the approved *Basis of Design Report for the Final Groundwater Remedy*, on December 20, 2021, PG&E requested DTSC's and DOI's approvals for turning off the IM system (also called IM No. 3) as Phase 1 groundwater remedy equipment and systems are in place and ready to begin start-up. PG&E received written approvals from DTSC and DOI on December 20 and 21, respectively.

After receipt of the agencies' approvals, PG&E turned off the IM No. 3 extraction wells (TW-2D and TW-3D) at 2:20 pm pacific standard time on December 21 and started to prepare IM-3 for layup. The treatment at IM3 was terminated on December 28, 2021.

The preparation for lay-up of IM-3 was completed on March 21, 2022 and IM-3 was put on lay-up mode starting March 22, 2022. A report to summarize activities to prepare IM-3 for lay-up is being prepared and will be submitted to DTSC and DOI when available (target Q2 2022).

3. References

California Department of Toxic Substances Control (DTSC). 1996. Corrective Action Consent Agreement (Revised), Pacific Gas and Electric Company's Topock Compressor Station, Needles, California. EPA ID No. CAT080011729. February 2.

California Department of Toxic Substances Control (DTSC). 2018a. Acceptance and Conditional Approval of Groundwater Remedy Design and Corrective Measures Implementation Workplan at Pacific Gas and Electric Company, Topock Compressor Station, Needles, California. April 24.

California Department of Toxic Substances Control (DTSC). 2018b. *Final Subsequent Environmental Impact Report for the Pacific Gas and Electric Company Topock Compressor Station Final Groundwater Remediation Project.* April 24.

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United States Department of the Interior (DOI). 2012. <u>Community Involvement Plan, Pacific Gas and</u> <u>Electric Topock Compressor Station, Needles, California</u>. September.

United States Department of the Interior (DOI). 2013. *Remedial Action/Remedial Design Consent Decree (CD) between the United States of America and Pacific Gas & Electric Company.* Case 5:13-cv-00074-BRO-OP, Document 23. Entered November 21.

United States Department of the Interior (DOI). 2018. Approval of PG&E Topock Compressor Station Remediation Site – Basis of Design Report/Final (100%) Design Submittal and Construction/Remedial Action Work Plan for the Final Groundwater Remedy and the Supplemental and Errata Information for the Final (100%) Design for the Final Groundwater Remedy, PG&E Topock Compressor Station, Needles, California. Letter from Pamela Innis/DOI to Curt Russell/PG&E. April 3.

Tables



Table 2-1a. Summary of Non-Well Environmental Release-To-Constructions (ERTCs)

March 2022 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup PG&E Topock Compressor Station, Needles, California

| ERTC No.* | Brief Description of Covered Areas and Scope of Authorized Activities | Original Issue Date |
|-----------------------------|---|---------------------|
| Amendment 1 to ERTC 21** | Scope included for the fence installation and planting in the revegetation areas in the floodplain. | March 18, 2022 |

Notes:

* For brevity and readability, the Non-Well ERTCs issued for Phase 1 construction, revegetation effort, and miscellaneous stormwater erosion control projects (October 2018 thru February 2022) are not listed in this report. For a complete list of those ERTCs, please Table 2-1a of the February 2022 Monthly Progress Report. The monthly progress reports can be accessed via the Project website at <u>link</u>.

** ERTC 21 was issued on December 15, 2021 for site preparation for mitigation planting which involve the removal of tamarisk debris and root balls, off-site disposal of debris, installation of irrigation system, and leaching of soluble salts from the soil.



Table 2-1b. Summary of Well Environmental Release-To-Constructions (ERTCs)

March 2022 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup PG&E Topock Compressor Station, Needles, California

| ERTC No.* | Brief Description of Covered Areas and Scope of Authorized Activities | Original Issue Date |
|-----------------------------------|--|---------------------|
| 5aq | Scope included the site preparation for and drilling of freshwater injection well FW-2 along the access road to Bat Cave Wash. | February 22, 2022 |
| 5ar | Scope included the site preparation at the TW Bench for drilling of wells TWB-1 and TWB-2. | February 23, 2022 |
| Amendment No. 1 to ERTC 5ar | Scope included the drilling of extraction wells TWB-1 and TWB-2 on the Transwestern Bench. | March 13, 2022 |
| 5as | Scope included the site preparation for and drilling of extraction wells TCS-1 and TCS-2 inside the Compressor Station. | March 18, 2022 |
| 5at | Scope included the site preparation for and drilling of extraction wells ER-1 and ER-2 along historic route 66. | March 14, 2022 |

* For brevity and readability, the Well ERTCs issued for Phase 1 construction are not listed in this report. For a complete list of those ERTCs, please Table 2-1a of the February 2022 Monthly Progress Report. The monthly progress reports can be accessed via the Project website at <u>link</u>.



Table 2-2. Monitoring Wells Nomenclature Changes

March 2022 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup PG&E Topock Compressor Station, Needles, California

| PG&E TOPOCK Compressor S | New Monitoring Well Name |
|--------------------------|--------------------------|
| MW-10D | MW-10D |
| MW-11D | MW-11D |
| MW-70BR-D | MW-70BR-289 |
| MW-B-033 | MW-75-033 |
| MW-B-117 | MW-75-117 |
| MW-B-202 | MW-75-202 |
| MW-B-267R | MW-75-267 |
| MW-B-337 | MW-75-337 |
| MW-C-039 | MW-76-039 |
| MW-C-156 | MW-76-156 |
| MW-C-181 | MW-76-181 |
| MW-C-218 | MW-76-218 |
| MW-D-046R | MW-77-046 |
| MW-D-102 | MW-77-102 |
| MW-D-158 | MW-77-158 |
| MW-D-187 | MW-77-187 |
| MW-E-072 | MW-78-072 |
| MW-E-142 | MW-78-142 |
| MW-F-060 | MW-79-060 |
| MW-F-104 | MW-79-104 |
| MW-G-057 | MW-80-057 |
| MW-G-082 | MW-80-082 |
| Former IRZ-19 | MW-81-43 |
| Former IRZ-19 | MW-81-98 |
| MW-H-046 | MW-82-046 |
| MW-H-112 | MW-82-112 |
| MW-H-168 | MW-82-168 |
| MW-H-198 | MW-82-198 |
| MW-L-090 | MW-83-090 |
| MW-L-180 | MW-83-180 |
| MW-L-225 | MW-83-225 |
| MW-L-245 | MW-83-245 |
| MW-M-057 | MW-84-057 |
| MW-M-095 | MW-84-095 |



| Previous Well Name | New Monitoring Well Name |
|--------------------|--------------------------|
| MW-M-132 | MW-84-132 |
| MW-M-193 | MW-84-193 |
| MW-N-129 | MW-85-129 |
| MW-N-217 | MW-85-217 |
| MW-N-237 | MW-85-237 |
| MW-O-030 | MW-86-030 |
| MW-O-066 | MW-86-066 |
| MW-O-120 | MW-86-120 |
| MW-O-140 | MW-86-140 |
| MW-R-109 | MW-87-109 |
| MW-R-139 | MW-87-139 |
| MW-R-192 | MW-87-192 |
| MW-R-275 | MW-87-275 |
| MW-S-109 | MW-88-109 |
| MW-U-183 | MW-89-183 |
| MW-U-273 | MW-89-273 |
| MW-W-031 | MW-90-031 |
| MW-X-045 | MW-91-045 |
| MW-X-120 | MW-91-120 |
| MW-X-170 | MW-91-170 |
| MW-X-320 | MW-91-320 |
| MW-Y-037 | MW-92-037 |
| MW-Y-072 | MW-92-072 |
| MW-Y-102 | MW-92-102 |
| MW-Y-122 | MW-92-122 |
| MW-Z | MW-93 |
| HYDRO-6 (deep) | MW-94-30 |
| HYDRO-6 (mid) | MW-94-100 |
| HYDRO-6 (shallow) | MW-94-175 |
| MW-V | MW-95-113 MW-95-157 |
| MW-A | MW-96-045 MW-96-217 |
| Former IRZ-11 | MW-97-042 MW-97-202 |
| Relocated MW-K | MW-98-055 MW-98-077 |



| Previous Well Name | New Monitoring Well Name |
|--------------------|--------------------------|
| Second HYDRO-6 | MW-99-40 |
| | MW-99-140 |



Table 2-3. Summary of Work Variance Requests (WVRs)

March 2022 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup PG&E Topock Compressor Station, Needles, California

| WVR No. | Brief Description of Work Variance Request | Approval Dates |
|---------|--|---|
| 1 | This WVR addressed PG&E's proposed modification to the brine tanks containment for use by the remedy, specifically: | DOI approved WVR #1 on June 22, 2018 |
| | • Upgrade the existing lined containment to concrete - The original synthetic liner material has degraded from exposure to UV light, heat, and abrasion and must be replaced. PG&E proposed to replace the synthetic-lined containment (including K-rails) with a concrete containment to support the groundwater remedy. The concrete color will be desert tan, and information on this proposed concrete color will be submitted to the agencies for review. The proposed concrete material will be similar to the material of the truck lane in the final remedy design (refer to Appendix E of the Final Basis of Design Report (CH2M, 2015a),* Section 033 00, Cast-In-Place Concrete). | DTSC approved WVR #1 on July 5, 2018 |
| | • Shorten the length of the containment - This containment will have the same height as the existing containment, but with a slightly smaller footprint (the length is 5 feet shorter). This smaller footprint still meets the required volume for a secondary containment and allows for more space for remedy construction at the tight MW-20 bench. | |
| 2 | PG&E proposed to relocate the tie-in point for remedy construction water to an aboveground location inside Topock Compressor Station (TCS) and below the TCS Water Storage Tanks. This is to eliminate the risk of damaging the existing pressurized 6-inch water line and to avoid any interference with PG&E Gas Operations control of the Station's water supply. The WVR addressed this relocation, specifically: | DOI/DTSC approved WVR #2 on August 29, 2018 |
| | Relocate the construction water tie-in point to an aboveground location below the TCS Water Storage Tanks, inside TCS – The final design calls for the temporary construction water line to hot-tap into the existing 6-inch steel water line just as the line turns southwest to continue to TCS. PG&E proposed to move the tie-in point to an aboveground valve manifold, located below the TCS Water Storage Tanks in the boneyard area. | |
| | • Extend the temporary construction water line to the new tie-in point, along Pipeline 300A access road – The planned 4-inch high-density polyethylene (HDPE) temporary construction water line will be extended, following the route of the Pipeline 300A access road, to the new tie-in point inside TCS. This pipeline extension is approximately 1,950 feet and is also made of 4-inch HDPE. The pipe will be laid on ground surface and to the south of the 6-inch water line where possible. At the crossing with the SoCal Gas pipeline access road, the pipeline will be at grade with fill to allow for vehicle crossing. | |
| 3 | PG&E proposed changes within the CHQ fence line to avoid/minimize the overall amount of soil disturbance during construction, reduce the number of truck trips to haul wastewater, and allow for additional working space within the yard. There are no proposed changes to the CHQ footprint nor its fence line. The specifics are described below: | DOI/DTSC approved WVR #3 on January 4, 2019 |
| | Relocate the decontamination pad from the western fence to the northern fence (near the western corner). Based on recent survey data collected during construction, the difference in ground elevation between northern and southern end of the pad is about 4 feet. Moving the pad to the northern fence would eliminate the difference in ground elevation and reduce the amount of soil disturbance by at least 80 cubic yards. | |
| | Bring the remedy-produced wastewater tank from belowground to aboveground, increase the tank volume from 1,000 to 2,500 gallons, and place the aboveground, double-walled tank adjacent to the decontamination pad. The change from belowground to aboveground reduces the amount of soil disturbance by at least 50 cubic yards. The change to a bigger tank will reduce the amount of truck trips needed to haul wastewater. The placement of the tank adjacent to the decontamination pad allows for the pad to function as a secondary containment for the haul truck during off-loading of the wastewater. | |
| | • Defer construction of the underground sewage tanks. Deferral of the underground tanks reduces the overall amount of soil disturbance by at least 800 cubic yards. All sanitary wastes will be managed in aboveground sewage tanks (similar to the ones currently used for the SPY trailers) or portable toilets. | |
| | • Swap the location of the construction trailers and the sunshade and change the configuration of the sunshade from a rectangle to a square. This change will allow for more working space within the CHQ. All functions that would occur in the Workshop/Sampling Processing building will be conducted in the construction trailers. | |

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| WVR No. | Brief Description of Work Variance Request | Approval Dates |
|---------|---|---|
| 4 | PG&E proposed to revise a segment of Pipeline C near the I-40 bridge, to meet the permit requirement in Caltrans Encroachment Permit No. 08-18-6-MW-0533. The revision involves relocating a small segment of Pipeline C to within National Trails Highway to meet a minimum distance of 10 feet from current and future I-40 bridge footings. The treatment measure specified for Segment X of National Trails Highway in the Cultural and Historic Property Management Plan will be implemented during installation of this pipeline segment. | DOI/DTSC approved WVR #4 on May 14, 2019 |
| 5 | PG&E proposed to phase the remedy produced water conditioning system within the approved footprint inside TCS. | DOI and DTSC approved WVR #5 on July 19 and July 22, 2019, respectively. |
| 6 | In early October 2018, PG&E conducted a geotechnical investigation along the Pipeline F alignment on the entrance road to the TCS and the adjacent hill side. Based on the geotechnical results, the construction contractor (PIVOX) indicated that soldier piles and lagging would be required for temporary shoring. Over 40 soldier piles would be installed by drilling using a 330-sized excavator or larger. A 330-sized excavator has a general width of 11 feet, and counter weight clearance of approximately 4 feet. During operation, this rig would occupy a minimum 15 to 16 feet width of the TCS entrance road for about 12 days. The paved width of the road is between 22 to 24 feet in the area of shoring (per review of the location via Google Earth). | DOI and DTSC approved WVR #6 on May 21 and May 22, 2019, respectively. |
| | Assuming a minimum clearance of 1 foot (which is still less than the recommended clearance) from any operating equipment, there will be approximately 5 to 8 feet of available lane width for access by TCS traffic. Large vehicles (tractor-trailers, delivery trucks, construction equipment) will likely not be able to pass by the active operation, and passenger vehicles may also not be able to pass the active operation in locations where the road narrows. Also, the excavator cannot be repositioned while soldier piles are being drilled. In sum, access to TCS will be severely restricted for about 12 days. This is not acceptable for Compressor Station operations. | |
| | Therefore, PG&E proposed to realign Pipeline F (starting from segment F3) along the approved alignment of Pipelines B and J. Construction of Pipelines F, B, and J would occur in the same alignment and at the same time. | |
| 7 | This WVR proposed the following changes to remedy infrastructure at the CHQ and SPY. a) Locate all temporary office and break trailers at the SPY. PG&E proposed to keep the three existing office trailers at their current locations in the SPY and add two additional office trailers and one break trailer for workers. The additional trailers will be equipped with aboveground sewage tanks, similar to the existing trailers. They will also be powered by Needles Electric. This will require the original SPY fence line to be extended south/southwest to encompass these trailers and the original truck entrance from National Trails Highway to the access road east of SPY. Neither changes reduce the overall area available for soil storage. | DOI and DTSC approved WVR #7 on June 14, 2019. |
| | b) Eliminate the workshop/sample processing building at the CHQ. The function planned for this building will be moved to the Carbon Amendment building at the MW-20 Bench. Removal of this building reduces the amount of soil disturbance by approximately 334 cubic yards. | |
| | c) Eliminate the sunshade at the CHQ. The function for the sunshade will be replaced by the break trailer for the workers. Removal of the sunshade reduces the amount of soil distance (i.e., installation of the footings) by approximately 14 cubic yards. | |
| | d) Convert the utility pad at the CHQ to a smaller transformer/electrical panel pad. With the relocation of the six trailers to SPY and elimination of the workshop/sample processing building, PG&E proposed to convert the utility pad to smaller pad for a smaller transformer/electrical panel to serve the remaining trailers at the CHQ. This reduces the amount of soil disturbance by approximately 61 cubic yards. | |
| 8 | On September 12, 2019, PG&E proposed a WVR to change the alignment of pipeline segment C6 on the eastern slope of the MW-20 Bench. The purpose of the WVR is to reduce the amount of soil disturbance, reduce the number of plants to be removed, reduce the safety risks associated with construction atop the MW-20 bench, and reduce the hazards associated with operation at the MW-20 bench during construction. | DTSC and DOI approved WVR #8 on October 4 and 8, 2019, respectively. |
| 9 | On March 20, 2020 and at DTSC's direction, PG&E submitted a WVR to relocate MW-A and convert IRZ-11 to a monitoring well. | DTSC and DOI approved WVR #9 on April 24, 2020. |
| 10 | On December 1, 2021, PG&E proposed a WVR to revise the following pipeline alignments for constructability and safety during Phase 2A construction, as well as future O&M: 1. Outside the Compressor Station | DTSC and DOI approved WVR #10 |



| WVR No. | Brief Description of Work Variance Request | Approval Dates |
|---------|---|---|
| | Realign Pipeline C18 in East Ravine. Realign Pipeline I1 in Bat Cave Wash. Inside the Compressor Station Consolidate piping/conduits (L1/L2/D1/D2) in the southern area of TCS into a common utility corridor Realign Pipeline L3 to connect to Pipeline K. | on January 6 and 7, 2022, respectively. |
| 11 | On January 11, 2022, PG&E proposed a WVR for new mitigation planting areas in the floodplain. The purpose of the WVR is to propose new mitigation planting areas that are better suited for the mitigation plantings than some earlier identified areas. | DOI and DTSC approved WVR #11 on January 14 and 19, 2022, respectively. |

Note:

* CH2M HILL, Inc. (CH2M). 2015a. Basis of Design Report/Final (100%) Design Submittal for the Final Groundwater Remedy, PG&E Topock Compressor Station, Needles, California. November 18.



Table 2-4. Summary of Cumulative Percent Completeness of Key Construction Activities

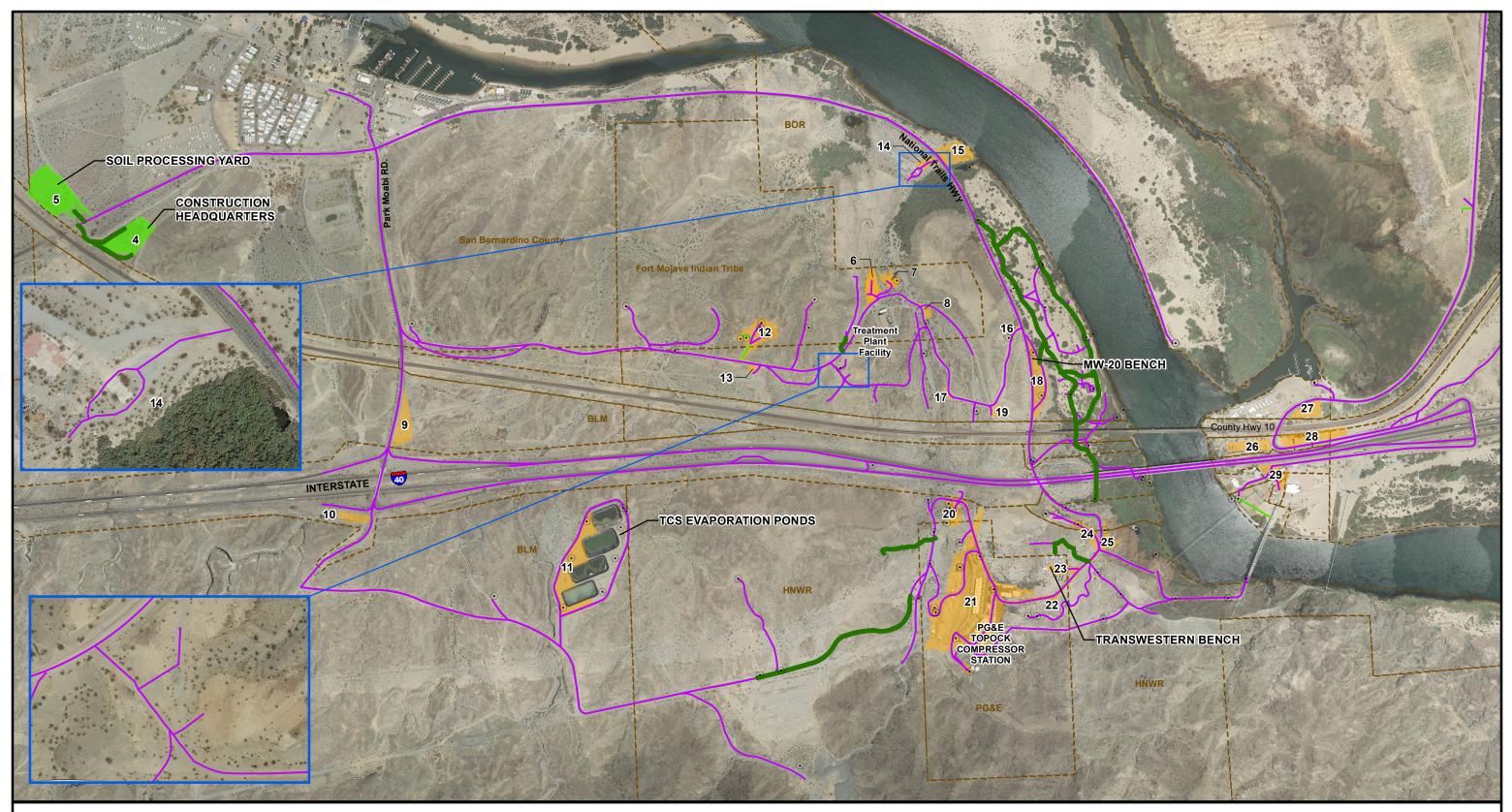
March 2022 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup PG&E Topock Compressor Station, Needles, California

| Activity | % Complete | Cumulative Status of Phase 1 Construction Activities (as of March 31, 2022) |
|---|------------|---|
| Project signage & Public Information Office | 100% | Complete. |
| Staging Areas 9, 18, and 23 set-up | 100% | Complete. |
| Temporary construction offices at Soil Processing Yard | 100% | Complete. |
| Soil Processing Yard including security fence | 100% | Complete. |
| National Trails Highway lane closure and traffic control installation | 100% | Complete. |
| Temporary construction water line | 100% | Complete. |
| TCS Ponds concrete containment pad | 100% | Complete. |
| Construction Headquarters (CHQ) access road and security fence | 100% | Complete. |
| Brine Tanks containment upgrade | 100% | Complete. |
| MW-L, N, E, W, O, R, M, U, 10D, 11D, B, C, D, H, S, Hydro-6, X, Y', G, F, V, and Z, and MW-99. | 100% | Complete. |
| MW-70BR (damaged) | 100% | Bentonite grout had entered the well casing. The conductor casing was damaged and the well was repaired in June 2020. The repair consisted of cleaning out the borehole to approximately 246 feet bgs, set a 4-inch PVC sleeve to approximately 240 feet, and cement to approximately 230 feet. Well development was completed in July 2020. Well surface completion was completed in October 2020. |
| MW-97 (former IRZ-11 MW) | 100% | Complete. |
| MW-96 (relocated MW-A) | 100% | Complete. |
| Pilot borings for wells RB-5, RB-4, RB-3, RB-2, IRZ-9, 13, 15, 16, 17, 18, 21, 23, 25, 27, 29, 31, 35, 37, and 39. | 100% | Complete. |
| RB-2, RB-3, RB-4, and RB-5 | 100% | Complete. |
| IRZ-9, IRZ-13S/D, IRZ-15, IRZ-16, IRZ-17, IRZ- 18, IRZ-21, IRZ-23, IRZ-25, IRZ-27, IRZ-29, IRZ-31, IRZ-33, IRZ-35, IRZ-37, and IRZ-39 | 100% | Complete. |
| Pipeline B Erosion Control Measures | TBD | Pipeline Complete. Installation of permanent erosion control measures started on February 22, 2022. On March 29, 2022, the storm erosion control measures were severely damaged by a large storm event. PG&E is evaluating options to repair the damages. |
| Pipeline C Floodplain Segments C3, C4, C5, C6, C7, C8, C8-Alt, C14 including aggregate-based access road in floodplain | 100% | Complete with the exception of C8-Alt. On November 2-4, 2021, additional soil cover was added to meet Caltrans permit requirement of 42 inches above the concrete pipe encasement. On November 11, 2021, FMIT tribal monitors notified PG&E of concerns about the presence of asphalt debris in the new soil cover at C8-Alt. Various field inspections and discussions occurred to address the FMIT monitors' concern. In late November 2021, PG&E informed FMIT Project Manager that the soil cover will be replaced with different soil materials. PG&E removed the soil cover on December 14, 2021, and rebuilt the soil cover with new |

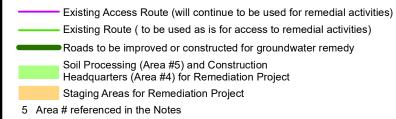


| Activity | % Complete | Cumulative Status of Phase 1 Construction Activities (as of March 31, 2022) | |
|--|------------|---|--|
| | | fill in February 2022 (see description in Phase 1 Work Site Closeout line item below). | |
| Pipeline C NTH Segments C13, C15, C16, C19, C20 | 100% | Complete. | |
| Pipeline C9, C10, C17 | 100% | Complete. | |
| Pipeline F | 100% | Complete. | |
| Pipeline J Segments J1 and J2 | 100% | Asphalt paving complete. | |
| Pipeline J Segments J3 and J4 | 100% | Complete. | |
| Pipeline M2-M6 (inside TCS) | 100% | Complete. | |
| Pipeline/Conduit F8/M1/X (inside TCS) | 100% | Complete. | |
| Phase 1 Remedy-produced water conditioning system and associated facilities (TCS) | 100% | Substantially complete. | |
| MW-20 Bench carbon amendment facility and associated piping | 100% | Building structure, mechanical work, fencing and site earthwork, HVAC, and final electrical complete. | |
| Remediation well vaults and well buildout | 100% | Substantially complete. | |
| Underground electrical and controls cable installation | 100% | Substantially complete. | |
| Electrical installation at transformer nodes 99 (TCS), 2 (south floodplain), 3 (MW-20 Bench), and 4 (north floodplain) | 100% | All Node electrical installation complete. In mid-March, some electrical components in Nodes 2 and 4 were identified as needing repairs. Repair was completed in March. | |
| | | The groundwater remedy received permanent power from TCS on March 24, 2022. | |
| Controls installation and programming at Phase 1 Remedy-Produced water conditioning facility (TCS) | 99% | Node 99 controls terminations completed in March 2022. | |
| Controls installation and programming at MW-20 Bench carbon amendment facility | 100% | Substantially complete. | |
| System Integration, Functional Testing, and Startup | 80% | IRZ functional testing and startup continues using portable generator. RPWC system functional testing and Full system (including Remedy power system and RPWC system) startup to be completed in April 2022. | |
| Site preparation for revegetation including fencing | 80% | Irrigation system installation complete. Irrigation operation to leach soluble salts from soils started on February 7, 2022. | |
| Phase 1 Work Site Closeout (Exclude Pipeline B stormwater erosion control measures) | 95% | A walk down of Phase 1 pipelines and TWB/CHQ stormwater erosion control measures with agencies and Tribes on March 1. Completion of punch list items target end of April 2022. | |

Figures



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Notes:

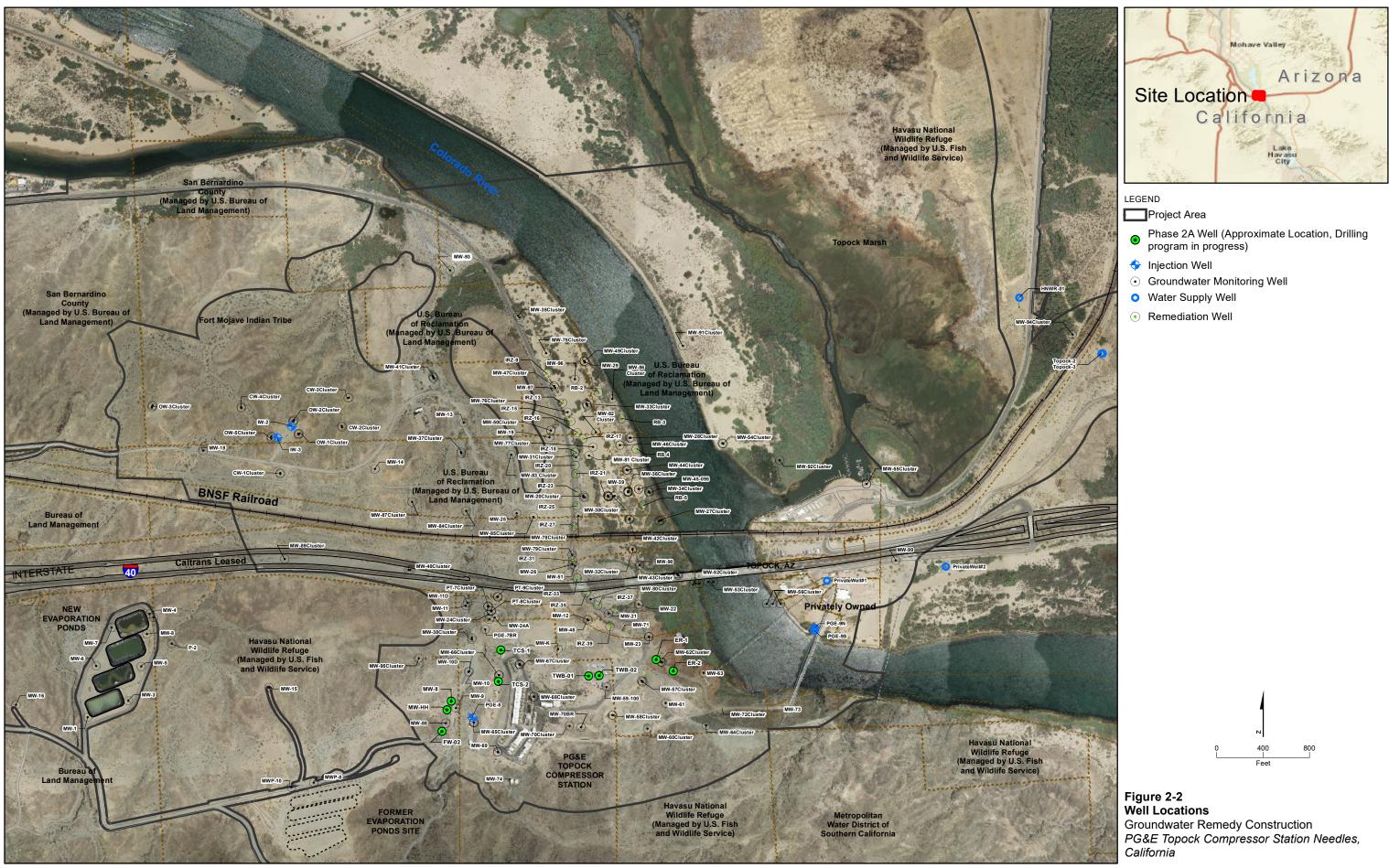
- 1. Decontamination pads will be located in Area #21 (Topock Compressor Station), and
- Area #21 (Topock Compressor Station), and Area #23 (Transwestern Bench).
 2. Areas #15, 16, 17, 19, and 20 will not be used as staging areas. Areas #16, 17, and 19 may be part of the primary work zones for remedy infrastructure along the access road.
 3. Area #20 may be part of the primary work zone for installation of future provisional well IRL-6 (if determined to be needed in the future) and associated piping/concrete/vault.
- 4. Public roadways outside of the EIR project area and the APE can also be used for remedy implementation.
 - Feet

Ndc1vs01/GISProjIP/PGE/Topock/MapFiles/2018/CMS/Phase1Construction/Fig2-1_AccessRoutes_CA_2_20200604.mxd Date Saved: 6/4/2020 1:43:56 PM

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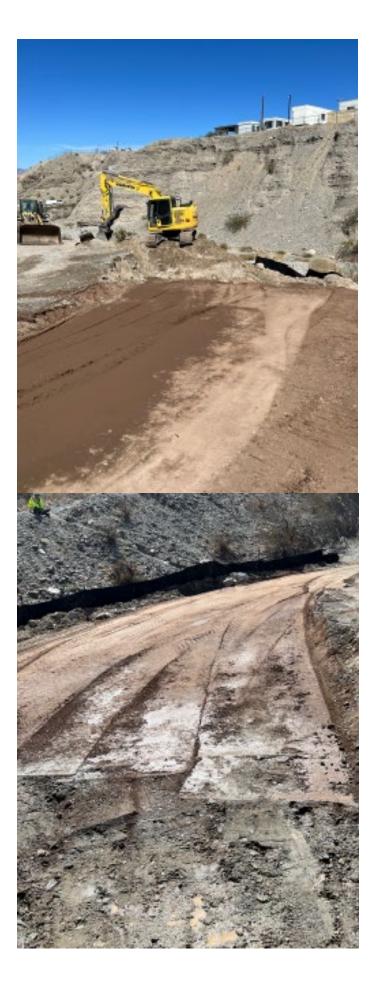
FIGURE 2-1 CONSTRUCTION SITE PLAN AND ACCESS ROUTES

GROUNDWATER REMEDY PHASE 1 CONSTRUCTION PG&E TOPOCK COMPRESSOR STATION NEEDLES, CALIFORNIA JACOBS



ROJ/P/PGE\TOPOCK\MAPFILES\2022\FIGURE2 2 WELL LOCATIONS.MXD CLARKE 3/28/2022 10:49:43 AI

Attachment A Photographs



Pictures of site preparation at FW-2 drilling location



Photo showing drill rig at the Transwestern Bench



Photo showing potholing at FW-2 drilling location



Photos showing potholing at TCS-1 and ER-1 drilling locations.

Attachment B Available Boring and Well Construction Logs, Groundwater Sample Results from Well Drilling, and Well Testing Activities

(Logs and Well Testing Plans/Results are Presented in Separate PDFs)



Table B-1. Groundwater Sampling Results

March 2022 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup PG&E Topock Compressor Station, Needles, California

| Location* | Sample ID | Sample Date | Sample Depth Interval in feet below ground surface | Total Dissolved Chromium Concentration in microgram per liter | Hexavalent Chromium Concentration in microgram per liter |
|-----------|------------------------|---------------------------|---|--|--|
| TWB-1 | Info not yet available | Info not yet available | Info not yet available | Analytical data are being validated | Analytical data are being validated |
| TWB-2 | Info not yet available | Info not yet available | Info not yet available | Analytical data are being validated | Analytical data are being validated |

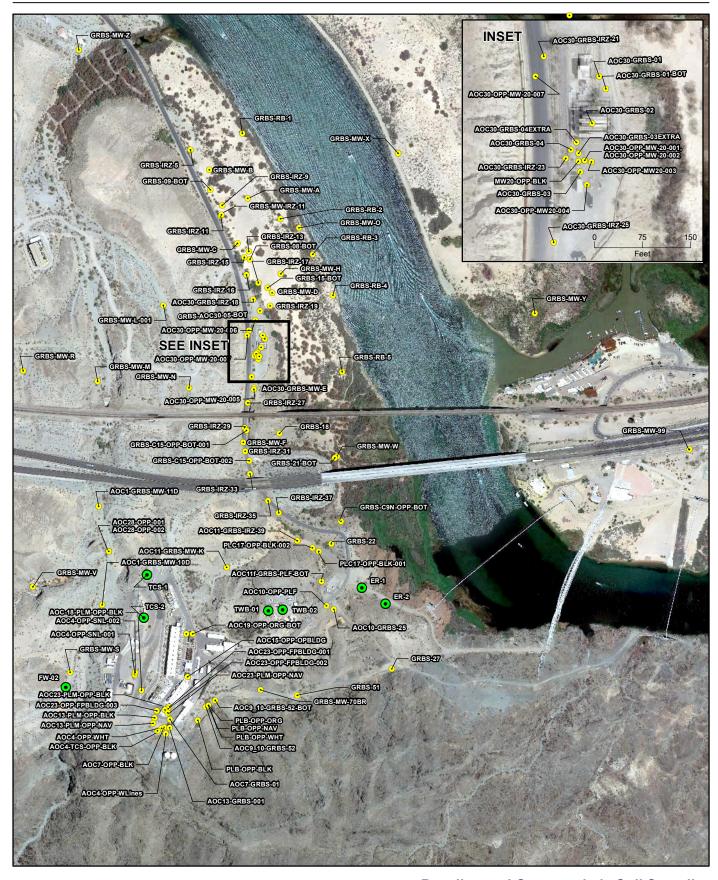
* For brevity and readability, VAS data collected during Phase 1 well drilling and installation are not included in this report. For a complete listing of those data, see Table B-1 of the February 2022 Monthly Progress Report. The monthly progress reports can be accessed via the Project website at <u>link</u>.





Attachment C Soil Sampling Locations and Available Soil Analytical Results

(Soil Data Presented in Excel File)



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• Soil Sample Location

Soil Sample Collected from This Location in March 2022

0 300 600 N

Baseline and Opportunistic Soil Sampling Locations Monthly Progress Report Groundwater Remedy Construction

PG&E Topock Compressor Station, Needles, California

\DC1VS01\GISPROJ\P\PGE\TOPOCK\MAPFILES\2022\CMS\SOILSAMPLELOCATIONS_ALL_APRIL2022.MXD KMINO 4/4/2022 8:54:58 AM

JACOBS



Attachment D Perimeter Air Sampling Analytical Results



Attachment D. Perimeter Air Sampling Analytical Results

In conformance with the approved *Construction/Remedial Action Work Plan for the Final Groundwater Remedy, PG&E Topock Compressor Station, Needles, California* (CH2M, 2015), air monitoring has been conducted during construction to evaluate the ongoing effectiveness of the dust control program, to guide modifications to field activities and engineering control measures, if necessary, and to document that construction activities do not result in the migration of soil contaminants beyond the work area boundaries.

Perimeter air monitoring has been performed if construction activities have the potential to generate visible dust. The air monitoring program consists of both real-time fugitive dust monitoring and perimeter air sampling for select soil contaminants. Locations to be monitored and sampled are as follows:

- Real-time fugitive dust monitoring is performed at the perimeter of the work areas (outside of the exclusion zone) that have the potential to generate visible dust, including the Construction Headquarters (CHQ) and the Soil Processing Yard (SPY).
- Perimeter air sampling for hexavalent chromium is performed at the perimeter of the work areas (outside of the exclusion zone) that are inside Areas of Concern (AOCs) within the construction footprint where hexavalent chromium concentrations in soil have been historically reported. Air sampling for hexavalent chromium in the SPY will be performed when soil from AOCs with reported concentrations of hexavalent chromium is actively being processed. Air sampling may also be performed at other work areas at the site based on hexavalent chromium concentrations reported from new soil data or based on field observations during construction activities.
- Air sampling for asbestos will be limited to work areas where asbestos-containing material (ACM) has been observed in prior field investigations, including two areas in AOC 12 and one area in AOC 4.
 Perimeter air monitoring may also be performed at other work areas at the site if ACM is discovered during construction activities.

Project-specific levels of concern (LOCs) and action levels were developed as an indicator to determine whether additional dust control measures, as presented in the project's Dust Control Plan required by the Mojave Desert Air Quality Management District (MDAQMD), are necessary.

- The LOCs, which represent conservative concentrations of compounds that receptors outside the work area could be safely exposed to during construction, have been evaluated for all compounds that have been detected in soil samples collected at the site in the prior investigations. The LOCs were developed using standard U.S. Environmental Protection Agency (USEPA) and California Environmental Protection Agency risk assessment methodology, toxicology data, and exposure assumptions (USEPA, 2009, 2017; California Department of Toxic Substances Control [DTSC], 2018). Both cancer and noncancer health effects were considered. For each type of health effect, the LOC was back-calculated from an established target or from acceptable cancer risk or noncancer hazard where USEPA or DTSC toxicity values are available. The LOCs for cancer effects are based on a target excess cancer risk of one in a million (1 × 10⁻⁶). The LOCs for noncancer effects are based on a target hazard quotient of 1. The LOCs were developed using these assumptions:
 - Receptors are present outside the perimeter of the work areas
 - Exposure via inhalation is 10 hours per day for a 10 days on/4 days off schedule
 - Duration of Phase 1 of the final groundwater remedy construction is 20 months
- The action level for fugitive dust monitoring is 100 micrograms per cubic meter (µg/m³) for a net (downwind minus upwind) dust concentration. This action level is based on MDAQMD Rule 403, Part C. A 10-hour time-weighted average of readings collected throughout the work day will be used to document compliance with MDAQMD Rule 403.
- For analytes detected in soil, the following equation was used to calculate maximum allowable airborne particulate concentrations for receptor exposure outside the work area (based on the approach presented by Marlowe (1999):



$$AL = \frac{LOC \ x \ 1,000,000 \ mg/kg}{CS}$$

Where:

AL = action level for airborne particulates (μ g/m³)

LOC = Project specific risk-based level of concern (μ g/m³)

CS = maximum detected concentration of compound in site soil (milligrams per kilogram [mg/kg])

Action levels were determined as follows:

- Soil data from prior investigations were gathered for the entire site.
- Sample locations within the maximum construction footprint were evaluated. Some sample locations were removed from evaluation as they were within the compressor station in locations where no construction activities will actually occur.
- The maximum reported soil concentration for each compound was determined and then used to calculate an airborne particulate action level.
- All compounds had allowable airborne particulate action levels greater than 100 µg/m³ except for hexavalent chromium at a few locations.
- Lead does not have USEPA or DTSC toxicity values; however, an action level was calculated using the DTSC (2011) LeadSpread 8 model. This is based on the maximum reported soil concentration for lead of 1,400 mg/kg from samples collected within the construction footprint and a blood level of concern through inhalation of 1 microgram per deciliter. The resulting action level for lead is 548 μg/m³.
- Therefore, keeping fugitive dust below the action level 100 µg/m³ will result in airborne particulate concentrations of contaminants (other than hexavalent chromium) remaining below their respective LOCs.
- Fugitive dust monitoring will be used to evaluate airborne contaminants in dust for all compounds except for hexavalent chromium.

In March 2022, 40 real time dust observation/monitoring events were conducted at the perimeter of the work areas (outside of the exclusion zone). No exceedance of the action level for fugitive dust monitoring (100 µg/m³) was observed in March 2022.

Two air sampling events for hexavalent chromium were conducted at the SPY on March 18 and March 22, 2022. Data will be reported in future monthly reports when available. For brevity and readability, starting with this report (March 2022), Tables D-1a and D-1b of **Attachment D** present all analytical results from air sampling events conducted during Phase 2 remedy construction available at this time. Analytical results from air sampling events conducted during Phase 1 remedy construction are available in the February 2022 Monthly Progress Report.

References Cited:

California Department of Toxic Substances Control (DTSC). 2011. LeadSpread8.

California Department of Toxic Substances Control (DTSC). 2018. Human Health Risk Assessment Note 3 – DTSC-Modified Screening Levels (DTSC-SLs), California Department of Toxic Substances Control, Human and Ecological Risk Office (HERO). January.

CH2M HILL, Inc. (CH2M). 2015. Construction/Remedial Action Work Plan for the Final Groundwater Remedy, PG&E Topock Compressor Station, Needles, California. November 18.



Marlowe, C. 1999. Safety Now! Controlling Chemical Exposures at Hazardous Waste Sites with Real-Time Measurements. Fairfax, Va.: American Industrial Hygiene Association Press.

U.S. Environmental Protection Agency (USEPA). 2009. *Risk Assessment Guidance for Superfund Volume I: Human Health Evaluation Manual (Part F, Supplemental Guidance for Inhalation Risk Assessment)*. Final. OSWER 9285.7-82. January.

U.S. Environmental Protection Agency (USEPA). 2017. Regional Screening Levels (RSLs)—Generic Tables. November.



Table D-1a. Perimeter Air Sampling Results – Hexavalent Chromium

March 2022 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup PG&E Topock Compressor Station, Needles, California

| Location ID | Location | Sampling Date | Hexavalent Chromium Concentration in micrograms per cubic meter |
|------------------------------|----------------------|---------------|--|
| GRAM-SPY-U1-Cr6- 20220318 | SPY Upwind | 3/18/2022 | Data not yet available. |
| GRAM-SPY-D1-Cr6- 20220318 | SPY Downwind 1- West | 3/18/2022 | Data not yet available. |
| GRAM-SPY-D2-Cr6- 20220318 | SPY Downwind 2- East | 3/18/2022 | Data not yet available. |
| GRAM-SPY-U1-Cr6- 20220322 | SPY Upwind | 3/22/2022 | Data not yet available. |
| GRAM-SPY-D1-Cr6- 20220322 | SPY Downwind 1- West | 3/22/2022 | Data not yet available. |
| GRAM-SPY-D2-Cr6- 20220322 | SPY Downwind 2- East | 3/22/2022 | Data not yet available. |

* For brevity and readability, perimeter air sampling results for hexavalent chromium collected during Phase 1 construction are not included in this report. For those results, please see Table D-1a of the February 2022 Monthly Progress Report. The monthly progress reports can be accessed via the Project website at <u>link</u>.



Table D-1b. Perimeter Air Sampling Results – Asbestos

March 2022 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup PG&E Topock Compressor Station, Needles, California

| Location ID | ocation ID Location | | Asbestos Concentration in fibers per cubic meter | | |
|-------------|---------------------|--|--|--|--|
| | | | | | |

* For brevity and readability, perimeter air sampling results for asbestos collected during Phase 1 construction are not included in this report. For those results, please see Table D-1a of the February 2022 Monthly Progress Report. The monthly progress reports can be accessed via the Project website at <u>link</u>.

Attachment E Noise Monitoring Results (SEIR NOISE-2 Requirement)



Attachment E. Noise Monitoring Results

In conformance with the Supplemental Environmental Impact Report (SEIR) Mitigation Measure NOISE-2, noise monitoring has been conducted with ANSI S1.4 Type 1, precision sound level meters when construction activities are within the specified distance (e.g., 1,850 feet from sensitive receptors in California) at approved monitoring locations previously determined in coordination with the Tribes and land owners/managers. The goal of the noise monitoring is to identify if noise levels from project construction activities exceed applicable standards of the San Bernardino and Mohave County codes. Exceedance of standards would require coordination with the Tribes and land owners/managers to evaluate the potential constraints and locations for temporary engineered acoustical barriers. Consistent with the request of the Tribes, monitoring equipment is not left at the approved monitoring locations; rather, it is mounted on a tripod for attended representative measurements and removed when the monitoring event is complete.

When a new construction activity is conducted or a previously monitored construction activity is conducted closer to a noise-sensitive area, monitoring is conducted at more frequent intervals to evaluate the potential need for an acoustical barrier. As the activities continue in the same location and multiple attended measurements indicate that the applicable standard has not been exceeded by the construction activity, periodic attending monitoring events are conducted to confirm continued compliance.

The attended monitoring events document the A-weighted equivalent continuous sound level (L_{eq}) at periodic intervals (e.g., 5, 10, 15, 20, 30, 40, 50 and 60 minutes). The trend of the data at these intervals is evaluated in the field to assess the stability in the sound level to determine the duration of the monitoring event. When the interval data are relatively stable or clearly below the standard, the attended monitoring event will typically be 15 to 30 minutes in duration. As the applicable standards are expressed in terms of the 24-hour average day-night sound level (L_{dn}) which is based on the L_{eq} metric, the measured L_{eq} is compared to the applicable L_{dn} standard for mobile noise sources (i.e., 60 A-weighted decibels [dBA] for Park Moabi, 65 dBA at all other locations). This results in a reasonable and conservative assessment given construction activities are not emitting noise continuously over a 24-hour period, nor are they occurring frequently during the nighttime hours (10 p.m. to 7 a.m.).

In March 2022, the following monitoring events were conducted:

- Eleven events at a location west of the mobile home park at Moabi Regional Park. Construction activities closest to this monitoring location include activities at the SPY and CHQ, as well as construction traffic on NTH. The sound level typically varied between 41 and 56 dBA, with an average and median of 45-47 dBA.
- Ten events at a location in the Upland just off the IM-3 access road, and near the top of the hill closest to the NTH and MW-20 Bench. Construction activities closest to this monitoring location include activities at the MW-20 Bench and construction traffic on the IM-3 access road. The sound level varied between 47 and 55 dBA, with an average and median of 50 dBA.
- Eleven events at the old restaurant location west of NTH. Construction activities closest to this monitoring location include construction traffic on NTH and construction traffic in the north floodplain. The sound level varied between 46 and 58 dBA, with an average and median of 52 dBA.
- Nine events at a location on a bluff below TCS, just south of I-40 and east of the Topock Maze.
 Construction activities closest to this monitoring location are associated with site preparation for drilling of FW-02 well location in Bat Cave Wash, site preparation for TCS-1 drilling, and drilling of well TCS-1.
 The sound level typically varied between 53 and 59 dBA, with an average and median of 56-57 dBA.

Sound monitoring will continue as work progresses and moves into new areas to identify when an acoustical barrier needs to be considered.

Attachment F Six-Week Look-Ahead Schedule

Six-Week Look-Ahead Schedule

PG&E Topock Compressor Station Remedial Activities

| Activity | Sunday | Monday | Tuesday | Wednesday | Thursday | Friday | Saturday |
|---|---|---|--|--|--|---|---|
| Primary Planned Activities | 4/3/2022 | 4/4/2022 | 4/5/2022 | 4/6/2022 | 4/7/2022 | 4/8/2022 | 4/9/2022 |
| Start Time (PST) | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM |
| Site Wide Groundwater Sampling G3*, F3*, E4*, F4*, G4*, D5*, E5*, F5*, G5*, D6*, E6*, F6*, & G6* | No Work | No Work | No Work | No Work | No Work | No Work | No Work |
| Site Wide Revegetation F5* | [^] Tree Planting and Fence Installation | [^] Tree Planting and Fence Installation | [^] Tree Planting and Fence Installation | [^] Tree Planting and Fence Installation | [^] Tree Planting and Fence Installation | No Work | No Work |
| Site Wide Electrical & Controls Construction E5*, F5 *, G5 * | No Work | Offsite SCADA and Programming Support | Offsite SCADA and Programming Support | Offsite SCADA and Programming Support | Offsite SCADA and Programming Support | Offsite SCADA and Programming Support | No Work |
| Phase 2 Drilling G5 * | ATCS-2 Site Prep, TCS-1 Drilling/ER-1 Drilling (Sonic) | ^TCS-2 Site Prep, TCS-1 Drilling/ER-2 Drilling (Sonic) | ^FW-02 Rip Rap Install and BCW Road Repair, TCS-1 Drilling/ER-2 Drilling (Sonic) | [^] FW-02 Rip Rap Install and BCW Road Repair, TCS-1 Drilling/ER-2 Drilling (Sonic) | ^FW-02 Rip Rap Install and BCW Road Repair, TCS-1 Drilling/ER-2 Drilling (Sonic) | No Work | No Work |
| Primary Planned Activities | 4/10/2022 | 4/11/2022 | 4/12/2022 | 4/13/2022 | 4/14/2022 | 4/15/2022 | 4/16/2022 |
| Start Time (PST) | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM |
| Site Wide Groundwater Sampling G3*, F3*, E4*, F4*, G4*, D5*, E5*, F5*, G5*, D6*, E6*, F6*, & G6* | No Work | Monthly PCM samples and transducer downloads | Monthly PCM samples and transducer downloads | Monthly PCM samples and transducer downloads | Monthly PCM samples and transducer downloads | No Work | No Work |
| Site Wide Revegetation F5 * | No Work | No Work | ^Tree Planting (Tentative) and Fence Installation | ^Tree Planting (Tentative) and Fence Installation | ^Tree Planting (Tentative) and Fence Installation | ^Tree Planting (Tentative) and Fence Installation | [^] Tree Planting (Tentative) and Fence Installation |
| Site Wide Electrical & Controls Construction E5* , F5 *, G5 * | No Work | ARCADIS/PSI - Final Inspections - Tentative | ARCADIS/PSI - Final Inspections - Tentative | ARCADIS/PSI - Final Inspections - Tentative | ARCADIS/PSI - Final Inspections - Tentative | ARCADIS/PSI - Final Inspections - Tentative | No Work |
| Phase 2 Drilling G5 * | No Work | No Work | ^TWB-3 Site Prep, TCS-1 Drilling/ER-1 Drilling (HSA) | ^TWB-3 Site Prep, TCS-1 Drilling/ER-1 Drilling (HSA) | [^] TWB-3 Site Prep, TCS-1 Drilling/ER-1 Drilling (HSA) | ^TWB-3 Site Prep, TCS-1 Drilling/ER-1 Drilling (HSA) | [^] TWB-3 Site Prep, TCS-2 Drilling/ER-1 Drilling (HSA) |
| Primary Planned Activities | 4/17/2022 | 4/18/2022 | 4/19/2022 | 4/20/2022 | 4/21/2022 | 4/22/2022 | 4/23/2022 |
| Start Time (PST) | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM |
| TCS Pipelines | Mobilization | ^TCS Phase 2A Pipelines | ^TCS Phase 2A Pipelines | ^TCS Phase 2A Pipelines | ^TCS Phase 2A Pipelines | ^TCS Phase 2A Pipelines | No Work |
| Site Wide Groundwater Sampling G3*, F3*, E4*, F4*, G4*, D5*, E5*, F5*, G5*, D6*, E6*, F6*, & G6* | No Work | No Work | No Work | No Work | No Work | No Work | No Work |
| Site Wide Revegetation F5 * | No Work | No Work | No Work | No Work | No Work | No Work | No Work |
| Site Wide Electrical & Controls Construction E5*, F5 *, G5 * | No Work | PSI Punchlist Items - Tentative | PSI Punchlist Items - Tentative | PSI Punchlist Items - Tentative | PSI Punchlist Items - Tentative | PSI Punchlist Items - Tentative | No Work |
| Phase 2 Drilling G5 * | ^TWB-3 Site Prep, TCS-2 Drilling/ER-2 Drilling (HSA) | ^TWB-3 Site Prep, TCS-2 Drilling/ER-2 Drilling (HSA) | ^A TWB-3 Site Prep, TCS-2 Drilling/ER-2 Drilling (HSA), FW-02 Drilling (Tentative) | ^A TWB-3 Site Prep, TCS-2 Drilling/ER-2 Drilling (HSA), FW-02 Drilling (Tentative) | [^] TWB-3 Site Prep, TCS-2 Drilling/ER-2 Drilling (HSA), FW-02 Drilling (Tentative) | No Work | No Work |
| Primary Planned Activities | 4/24/2022 | 4/25/2022 | 4/26/2022 | 4/27/2022 | 4/28/2022 | 4/29/2022 | 4/30/2022 |
| Start Time (PST) | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM |
| TCS Pipelines | No Work | ^TCS Phase 2A Pipelines | ^TCS Phase 2A Pipelines | ATCS Phase 2A Pipelines | ^TCS Phase 2A Pipelines | ^TCS Phase 2A Pipelines | No Work |
| Site Wide Groundwater Sampling G3*, F3*, E4*, F4*, G4*, D5*, E5*, F5*, G5*, D6*, E6*, F6*, & G6* | No Work | No Work | No Work | No Work | No Work | No Work | No Work |
| Site Wide Revegetation F5* | No Work | No Work | No Work | No Work | No Work | No Work | No Work |
| Site Wide Electrical & Controls Construction E5*, F5 *, G5 * | No Work | PSI Punchlist Items - Tentative | PSI Punchlist Items - Tentative | PSI Punchlist Items - Tentative | PSI Punchlist Items - Tentative | PSI Punchlist Items - Tentative | No Work |
| Phase 2 Drilling G5 * | No Work | No Work | 1 Well Installation, FW-02 Drilling (Tentative) | 1 Well Installation, FW-02 Drilling (Tentative) | [^] Drilling Support Waste Management, TCS-2 Drilling/ER 1 Well Installation, FW-02 Drilling (Tentative) | 1 Well Installation, FW-02 Drilling (Tentative) | 1 Well Installation, FW-02 Drilling (Tentative) |
| Primary Planned Activities | 5/1/2022 | 5/2/2022 | 5/3/2022 | 5/4/2022 | 5/5/2022 | 5/6/2022 | 5/7/2022 |
| Start Time (PST) | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM |

Six-Week Look-Ahead Schedule

PG&E Topock Compressor Station Remedial Activities

| Activity | Sunday | Monday | Tuesday | Wednesday | Thursday | Friday | Saturday |
|--|--|--|---|---|---|---|---|
| TCS Pipelines | No Work | ATCS Phase 2A Pipelines | ATCS Phase 2A Pipelines | ^TCS Phase 2A Pipelines | ^TCS Phase 2A Pipelines | ^TCS Phase 2A Pipelines | No Work |
| Site Wide Groundwater Sampling G3*, F3*, E4*, F4*, G4*, D5*, E5*, F5*, G5*, D6*, E6*, F6*, & G6* | No Work | Tentative - Monthly PCM samples and transducer downloads | Tentative - Monthly PCM samples and transducer downloads | Tentative - Monthly PCM samples and transducer downloads | Tentative - Monthly PCM samples and transducer downloads | No Work | No Work |
| Site Wide Revegetation F5 * | No Work | No Work | No Work | No Work | No Work | No Work | No Work |
| Site Wide Electrical & Controls Construction E5*, F5* , G5* | No Work | No Work | No Work | No Work | No Work | No Work | No Work |
| Phase 2 Drilling G5 * | [^] Drilling Support Waste Management, TWB-3 Drilling/ER-2 Well Installation, FW-02 Drilling (Tentative) | [^] Drilling Support Waste Management, TWB-3 Drilling/ER-2 Well Installation, FW-02 Drilling (Tentative) | [^] Drilling Support Waste Management, TWB-3 Drilling/ER-2 Well Installation, FW-02 Drilling (Tentative) | [^] Drilling Support Waste Management, TWB-3 Drilling/ER-2 Well Installation, FW-02 Well Installation (Tentative) | ^Drilling Support Waste Management, TWB-3 Drilling/ER-2 Well Installation, FW-02 Well Installation (Tentative) | No Work | No Work |
| Primary Planned Activities | 5/8/2022 | 5/9/2022 | 5/10/2022 | 5/11/2022 | 5/12/2022 | 5/13/2022 | 5/14/2022 |
| Start Time (PST) | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM | 7:00 AM |
| TCS Pipelines | No Work | ^TCS Phase 2A Pipelines | ^TCS Phase 2A Pipelines | ^TCS Phase 2A Pipelines | ^TCS Phase 2A Pipelines | ^TCS Phase 2A Pipelines | No Work |
| Site Wide Groundwater Sampling G3*, F3*, E4*, F4*, G4*, D5*, E5*, F5*, G5*, D6*, E6*, F6*, & G6* | No Work | No Work | No Work | No Work | No Work | No Work | No Work |
| Site Wide Revegetation F5 * | No Work | No Work | No Work | No Work | No Work | No Work | No Work |
| Site Wide Electrical & Controls Construction E5*, F5*, G5 * | No Work | No Work | No Work | No Work | No Work | No Work | No Work |
| Phase 2 Drilling G5* | No Work | No Work | [^] Drilling Support Waste Management, TWB-3 Drilling/ER-1 Well Development/Testing, FW-02 Well Installation (Tentative); TWB-1-Temp Well Development/Testing | [^] Drilling Support Waste Management, TWB-3 Drilling/ER-1 Well Development/Testing, TWB-1-Temp Well Development/Testing | [^] Drilling Support Waste Management, TWB-3 Drilling/ER-1 Well Development/Testing, TWB-1-Temp Well Development/Testing | [^] Drilling Support Waste Management, TWB-3 Drilling/ER-1 Well Development/Testing, TWB-1-Temp Well Development/Testing | [^] Drilling Support Waste Management, TWB-3 Drilling/ER-1 Well Development/Testing, TWB-1-Temp Well Development/Testing |

Notes:

The timing of field activities is estimated and may change day-to-day based on site conditions, field progress, or other factors.

When planning to visit the site to observe a specific activity or area, please contact Curt Russell (760.791.5884) for the latest schedule information.

* Bold font = Work location as described on the Project Grid Map. See Project Grid Map tab for location of grid positions provided on the Look-Ahead.

^ = Intrusive/Ground-Disturbing work activity

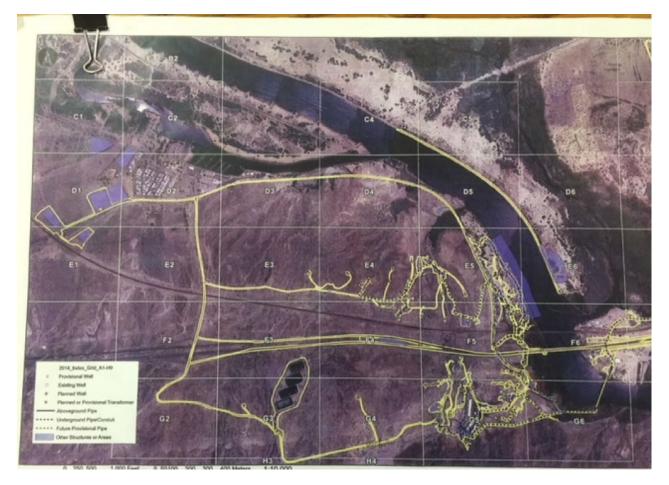


Figure showing a grid superimposed on the Topock site map. Each grid position is denotated by an letter followed by a number.

Attachment G Validated Groundwater Monitoring Data (DTSC Condition of Approval xi)

(Groundwater Data Presented in Separate PDF)