



Colorado River Basin Regional Water Quality Control Board

October 4, 2019

Mr. Curt Russell
Pacific Gas and Electric Company
P.O. Box 337
Needles, CA 92363

SUBJECT: APPROVAL OF DISCHARGE TO LAND IN ACCORDANCE WITH STATE WATER QUALITY CONTROL ORDER NO. 2003-0003-DWQ, PIPELINES G, B AND J

FACILITY: TOPOCK COMPRESSOR STATION, SOUTHEAST OF NEEDLES, SAN BERNARDINO COUNTY, GEOTRACKER ID SL0607161506

Dear Mr. Russell:

The California Regional Water Quality Control Board, Colorado River Basin Region (Regional Water Board) has previously approved the discharge to land of hydrostatic test water at the facility referenced above. On September 30, 2019, Regional Water Board staff received via email from Christina Hong with Jacobs Engineering, another request for discharging hydrostatic test water to land, this time from pipelines G, B and J, in accordance with a Discharge Monitoring Plan (DMP) dated September 19, 2019 by PIVOX Corporation.

Remedial actions (Remedy) are underway at the facility under the oversight of the California Department of Toxic Substances Control (DTSC) and the US Department of the Interior (DOI) as part of a Corrective Action/Remedial Action. As part of the Remedy, Pacific Gas & Electric Company (PG&E) is not required to apply for each separate permit that it might otherwise be required to obtain provided it follows in substantive part all applicable, relevant and appropriate requirements of those permits.

The DMP indicated PG&E and its contractors are proposing to conduct hydrostatic testing on pipelines being installed as part of the Remedy and intend to discharge to the ground within the immediate vicinity of the pipes being tested some or all of the fluid used in the tests. Relevant facts include:

1. The fluid to be used in the test is potable water obtained from the Facility water supply system.
2. The pipeline to be tested is newly installed.
3. Laboratory testing on the water source was performed in October 2018 and indicated the water does not contain chemicals in excess of applicable water quality standards.

NANCY WRIGHT, CHAIR | PAULA RASMUSSEN, EXECUTIVE OFFICER

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4. The DMP for the proposed work was provided to the Regional Water Board for review and indicated the location of the proposed work.
5. The proposed work would normally be permitted under the requirements of State Water Resources Control Board Water Quality Order No. 2003-0003-DWQ entitled "State General Waste Discharge Requirements (WDRs) for Discharge to Land with a Low Threat to Water Quality (General WDRs)" (Order).
6. The Order contains several categories of discharge, and the proposed discharge is consistent with the category entitled "Clear Water Discharges: Pipeline/Tank Hydrostatic Testing Discharge."
7. The Order requires that the Discharger submit a Notice of Intent (NOI) that includes a DMP with the following information:
 - All pollutants believed to be present and their concentrations;
 - Monitoring Locations and frequencies;
 - Reporting schedules;
8. The Order indicates that the discharge may not be initiated until the Regional Water Board Executive Officer approves of the DMP.

REGIONAL WATER BOARD COMMENTS

Regional Water Board staff considers the DMP referenced above to meet the requirements of the Order and hereby approves the proposed discharge of hydrostatic test water at the locations indicated in the DMP.

If you have any questions, please contact Scot Stormo, Engineering Geologist, at (760) 776-8964 or scot.stormo@waterboards.ca.gov.

Sincerely,



Paula Rasmussen
Executive Officer
Colorado River Basin
Regional Water Quality Control Board

SAS/JC

cc: Christina Hong, Jacobs Engineering, Christina.Hong@jacobs.com
Aaron Yue, DTSC, Aaron.Yue@dtsc.ca.gov
Pamela Innis, DOI, Pamela_Innis@ios.doi.gov

File: PG&E Topock Compressor Station, Cleanup Site, GeoTracker ID# SL0607161506