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Subject: [EXTERNAL] Postponement of Groundwater Remedy Construction

Dear Mr. Sullivan, Ms. Starring, Mr. Russell, and Mr. Dudley,

On March 27, 2020, the U.S. Department of the Interior (U.S. DOI) verbally notified PG&E to begin a temporary and orderly postponement of the groundwater remedy construction activities. As a follow-

up, on April 1, 2020, the U.S. DOI issued the attached letter formally directing PG&E to temporarily discontinue and halt the construction activities associated with the groundwater remedy. The California Department of Toxic Substances Control (DTSC), as the state lead agency with jurisdiction over PG&E's compliance with Corrective Action under the Resource Conservation and Recovery Act (RCRA) and the California Hazardous Waste Control Act, supports the U.S. DOI's order to initiate an orderly and temporary shutdown of the groundwater remedy construction. DTSC also concurs with the U.S. DOI that PG&E should continue the operation and maintenance of the Interim Measure "pump and treat" system as essential and critical infrastructure for the protection of the Colorado River during this period.

DTSC understands from PG&E and the U.S. DOI that there will be a "ramp down" period for some construction activities currently underway at the site and PG&E will continue to communicate with DTSC and U.S. DOI on the status of these field activities until their complete cessation. DTSC notes that the shutdown order pertains only to the postponement of the groundwater remedy construction activities under the jurisdiction of the U.S. DOI and DTSC. PG&E's gas line operations are outside the scope of DTSC jurisdiction and this requirement. Furthermore, DTSC is aware that PG&E will retain a small crew of contractors on-site to provide security and maintenance of the worksite including, but not limited to, erosion controls and inspection of stormwater pollution prevention measures. DTSC expects PG&E to ensure all remaining workers exercise appropriate social distancing and utilize proper safety precautions in conformance with the guidance from the Center for Disease Control (CDC) in response to the current COVID-19 pandemic.

If you have any questions, please feel free to contact me or Ms. Karen Baker.

Sincerely,

Aaron Yue
Department of Toxics Substances Control
Project Manager
Geological Services Branch