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April 10, 2025

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Environmental Compliance and Cleanup Division
Office of Environmental Policy and Compliance (OEPC)
US Department of Interior

Mr. Christopher Ioan
California Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, CA 90630

Subject: March 2025 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_2025_20250410)

Dear Ms. Dickerson and Mr. Ioan:

In compliance with the *1996 Corrective Action Consent Agreement* (Attachment 6, Part E, Section 9a and Attachment 7) and the *2013 Remedial Design/Remedial Action Consent Decree* (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 March 2025, as well as activities planned for the next six weeks (March 30, 2025 to May 10, 2025), and presents available results from sampling and testing, if any, 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 the California Department of Toxic Substances Control (DTSC) and U.S. Department of the Interior (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 and the Subsequent Environmental Impact Report 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 startup of the groundwater remedy at the Topock Compressor Station which officially began on October 2, 2018. This is the 78th monthly progress report. Please contact me at (628) 219-8380 if you have any questions or comments regarding this submittal.

Sincerely,

A handwritten signature in cursive script that reads 'Kristina Bonnett'.

Kristina Bonnett
Topock Technical Project Manager

Topock Project Executive Abstract

Document Title: <i>March 2025 Monthly Progress Report for the Groundwater Remedy Construction and Startup, PG&E Topock Compressor Station, Needles, California</i> Submitting Agency: DOI, DTSC Final Document? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Date of Document: 04/10/2025 Who Created this Document? (i.e. PG&E, DTSC, DOI, Other) PG&E
Priority Status: <input type="checkbox"/> HIGH <input type="checkbox"/> MED <input checked="" type="checkbox"/> LOW	Is this time critical? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Type of Document: <input type="checkbox"/> Draft <input checked="" type="checkbox"/> Report <input type="checkbox"/> Letter <input type="checkbox"/> Memo <input type="checkbox"/> Other / Explain:	Action Required: <input checked="" type="checkbox"/> Information Only <input type="checkbox"/> Review and Input <input type="checkbox"/> Other / Explain:
What does this information pertain to? <input type="checkbox"/> Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA)/Preliminary Assessment (PA) <input type="checkbox"/> RCRA Facility Investigation (RFI)/Remedial Investigation (including Risk Assessment) <input type="checkbox"/> Corrective Measures Study (CMS)/Feasibility Study (FS) <input checked="" type="checkbox"/> Corrective Measures Implementation/Remedial Action (RA) <input type="checkbox"/> California Environmental Quality Act/ Environmental Impact Report (EIR) <input type="checkbox"/> Interim Measures <input type="checkbox"/> Other / Explain:	Is this a Regulatory Requirement? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 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: <input type="checkbox"/> Permit <input type="checkbox"/> Other / Explain:
Brief Summary of attached document: This monthly report describes activities taken in March 2025 as well as activities planned for the next six weeks (March 30 to May 10, 2025) and presents available results from sampling and testing in the reporting period. In addition, this report discusses material deviations from the approved design documents and/or the <i>Construction/ Remedial Action Work Plan (C/RAWP)</i> , if any, that PG&E has proposed to the California Department of Toxic Substances Control (DTSC) and the U.S. Department of the Interior (DOI) or that have been approved by DTSC and DOI. This report also highlights key personnel changes, if any, and summarizes activities performed and activities planned at the Topock Compressor Station in support of DOI's 2012 Community Involvement Plan and DTSC's 2019 Community Outreach Plan, as well as contacts with local community, representatives of the press, and/or public interest groups, if any. Written by: Pacific Gas and Electric Company	
Recommendations: Provide input to PG&E.	
How is this information related to the Final Remedy or Regulatory Requirements: This submittal is required in compliance with the CACA, CD, and pursuant to the C/RAWP.	
Other requirements of this information? None.	



March 2025
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_20250410

April 2025

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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¹ Sections/Tables/Attachments denoted with * have no changes since last reporting period. They will not appear in the body of the report. This abbreviated reporting format has been implemented since the March 2024 Monthly Progress Report.

Acronyms and Abbreviations

Acronym	Definition
AOC	area of concern
CACA	Corrective Action Consent Agreement
C/RAWP	Construction/Remedial Action Work Plan
CD	Consent Decree
DOI	United States Department of the Interior
DTSC	California Department of Toxic Substances Control
ERTC	Environmental Release to Construct
IM-3	Interim Measure No. 3
IRZ	in-situ reactive zone
O&M	operations and maintenance
PG&E	Pacific Gas and Electric Company
RCRA	Resource Conservation and Recovery Act
SEIR	Subsequent Environmental Impact Report
TCS	Topock Compressor Station

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 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 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, 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 78th 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 2025 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 (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 near-term (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.

Note that Sections/Tables/Attachments that have no changes since last reporting period, will not appear in the body of the report. This abbreviated reporting format has been implemented since with the March 2024 Monthly Progress Report.

Please note that since activities conducted to comply with the project's Applicable or Relevant and Appropriate Requirement 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, includes the National Trail Highway In-situ 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 system. Figures 2-1 and 2-2 show the locations of key areas and wells.

Phase 1 systems and components were integrated and tested to make sure they function properly. On December 22, 2021, PG&E initiated injection of ethanol into the groundwater at select National Trail Highway IRZ wells using temporary power (i.e., portable generator). On March 24, 2022, the permanent power system (from TCS) was put in service. The Remedy-Produced Water Conditioning system inside TCS was fully operational on June 24, 2022. Between March and August 2022, the groundwater remedy experienced intermittent power outages of various durations (the contributing factors, include but are not limited to, TCS operations load shedding [i.e., power to remedy was shut off by TCS due to gas operational reasons] and/or functionality of electrical components). Portable generators were used to supply power from end of August to end of October 2022. The permanent power supply issue was resolved at the end of October 2022. The portable generators were kept onsite temporarily as contingencies and removed from site at the end of January 2023.

Concurrently, after receipt of DTSC's and DOI's approvals, PG&E turned off the Interim Measure No. 3 (IM-3) extraction wells (TW-2D and TW-3D) on December 21, 2021, and started to prepare IM-3 for lay-up. 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.

Phase 2 remedy construction commenced on March 2, 2022, and includes additional wells (located in Bat Cave Wash [BCW]/TCS, on the Transwestern Bench [TWB], 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. Due to a supply chain issue for vault panels which delays the delivery of those components, a temporary pause of Phase 2A heavy construction activities was planned for mid-June to September 2023. The vault panels were received in August 2023 and installed by October 2023. On August 15, 2023, PG&E informed DTSC and DOI that PG&E intends to extend the pause as PG&E awaited further direction on the Phase 2B design modification proposal submitted to the agencies December 2022.

On October 31, 2024, DTSC and DOI issued a decision to not approve and officially reject the Phase 2B design modification proposal, leaving the design submitted on November 18, 2015 (CH2M, 2015a) (also called 2015 Basis of Design [BOD]) as the only approved groundwater remedy for the Topock site. On November 8, 2024, PG&E requested DTSC's decision on the Phase 2B design modification proposal be reconsidered. On December 20, 2024, PG&E informed DTSC/DOI of the following plan to restart construction of the approved groundwater remedy:

- Q4 2024-Q3 2025 – Bring 2015 BOD designs up to current code, bid work for construction contracting.

- Mid Q1 2025 – Hold first look/stakeholder site walk.
- Late Q1 2025 – Prepare site for remobilization and prepare well pads.
- Early Q2 2025 – Resume drilling activities.
- Early Q4 2025 – Resume pipeline construction activities.

On February 13, 2025, DTSC replied to PG&E's November 8, 2024 request to reconsider its October 31, 2024 decision. After a review of the request and conferring with DOI, DTSC declined to change its October 31, 2024 decision.

A project initiation meeting was held on March 4, 2025 for Phase 2 drilling and pipeline construction in the Upland. Mobilization occurred the weeks of March 10 and March 15, 2025, and ground disturbance activities started on March 25, 2025.

Below is a summary of activities and work completed in March 2025:

- 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, the California Regional Water Quality Control Board, Colorado River Basin Region, the Metropolitan Water District of Southern California, Tribes, and the Technical Review Committee. PG&E continues to send these weekly emails to date. As of March 31, 2025, a total of 346 six-week look-ahead schedule emails have been sent. Of those, five six-week look-ahead schedule emails were sent in March 2025 (on March 3, 10, 17, 24, and 31).
- On August 10, 2018, PG&E issued the first Environmental Release to Construct (ERTC) to contractors. As of March 31, 2025, a total of 116 ERTCs (including addenda) and 10 Environmental Release to Operate (ERTOs, including addenda) were issued for construction and operation activities. The ERTCs are listed in Tables 2-1a and 2-1b. The ERTOs are listed in Table 2-1c.

On March 14, 2025, Well ERTC #5ab was issued for site preparation, well drilling, well installation, and well testing at locations IRL-2, IRL-3, and MW-I. No ERTO was issued in March 2025.

- 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. Seven daily activity lists were issued in March 2025.
- In March 2025, PG&E performed the following remedy construction and O&M activities:
 - **March 2 to 8 activities:**
 - Continued IRZ circulation and ethanol injection O&M activities, including O&M support activities. Example O&M activities include:
 - Process monitoring -- Inspect wells and system areas, adjust operational parameters including extraction and injection well flowrates and ethanol dosing concentrations;
 - Well and system maintenance – Backwash injection wells, chemical and physical rehabilitation of IRZ wells, operate water conditioning system, perform routine preventative maintenance; and
 - General system/site inspection – inspection of access roads and monthly inspection of industrial SWPPP best management practices.
 - Held a project initiation meeting for Phase 2b drilling and pipeline construction in the upland.
 - **March 9 to 15 activities:**
 - Continued IRZ circulation and ethanol injection O&M activities, including O&M support activities. See example O&M activities in the first bullet above.
 - Conducted groundwater sampling and transducer downloads in various areas.

- **March 16 to 22 activities:**
 - Continued IRZ circulation and ethanol injection O&M activities, including O&M support activities. See example O&M activities in the first bullet above.
 - IRL-2, IRL-3 and MW-I mobilization and site preparation.
- **March 23 to 29 activities:**
 - Continued IRZ circulation and ethanol injection O&M activities, including O&M support activities. See example O&M activities in the first bullet above.
 - IRL-3 and IRL-2 drilling site and road preparation.
 - Revegetation monitoring and beavertail transplant.
- Fugitive Dust Monitoring:
 - Twelve observations for fugitive dust were made during periodic inspection of construction activities. No visible dust was observed outside of the work areas.
- Noise Monitoring (the following are highlights, details are in **Attachment E**):
 - Five events at the pre-approved location west of the mobile home park at Moabi Regional Park. Construction activities closest to this monitoring location include activities at the SPY and Construction Headquarters (CHQ), as well as traffic on NTH. The sound level typically varied between 37 and 47 dBA, with an average and median of 43 dBA.
 - Four events at the pre-approved location in the Upland just off the IM-3 access road, and near the top of the hill closest to MW-20 Bench. Construction activities closest to this monitoring location include activities at Staging Area 6 (across from the IM-3 treatment plant), site preparation/road improvements at IRL-2, IRL-3, and MW-I, air knifing, and traffic on the IM-3 access road. The sound level typically varied between 47 and 52 dBA, with an average and median of 54 dBA.
 - Seven events at the pre-approved location near and at the same elevation as Maze C. Construction activities closest to this monitoring location are associated with site preparation/drill pad at IRL-2 and MW-I, road improvement between IRL-2 and MW-I, air knifing, and activities in Staging Area 6. The sound level varied between 40 and 61 dBA, with an average and median of 50 dBA.

2.2 Freshwater Usage, Waste Generation, and Management

In March 2025, freshwater usage, waste generation, and management are as follows:

2.2.1 Freshwater and Wastewater

- In March 2025, an approximate total of 3,800 gallons of freshwater was used for IRZ wells rehabilitation, 16,646 gallons was used for O&M activities in the revegetation areas, and 72,000 gallons was used for dust control during remedy construction.
- For the reporting period, an estimated 72,040 gallons of remedy-produce water (after conditioning) was re-injected into the aquifer. Prior to reinjection, the conditioned water is sampled in accordance with the approved sampling plan in the O&M Plan. Analytical data for remedy-produced water is included in Attachment G. To date, there has been no offsite disposal, or disposal to the PG&E TCS evaporation ponds, of remedy-produced water generated from O&M activities.

2.2.2 Displaced Materials/Soils/Clay/Sludge

- An approximate 45 cubic yards of excess soils were generated from construction of the access road to well IRL-2. This material was transported to the Soil Processing Yard, stockpiled, and will be managed in accordance with the Remedy Soil Management Plan.
- One 5-gallon bucket of sludge was generated from cleaning of various secondary containments at the MW-20 Bench. The sludge has been characterized and profiled as non-RCRA hazardous waste and will be transported offsite for disposal at a permitted landfill.
- An approximate 10 gallons of sludge was generated from IRZ well rehabilitation. The sludge has been characterized and profiled as non-RCRA hazardous waste and will be transported offsite for disposal at a permitted landfill.

2.2.3 General Construction Waste, Sanitary Waste, and Recyclables

- In March 2025, approximately one cubic yard of general waste was generated and hauled to local landfills. In addition, spent filters were generated from the bag filter at well PTI-1D.
- Sanitary waste from construction trailers/portable toilets is hauled offsite as needed.

2.3 Worker Training and Education

- In March 2025, twenty-nine safety training sessions were held and a total of twenty-nine personnel trained. In addition, twenty-nine personnel took the WEAT.

2.4 Status of Work Variance Requests*

No changes to report this month.

2.5 Use of Future Activity Allowance*

No changes to report this month.

2.6 Issues Encountered and Actions Taken to Rectify Issues/Problems*

No changes to report this month.

2.7 Key Personnel Changes

Veen Chee Fong was added to the PG&E project team.

2.8 Communication with the Public*

No changes to report this month.

2.9 Planned Activities for Next Six Weeks

The planned activities for next six weeks (March 30 to May 10, 2025) include the following:

- Continue IRZ O&M including revegetation and maintenance of revegetation area.
- Continue groundwater sampling.
- Hold a Pre-Work Field Review for the remaining upland wells on April 3, 2025.
- Complete site preparation for drilling at IRL-2, IRL-3, and MW-I.
- Start drilling at IRL-3.

- Start site preparation and access road construction at IRL-4.
- Conduct post-NTCRA revegetation soil sampling in East Ravine and Bat Cave Wash.
- Continue to conduct inspection of Stormwater Pollution Prevention Plan best management practices, as needed.
- Continue to manage displaced soil per the approved Soil Management Plan, as needed.

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 start 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 summarizes the percent completeness for key Phase 2 construction activities, as of March 31, 2025. In addition, the latest project schedule including remedy construction can be downloaded [here](#) on the project website.

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 data in each monthly progress report starting with the November 2018 monthly report. The data are included in Attachment G of this report.

2.12 IM-3 Shutdown and Preparation for Layup*

No changes to report this month.

2.13 Summary of Releases Occurred During Groundwater Remedy Construction*

No changes to report this month.

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.

California Department of Toxic Substances Control (DTSC). 2019. [Community Outreach Plan, Pacific Gas and Electric Company's Topock Compressor Station, Needles, California](#). May.

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

United States Department of the Interior (DOI). 2012. [Community Involvement Plan, Pacific Gas and Electric Topock Compressor Station, Needles, California](#). 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

The following tables did not have any updates, and are not included in this monthly report:

- 2-1a. Summary of Non-Well Environmental Release-To-Constructions
- 2-1c. Summary of Environmental Release-To-Operate
- 2-2. Monitoring Wells Nomenclature Changes
- 2-3. Summary of Work Variance Requests
- 2-4. Summary of Cumulative Percent Completeness of Key Phase 2 Construction Activities
- 2-5. Summary of Releases Occurred During Groundwater Remedy Construction

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

*March 2025 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup
PG&E Topock Compressor Station, Needles, California*

ERTC Number ^[a]	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 1 to ERTC 5ar	Scope included the drilling of extraction wells TWB-1 and TWB-2 on the Transwestern Bench.	March 13, 2022
Amendment 2 to ERTC 5ar	Scope included installation of an office trailer and associated utility services at the Transwestern Bench.	May 11, 2023
5at	Scope included the site preparation for and drilling of extraction wells TCS-1 and TCS-2 inside the Compressor Station.	March 18, 2022
5as	Scope included the site preparation for and drilling of extraction wells ER-1 and ER-2 along historic route 66.	March 14, 2022
Addendum 1 to ERTC 5as	Scope included the 48-hour aquifer tests at extraction wells ER-1 and ER-2.	October 26, 2022
5au	Scope included the site preparation for and drilling of extraction well TWB-3.	April 21, 2022
Addendum 1 to ERTC 5aq	Scope included the site preparation for and drilling of FW-02B (also known as FW-2A' or FW-2Alt').	August 16, 2022
Addendum 2 to ERTC 5ah ^[b]	Scope included the re-establishment of a walking path for safe access to well MW-V (also called MW-95) for groundwater sampling.	Renewed April 18, 2023 for storm erosion repair work (originally issued on November 21, 2022)
5ay	Scope included the site preparation for and installation of extraction wells ER-3 and ER-4.	February 27, 2023
5ax	Scope included the repair of MW-11S well pad.	March 1, 2023
5az	Scope included the replacement of well MW-30-30 and installation of new monuments at MW-30-30, MW-30-50, ER-3, and ER-4.	October 5, 2023
Addendum 2 to ERTC 5s	Scope included the relocation of in-vault power and controls equipment to aboveground panels on stanchion with a sunshade at IRZ-39.	November 6, 2024
5ba	Scope included site preparation, well drilling, well installation, and well testing at IRL-2, IRL-3, and MW-I	March 14, 2025

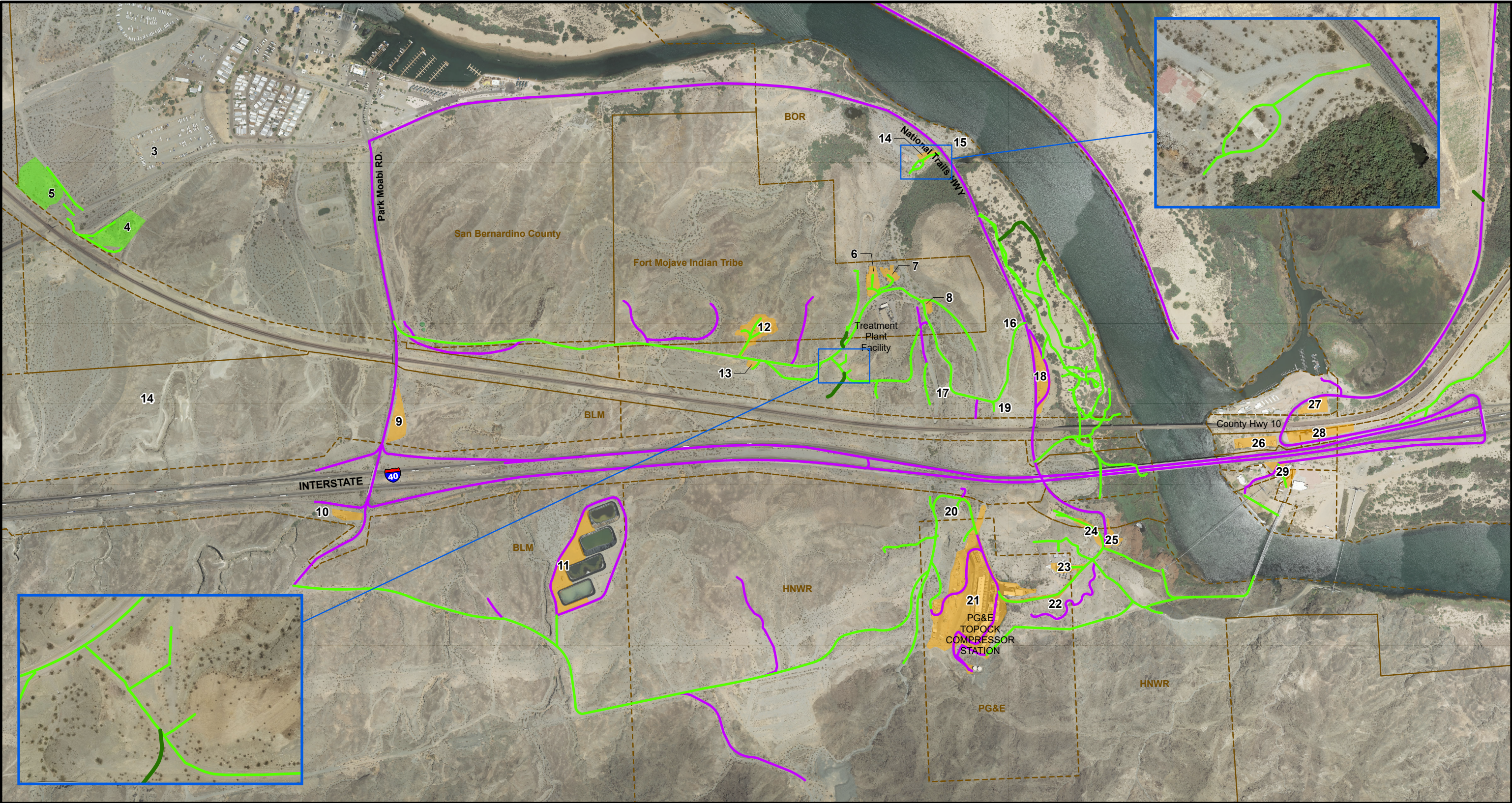
^[a] For brevity and readability, the Well ERTCs issued for Phase 1 construction are not listed in this report. For a complete list of those ERTCs, please Table 2-1a of the February 2022 Monthly Progress Report. The monthly progress reports can be accessed via the [Project website](#).

^[a] Renewed ERTC for re-establishing access to MW-V.

ERTC = Environmental Release-To-Construction

TCS = Topock Compressor Station

Figures

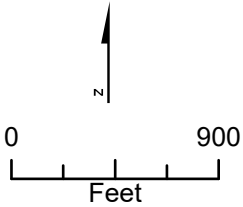


LEGEND

- Existing Access Route continue to be used for remedial activities
- Existing Route to be used and maintained for access to remedial activities
- Roads to be improved or constructed for groundwater remedy
- Staging Areas for Remediation Project
- Soil Processing Yard (Area #5) and Construction Headquarter (Area #4) for Remediation Project

Notes:

- Area #3 was not be used as the Construction Headquarter (CHQ). The CHQ was moved to Area #4.
- Area #9 is the primary truck inspection area. Areas #4, 5, 18, and 25 might also be used depending on the specific construction activity.
- Decontamination pads will be located in Area #4 (Construction Headquarters), Area #21 (Topock Compressor Station), and Area #23 (Transwestern Bench).
- 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.
- 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.
- Public roadways outside of the EIR project area and the APE can also be used for remedy implementation.



UPDATED 03/10/2025

**FIGURE 2-1
CONSTRUCTION SITE PLAN
AND ACCESS ROUTES**

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



Legend

◆ Phase 2b Well



Figure 2-2b
Phase 2b Well Locations
PG&E Topock Compressor Station,
Needles, California

Attachments

The following attachments did not have any updates, and are not included in this monthly report:

- B. Available Boring and Well Construction Logs, Groundwater Sample Results from Well Drilling, and Well Testing Activities
- C. Soil Sampling Locations and Available Soil Analytical Results
- D. Perimeter Air Sampling Analytical Results

Attachment A

Photographs



Photo showing remedy construction activities at Staging Area 6.



Photo showing access road construction.



Photo showing air knifing at well IRL-3.

Attachment E
Noise Monitoring Results
(SEIR NOISE-2 and NOISE-3 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 landowners/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 landowners/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. To date, when the interval data are relatively stable or clearly below the standard, the attended monitoring event is typically be 10 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 2025, the following monitoring events were conducted:

- Five events at the pre-approved location west of the mobile home park at Moabi Regional Park. Construction activities closest to this monitoring location include activities at the SPY and Construction Headquarters (CHQ), as well as traffic on NTH. The sound level typically varied between 37 and 47 dBA, with an average and median of 43 dBA.
- Four events at the pre-approved location in the Upland just off the IM-3 access road, and near the top of the hill closest to MW-20 Bench. Construction activities closest to this monitoring location include activities at Staging Area 6 (across from the IM-3 treatment plant), site preparation/road improvements at IRL-2, IRL-3, and MW-I, air knifing, and traffic on the IM-3 access road. The sound level typically varied between 47 and 52 dBA, with an average and median of 54 dBA.
- Seven events at the pre-approved location near and at the same elevation as Maze C. Construction activities closest to this monitoring location are associated with site preparation/drill pad at IRL-2 and MW-I, road improvement between IRL-2 and MW-I, air knifing, and activities in Staging Area 6. The sound level varied between 40 and 61 dBA, with an average and median of 50 dBA.

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	3/30/2025	3/31/2025	4/1/2025	4/2/2025	4/3/2025	4/4/2025	4/5/2025
Start Time (PST)	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 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 Construction E4*	[^] IRL-3 and IRL-2 Drilling Site and Road Preparation	IRL-3 and IRL-2 Drilling Site and Road Preparation Site Surveying	IRL-3 and IRL-2 Drilling Site and Road Preparation, Air Knifing IRL-2 and IRL-3, Site Surveying	IRL-3 and IRL-2 Drilling Site and Road Preparation, Air Knifing IRL-2, Site Surveying	IRL-3 and IRL-2 Drilling Site and Road Preparation Remaining Phase 2B Drill	No Work	No Work
Site Wide Revegetation F5*, F6*	No Work	No Work	No Work	No Work	Irrigation O&M/Watering	No Work	No Work
Primary Planned Activities	4/6/2025	4/7/2025	4/8/2025	4/9/2025	4/10/2025	4/11/2025	4/12/2025
Start Time (PST)	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 AM
Site Wide Groundwater Sampling G3*, F3*, E4*, F4*, G4*, D5*, E5*, F5*, G5*, D6*, E6*, F6*, & G6*	No Work	Monthly sampling	Monthly sampling	Monthly sampling	Monthly sampling	No Work	No Work
Site Wide Construction E4*	No Work	Drilling Equipment Mobilization	[^] IRL-2 and MW-I Drilling Site and Road Preparation, Sonic Rig Inspections, IRL-3 Site Setup	[^] IRL-2 and MW-I Drilling Site and Road Preparation, IRL-3 Site Setup and Drilling, Utility location at FW-01, MW-20 Bench, Bat Cave Wash, and East Ravine	[^] IRL-2 and MW-I Drilling Site and Road Preparation, IRL-3 Drilling	[^] IRL-2 and MW-I Drilling Site and Road Preparation, IRL-3 Drilling	[^] IRL-2 and MW-I Drilling Site and Road Preparation, IRL-3 Drilling
Site Wide Revegetation F5*, F6*	No Work	No Work	No Work	No Work	Irrigation O&M/Watering	No Work	No Work
Primary Planned Activities	4/13/2025	4/14/2025	4/15/2025	4/16/2025	4/17/2025	4/18/2025	4/19/2025
Start Time (PST)	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 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 Construction E4*	[^] IMW-I and IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	[^] IMW-I and IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	[^] IMW-I and IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	[^] MW-I and IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling. Air Knifing MW-I	[^] IMW-I and IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	No Work	No Work
Site Wide Revegetation F5*, F6*,G5*	No Work	No Work	Monitoring, Weeding	Monitoring, Weeding	[^] Monitoring, Weeding. Soil Sampling, Irrigation O&M/Floodplain Watering	[^] Post-NTCRA Reveg Soil Sampling	No Work
Primary Planned Activities	4/20/2025	4/21/2025	4/22/2025	4/23/2025	4/24/2025	4/25/2025	4/26/2025
Start Time (PST)	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 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 Construction E4*	No Work	No Work	[^] IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	[^] IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	[^] IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	[^] IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	[^] IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling
Site Wide Revegetation F5*, F6*	No Work	No Work	No Work	No Work	Irrigation O&M/Watering	No Work	No Work
Primary Planned Activities	4/27/2025	4/28/2025	4/29/2025	4/30/2025	5/1/2025	5/2/2025	5/3/2025
Start Time (PST)	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 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 Construction E4*	[^] IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	[^] IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	[^] IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	[^] IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	[^] IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	No Work	No Work
Site Wide Revegetation F5*, F6*	No Work	No Work	No Work	No Work	Irrigation O&M/Watering	No Work	No Work
Primary Planned Activities	5/4/2025	5/5/2025	5/6/2025	5/7/2025	5/8/2025	5/9/2025	5/10/2025
Start Time (PST)	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 AM	6:30 AM
Site Wide Groundwater Sampling G3*, F3*, E4*, F4*, G4*, D5*, E5*, F5*, G5*, D6*, E6*, F6*, & G6*	No Work	Monthly sampling	Monthly sampling	Monthly sampling	Monthly sampling	No Work	No Work
Site Wide Construction E4*	No Work	No Work	[^] IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	[^] IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	[^] IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling	[^] IRL-4 Drilling Site and Road Preparation, IRL-3 Drilling and Site Cleanup	[^] IRL-4 Drilling Site and Road Preparation, IRL-2 Mobilization, Site Setup, and
Site Wide Revegetation F5*, F6*	No Work	No Work	No Work	No Work	Irrigation O&M/Floodplain Watering	No Work	No Work

Note: The Pre-Work Field Review was formerly known as the Last Look

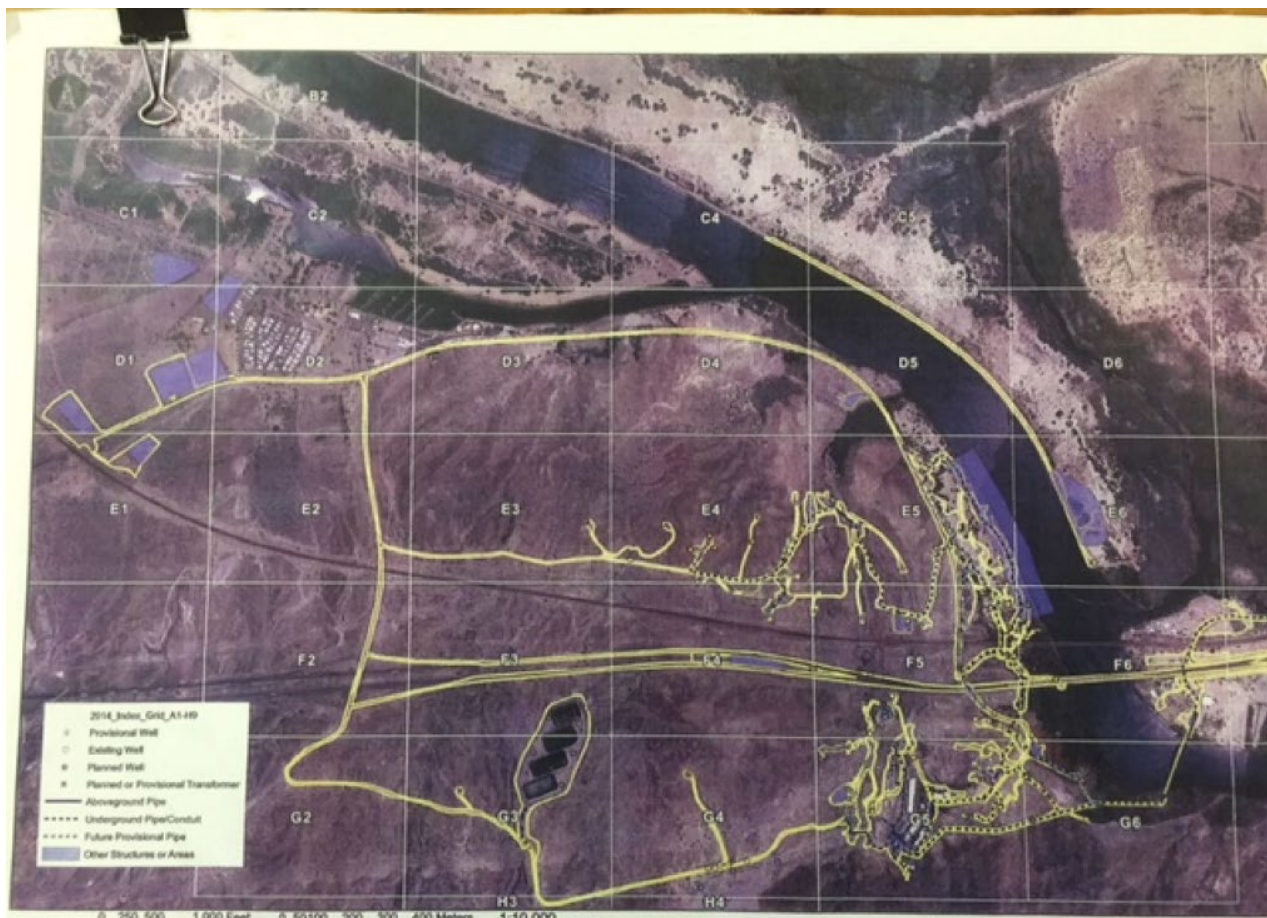


Figure showing a grid superimposed on the Topock site map. Each grid position is denoted by an letter followed by a number.

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

(Groundwater Data Presented in Separate PDF)