



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



ELECTRONIC SUBMISSION

March 1, 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-02, February 12, 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 its evaluation of the *“Topock Soil RFI/RI – Plan to Address Data Gaps Identified During Work Plan Implementation, DG-WP-02”* (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 February 12, 2016. As part of our evaluation, the Agencies reviewed and considered comments received from the Fort Mojave Indian Tribe (FMIT, February 22 and 26, 2016), and the Cocopah Indian Tribe (February 26, 2016).

Based on the evaluation of the above items, the Agencies approve the proposed work described in the data gap workplan. In accordance with Soil FEIR Mitigation Measure 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 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.

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 Cocopah requests all the data used to support the proposed additional sampling, while acknowledging that some of the data were presented in the TCS-4 Decommissioning Plan. The FMIT posed a similar question via electronic mail dated February 22, 2016. On February 23, 2016, the Agencies responded to the FMIT indicating that the data used to support the proposed sampling in the vicinity of old well TCS-4 are based on laboratory analytical results that are reported in the TCS-4 Decommissioning Plan. Additionally, proposed sample AOC-10-24 is based on pre-validated data collected from the current soil sampling activities from AOC 10. According to PG&E, the validation process is underway and validated data are currently not available. However, in discussions with the Agencies, PG&E indicated that the pre-validated analytical data indicate the presence of dioxins with results ranging from 1 to over 100 times the ecological screening level. This is noted in the data gap workplan. Since there is limited opportunity before the bat roosting season begins in mid-March, the Agencies believe that it is prudent to collect the additional sample based on advance notification of the exceedances by PG&E. However, PG&E will be asked to share the validated data when it becomes available.
- The FMIT requests the data and comparison criteria used as the basis for the proposed samples. The analytical data used in evaluating the TCS-4 area is presented in Tables 1 through 4 of the TCS-4 Decommissioning Plan, dated December 4, 2015. The comparison criteria are also on the tables and are based on human and ecological screening levels identified in the Soil RFI/RI Workplan, as indicated on Table 1.
- The FMIT requests that only fully-validated data be used as the basis for data gap samples. The Agencies agree that ideally it is best to use validated data in the data gap evaluation process however, as previously indicated, due to the limited opportunity before the start of the bat roosting season (mid-March), the Agencies believe that it is prudent to collect the additional samples based on advance notification of the exceedances by PG&E. PG&E has been notified to share the validated data when it becomes available.
- The FMIT requests that future data gap workplans should include descriptions and maps of sufficient scale to allow for field verification. The Agencies agree that figures with the appropriate scale for field verification are necessary; PG&E is hereby directed to provide the requested information in future data gap workplans. Only a general description (20 to 25 feet from TCS-4), and not the exact locations of the proposed sample locations in the vicinity of TCS-4 was provided in the data gap workplan. The exact locations will be based on the field conditions encountered during the decommissioning of old well TCS-4. The proposed sampling was designed to allow for field determination but within the range of 20 to 25 feet from TCS-4. PG&E will provide the Tribes and Agencies a figure of appropriate scale with the final sampling locations once determined and marked in the field.

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