



**United States Department of the Interior
California Department of Toxic Substances Control**



ELECTRONIC SUBMISSION

February 02, 2016

Ms. Yvonne Meeks
Topock Project Manager
Pacific Gas and Electric Company
4325 South Higuera Street
San Luis Obispo, California 93401

Subject: Topock Soil RFI/RI - Plan to Address Data Gaps Identified During Work Plan Implementation, DG-WP-01, January 13, 2016, for the Pacific Gas and Electric Company, Topock Compressor Station, Needles, California (EPA ID NO. CAT080011729)

Dear Ms. Meeks:

The United States Department of the Interior (DOI) and the California Department of Toxic Substances Control (DTSC) (collectively referred to as the Agencies) have completed the evaluation of the *“Topock Soil RFI/RI – Plan to Address Data Gaps Identified During Work Plan Implementation, DG-WP-01”* (data gap workplan), for the Pacific Gas & Electric (PG&E) Topock Compressor Station Project. The data gap workplan was prepared by CH2M for PG&E and is dated January 13, 2016. As part of our evaluation, the Agencies reviewed and considered comments received from the Fort Mojave Indian Tribe (FMIT, January 25, 2016), the Hualapai Indian Tribe (January 27, 2016), and the Cocopah Indian Tribe (January 29, 2016) as well as the preliminary results from the January 29, 2016 pre-investigation historical resources field verification survey (Soil FEIR Mitigation Measure CR-1c-2).

Based on the evaluation of the above items, the Agencies approve the data gap workplan with the condition that ground disturbing activities cannot occur at the sample locations surveyed during the January 29, 2016 field verification until DTSC’s review and concurrence of the Pre-Investigation Historical Resources Field Verification Memoranda as required by CR-1c-2. In accordance with CR-1c-2, sampling activities may occur within the buffer area of previously surveyed sample locations without

additional field verification. It is the Agencies understanding that some of the proposed sample locations in the data gap workplan are within the buffer of previously field verified locations and therefore are not restricted from sampling and would not be required to be re-surveyed during the January 29, 2016 field verification survey.

As indicated above, the Agencies reviewed and considered comments received from the Tribes as part of the overall evaluation of the data gap workplan. Below are the Agencies' direction to PG&E and responses to comments received from the Tribes.

- The FMIT indicated that the proposed sample locations based on visual observation of debris, subsurface findings using non-invasive techniques (e.g., ground-penetrating radar) or field observations of storm drains are acceptable. The FMIT expects to be able to review any additional step-out samples that are proposed based on these results. The Agencies appreciate the FMIT's concurrence with the proposed sample locations. PG&E shall proceed with the proposed sample collection. In accordance with CR-1a, Tribes shall be afforded the opportunity to review technical documents including soil investigation related plans such as any future data gap workplans that may propose additional sample locations.
- The FMIT requests the results of the XRF screening used to evaluate the data gaps, while the Hualapai and Cocopah commented that the XRF and geophysical data were not provided in the data gap workplan. Although some of the XRF data were provided verbally during the January 21, 2016 briefing and site walk, data for three of the proposed sample locations were not provided. DTSC has directed PG&E to provide the information to the Tribes and stakeholders in an email dated January 28, 2016. The data set was provided to the Tribes by PG&E on February 1, 2016.
- The FMIT commented on the screening criteria used in the data gap evaluation. The Agencies would like to clarify that in addition to background and residential screening levels, ecological screening levels are also used as a screening criteria. In cases when the ecological screening value is less than the background concentration, the background concentration is used. Additionally, consistent with the conceptual site model for the area, spatial concentration trends and multi-constituent concentration trends/correlations are also considered in the overall evaluation of potential data gaps. No change to the proposed data gap workplan is necessary.
- The FMIT, Hualapai and Cocopah noted that SD-20 was listed on the data gap workplan but was already collected. According to PG&E, the sample was collected based on the field conditions (break in the storm drain) and the field team's interpretation of the storm drain sampling program; furthermore, Tribal monitors from the FMIT were present during sample collection. The Agencies agree, however, that if additional samples are necessary as a result of future data gap evaluations, the workplans would be shared with the Tribes and stakeholders for review.
- The Hualapai and Cocopah commented that XRF samples from AOC 14 (XRF-01 - XRF-06) were not in the Soil Investigation Workplan and were collected without stakeholder review. The Agencies would like to clarify that Appendix C, Subappendix C7 – Area of Concern 14 of the approved Soil Investigation Workplan indicates that up to 20 XRF samples may be collected in

AOC 14 to assist in identifying possible sample locations. Additionally, the proposed XRF sample locations in AOC 14 were identified by the agencies and field-verified with PG&E and Tribal representatives on November 5, 2015.

As indicated by the Agencies in previous project meetings and correspondence, the timely implementation of the soil investigation workplan is critical in order to complete the soil sampling activities within a narrow time frame that avoids potential biology-related impacts while maintaining a schedule to complete the risk assessment for the purpose of making decisions on displaced soils from the groundwater remedy construction. The Agencies appreciate the collaboration between all the parties involved in the project towards accomplishing this objective.

If you have any questions please feel free to contact either of the undersigned project managers. The phone number for Pamela Innis is (602) 417-9578 and for Aaron Yue is (714) 484-5439.

Sincerely,



Pamela S. Innis
DOI Topock Remedial Project Manager



Aaron Yue
DTSC Project Manager
Office of Geology

cc: PG&E Topock Consultative Workgroup Members
PG&E Topock Geo/Hydro Technical Workgroup Members
Tribal Representatives in PG&E Project Contact List
Technical Review Committee Contact List