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December 10, 2024

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

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

**Subject: November 2024 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup, PG&E Topock Compressor Station, Needles, California**  
(Document ID: TPK\_Monthly\_Progress\_Rpt\_November\_2024\_20241210)

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 November 2024, as well as activities planned for the next six weeks (December 2, 2024 to January 11, 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 10<sup>th</sup> 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 74<sup>th</sup> 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 black ink that reads 'Kristina Bonnett'. The signature is written in a cursive, flowing style.

Kristina Bonnett  
Topock Technical Project Manager

# Topock Project Executive Abstract

<p>Document Title: <i>November 2024 Monthly Progress Report for the Groundwater Remedy Construction and Startup, PG&amp;E Topock Compressor Station, Needles, California</i></p> <p>Submitting Agency: DOI, DTSC</p> <p>Final Document?    <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p>	<p>Date of Document: 12/10/2024</p> <p>Who Created this Document? (i.e. PG&amp;E, DTSC, DOI, Other) PG&amp;E</p>
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<p>What does this information pertain to?</p> <p><input type="checkbox"/> Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA)/Preliminary Assessment (PA)</p> <p><input type="checkbox"/> RCRA Facility Investigation (RFI)/Remedial Investigation (including Risk Assessment)</p> <p><input type="checkbox"/> Corrective Measures Study (CMS)/Feasibility Study (FS)</p> <p><input checked="" type="checkbox"/> Corrective Measures Implementation/Remedial Action (RA)</p> <p><input type="checkbox"/> California Environmental Quality Act/ Environmental Impact Report (EIR)</p> <p><input type="checkbox"/> Interim Measures</p> <p><input type="checkbox"/> Other / Explain:</p>	<p>Is this a Regulatory Requirement?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, why is the document needed?</p>
<p>What is the consequence of NOT doing this item? What is the consequence of DOING this item?</p> <p>The consequence for not doing this item is PG&amp;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).</p>	<p>Other Justification/s:</p> <p><input type="checkbox"/> Permit    <input type="checkbox"/> Other / Explain:</p>
<p>Brief Summary of attached document:</p> <p>This monthly report describes activities taken in November 2024 as well as activities planned for the next six weeks (December 2, 2024 to January 11, 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&amp;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.</p> <p>Written by: Pacific Gas and Electric Company</p>	
<p>Recommendations:</p> <p>Provide input to PG&amp;E.</p>	
<p>How is this information related to the Final Remedy or Regulatory Requirements:</p> <p>This submittal is required in compliance with the CACA, CD, and pursuant to the C/RAWP.</p>	
<p>Other requirements of this information?</p> <p>None.</p>	



**November 2024**  
**Monthly Progress Report for the**  
**Final Groundwater Remedy Construction and Startup**

**PG&E Topock Compressor Station**  
**Needles, California**

**Document ID: TPK\_Monthly\_Progress\_Rpt\_November\_20241210**

**December 2024**

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

*On Behalf of*  
Pacific Gas and Electric Company



## Contents<sup>1</sup>

Topock Project Executive Abstract.....	iii
<b>Acronyms and Abbreviations .....</b>	<b>ix</b>
<b>1. Introduction.....</b>	<b>1</b>
<b>2. Monthly Update.....</b>	<b>2</b>
2.1 Work Completed.....	2
2.2 Freshwater Usage, Waste Generation, and Management .....	4
2.2.1 Freshwater and Wastewater.....	4
2.2.2 Displaced Materials/Soils/Clay .....	4
2.2.3 General Construction Waste, Sanitary Waste, and Recyclables.....	5
2.3 Worker Training and Education.....	5
2.4 Status of Work Variance Requests* .....	5
2.5 Use of Future Activity Allowance* .....	5
2.6 Issues Encountered and Actions Taken to Rectify Issues/Problems .....	5
2.7 Key Personnel Changes* .....	5
2.8 Communication with the Public*.....	5
2.9 Planned Activities for Next Six Weeks.....	5
2.10 Construction Schedule Review .....	6
2.11 Available Sitewide Groundwater Monitoring Data (DTSC Condition of Approval xi) .....	6
2.12 IM-3 Shutdown and Preparation for Layup*.....	6
2.13 Summary of Releases Occurred During Groundwater Remedy Construction* .....	6
<b>3. References .....</b>	<b>6</b>

### Tables

2-1a. Summary of Non-Well Environmental Release-To-Constructions
2-1b. Summary of 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*

### Figures

2-1 Construction Site Plan and Access Routes
2-2 Well Locations

### Attachments

A Photographs
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*
E Noise Monitoring Results (SEIR NOISE-2 and NOISE-3 Requirement)
F Six-Week Look-Ahead Schedule
G Groundwater Monitoring Data (DTSC Condition of Approval xi)

<sup>1</sup> 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

<b>Acronym</b>	<b>Definition</b>
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 74<sup>th</sup> 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 November 2024, 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 on the Phase 2b design modification proposal. On November 8, 2024, PG&E requested DTSC's decision on the Phase 2b design modification proposal be reconsidered.

The following is a summary of activities and work completed in November 2024:

- 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 November 30, 2024, a total of 328 six-week look-ahead schedule emails

have been sent. Of those, four six-week look-ahead schedule emails were sent in November 2024 (on November 4, 11, 18, and 25).

- On August 10, 2018, PG&E issued the first Environmental Release to Construct (ERTC) to contractors. As of November 30, 2024, a total of 115 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.

In November 2024, two addenda to existing ERTCs were issued:

- Addendum #2 to ERTC #5s was issued for the relocation of in-vault power and controls equipment to aboveground panels on stanchion with a sunshade at IRZ-39.
- Addendum #2 to ERTC #21 was issued for the installation of the Node 1 sunshade and associated electrical 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. Ten daily activity lists were issued in November 2024.
- In November 2024, PG&E performed the following remedy construction and O&M activities:
  - **October 27 to November 2 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.
    - Completed fence post installation for floodplain gate.
    - Continue irrigation extension work at the floodplain revegetation area.
    - Conducted groundwater sampling at various locations.
  - **November 3 to 9 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.
    - Continue irrigation extension work at the floodplain revegetation area.
  - **November 10 to 16 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.
    - Continue irrigation extension work at the floodplain revegetation area.
    - Continue monthly groundwater sampling at various locations.
    - Completed soil/sediment removal accumulated behind the AOC4 gabions.
    - Completed maintenance repairs to riprap within the jurisdictional wash at the CHQ.
    - Completed IRZ-39 aboveground panels and sunshade installation.
  - **November 17 to 23 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.
- Continue irrigation extension work at the floodplain revegetation area.
- Continue monthly groundwater sampling at various locations.
- Completed monitoring and planting in revegetation areas.
- Continue Node 2 to Node 1 conductor pull, sunshade and panel installation.
- Fugitive Dust Monitoring:
  - No visible dust was observed outside of the work areas during periodic inspection of construction activities.
- Noise Monitoring (the following are highlights, details are in **Attachment E**):
  - Two 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 30 and 57 dBA, with an average of 42 to 47 and median of 38 to 48 dBA.
  - One event 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 the Transwestern Bench and traffic on the IM-3 access road. The sound level typically varied between 38 and 52 dBA, with an average and median of 44 dBA.
  - One event at the pre-approved location west of the access road to Bat Cave Wash (BCW), on the same elevation as the Topock Maze. Construction activities closest to this monitoring location are associated with mobilization of construction equipment for the removal of soil/sediment at AOC4 gabions and relocation of the ripraps from top of BCW access road to the AOC4 gabion location. The sound level varied between 49 and 81 dBA, with an average of 59 dBA and median of 55 dBA. The maximum sound level of 81 dBA was due to the beeping sound of the backhoe backing up during movement of ripraps on top of BCW access road.

## **2.2 Freshwater Usage, Waste Generation, and Management**

In November 2024, freshwater usage, waste generation, and management are as follows:

### **2.2.1 Freshwater and Wastewater**

- In November 2024, an approximate total of 1,700 gallons of freshwater was used for IRZ wells rehabilitation, 10,067 gallons was used for O&M activities in the revegetation areas, and 4,000 gallons was used for dust control during soil/sediment removal at AOC4 and maintenance repair of riprap at the CHQ.
- For the reporting period, an estimated 83,590 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**

- An approximate 25 cubic yards of soils/sediments were generated from AOC4 maintenance in November 2024. This material has been characterized as non-hazardous and is currently stockpiled in the SPY, awaiting the completion of profiling for purposes of offsite disposal at a permitted landfill.
- Two 5-gallon buckets of sludge were 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.

### **2.2.3 General Construction Waste, Sanitary Waste, and Recyclables**

- In November 2024, approximately six cubic yards of general waste was generated and hauled to local landfills.
- Sanitary waste from construction trailers/portable toilets is hauled offsite as needed.

## **2.3 Worker Training and Education**

- In November 2024, two safety training sessions were held and a total of nine personnel trained. In addition, sixteen 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**

On November 15, 2024, PG&E Biologist notified DTSC, DOI, USFWS, and the Refuge, via email, that a roadrunner carcass was found on the Topock project site underneath the floodplain revegetation fencing. The following detail was included in PG&E's agency notification email:

*".. The roadrunner was observed on November 4<sup>th</sup> during the first day of the Caltrans geotechnical borings activity by the Caltrans biologist that was conducting an initial survey of the area. The carcass was found wedged under the fence where it meets the ground. It appears that the road runner got into the re-vegetation area, could not get out, and got caught in the fence trying to escape underneath it.*

*While we don't know the exact point of entry, we think the roadrunner entered the revegetation area from a gate that was left open during maintenance activities. Crews tend to leave the gates open during the day as they are entering and exiting the area throughout the day.*

*As a best practice, PG&E reminded our contractors and subcontractors to keep the gates closed as much as possible moving forward to prevent future roadrunners from entering the revegetation areas..."*

## **2.7 Key Personnel Changes\***

No changes to report this month.

## **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 (December 2, 2024 to January 11, 2025) include the following:

- Continue IRZ O&M including revegetation and maintenance of revegetation area.
- Complete remaining electrical connection at IRZ-39 and Node 2.
- Continue groundwater sampling.

- 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 November 30, 2024. In addition, the latest project schedule including remedy construction can be downloaded from 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.

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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:

Table 2-1c. Summary of Environmental Release-To-Operate

Table 2-2. Monitoring Wells Nomenclature Changes

Table 2-5. Summary of Releases Occurred During Groundwater Remedy Construction

**Table 2-1a. Summary of Non-Well Environmental Release-To-Constructions**

November 2024 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup  
 PG&E Topock Compressor Station, Needles, California

ERTC Number <sup>[a]</sup>	Brief Description of Covered Areas and Scope of Authorized Activities	Original Issue Date
Amendment 1 to ERTC 17 <sup>[b,c]</sup>	Scope included fence installation and planting in the revegetation areas in the floodplain.	March 18, 2022
Amendment 2 to ERTC 17 <sup>[b,c]</sup>	Scope included fence installation and planting in the UHR-1 revegetation area, located right off National Trails Highway.	April 4, 2022
ERTC 18	Scope included remedy pipeline installation within TCS.	April 15, 2022
Addendum 1 to ERTC 18	Scope included remedy electrical work inside TCS.	December 7, 2022
Addendum 2 to ERTC 18	Scope included additional remedy electrical work inside TCS.	March 2, 2023
Addendum 3 to ERTC 18	Scope included asphalt repair/placement and retaining wall rebuild inside TCS and asphalt placement on access road just outside TCS.	April 7, 2023
ERTC 19	Scope included remedy pipeline I2 installation in Bat Cave Wash.	Renewed March 2, 2023 for storm damage repair work (originally issued on July 15, 2022)
Addendum 1 to ERTC 19	Scope included the rebuild of the pipeline I2 access road damaged by the August 2022 storm events	February 16, 2023
Addendum 2 to ERTC 19	Scope included the re-installation of a V-ditch on east side of pipeline I2 access road.	May 11, 2023
Addendum 8 to ERTC 1 <sup>[d]</sup>	Scope included the expansion of the Soil Processing Yard during the Soil Non-Time Critical Removal Action.	July 18, 2022
ERTC 20	Scope included site preparation for remedy pipeline G installation in the floodplain.	August 8, 2022
Addendum 1 to ERTC 20	Scope included remedy pipeline G, riverbank well vaults, and aggregate-based access road on top of pipeline G.	August 18, 2022
Addendum 2 to ERTC 20	Scope included remedy electrical work between Electrical Node 2 and well RB-5.	December 16, 2022
ERTC 21 <sup>[e]</sup>	Scope included remedy pipeline E installation at and in the vicinity of the Transwestern Bench.	Renewed April 27, 2023 for asphalt repair/placement on portion of Pipeline E along NTH (originally issued on October 17, 2022)
Addendum 1 to ERTC 21	Scope included remedy electrical work along Pipeline E.	January 31, 2023
Addendum 2 to ERTC 21	Scoped included the installation of the sunshade at Node 1 and associated electrical work	November 7, 2024
ERTC 22 <sup>[e]</sup>	Scope included remedy pipeline C11 installation.	Renewed April 27, 2023 for asphalt placement on portion of Pipeline C11 crosses NTH (originally issued on January 9, 2023)

ERTC Number <sup>[a]</sup>	Brief Description of Covered Areas and Scope of Authorized Activities	Original Issue Date
Miscellaneous erosion control ERTC	Scope included localized repair of the installed Pipeline F erosion control measures.	Renewed January 30, 2023 ( <i>originally issued in February 2021</i> )
Addendum 1 to ERTC 11b	Scope included installation of stormwater erosion control measures along Pipeline B access road.	Renewed March 14, 2023 for storm damage repair work ( <i>originally issued in February 2022</i> )
Addendum 2 to ERTC 11b	Scope included repair of stormwater erosion control measures along Pipeline B access road.	May 22, 2023
ERTC 23	Scope included the installation of infrastructure for PTI-1D floodplain extraction test.	September 26, 2023

<sup>[a]</sup> 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](#).

<sup>[b]</sup> ERTC 17 was issued on December 15, 2021, for site preparation for mitigation planting, which involves the removal of tamarisk debris and root balls, offsite disposal of debris, installation of irrigation system, and leaching of soluble salts from the soil.

<sup>[c]</sup> Addendum 1 and 2 to ERTC 17 were renewed to allow for mitigation planting in Fall 2022.

<sup>[d]</sup> ERTC 1 was issued on August 10, 2018, for the setup at the Soil Processing Yard, Construction Headquarters, and various staging areas.

<sup>[e]</sup> Renewed for asphalt repair/placement along and cross NTH.

ERTC = Environmental Release-To-Construction

TCS = Topock Compressor Station

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

*November 2024 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup  
PG&E Topock Compressor Station, Needles, California*

ERTC Number <sup>[a]</sup>	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 <sup>[b]</sup>	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

<sup>[a]</sup> 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](#).

<sup>[b]</sup> Renewed ERTC for re-establishing access to MW-V.

ERTC = Environmental Release-To-Construction

TCS = Topock Compressor Station



**Table 2-4. Summary of Cumulative Percent Completeness of Key Phase 2 Construction Activities**  
November 2024 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup  
PG&E Topock Compressor Station, Needles, California

Activity	% Complete	Cumulative Status of Phase 2 Construction Activities (as of November 30, 2024)
Extraction and Injection Well Installation	80%	<ul style="list-style-type: none"> <li>• Pilot holes for TWB-1, -2, -3, TCS-1, -2, FW-02A, and FW-02B have been drilled.</li> <li>• TWB-2 was not a viable location for extraction and was abandoned.</li> <li>• A temporary well was installed at TWB-1 followed by well development and step testing. Results showed that TWB-1 is a viable location for an extraction well. A larger diameter extraction well was installed in August and developed and tested in September/October.</li> <li>• No aquifer was present at FW-02 alternate location. Drill casing was left in place at FW-02 alternate. Evaluation of the data was performed and potential alternate locations have been identified and presented to agencies and stakeholders on May 6 and May 18, 2022. A site walk was held on June 23 to view the identified potential alternate locations. An additional site walk was held on July 14 to view the location FW-02A' and to discuss implementation details. In mid-August, a pilot hole was drilled at the FW-02A' location which was subsequently renamed FW-02B. The location is viable for the freshwater injection well. In October, the pilot hole was over-drilled. In November, an injection well was installed and developed.</li> <li>• ER-1 and ER-2 were drilled, installed, developed, and tested. Sediment was observed at the bottom of ER-2 during development in early June. A bung was installed in ER-2 to prevent further sediment infiltration and allow for completion of development. Based on performance of these wells during well development, additional 48-hour step testing will be conducted at both extraction well locations in early November.</li> <li>• A pilot hole for TWB-3 was drilled. The observed lithology and aquifer thickness showed that TWB-3 is expected to be a viable extraction well. The extraction well was installed in August and developed and tested in September/October.</li> <li>• Final well designs were completed for injection/extraction wells TWB-1 &amp; -3, TCS-1 &amp; -2, and FW-02B.</li> <li>• Pump for groundwater sampling at PGE-07BR was stuck in the well. The stuck pump retrieved, cleaned, and reset to the appropriate depth needed for sampling. In addition, a drop tube was installed to collect water level measurements without needing to remove the pump. The pump was tested prior to reinstallation but was not operating during groundwater sampling and will be retested in July. The pump and tubing were replaced in August.</li> <li>• Monitoring well MW-70BR-225 was renamed as ER-6 to function as an extraction well. ER-6 was developed and a step test was conducted to appropriately size the future pump. The step test was unable to be completed in May due to equipment malfunctions. The step test was completed in July.</li> <li>• TCS-1 has been drilled and testing (including injectivity testing) are complete. TCS-2 has been drilled underwent development and testing in October/November.</li> <li>• Downhole camera survey completed on wells TCS-1, TCS-2, TWB-1, TWB-3 and FW-02B in December.</li> <li>• A pilot hole for ER-04 was drilled in March and the extraction well was installed in April.</li> <li>• A pilot hole for ER-03 and the extraction well was installed in May.</li> <li>• Extraction wells ER-03 and ER-04 were developed and tested in May. A downhole camera survey was also completed in May.</li> </ul>

Activity	% Complete	Cumulative Status of Phase 2 Construction Activities (as of November 30, 2024)
		<ul style="list-style-type: none"> <li>The PVC casing was cut down at both ER-03 and ER-04, and both wells were temporarily covered with steel plates in June.</li> <li>Additional purging was conducted at extraction well ER-04 in July to remove the total volume of water added during drilling. ER-03 and ER-04 were sampled in July.</li> </ul>
Extraction and Injection Well Downhole Installation	20%	<ul style="list-style-type: none"> <li>Engineer drawings of each downhole set up have been completed.</li> <li>Pumps have been procured for all wells installed in 2022.</li> </ul>
Pipeline Installation Inside TCS	97%	<ul style="list-style-type: none"> <li>Pipeline excavation activities have been completed on pipelines M1/2/2', I1, L3, N1, K1, and M5/6 (formerly M3/M4/M5).</li> <li>Duct bank reinforcing steel placement completed on pipelines M1/2/2', I1, M5/6, L3, N1, and K1.</li> <li>Duct bank concrete encasement has been completed on pipelines M1/2/2', I1, L3, N1, K1, and M5/6.</li> <li>Duct bank conduit installation completed on pipelines M1/2/2', I1, M5/6, N1, K1, and L3.</li> <li>TCS-1 pre-cast concrete vault excavation and placement completed.</li> <li>TCS-1 pre-cast concrete vault backfill has been completed.</li> <li>TCS-2 pre-cast concrete vault excavation and placement has been completed.</li> <li>TCS-2 pre-cast concrete vault backfill has been completed.</li> <li>TCS-1 and TCS-2 pre-cast concrete HDPE and conduit penetration coring has been completed.</li> <li>TCS-1 and TCS-2 pre-cast concrete vault interior mechanical has been completed.</li> <li>TCS-1 and TCS-2 concrete vault sloped floor installation has been completed.</li> <li>Pipeline HDPE force main installation completed on pipelines M1/2/2', I1, N1, K1, M5/6, and L3.</li> <li>Trench backfill has been completed on pipelines M1/2/2', I1, L3, N1, K1, and M5/6.</li> <li>TCS-1 and TCS-2 pre-cast vault lid installation has been completed.</li> <li>Pipeline contractor completed demobilization.</li> <li>TCS-1 and TCS-2 vault ladder and safety arm installation has been completed.</li> <li>Phase 2A TCS-1 and TCS-2 well vault panel and sump pump installation has been completed.</li> </ul>
Pipeline Installation Outside TCS	76%	<ul style="list-style-type: none"> <li>Pipeline G mobilization has been completed.</li> <li>Pipeline G temporary road construction has been completed.</li> <li>Pipeline G vegetation removal and site grading has been completed.</li> <li>Pipeline G HDPE forcemain installation has been completed.</li> <li>Pipeline G conduit and pull box installation has been completed.</li> <li>Pipeline G final road construction has been completed.</li> <li>Pipeline E1 mobilization has been completed.</li> <li>Pipeline E1 site setup and utility location has been completed.</li> <li>Pipeline E1 TWB-1 extraction vault excavation and placement has been completed.</li> <li>Pipeline E1 HDPE and conduit trench excavation has been completed.</li> <li>Pipeline E1 HDPE force main installation has been completed.</li> </ul>

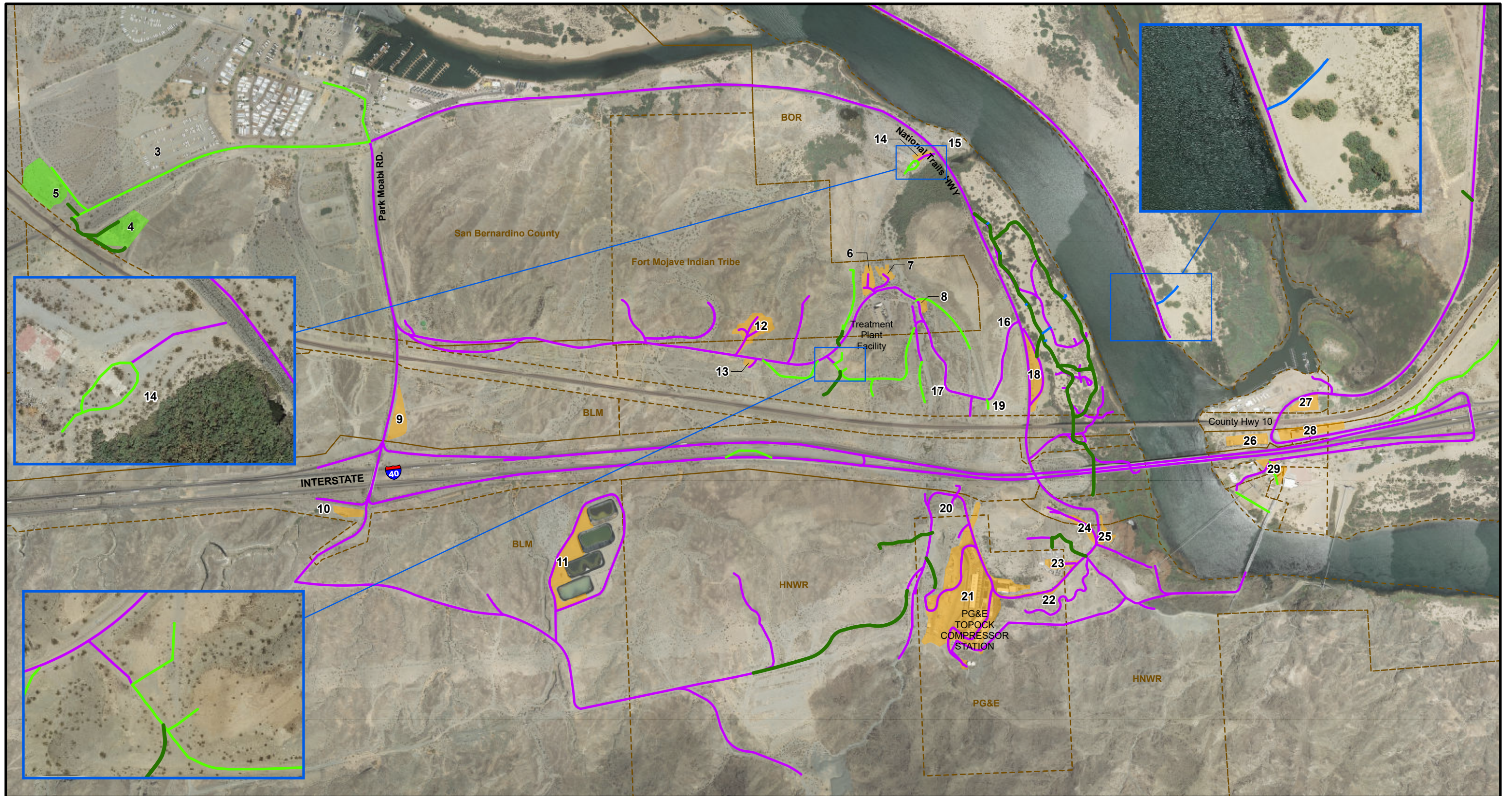
Activity	% Complete	Cumulative Status of Phase 2 Construction Activities (as of November 30, 2024)
		<ul style="list-style-type: none"> <li>• Pipeline E1 conduit and pull box installation has been completed.</li> <li>• Pipeline E1 trench backfill has been completed.</li> <li>• Pipeline E3 mobilization has been completed.</li> <li>• Pipeline E3 site setup and utility location completed.</li> <li>• Pipeline E3 HDPE and conduit trench excavation has been completed.</li> <li>• Pipeline E3 HDPE force main installation has been completed.</li> <li>• Pipeline E3 conduit and pull box installation has been completed.</li> <li>• Pipeline E3 TWB-3 extraction vault excavation and placement has been completed.</li> <li>• Pipeline E3 trench backfill has been completed.</li> <li>• Pipeline C11 mobilization has been completed.</li> <li>• Pipeline C11 site setup and utility location completed.</li> <li>• Pipeline C11 HDPE and conduit trench excavation has been completed.</li> <li>• Pipeline C11 HDPE force main installation has been completed.</li> <li>• Pipeline C11 conduit and pull box installation has been completed.</li> <li>• Pipeline C11 meter and well vault excavation and placement has been completed.</li> <li>• Pipeline C11 trench backfill has been completed.</li> <li>• Pipeline I2 mobilization has been completed.</li> <li>• Pipeline I2 site setup and utility location has been completed.</li> <li>• Pipeline I2 HDPE and conduit trench excavation has been completed.</li> <li>• Pipeline I2 HDPE force main installation has been completed.</li> <li>• Pipeline I2 conduit and pull box installation has been completed.</li> <li>• Pipeline I2 trench backfill has been completed.</li> <li>• Pipeline I2 roadway backfill and grading has been completed.</li> <li>• Pipeline contractor site cleanup and demobilization has been completed.</li> <li>• MW 20 Bench system mechanical for Phase 2A wells has been completed.</li> <li>• Phase 2A well vault panel and sump pump installation has been completed.</li> </ul>
Remedy Electrical Work	25%	<ul style="list-style-type: none"> <li>• Conductor and fiber pull inside TCS has been completed.</li> <li>• Conductor and Fiber pull outside TCS (from Electrical Node 2 to well RB-5) has been completed.</li> <li>• Conductor and Fiber pull outside TCS (from Node 2 pull box to wells TWB-1 and TWB-3) has been completed.</li> <li>• Additional pull box and conduit installation at the TCS Tank Farm completed.</li> <li>• Node 1 transformer and control pad excavation has been completed.</li> <li>• Node 1 transformer and control pad subgrade and backfill has been completed.</li> <li>•</li> <li>• Node 1 transformer and control pad conduit installation has been completed.</li> </ul>

Activity	% Complete	Cumulative Status of Phase 2 Construction Activities (as of November 30, 2024)
		<ul style="list-style-type: none"> <li>• Node 1 transformer and control pad grounding system has been completed.</li> <li>• Node 1 transformer and control pad form and rebar installation has been completed.</li> <li>• Additional conduit installation at the TCS Tank Farm has been completed.</li> <li>• Node 1 to Node 2 conductor pull completed.</li> <li>• Node 1 switchboard electrical connections completed.</li> <li>• Node 1 sunshade structure installation completed.</li> </ul>
Other Construction Activities	100%	<ul style="list-style-type: none"> <li>• Well MW-30-30 was inoperable. Replacement was necessary. The old well was decommissioned in accordance with the approved WELL-SOP-01 (Standard Operating Procedure for Well and Borehole Permanent Decommissioning). The old well casing was removed, over-drilled to remove any well materials, and a new well was installed in the same borehole. In addition, the well pad and monument at nearby MW-30-050 was replaced.</li> <li>• Construction of the infrastructure required for the PTI-1D floodplain extraction test has been completed.</li> <li>• Relocation of the in-vault power and controls equipment to aboveground panels on stanchion with sunshade at well IRZ-39.</li> </ul>

Note:

Duct bank is a group of pipes through which electrical conduits/wires are pulled through.

## **Figures**

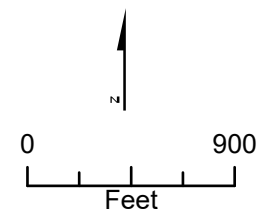


**LEGEND**

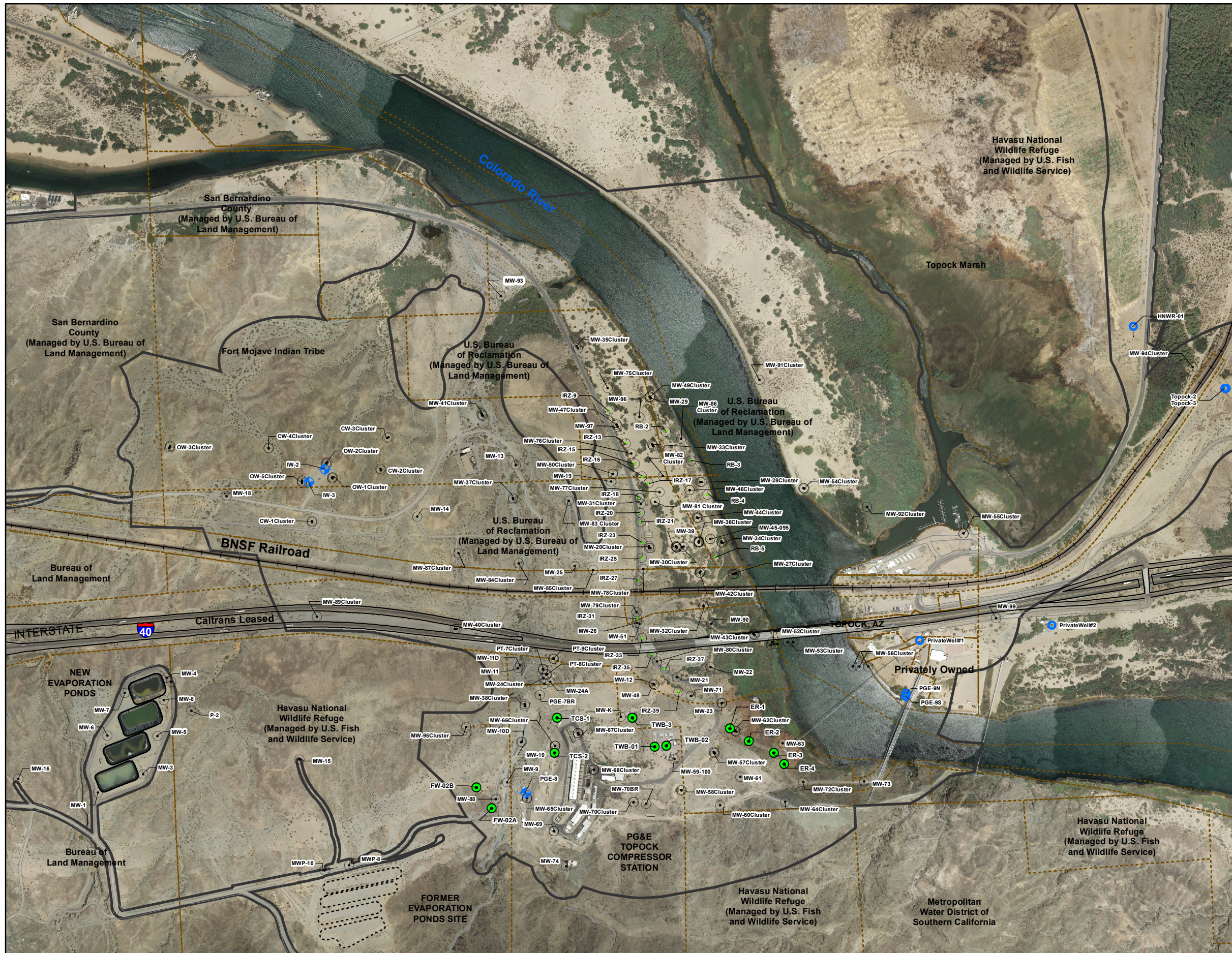
- Existing Access Route (will continue to be used for remedial activities)
- Existing Route (proposed to be used as is for access to remedial activities)
- Roads to be improved or constructed for groundwater remedy
- Temporary Construction Access
- Potential Soil Storage and Staging Area Proposed Staging Areas for Remediation Project
- StagingAreas\_90 Proposed Soil Processing (Area #5) and Construction Headquarter (Area #4) for Remediation Project

**Notes:**

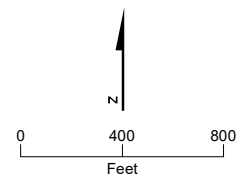
1. Area #3 will not be used as the Construction Headquarter (CHQ). The CHQ will be moved to Area #4.
2. Area #4 will be used as the primary truck inspection area. Areas #9, 18, and 23 or other staging areas might also be used depending on the specific construction activity.
3. Decontamination pads will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



**FIGURE 2-1  
CONSTRUCTION SITE PLAN  
AND ACCESS ROUTES**  
GROUNDWATER REMEDY PHASE 1 CONSTRUCTION  
PG&E TOPOCK COMPRESSOR STATION,  
NEEDLES, CALIFORNIA



- LEGEND
- Project Area
  - Phase 2A Well
  - ⊕ Injection Well
  - Groundwater Monitoring Well
  - Water Supply Well
  - Remediation Well



**Figure 2-2**  
**Well Locations**  
 Groundwater Remedy Construction  
 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 maintenance repair of riprap at the Construction Headquarters (CHQ).



Photo showing trenching at IRZ-39 for the installation of belowground conduits and aboveground infrastructure.



Photo showing the long reach excavator removing soil/sediment behind the AOC4 gabions in Bat Cave Wash.



Photo showing the long reach excavator loading excavated soil/sediment into a dump truck.

**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 November 2024, the following monitoring events were conducted:

- Two 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 30 and 57 dBA, with an average of 42 to 47 and median of 38 to 48 dBA. An anomalous high sound measurement of 83 dBA was noted when a Park Moabi dump truck (not related to PG&E's remedy construction) passed directly in front of the noise monitoring location, and was excluded from the sound data set.
- One event 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 the Transwestern Bench and traffic on the IM-3 access road. The sound level typically varied between 38 and 52 dBA, with an average and median of 44 dBA.
- One event at the pre-approved location west of the access road to Bat Cave Wash (BCW), on the same elevation as the Topock Maze. Construction activities closest to this monitoring location are associated with mobilization of construction equipment for the removal of soil/sediment at AOC4 gabions and relocation of the ripraps from top of BCW access road to the AOC4 gabion location. The sound level varied between 49 and 81 dBA, with an average of 59 dBA and median of 55 dBA. The maximum sound level of 81 dBA was due to the beeping sound of the backhoe backing up during movement of ripraps on top of BCW access road.

**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
<b>Primary Planned Activities</b>	<b>12/1/2024</b>	<b>12/2/2024</b>	<b>12/3/2024</b>	<b>12/4/2024</b>	<b>12/5/2024</b>	<b>12/6/2024</b>	<b>12/7/2024</b>
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	Quarterly Sampling	Quarterly Sampling	Quarterly Sampling	Quarterly Sampling	Quarterly Sampling	No Work
Site Wide Construction G5*	No Work	^Site Road Maintenance (IM3 and Pond Road), First and Last Look	^Site Road Maintenance (IM3 and Pond Road)	^Site Road Maintenance (IM3 and Pond Road)	No Work	No Work	No Work
Site Wide Construction G5*	No Work		Node 2 and IRZ-39 Electrical Connections	Node 2 and IRZ-39 Electrical Connections	Node 2 and IRZ-39 Electrical Connections	No Work	No Work
Site Wide Revegetation F5*	No Work	Irrigation Header Replacement	Irrigation Header Replacement	Irrigation Header Replacement	Irrigation Header Replacement/Irrigation O&M/Watering	Irrigation Header Replacement	No Work
<b>Primary Planned Activities</b>	<b>12/8/2024</b>	<b>12/9/2024</b>	<b>12/10/2024</b>	<b>12/11/2024</b>	<b>12/12/2024</b>	<b>12/13/2024</b>	<b>12/14/2024</b>
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 and transducer downloads	Monthly sampling and transducer downloads	Monthly sampling and transducer downloads	Monthly sampling and transducer downloads	Monthly sampling and transducer downloads	No Work
Site Wide Construction G5*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Site Wide Revegetation F5*	No Work	Irrigation Header Replacement	Irrigation Header Replacement	Irrigation Header Replacement	Irrigation Header Replacement/Irrigation O&M/Lycium Watering	Irrigation Header Replacement	No Work
<b>Primary Planned Activities</b>	<b>12/15/2024</b>	<b>12/16/2024</b>	<b>12/17/2024</b>	<b>12/18/2024</b>	<b>12/19/2024</b>	<b>12/20/2024</b>	<b>12/21/2024</b>
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 G5*, E1*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Site Wide Revegetation F5*	No Work	^Irrigation Emitter Replacement	^Irrigation Emitter Replacement, Lycium Monitoring	^Irrigation Emitter Replacement	^Irrigation Emitter Replacement, Irrigation O&M/Lycium Watering	^Irrigation Emitter Replacement	No Work
<b>Primary Planned Activities</b>	<b>12/22/2024</b>	<b>12/23/2024</b>	<b>12/24/2024</b>	<b>12/25/2024</b>	<b>12/26/2024</b>	<b>12/27/2024</b>	<b>12/28/2024</b>
Start Time (PST)	6:30 AM	6:30 AM	6:30 AM	HOLIDAY	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 G5*, E1*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Site Wide Revegetation F5*	No Work	No Work	Monitoring	No Work	Irrigation O&M/Watering	No Work	No Work
<b>Primary Planned Activities</b>	<b>12/29/2024</b>	<b>12/30/2024</b>	<b>12/31/2024</b>	<b>1/1/2025</b>	<b>1/2/2025</b>	<b>1/3/2025</b>	<b>1/4/2025</b>
Start Time (PST)	6:30 AM	6:30 AM	6:30 AM	HOLIDAY	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 G5*, E1*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Site Wide Revegetation F5*	No Work	No Work	Monitoring	No Work	Irrigation O&M/Lycium Watering	No Work	No Work
<b>Primary Planned Activities</b>	<b>1/5/2025</b>	<b>1/6/2025</b>	<b>1/7/2025</b>	<b>1/8/2025</b>	<b>1/9/2025</b>	<b>1/10/2025</b>	<b>1/11/2025</b>
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 G5*, E1*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Site Wide Revegetation F5*	No Work	No Work	Monitoring	No Work	Irrigation O&M/Lycium Watering	No Work	No Work

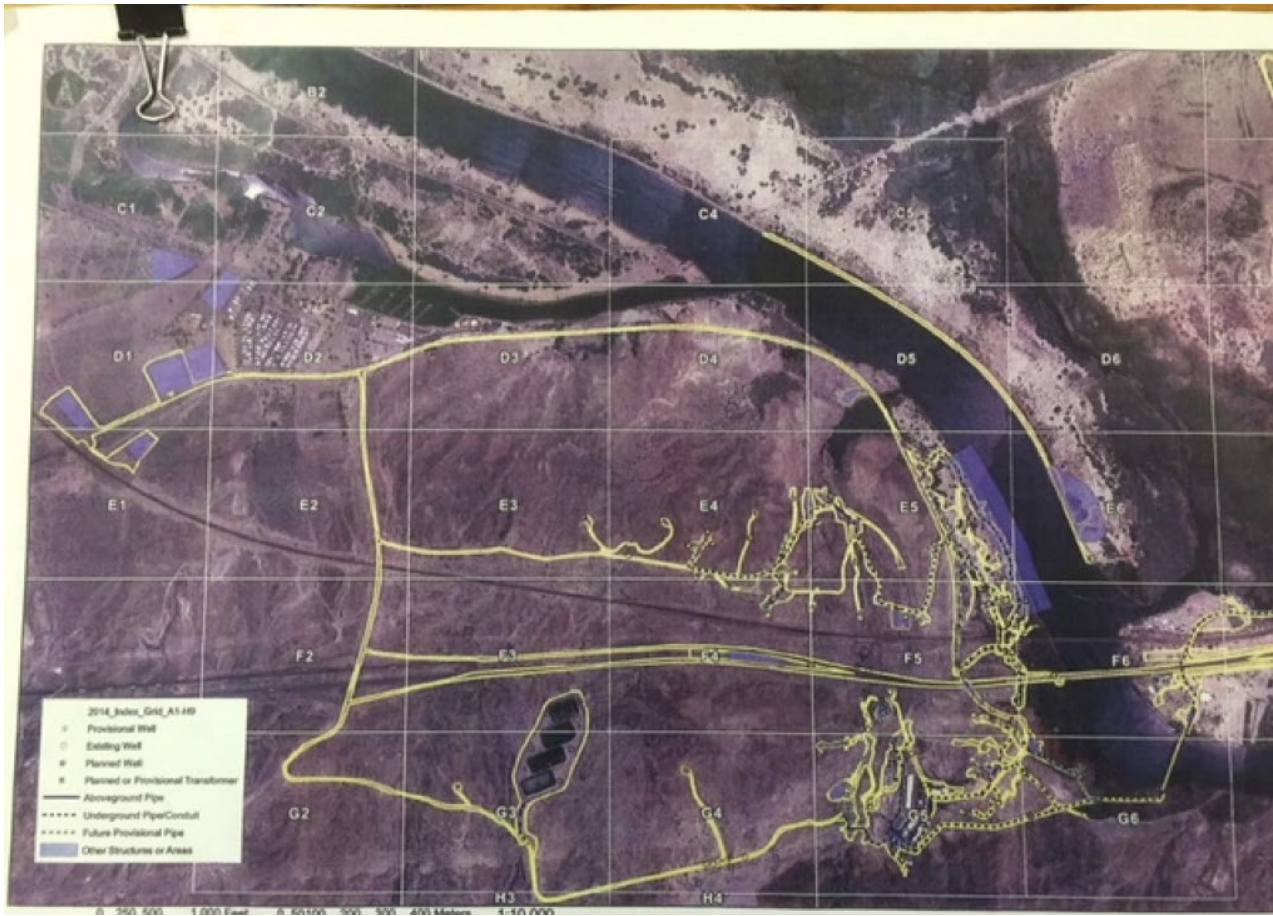


Figure showing a grid superimposed on the Topock site map. Each grid position is denoted by an letter followed by a number.



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

**(Groundwater Data Presented in Separate PDF)**