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May 10, 2020

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

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

Subject: April 2020 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_2020_20200510_Final)

Dear Ms. Innis and Mr. Yue:

As directed by the U.S. Department of the Interior (DOI) verbally on March 27, 2020 and in writing on April 1, 2020, PG&E initiated an orderly and temporary shutdown of the groundwater remedy construction field activities in response to the COVID-19 pandemic. On April 6, 2020, the California Department of Toxic Substances Control (DTSC) provided support to DOI's order. All construction activities were shut down by Saturday April 5, 2020. All construction sites were stabilized and secured. Since April 5, 2020, PG&E has continued to monitor the construction sites and performed housekeeping activities including erosion and access control. In addition, during the week of April 20, 2020, with the agencies' concurrence, PG&E transported approximately 820.8 tons of non-hazardous soils, but not suitable for reuse onsite, to U.S. Ecology in Beatty, Nevada. These soils were sampled and analyzed in accordance with the Soil Management Plan in February and March 2020. Analytical results showed that these soils exceeded both the interim soil management screening levels for nickel (27.3 milligrams per kilogram [mg/kg]) and copper (16.8 mg/kg) and the lowest ecological risk-based concentrations for nickel (16 mg/kg) and copper (109 mg/kg) in the draft Soil Human Health and Ecological Risk Assessment Report.

The direction from DOI was to pause construction activities until April 30, 2020. On May 1, PG&E submitted a proposal to re-start construction starting the week of May 11, 2020. The initial workforce that will be returning will be less than half the size of the workforce at the time of the temporary shutdown and PG&E will be constructing at less than half of the previous locations. In addition, PG&E will be implementing health and safety protocols that are consistent with Center of Disease Control and state health department guidelines to promote protection of site personnel. DOI approved PG&E's proposal on May 1, 2020, and stated that PG&E, in coordination with DOI and DTSC, will periodically re-evaluate the current status of construction activities and the effectiveness of the health and safety procedures in determining the appropriate time to add additional tasks.

Typically, the monthly progress reports that PG&E submits to the agencies by the 10th day of the following month, describe construction activities taken during the reporting month, as well as activities planned for the next six weeks, and presents available results from sampling and testing performed in the reporting period. The reports also discuss material deviations from the approved design documents and/or the C/RAWP, if any, that PG&E has proposed to DTSC and DOI, or that have been approved by DTSC and DOI. The reports also include 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.

Since there was no construction activity from April 5 through 30, for brevity, this nineteenth monthly progress report was shortened to only include new data and information since the March 2020 report. Specifically, the report includes new results from sampling and testing of wells (Table B-1), new well and boring logs (Appendix B),

new soil sampling data (Appendix C), the latest six-week look ahead describing planned construction activities for the next six weeks starting May 11, 2020 (Appendix G), and new data from samples collected as part of the sitewide groundwater monitoring program within 60 days of sample collection (Appendix H). Please contact me at (760) 791-5884 if you have any questions or comments regarding this submittal.

Sincerely,

A handwritten signature in cursive script that reads "Curt Russell".

Curt Russell
Topock Project Manager

Topock Project Executive Abstract

<p>Document Title: <i>April 2020 Monthly Progress Report for the Groundwater Remedy Construction and Startup, PG&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: 05/10/2020</p> <p>Who Created this Document?: (i.e. PG&E, DTSC, DOI, Other) PG&E</p>
<p>Priority Status: <input type="checkbox"/> HIGH <input type="checkbox"/> MED <input checked="" type="checkbox"/> LOW</p>	<p>Is this time critical? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>Type of Document:</p> <p><input type="checkbox"/> Draft <input checked="" type="checkbox"/> Report <input type="checkbox"/> Letter <input type="checkbox"/> Memo</p> <p><input type="checkbox"/> Other / Explain:</p>	<p>Action Required:</p> <p><input checked="" type="checkbox"/> Information Only <input type="checkbox"/> Review and Input</p> <p><input type="checkbox"/> Other / Explain:</p>
<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 (RI) (including Risk Assessment)</p> <p><input type="checkbox"/> Corrective Measures Study (CMS)/Feasibility Study (FS)</p> <p><input checked="" type="checkbox"/> Corrective Measures Implementation (CMI)/ Remedial Action (RA)</p> <p><input type="checkbox"/> California Environmental Quality Act (CEQA)/ 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&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>Typically, the monthly progress reports that PG&E submits to the agencies by the 10th day of the following month, describe construction activities taken during the reporting month, as well as activities planned for the next six weeks, and presents available results from sampling and testing performed in the reporting period. The reports also discuss material deviations from the approved design documents and/or the C/RAWP, if any, that PG&E has proposed to DTSC and DOI, or that have been approved by DTSC and DOI. The reports also include 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.</p> <p>Since there was no construction activity from April 5 through 30, for brevity, this nineteenth monthly progress report was shortened to only include new data and information since the March 2020 report. Specifically, the report includes new results from sampling and testing of wells (Table B-1), new well and boring logs (Appendix B), new soil sampling data (Appendix C), the latest six-week look ahead describing planned construction activities for the next six weeks starting May 11, 2020 (Appendix G), and new data from samples collected as part of the sitewide groundwater monitoring program within 60 days of sample collection (Appendix H).</p> <p>Written by: Pacific Gas and Electric Company</p>	
<p>Recommendations:</p> <p>Provide input to PG&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 Corrective Action Consent Agreement, Consent Decree, and pursuant to the Construction/Remedial Action Work Plan.</p>	
<p>Other requirements of this information?</p> <p>None.</p>	



April 2020
Monthly Progress Report for the
Final Groundwater Remedy Construction and Startup

PG&E Topock Compressor Station
Needles, California

Document ID: TPK_Monthly_Progress_Rpt_ **April**_20200510_Final

May 2020

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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- G Six-Week Look-Ahead Schedule
- H Validated Groundwater Monitoring Data (DTSC Condition of Approval xi)



- LEGEND**
- ◆ Injection Well
 - Groundwater Monitoring Well
 - Water Supply Well
 - Remediation Well

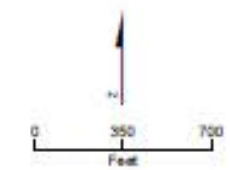


Figure 2-2
Well Locations
Groundwater Remedy Phase 1 Construction
PG&E Topock Compressor Station Needles,
California

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

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

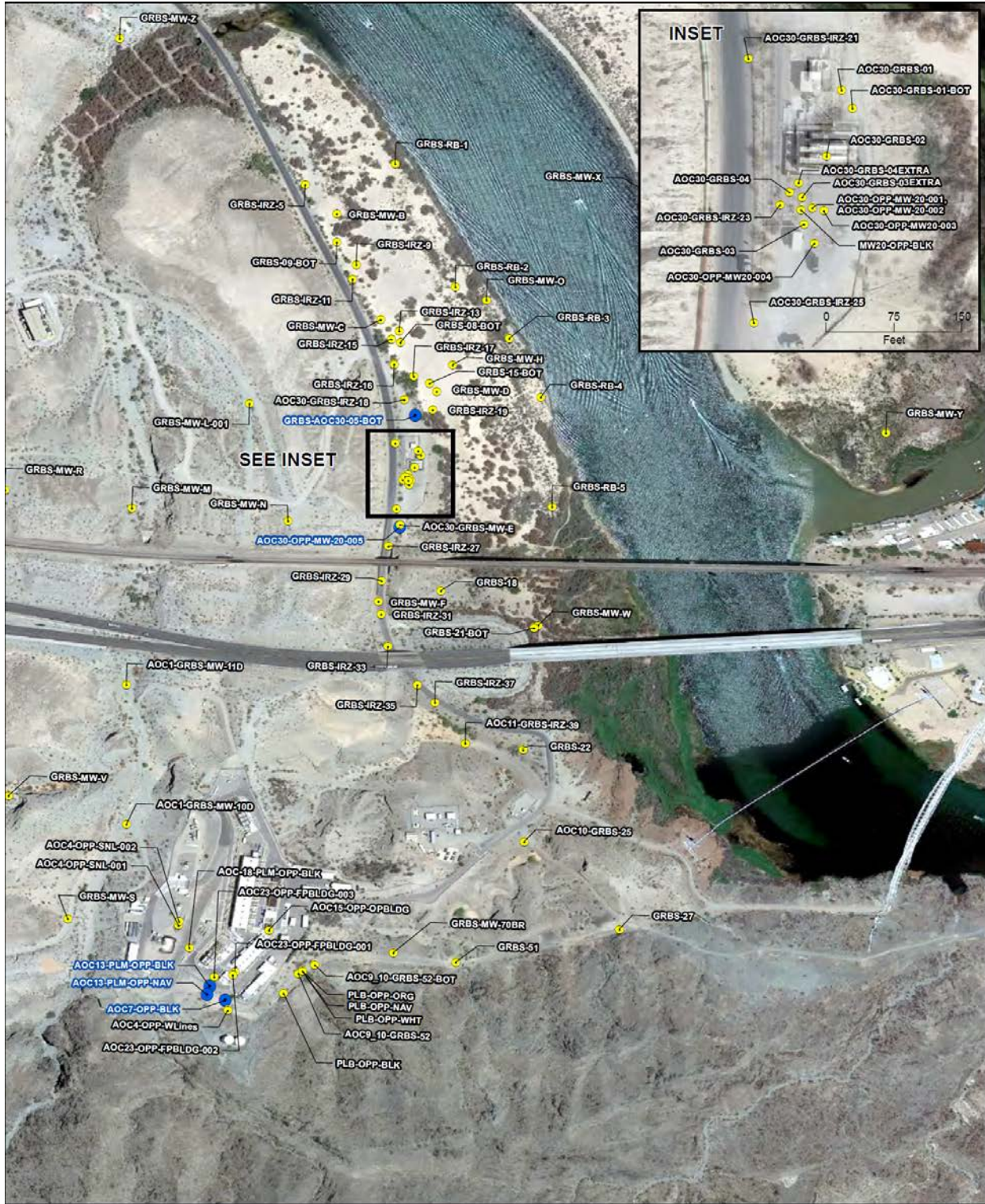
Table B-1. Groundwater Sampling Results

April 2020 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup
PG&E Topock Compressor Station, Needles, California

Location	Sample ID	Sample Date	Sample Depth Interval in feet below ground surface	Total Dissolved Chromium Concentration in microgram per liter	Hexavalent Chromium Concentration in microgram per liter
MW-93 (former MW-Z)	MW-93-VAS-57-61.1	02/06/20	Vertical aquifer sample collected at 57 – 61 feet	Not detected below reporting limit of 0.13 microgram per liter	Not detected below reporting limit of 0.033 microgram per liter
MW-93 (former MW-Z)	MW-93-VAS-42-46.3	02/06/20	Vertical aquifer sample collected at 42 – 46 feet	7.1	8.5
MW-93 (former MW-Z)	MW-93-VAS-32-37	02/06/20	Vertical aquifer sample collected at 32 – 37 feet	4.9	2.5
MW-93 (former MW-Z)	MW-93-VAS-72-77	2/7/2020	Vertical aquifer sample collected at 72 – 77 feet	Estimated concentration of 0.161 micrograms per liter	Not detected below reporting limit of 0.033 microgram per liter
MW-93 (former MW-Z)	MW-93-VAS-112-117	2/8/2020	Vertical aquifer sample collected at 112 – 117 feet	Estimated concentration of 0.452 micrograms per liter	Not detected below reporting limit of 0.033 microgram per liter
MW-93 (former MW-Z)	MW-93-VAS-142-147	2/8/2020	Vertical aquifer sample collected at 142 – 147 feet	Estimated concentration of 0.254 micrograms per liter	Not detected below reporting limit of 0.17 microgram per liter
MW-93 (former MW-Z)	MW-93-VAS-152-157	2/9/2020	Vertical aquifer sample collected at 152 – 157 feet	Estimated concentration of 0.198 micrograms per liter	Not detected below reporting limit of 0.17 microgram per liter
MW-93 (former MW-Z)	MW-93-VAS-172-177	2/10/2020	Vertical aquifer sample collected at 172 – 177 feet	Estimated concentration of 0.241 micrograms per liter	Not detected below reporting limit of 0.17 microgram per liter
MW-93 (former MW-Z)	MW-93-VAS-192-197	2/10/2020	Vertical aquifer sample collected at 192 – 197 feet	Not detected below reporting limit of 0.13 microgram per liter	Not detected below reporting limit of 0.033 microgram per liter
MW-93 (former MW-Z)	MW-93-VAS-212-217	2/11/2020	Vertical aquifer sample collected at 212 – 217 feet	Estimated concentration of 0.412 micrograms per liter	Not detected below reporting limit of 0.17 microgram per liter
MW-95 (former MW-V)	MW-95-VAS-122-127	03/10/20	Vertical aquifer sample collected at 122 – 127 feet	Estimated concentration of 0.855 micrograms per liter	0.87
MW-95 (former MW-V)	MW-95-VAS-97-102	03/10/20	Vertical aquifer sample collected at 97 – 102 feet	Estimated concentration of 0.44 micrograms per liter	0.79
MW-95 (former MW-V)	MW-95-VAS-152-157	03/12/20	Vertical aquifer sample collected at 152 – 157 feet	Not detected below reporting limit of 0.13 microgram per liter	Not detected below reporting limit of 0.033 microgram per liter

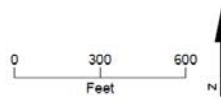
Location	Sample ID	Sample Date	Sample Depth Interval in feet below ground surface	Total Dissolved Chromium Concentration in microgram per liter	Hexavalent Chromium Concentration in microgram per liter
MW-95 (former MW-V)	MW-95-VAS-182-187	03/20/20	Vertical aquifer sample collected at 182 – 187 feet	Not detected below reporting limit of 0.13 microgram per liter	Not detected below reporting limit of 0.17 microgram per liter
IRZ-27	IRZ-27-67-030720	03/07/20	Sample collected from well development	2300	2300
IRZ-27	IRZ-27-100-030720	03/07/20	Sample collected from well development	490	510
IRZ-27	IRZ-27-134-030320	03/03/20	Sample collected from well development	5500	5400
IRZ-29	IRZ-29-77-032820	03/28/20	Sample collected from well development	1700	1600
IRZ-29	IRZ-29-121-032820	03/28/20	Sample collected from well development	2500	2500

Attachment C
Soil Sampling Locations and Available Soil
Analytical Results
(Soil Data Presented in Excel File)



LEGEND

- Soil Sample Location
- Soil Sample Collected from this Location in March 2020



Baseline and Opportunistic Soil Sampling Locations

Monthly Progress Report
 Groundwater Remedy Phase 1 Construction
 PG&E Topock Compressor Station, Needles, California



Attachment G
Six-Week Look-Ahead Schedule

Six-Week Look-Ahead Schedule

PG&E Topock Compressor Station Final Groundwater Remedy

All Tasks Shown On/After 5/11/2020 Tentative - Pending Unconfirmed Contractor Mobilization Schedules

Activity	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Primary Planned Activities	5/10/2020	5/11/2020	5/12/2020	5/13/2020	5/14/2020	5/15/2020	5/16/2020
Start Time (PST)	No Work	9:00 AM	7:00 AM	7:00 AM	7:00 AM	7:00 AM	7:45 AM
Pipeline C Installation F5*	No Work	Re-mobilization & site setup @ Pipeline C6	Re-mobilization, site setup, land survey @ Pipeline C6	Re-mobilization & Pipeline installation @ C6	Re-mobilization & Pipeline installation @ C6	Re-mobilization & Pipeline installation @ C6	No Work
Pipeline C Jack and Bore F5*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
TCS Approach Pipeline Installation F5*, G5*, G6*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
TCS Facilities Construction G5*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
MW-20 Bench Facility Construction E5*, F5*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Well Installation	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Well Development	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Well Testing	No Work	Re-mobilization, IRZ-29 (F5*)	IRZ-29 (F5*)	IRZ-29 (F5*)	IRZ-29 (F5*)	IRZ-29 (F5*)	No Work
IM-3 Outage	No Work	Outage	Outage	Outage	Outage	Outage	
Primary Planned Activities	5/17/2020	5/18/2020	5/19/2020	5/20/2020	5/21/2020	5/22/2020	5/23/2020
Start Time (PST)	No Work	7:00 AM	7:00 AM	7:00 AM	7:00 AM	7:00 AM	7:45 AM
Pipeline C Installation F5*	No Work	Pipeline Install @ C6	Pipeline Install @ C6	Pipeline Install @ C6	Pipeline Install @ C6	Pipeline Install @ C6	No Work
Pipeline C Jack and Bore F5*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
TCS Approach Pipeline Installation F5*, G5*, G6*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
TCS Facilities Construction G5*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
MW-20 Bench Facility Construction E5*, F5*	No Work	Tentative: Re-mobilization/ Carbon amendment storage tank foundation & piping construction	Tentative: Re-mobilization/ Carbon amendment storage tank foundation & piping construction	Tentative: Re-mobilization/ Carbon amendment storage tank foundation & piping construction	Tentative: Re-mobilization/ Carbon amendment storage tank foundation & piping construction	Tentative: Re-mobilization/ Carbon amendment storage tank foundation & piping construction	No Work
Well Installation	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Well Development	No Work	No Work	No Work	No Work	No Work	IRZ-33 (F5*)	No Work
Well Testing	No Work	IRZ-29 (F5*)	IRZ-31 (F5*)	IRZ-31 (F5*)	IRZ-31 (F5*)	No Work	No Work
Primary Planned Activities	5/24/2020	5/25/2020	5/26/2020	5/27/2020	5/28/2020	5/29/2020	5/30/2020
Start Time (PST)	No Work	No Work	7:00 AM	7:00 AM	7:00 AM	7:00 AM	7:45 AM
Pipeline C Installation F5*	No Work	No Work	Pipeline Install @ C6	Pipeline Install @ C6	Pipeline Install @ C6	Pipeline Install @ C6	No Work
Pipeline C Jack and Bore F5*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
TCS Approach Pipeline Installation F5*, G5*, G6*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
TCS Facilities Construction G5*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
MW-20 Bench Facility Construction E5*, F5*	No Work	No Work	Carbon amendment storage tank piping and unloading pad construction	Carbon amendment storage tank piping and unloading pad construction	Carbon amendment storage tank piping and unloading pad construction	Carbon amendment storage tank piping and unloading pad construction	No Work
Well Installation	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Well Development	No Work	No Work	IRZ-33 (F5*)	IRZ-35 (F5*)	IRZ-35 (F5*)	MW-Z (D5*)	No Work
Well Testing	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Primary Planned Activities	5/31/2020	6/1/2020	6/2/2020	6/3/2020	6/4/2020	6/5/2020	6/6/2020
Start Time (PST)	No Work	7:00 AM	7:00 AM	7:00 AM	7:00 AM	7:00 AM	7:45 AM
Pipeline C Installation F5*	No Work	Pipeline Install @ C6	Pipeline Install @ C6	Pipeline Install @ C6	Pipeline Install @ C6	Pipeline Install @ C6	No Work

Six-Week Look-Ahead Schedule

PG&E Topock Compressor Station Final Groundwater Remedy

All Tasks Shown On/After 5/11/2020 Tentative - Pending Unconfirmed Contractor Mobilization Schedules

Activity	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Pipeline C Jack and Bore F5*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
TCS Approach Pipeline Installation F5*, G5*, G6*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
TCS Facilities Construction G5*	No Work	Tentative: Re-mobilization, Tank Farm Excavation & Grading	Tentative: Re-mobilization, Tank Farm Excavation & Grading	Tentative: Re-mobilization, Tank Farm Excavation & grading, Potholing and Utility Surveys	Tentative: Re-mobilization, Tank Farm Excavation & grading, Potholing and Utility Surveys	Tentative: Re-mobilization, Tank Farm Excavation & grading, Potholing and Utility Surveys	No Work
MW-20 Bench Facility Construction E5*, F5*	No Work	Carbon amendment storage tank piping and unloading pad construction	Carbon amendment storage tank piping and unloading pad construction	Carbon amendment storage tank piping and unloading pad construction	Carbon amendment storage tank piping and unloading pad construction	Carbon amendment storage tank piping and unloading pad construction	No Work
Well Installation	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Well Development	No Work	MW-Z (D5*)	MW-Z (D5*)	MW-V (D5*)	MW-V (D5*)	MW-V (D5*)	No Work
Well Testing	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Primary Planned Activities	6/7/2020	6/8/2020	6/9/2020	6/10/2020	6/11/2020	6/12/2020	6/13/2020
Start Time (PST)	No Work	7:00 AM	7:00 AM	7:00 AM	7:00 AM	7:00 AM	7:45 AM
Pipeline C Installation F5*	No Work	Pipeline Install @ C6	Pipeline Install @ C6	Pipeline Install @ C6	Pipeline Install @ C6	Pipeline Install @ C6	No Work
Pipeline C Jack and Bore F5*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
TCS Approach Pipeline Installation F5*, G5*, G6*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
TCS Facilities Construction G5*	No Work	Tank Farm Excavation & Grading, Asphalt sawcut & removal	Tank Farm Excavation & Grading, Asphalt sawcut & removal	Tank Farm Excavation & grading, Excavation for FW & FPW Connection	Tank Farm Excavation & grading, Excavation for FW & FPW Connection	Tank Farm Excavation & grading, Excavation for FW & FPW Connection	No Work
MW-20 Bench Facility Construction E5*, F5*	No Work	Facility structural construction	Facility structural construction	Facility structural construction	Facility structural construction	Facility structural construction	No Work
Well Installation	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Well Development	No Work	Video survey: IRZ-31 (F5*), IRZ-29 (F5*)	No Work	No Work	No Work	No Work	No Work
Well Testing	No Work	No Work	RB-2 (E5*)	RB-3 (E5*)	No Work	No Work	No Work
Primary Planned Activities	6/14/2020	6/15/2020	6/16/2020	6/17/2020	6/18/2020	6/19/2020	6/20/2020
Start Time (PST)	No Work	7:00 AM	7:00 AM	7:00 AM	7:00 AM	7:00 AM	7:45 AM
Pipeline C Installation F5*	No Work	Pipeline Install @ C6	Pipeline Install @ C6	Pipeline Install @ C6	Pipeline Install @ C6	Pipeline Install @ C6	No Work
Pipeline C Jack and Bore F5*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
TCS Approach Pipeline Installation F5*, G5*, G6*	No Work	Pipeline Install Preparation @ F1	Pipeline Install Preparation @ F1	Pipeline Install Preparation @ F1	Pipeline Install Preparation @ F1	Pipeline Install Preparation @ F1	No Work
TCS Facilities Construction G5*	No Work	Excavation & pre-fabrication for FW & FPW Connection	Excavation & pre-fabrication for FW & FPW Connection	Excavation & pre-fabrication for FW & FPW Connection	FW & FPW Connection Installation	FW & FPW Connection Installation	No Work
MW-20 Bench Facility Construction E5*, F5*	No Work	Facility structural construction	Facility structural construction	Facility structural construction	Facility structural construction	Facility structural construction	No Work
Well Installation	No Work	Re-mobilization, IRZ-9 (E5*)	IRZ-9 (E5*)	IRZ-9 (E5*)	IRZ-9 (E5*)	IRZ-9 (E5*)	No Work
Well Development	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Well Testing	No Work	RB-3 (E5*)	RB-3 (E5*)	RB-3 (E5*)	RB-3 (E5*)	IRZ-31 (F5*)	No Work

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

(Data are Presented in a Separate PDF)

Attachment H. Validated Groundwater Monitoring Data

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 initially 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 since included validated data in each monthly progress report starting with the November 2018 report.