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June 10, 2025

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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: May 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_May_2025_20250610)

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 May 2025, as well as activities planned for the next six weeks (June 1 to July 12, 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 80th 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

<p>Document Title: <i>May 2025 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: 06/10/2025</p> <p>Who Created this Document? (i.e. PG&E, DTSC, DOI, Other) PG&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&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 May 2025 as well as activities planned for the next six weeks (June 1 to July 12, 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.</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 CACA, CD, and pursuant to the C/RAWP.</p>	
<p>Other requirements of this information?</p> <p>None.</p>	



May 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_May_20250610

June 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 80th 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 May 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). 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.

In May 2025, PG&E performed the following construction activities (note that Figures 2-1 and 2-2 show the construction access routes/staging areas and Phase 2b wells, respectively, and Table 2-2 presents the changes in well nomenclature):

- Attachment A includes select photos of activities during this reporting period.
- 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 May 31, 2025, a total of 355 six-week look-ahead schedule emails have been sent. Of those, four six-week look-ahead schedule emails were sent in May 2025 (on May 5, 12, 19, and 26).
- On August 10, 2018, PG&E issued the first Environmental Release to Construct (ERTC) to contractors. As of May 31, 2025, a total of 117 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 May 16, 2025, Pipeline ERTC #24 was issued for the installation of Pipeline C, Segment 18, from Station 0+00 to 3+00 in the East Ravine. No Well ERTC or ERTO was issued in May 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. Eighteen daily activity lists were issued in May 2025.
- In May 2025, PG&E performed the following remedy construction and O&M activities:
 - April 27 to May 3 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.
 - FW-01 drilling site and road preparation.
 - Upland access road maintenance.
 - IRL-3 drilling and site cleanup.

- Southwest Gas line air knifing/daylighting.
- IRL-2 mobilization and drilling.
- Reveg monitoring, weeding and soil sampling.
- Post-NTCRA reveg soil sampling.
- May 4 to 10 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.
 - FW-01 drill site and road preparation.
 - Upland road maintenance.
 - IRL-2 drilling, backfill, site cleanup and demobilization.
 - IRL-1 setup and drilling.
 - Air knifing IRL-1, FW-01, and MW-P locations.
 - Conduct baseline soil sampling at IRL-1, FW-01, and MW-P.
 - Monthly groundwater sampling at various locations.
- May 11 to 17 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 entrance bollard installation.
 - Pipeline B stormwater repairs.
 - IM-3 road maintenance.
 - Mob, setup and drilling at FW-01.
 - MW-15 transducer download and sampling.
 - Ground water sampling at various locations.
- May 18 to 24 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.
 - FW-01 drilling.
 - IRL-4 drilling site and road preparation.
 - Groundwater sampling at various locations.
- May 25 to 31 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.
 - FW-01 drilling, backfill, and demob.
 - Mob, setup, and drilling at MW-100D (former MW-I)
 - IRL-4 drilling site and road preparation.
 - Groundwater sampling at various locations.
- Remedy Baseline/Opportunistic Soil Sampling:

Pursuant to the Baseline Soil Sampling and Analysis Plan (Appendix A of the Soil Management Plan [SMP] [which is Appendix L of the C/RAWP]), baseline soil samples were collected at updated locations for MW-100S/D (former MW-I) on April 29, 2025, IRL-1 and MW-P Shallow (S) on May 6, 2025, and at MW-P Deep (D) and FW-01 on May 7, 2025.

See Attachment C for information about soil sampling locations and soil analytical results that are available at this time.

- Fugitive Dust Monitoring:
 - Thirty one 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**):
 - Twenty one events at the pre-approved location west of the mobile home park at Moabi Regional Park. Construction activities closest to this monitoring location include soil management activities at the SPY and Construction Headquarters (CHQ), as well as traffic on NTH. The sound level typically varied between 40 and 60 dBA, with an average and median of 46 to 48 dBA.
 - Eighteen 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 drilling at IRL-1 and IRL-2, and traffic on the IM-3 access road. The sound level typically varied between 47 and 66 dBA, with an average and median of 53-54 dBA.
 - Twenty-three 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 drilling at IRL-1, IRL-2, and FW-01. The sound level varied between 43 and 66 dBA, with an average and median of 56 dBA.

Due to close proximity of IRL-1 to this pre-approved monitoring location, sound curtain was erected during drilling at this location.

2.2 Freshwater Usage, Waste Generation, and Management

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

2.2.1 Freshwater and Wastewater

- In May 2025, an approximate total of 1,250 gallons of freshwater was used for IRZ wells rehabilitation, 17,120 gallons was used for O&M activities in the revegetation areas, 7,400 gallons for well drilling, and 410,130 gallons was used for dust control during remedy construction.
- For the reporting period, an estimated 81,500 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

- Since the start of Phase 2b remedy construction in late March 2025, an approximate 1,033 cubic yards of excess soils/materials were generated from construction activities. Of those, in May 2025 about 795 cubic yards were generated from excavation in the IRL-4 area, and 8 cubic yards were generated from well drilling. This material was transported to the Soil Processing Yard, stockpiled, and will be managed in accordance with the Remedy Soil Management Plan.
- Sludge was generated from IRZ well rehabilitation in May 2025. The sludge will be transported offsite for disposal at a permitted landfill as non-RCRA hazardous waste.

2.2.3 General Construction Waste, Sanitary Waste, and Recyclables

- In May 2025, approximately 3.5 cubic yards 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 May 2025, six safety training sessions were held and a total of sixteen personnel trained. In addition, ten personnel took the WEAT.

2.4 Status of Work Variance Requests

Table 2-3 includes information regarding activities related to approved and proposed WVRs (i.e., material deviations from the design documents, the C/RAWP, or other approved work plans), and agencies' actions on those requests.

- On April 14, 2025, PG&E submitted to DTSC and DOI the proposed Work Variance Request (WVR) #14 to a) install remedy pipeline C18 in the East Ravine at the existing post-Non-Time Critical Removal Action (NTCRA) elevation instead of the higher elevation in the 2015 Final Design and b) install an aggregate-based access road in East Ravine for remedy operation and maintenance instead of continued use and maintenance of the existing dirt road. DTSC forwarded the draft WVR to Tribes and stakeholders on the same day and requested input, if any, by May 9, 2025. No inputs received. DTSC and DOI approved WVR #14 on May 9 and 16, respectively.
- On May 22, 2025, PG&E submitted to DTSC and DOI the proposed Work Variance Request (WVR) #15 to modify the IRL-4 access road for dual rotary rig access and incorporation of a pre-cast concrete retaining wall for better protection against stormwater erosion. DTSC forwarded the draft WVR to Tribes and stakeholders on the same day and requested input, if any, by June 27, 2025. A site walk is planned to discuss the draft WVR.

2.5 Use of Future Activity Allowance*

No changes to report this month.

2.6 Issues Encountered and Actions Taken to Rectify Issues/Problems

The following key issues were encountered and are being resolved:

- During the April 3, 2025 pre-work field review for the remaining upland wells, the FMIT raised a concern about the location of well MW-DD and its planned work area, and requested a discussion with the agencies prior to drilling of this well. BLM, DOI, DTSC, and BOR met with Tribes on April 29, 2025. Agencies met with PG&E on May 1 to discuss alternative locations for MW-DD. DTSC requested a written explanation as to why arsenic monitoring wells MW-DD and MW-EE cannot be placed in the vicinity of the IM-3 access road. PG&E provided a response on May 29, 2025.
- A Northern Rough-Wing Swallow nest was observed on May 13, 2025, in a crevice on the northwestern wall of the East Ravine. A quick observation of the crevice confirmed an egg. A buffer of 95 feet was established to protect the parents from flushing off the nest. The nestling period is anticipated to be completed during the last week of June. Therefore, the East Ravine is closed until the nestling period ends.

- A Lesser Nighthawk nest was observed on May 22, 2025, on the ground in the UHR-1 revegetation area. A survey identified two eggs. A buffer of 60 feet (within the fenced revegetation area) was established to protect the parents from flushing off the nest. The nestling period is anticipated to be completed during the first week of July.

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 (June 1 to July 12, 2025) include the following:

- Continue IRZ O&M including revegetation and maintenance of revegetation area.
- Continue groundwater sampling.
- Drill at MW-100 (former MW-I)
- Site preparation and access road construction at IRL-4.
- Conduct extended aquifer test at IRZ-9.
- 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 2b construction activities, as of May 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

At the request of DTSC, a summary of releases (or spills) that occurred outside of containment and onto ground is provided in Table 2-5. The summary provides information about each release include date, location of release, type of material released, amount of material released (if known), and associated cleanup activities.

On May 9, 2025, approximately 5 to 10 gallons of freshwater was released from the drill rig at IRL-1 to ground. On May 31, 2025, approximately 2 quarts of diesel fuel was released from dump truck(s) on IM-3 access road and the entrance ramp to IRL-4 work area. See Table 2-5 for details.

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.

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Tables

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

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

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

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

*May 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
Amendment 1 to ERTC 17 ^[b,c]	Scope included fence installation and planting in the revegetation areas in the floodplain.	March 18, 2022
Amendment 2 to ERTC 17 ^[b,c]	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 ^[d]	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 ^[e]	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 ^[e]	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)
Miscellaneous erosion control ERTC	Scope included localized repair of the installed Pipeline F erosion control measures.	Renewed January 30, 2023 (originally issued in February 2021)

ERTC Number ^[a]	Brief Description of Covered Areas and Scope of Authorized Activities	Original Issue Date
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
ERTC 24	Scope included the installation of Pipeline C Segment 18 from Station 0+00 to 3+00 in the East Ravine	May 16, 2025

^[a] 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](#).

^[b] 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.

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

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

^[e] Renewed for asphalt repair/placement along and cross NTH.

ERTC = Environmental Release-To-Construction

TCS = Topock Compressor Station

Table 2-2. Monitoring Wells Nomenclature Changes

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

Previous Well Name	New Well Name	Previous Well Name	New Well Name
MW-10D	MW-10D	MW-M-132	MW-84-132
MW-11D	MW-11D	MW-M-193	MW-84-193
MW-70BR-D	MW-70BR-289	MW-N-129	MW-85-129
MW-B-033	MW-75-033	MW-N-217	MW-85-217
MW-B-117	MW-75-117	MW-N-237	MW-85-237
MW-B-202	MW-75-202	MW-O-030	MW-86-030
MW-B-267R	MW-75-267	MW-O-066	MW-86-066
MW-B-337	MW-75-337	MW-O-120	MW-86-120
MW-C-039	MW-76-039	MW-O-140	MW-86-140
MW-C-156	MW-76-156	MW-R-109	MW-87-109
MW-C-181	MW-76-181	MW-R-139	MW-87-139
MW-C-218	MW-76-218	MW-R-192	MW-87-192
MW-D-046R	MW-77-046	MW-R-275	MW-87-275
MW-D-102	MW-77-102	MW-S-109	MW-88-109
MW-D-158	MW-77-158	MW-U-183	MW-89-183
MW-D-187	MW-77-187	MW-U-273	MW-89-273
MW-E-072	MW-78-072	MW-W-031	MW-90-031
MW-E-142	MW-78-142	MW-X-045	MW-91-045
MW-F-060	MW-79-060	MW-X-120	MW-91-120
MW-F-104	MW-79-104	MW-X-170	MW-91-170
MW-G-057	MW-80-057	MW-X-320	MW-91-320
MW-G-082	MW-80-082	MW-Y-037	MW-92-037
Former IRZ-19	MW-81-43	MW-Y-072	MW-92-072
Former IRZ-19	MW-81-98	MW-Y-102	MW-92-102
MW-H-046	MW-82-046	MW-Y-122	MW-92-122
MW-H-112	MW-82-112	MW-Z	MW-93
MW-H-168	MW-82-168	HYDRO-6 (deep)	MW-94-30
MW-H-198	MW-82-198	HYDRO-6 (mid)	MW-94-100
MW-I	MW-100S; MW-100D	HYDRO-6 (shallow)	MW-94-175
MW-L-090	MW-83-090	MW-V	MW-95-113; MW-95-157
MW-L-180	MW-83-180	MW-A	MW-96-045; MW-96-217
MW-L-225	MW-83-225	Former IRZ-11	MW-97-042; MW-97-202
MW-L-245	MW-83-245	Relocated MW-K	MW-98-055; MW-98-077
MW-M-057	MW-84-057	Second HYDRO-6	MW-99-40; MW-99-140
MW-M-095	MW-84-095	MW-P	MW-101
FW-02A/FW-02Alt'	FW-02B		

Table 2-3. Summary of Work Variance Requests

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

WVR Number	Brief Description of Work Variance Request	Approval Dates
15	On May 22, 2025, PG&E submitted the proposed Work Variance Request (WVR) #15 to a) modify the IRL-4 access road design for dual rotary rig access and incorporation of a pre-cast concrete retaining wall for better protection against stormwater erosion, and b) propose to use concrete stain for the pre-cast concrete retaining wall, if color is desired, instead of integrated concrete color which is not commercially available.	Under consideration by DTSC and DOI
14	On April 14, 2025, PG&E submitted the proposed Work Variance Request (WVR) #14 to a) install Pipeline C18 in the East Ravine at the existing post-Non-Time Critical Removal Action (NTCRA) elevation instead of the higher elevation in the 2015 Final Design and b) install an aggregate-based access road in the East Ravine for remedy operations and maintenance instead of continued use and maintenance of the existing dirt road.	DTSC and DOI approved WVR #14 on May 9 and 16, respectively.
13	On October 14, 2024, PG&E submitted the proposed Work Variance Request (WVR) #13 to relocate in-vault power and controls equipment at well IRZ-39 to aboveground panels on a new stanchion with a sunshade. This relocation is necessary to restore the operation of well IRZ-39, and to ensure its long-term operability.	DTSC and DOI approved WVR #13 on October 30, 2024.
12	The extraction well TWB-3 was a provisional well in the remedy design, therefore a pipeline associated with this well was not specified in the design. On September 23, 2022, PG&E submitted a WVR to add a pipeline (and conduits) to connect TWB-3 to the groundwater remedy. In addition, the WVR proposes the deferral of construction of the Operations Building on the TWB.	DTSC and DOI approved WVR #12 on October 19 and 20, 2022, respectively.
11	On January 11, 2022, PG&E proposed a WVR for new mitigation planting areas in the floodplain. The purpose of the WVR is to propose new mitigation planting areas that are better suited for the mitigation plantings than some earlier identified areas.	DOI and DTSC approved WVR #11 on January 14 and 19, 2022, respectively.
10	On December 1, 2021, PG&E proposed a WVR to revise the following pipeline alignments for constructability and safety during Phase 2A construction, as well as future operations and maintenance: 1. Outside the Compressor Station i. Realign Pipeline C18 in East Ravine. ii. Realign Pipeline I1 in Bat Cave Wash. 2. Inside the Compressor Station i. Consolidate piping/conduits (L1/L2/D1/D2) in the southern area of TCS into a common utility corridor ii. Realign Pipeline L3 to connect to Pipeline K.	DTSC and DOI approved WVR #10 on January 6 and 7, 2022, respectively.
9	On March 20, 2020, and at DTSC's direction, PG&E submitted a WVR to relocate MW-A and convert IRZ-11 to a monitoring well.	DTSC and DOI approved WVR #9 on April 24, 2020.
8	On September 12, 2019, PG&E proposed a WVR to change the alignment of pipeline segment C6 on the eastern slope of the MW-20 Bench. The purpose of the WVR is to reduce the amount of soil disturbance, reduce the number of plants to be removed, reduce the safety risks associated with construction atop the MW-20 bench, and reduce the hazards associated with operation at the MW-20 bench during construction.	DTSC and DOI approved WVR #8 on October 4 and 8, 2019, respectively.
7	This WVR proposed the following changes to remedy infrastructure at the CHQ and SPY. a) Locate all temporary office and break trailers at the SPY. PG&E proposed to keep the three existing office trailers at their current locations in the SPY and add two additional office trailers and one break trailer for workers. The additional trailers will be equipped with aboveground sewage tanks, similar to the existing trailers. They will also be powered by Needles Electric. This will require the original SPY fence line to be extended south/southwest to encompass these trailers and the original truck entrance from National Trails Highway to the access road east of SPY. Neither changes reduce the overall area available for soil storage. b) Eliminate the workshop/sample processing building at the CHQ. The function planned for this building will be moved to the Carbon Amendment building at the MW-20 Bench. Removal of this building reduces the amount of soil disturbance by approximately 334 cubic yards.	DOI and DTSC approved WVR #7 on June 14, 2019.

WVR Number	Brief Description of Work Variance Request	Approval Dates
	<p>c) Eliminate the sunshade at the CHQ. The function for the sunshade will be replaced by the break trailer for the workers. Removal of the sunshade reduces the amount of soil distance (i.e., installation of the footings) by approximately 14 cubic yards.</p> <p>d) Convert the utility pad at the CHQ to a smaller transformer/electrical panel pad. With the relocation of the six trailers to SPY and elimination of the workshop/sample processing building, PG&E proposed to convert the utility pad to smaller pad for a smaller transformer/electrical panel to serve the remaining trailers at the CHQ. This reduces the amount of soil disturbance by approximately 61 cubic yards.</p>	
6	<p>In early October 2018, PG&E conducted a geotechnical investigation along the Pipeline F alignment on the entrance road to the TCS and the adjacent hill side. Based on the geotechnical results, the construction contractor (PIVOX) indicated that soldier piles and lagging would be required for temporary shoring. Over 40 soldier piles would be installed by drilling using a 330-sized excavator or larger. A 330-sized excavator has a general width of 11 feet, and counter weight clearance of approximately 4 feet. During operation, this rig would occupy a minimum 15 to 16 feet width of the TCS entrance road for about 12 days. The paved width of the road is between 22 to 24 feet in the area of shoring (per review of the location via Google Earth).</p> <p>Assuming a minimum clearance of 1 foot (which is still less than the recommended clearance) from any operating equipment, there will be approximately 5 to 8 feet of available lane width for access by TCS traffic. Large vehicles (tractor-trailers, delivery trucks, construction equipment) will likely not be able to pass by the active operation, and passenger vehicles may also not be able to pass the active operation in locations where the road narrows. Also, the excavator cannot be repositioned while soldier piles are being drilled. In sum, access to TCS will be severely restricted for about 12 days. This is not acceptable for Compressor Station operations.</p> <p>Therefore, PG&E proposed to realign Pipeline F (starting from segment F3) along the approved alignment of Pipelines B and J. Construction of Pipelines F, B, and J would occur in the same alignment and at the same time.</p>	DOI and DTSC approved WVR #6 on May 21 and May 22, 2019, respectively.
5	PG&E proposed to phase the remedy-produced water conditioning system within the approved footprint inside TCS.	DOI and DTSC approved WVR #5 on July 19 and July 22, 2019, respectively.
4	PG&E proposed to revise a segment of Pipeline C near the I-40 bridge, to meet the permit requirement in Caltrans Encroachment Permit No. 08-18-6-MW-0533. The revision involves relocating a small segment of Pipeline C to within National Trails Highway to meet a minimum distance of 10 feet from current and future I-40 bridge footings. The treatment measure specified for Segment X of National Trails Highway in the Cultural and Historic Property Management Plan will be implemented during installation of this pipeline segment.	DOI/DTSC approved WVR #4 on May 14, 2019
3	<p>PG&E proposed changes within the CHQ fence line to avoid/minimize the overall amount of soil disturbance during construction, reduce the number of truck trips to haul wastewater, and allow for additional working space within the yard. There are no proposed changes to the CHQ footprint nor its fence line. The specifics are described as follows:</p> <ul style="list-style-type: none"> Relocate the decontamination pad from the western fence to the northern fence (near the western corner). Based on recent survey data collected during construction, the difference in ground elevation between northern and southern end of the pad is about 4 feet. Moving the pad to the northern fence would eliminate the difference in ground elevation and reduce the amount of soil disturbance by at least 80 cubic yards. Bring the remedy-produced wastewater tank from belowground to aboveground, increase the tank volume from 1,000 to 2,500 gallons, and place the aboveground, double-walled tank adjacent to the decontamination pad. The change from belowground to aboveground reduces the amount of soil disturbance by at least 50 cubic yards. The change to a bigger tank will reduce the amount of truck trips needed to haul wastewater. The placement of the tank adjacent to the decontamination pad allows for the pad to function as a secondary containment for the haul truck during off-loading of the wastewater. Defer construction of the underground sewage tanks. Deferral of the underground tanks reduces the overall amount of soil disturbance by at least 800 cubic yards. All sanitary wastes will be managed in aboveground sewage tanks (similar to the ones currently used for the SPY trailers) or portable toilets. Swap the location of the construction trailers and the sunshade and change the configuration of the sunshade from a rectangle to a square. This change will allow for more working space within the CHQ. All functions that would occur in the Workshop/Sampling Processing building will be conducted in the construction trailers. 	DOI/DTSC approved WVR #3 on January 4, 2019

WVR Number	Brief Description of Work Variance Request	Approval Dates
2	<p>PG&E proposed to relocate the tie-in point for remedy construction water to an aboveground location inside TCS and below the TCS Water Storage Tanks. This is to eliminate the risk of damaging the existing pressurized 6-inch water line and to avoid any interference with PG&E Gas Operations control of the TCS's water supply. The WVR addressed this relocation, specifically:</p> <ul style="list-style-type: none"> Relocate the construction water tie-in point to an aboveground location below the TCS Water Storage Tanks, inside TCS – The final design calls for the temporary construction water line to hot-tap into the existing 6-inch steel water line just as the line turns southwest to continue to TCS. PG&E proposed to move the tie-in point to an aboveground valve manifold, located below the TCS Water Storage Tanks in the boneyard area. Extend the temporary construction water line to the new tie-in point, along Pipeline 300A access road – The planned 4-inch HDPE temporary construction water line will be extended, following the route of the Pipeline 300A access road, to the new tie-in point inside TCS. This pipeline extension is approximately 1,950 feet and is also made of 4-inch HDPE. The pipe will be laid on ground surface and to the south of the 6-inch water line where possible. At the crossing with the Southern California Gas pipeline access road, the pipeline will be at grade with fill to allow for vehicle crossing. 	DOI/DTSC approved WVR #2 on August 29, 2018
1	<p>This WVR addressed PG&E's proposed modification to the brine tanks containment for use by the remedy, specifically:</p> <ul style="list-style-type: none"> Upgrade the existing lined containment to concrete - The original synthetic liner material has degraded from exposure to ultraviolet light, heat, and abrasion and must be replaced. PG&E proposed to replace the synthetic-lined containment (including K-rails) with a concrete containment to support the groundwater remedy. The concrete color will be desert tan, and information on this proposed concrete color will be submitted to the agencies for review. The proposed concrete material will be similar to the material of the truck lane in the final remedy design (refer to Appendix E of the Final Basis of Design Report [CH2M, 2015a], Section 033 00, Cast-In-Place Concrete). Shorten the length of the containment - This containment will have the same height as the existing containment, but with a slightly smaller footprint (the length is 5 feet shorter). This smaller footprint still meets the required volume for a secondary containment and allows for more space for remedy construction at the tight MW-20 bench. 	DOI approved WVR #1 on June 22, 2018 DTSC approved WVR #1 on July 5, 2018

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

CHQ = Construction Headquarters

DOI = Department of the Interior

DTSC = California Department of Toxic Substances Control

HDPE = high-density polyethylene

PG&E = Pacific Gas and Electric

SPY = Soil Processing Yard

TCS = Topock Compressor Station

WVRs = Work Variance Request

Table 2-4. Summary of Cumulative Percent Completeness of Key Phase 2b Construction Activities
May 2025 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup
PG&E Topock Compressor Station, Needles, California

Key Activity	% Complete	Cumulative Status of Phase 2b Construction Activities (as of May 31, 2025)
Remediation Well* Installation	10%	Pilot holes for FW-01, IRL-01, IRL-02, and IRL-03 have been drilled. The pilot hole for MW-100 has been started.
Remediation Well Downhole Installation	0%	
Monitoring Well** Installation	0%	
Pipeline A Installation – California	0%	
Other Remedy Infrastructure Installation - California	0%	
Pipeline B Installation - Arizona	0%	
Other Remedy Infrastructure Installation - Arizona	0%	
Remedy Electrical Work	0%	

Notes:

* Phase 2b remediation wells include FW-01, IRL-1, IRL-2, IRL-3, and IRL-4.

** Phase 2b monitoring wells include MW-P, MW-Q, MW-AA, MW-BB, MW-CC, MW-DD, MW-FF, and MW-GG.

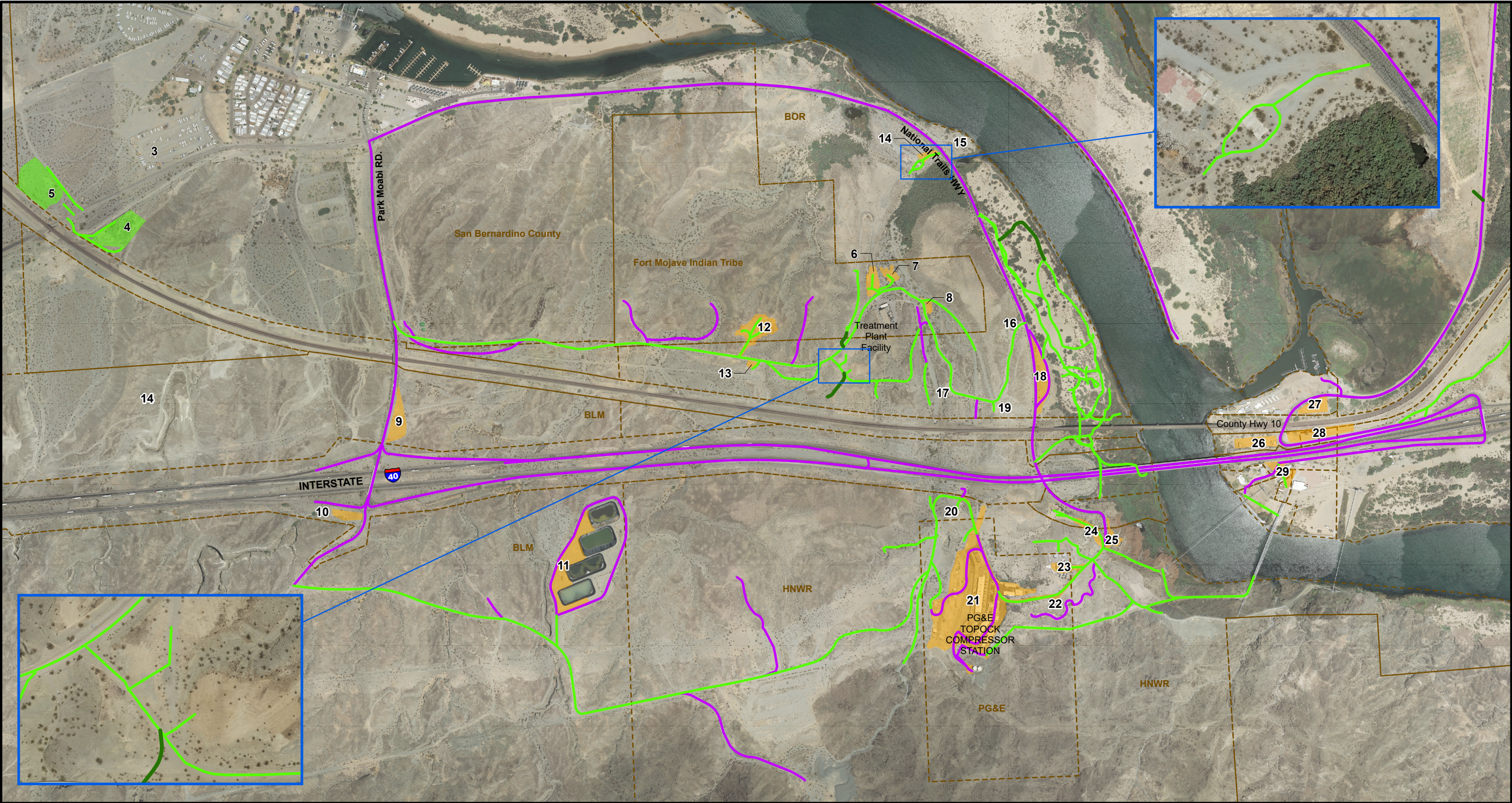
Table 2-5. Summary of Releases Occurred During Groundwater Remedy Construction and Startup
May 2025 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup
PG&E Topock Compressor Station, Needles, California

Date Release Identified ^[a]	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
5/31/25	IM-3 Access Road/Entrance to IRL-4 Work Area	A release of diesel from dump truck(s)	Diesel fuel	About 2 quarts	Impacted soil/rock was removed and place into a 55-gallon drum at the MW-20 Bench. Release is due to thermal expansion of diesel in the fuel tank of dump truck(s) hauling excavated soil from IRL-4 to the soil processing yard.	Fuel construction equipment including dump truck(s) to about 75% capacity to allow for thermal expansion.
5/9/25	IRL-1 (within Staging Area 6)	A release of freshwater	Freshwater	5-10 gallons	Impacted soil/rock was removed and place into 5-gallon buckets. The release was due to a mud tub seal break while conducting cleanout runs after the 10-inch temporary conductor casing was advanced. Soil built up inside the 10-inch casing caused the vibration that broke the mud tub seal.	Remove soil build up inside casing. Procure a new mud tub to replace the older one to help create a better mud tub seal.
4/16/25	IRL-3	A release of hydraulic oil from the drill rig to ground	Hydraulic oil mixed with lube oil	About 0.25 gallon (most fell into secondary containment)	Impacted soil and rock was removed and placed into a bucket at the MW-20 Bench. Release was due to a seal failing. The drill rig was removed from site for repair.	Increase routine inspections in areas of hard drilling as this increases vibrations on drilling equipment.
2/12/25	MW-20 Bench	A release of hydraulic oil from a rental telehandler to ground.	Hydraulic oil	About 0.1 gallon	The rental telehandler was inspected upon delivery and used for two days prior to the release. A mechanic inspected the equipment on 2/13/25 and determined that repair was needed. The equipment was removed from the site on 2/18/25. Approximately 1.5 gallons of impacted soil and rock was removed and placed into a bucket. The bucket is stored at the MW-20 Bench.	If equipment is to be driven for a longer period of time at a higher RPM than the normal running speed (i.e. if it is being driven down the road to another work site), a secondary inspection will be conducted upon arrival to the work area in addition to the morning inspection. The Heavy Equipment Operation JSA has been marked up to document this change.

Date Release Identified ^[a]	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
1/11/25	IRZ-37	A release of approximately 0.5 gallon of well rehabilitation acid solution was released from a transfer hose to ground.	Well rehabilitation solution (a mixture of well rehab acids [Nuwell 210 and Nuwell 310], and freshwater	About 0.5 gallon	Approximately 3 gallons of impacted soil were removed and placed into a bucket. The bucket was brought to the MW-20 Bench. A sample of the impacted soil was collected by Compliance personnel on 1/14/25 for analysis. Analytical results indicated that the impacted soil is non-hazardous.	SOP was updated to clarify process disconnecting any hose sections and ensuring the plastic liner on the ground is long enough to fully walk out the lengths of hoses used to perform work.

^[a] For brevity and readability, releases prior to 2025 are not listed in this report. For a complete list of those releases, please Table 2-5 of the February 2025 Monthly Progress Report. The monthly progress reports can be accessed via the [Project website](#).

Figures

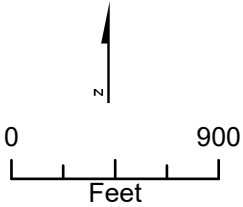


LEGEND

- 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 2-2
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
- D. Perimeter Air Sampling Analytical Results

Attachment A

Photographs



Photo showing sonic rig at MW-100D.



Photo showing sonic rig at MW-100D with sound barrier in the foreground.



Photo showing excavator at IRL-4 work area.



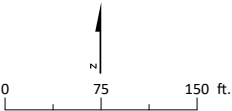
Photo showing soil screening at the Soil Processing Yard.

Attachment C
Soil Sampling Locations and Available Soil
Analytical Results



- Legend**
- Phase 2b Well
 - Soil Samples Collected in April 2025
 - Soil Samples Collected in May 2025

Note:
1. MW-100 is former MW-I



Baseline Soil Sampling
PG&E Topock Compressor Station,
Needles, California

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 May 2025, the following monitoring events were conducted:

- Twenty one events at the pre-approved location west of the mobile home park at Moabi Regional Park. Construction activities closest to this monitoring location include soil management activities at the SPY and Construction Headquarters (CHQ), as well as traffic on NTH. The sound level typically varied between 40 and 60 dBA, with an average and median of 46 to 48 dBA.
- Eighteen 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 drilling at IRL-1 and IRL-2, and traffic on the IM-3 access road. The sound level typically varied between 47 and 66 dBA, with an average and median of 53-54 dBA.
- Twenty-three 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 drilling at IRL-1, IRL-2, and FW-01. The sound level varied between 43 and 66 dBA, with an average and median of 56 dBA.

Due to close proximity of IRL-1 to this pre-approved monitoring location, sound curtain was erected during drilling at this location.

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	5/4/2025	5/5/2025	5/6/2025	5/7/2025	5/8/2025	5/9/2025	5/10/2025
Start Time (PST)	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 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*, F4	No Work	No Work	¹ FW-01 Drill Site and Road Preparation, Upland Road Maintenance, IRL-4 Drilling Site and Road Preparation, IRL-1 and FW-01 Air Knifing, IRL-2 Drilling and Backfill	¹ FW-01 Drill Site and Road Preparation, Upland Access Road Maintenance, IRL-4 Drilling Site and Road Preparation, MW-P Air Knifing, IRL-2 Drilling, Backfill, and Site Cleanup	¹ Upland Access Road Maintenance, IRL-4 Drilling Site and Road Preparation, IRL-2 Drilling, Backfill, and Demobilization, Mobilization to IRL-1	¹ Upland Access Road Maintenance, IRL-4 Drilling Site and Road Preparation, IRL-1 Site Setup	¹ IRL-4 Drilling Site and Road Preparation, IRL-1 Drilling
Site Wide Revegetation F5*, F6*	No Work	No Work	No Work	No Work	Irrigation O&M/Floodplain Watering	No Work	No Work
Primary Planned Activities	5/11/2025	5/12/2025	5/13/2025	5/14/2025	5/15/2025	5/16/2025	5/17/2025
Start Time (PST)	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM
Site Wide Groundwater Sampling G3*, F3*, E4*, F4*, G4*, D5*, E5*, F5*, G5*, D6*, E6*, F6*, & G6*	No Work	Ponds, River Sampling, and Hydro6 Sampling	Ponds, River Sampling, and Hydro6 Sampling MW-15 Transducer Monitoring	Ponds, River Sampling, and Hydro6 Sampling	Ponds, River Sampling, and Hydro6 Sampling	No Work	No Work
Site Wide Construction E4*, F4	¹ IRL-4 Drilling Site and Road Preparation, IRL-1 Drilling	¹ IRL-4 Drilling Site and Road Preparation, IRL-1 Drilling	¹ IRL-4 Drilling Site and Road Preparation, IRL-1 Drilling	¹ IRL-4 Drilling Site and Road Preparation, IRL-1 Drilling	No Work	No Work	No Work
Site Wide Revegetation F5*, F6*	No Work	No Work	No Work	No Work	Irrigation O&M	No Work	No Work
Primary Planned Activities	5/18/2025	5/19/2025	5/20/2025	5/21/2025	5/22/2025	5/23/2025	5/24/2025
Start Time (PST)	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 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	No Work	No Work
Site Wide Construction E4*, F4	No Work	¹ IRL-4 Drilling Site and Road Preparation, IRL-1 Drilling and Backfill	¹ IRL-4 Drilling Site and Road Preparation, IRL-1 Drilling, Backfill, and Site Cleanup	¹ IRL-4 Drilling Site and Road Preparation, IRL-1 Demobilization, FW-01 Mobilization and Site Setup	¹ IRL-4 Drilling Site and Road Preparation, FW-01 Drilling	¹ IRL-4 Drilling Site and Road Preparation, FW-01 Drilling	No Work
Site Wide Revegetation F5*, F6*	No Work	No Work	No Work	No Work	Irrigation O&M	No Work	No Work
Primary Planned Activities	5/25/2025	5/26/2025	5/27/2025	5/28/2025	5/29/2025	5/30/2025	5/31/2025
Start Time (PST)	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM
Site Wide Groundwater Sampling G3*, F3*, E4*, F4*, G4*, D5*, E5*, F5*, G5*, D6*, E6*, F6*, & G6*	No Work	No Work	No Work	Quarterly Sampling	Quarterly Sampling	Quarterly Sampling	No Work
Site Wide Construction E4*, F4	No Work	No Work	No Work	¹ IRL-4 Drilling Site and Road Preparation, FW-01 Drilling	¹ IRL-4 Drilling Site and Road Preparation, FW-01 Drilling	¹ IRL-4 Drilling Site and Road Preparation, FW-01 Drilling	¹ IRL-4 Drilling Site and Road Preparation, FW-01 Drilling
Site Wide Revegetation F5*, F6*	No Work	No Work	No Work	No Work	Monitoring, Irrigation O&M, Floodplain Watering	No Work	No Work
Primary Planned Activities	6/1/2025	6/2/2025	6/3/2025	6/4/2025	6/5/2025	6/6/2025	6/7/2025
Start Time (PST)	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM
Site Wide Groundwater Sampling G3*, F3*, E4*, F4*, G4*, D5*, E5*, F5*, G5*, D6*, E6*, F6*, & G6*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Site Wide Construction E4*, F4	¹ IRL-4 Drilling Site and Road Preparation, FW-01 Drilling and Backfill	¹ IRL-4 Drilling Site and Road Preparation, FW-01 Drilling, Backfill, and Site Cleanup	¹ IRL-4 Drilling Site and Road Preparation, FW-01 Demobilization, MW-100 Mobilization and Site Setup	¹ IRL-4 Drilling Site and Road Preparation, MW-100 Drilling	¹ IRL-4 Drilling Site and Road Preparation, MW-100 Drilling	No Work	No Work
Site Wide Revegetation F5*, F6*	No Work	No Work	No Work	No Work	Irrigation O&M	No Work	No Work
Primary Planned Activities	6/8/2025	6/9/2025	6/10/2025	6/11/2025	6/12/2025	6/13/2025	6/14/2025
Start Time (PST)	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM
Site Wide Groundwater Sampling G3*, F3*, E4*, F4*, G4*, D5*, E5*, F5*, G5*, D6*, E6*, F6*, & G6*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Site Wide Construction E4*, F4	No Work	No Work	¹ IRL-4 Drilling Site and Road Preparation, MW-100 Drilling	¹ IRL-4 Drilling Site and Road Preparation, MW-100 Drilling	¹ IRL-4 Drilling Site and Road Preparation, MW-100 Drilling	¹ IRL-4 Drilling Site and Road Preparation, MW-100 Drilling	¹ IRL-4 Drilling Site and Road Preparation, MW-100 Drilling
Site Wide Revegetation F5*, F6*	No Work	No Work	No Work	No Work	Irrigation O&M	No Work	No Work
	Note: The Pre-Work Field Review was formerly known as the Last Look						

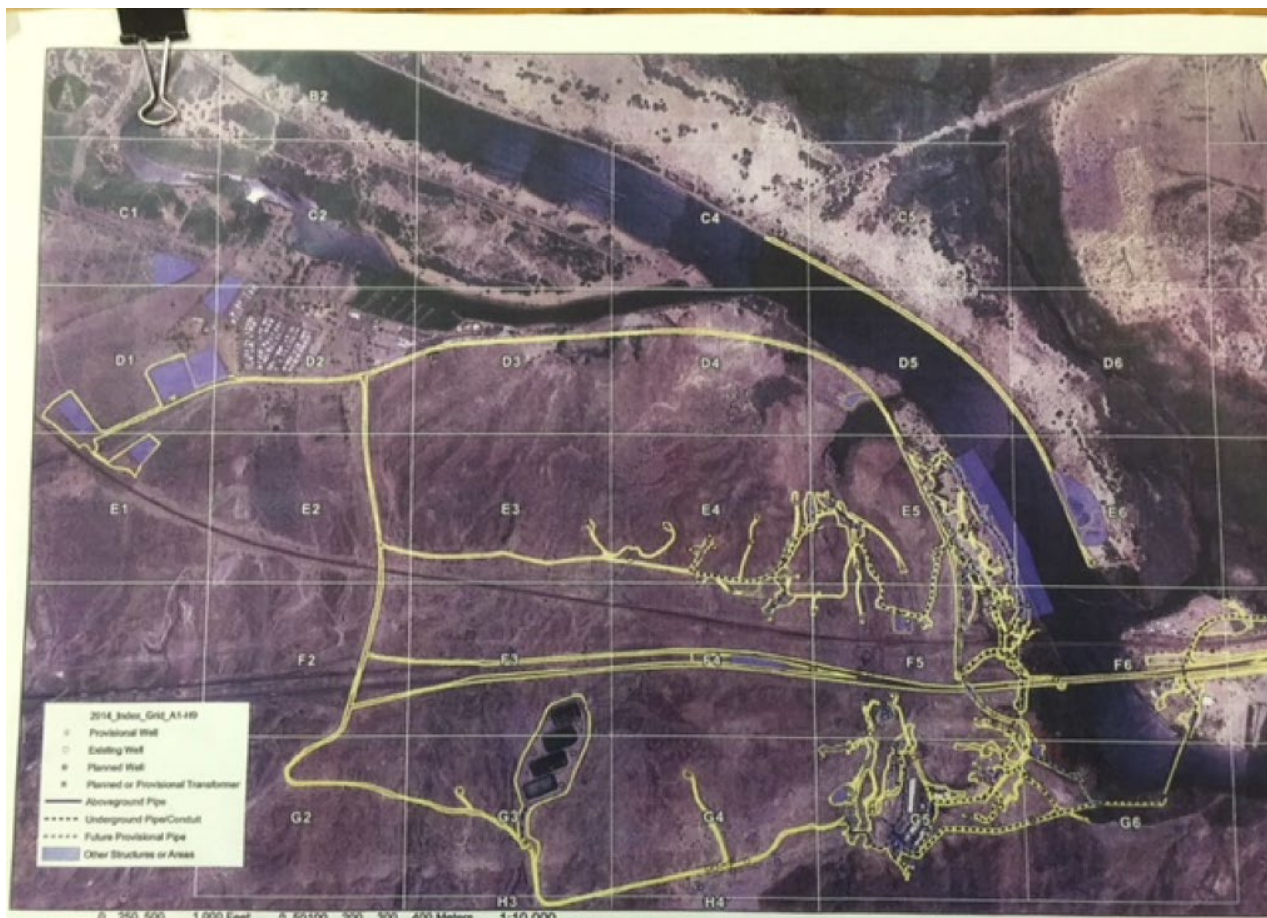


Figure showing a grid superimposed on the Topock site map. Each grid position is denoted by an letter followed by a number.

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

(Groundwater Data Presented in Separate PDF)