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May 29, 2020

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**Subject:** *Draft Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California  
(Document ID: TPK\_SoilEECA\_Draft\_2020.05.29)*

Dear Ms. Innis:

In compliance with the U.S. Department of the Interior's (DOI's) directive on October 30, 2018, Pacific Gas and Electric Company (PG&E) has prepared this Engineering Evaluation/Cost Analysis (EE/CA) for a potential non-time-critical removal action (NTCRA) to address contaminated soil present on federal lands adjacent to the PG&E Topock Compressor Station (TCS) in San Bernardino County, California. This draft Soil EE/CA complies with the requirements of the DOI's EE/CA Approval Memorandum that was transmitted with the directive of October 30, 2018, and is consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

The draft Soil EE/CA identifies fourteen potential areas for a removal action and evaluates each removal action alternative (including a No Action Alternative) for cleanup effectiveness, implementability, and cost. All of these potential action areas are on federal lands (Havasui National Wildlife Refuge) or at locations where contaminants in soil have the potential to migrate to federal land.

Please contact me at (760) 791-5884 if you have any questions or comments regarding this submittal.

Sincerely,

Curt Russell  
Topock Project Manager





# Topock Project Executive Abstract

|   |  |
|---|--|
| <p>Document Title: Draft <i>Soil Engineering Evaluation/Cost Analysis, PG&amp;E Topock Compressor Station, Needles, California</i></p> <p>Submitting Agency: DOI, DTSC</p> <p>Final Document? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>   | <p>Date of Document: 05/29/2020</p> <p>Who Created this Document?: (i.e. PG&amp;E, DTSC, DOI, Other) PG&amp;E</p>  |
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| <p>What is the consequence of NOT doing this item? What is the consequence of DOING this item?</p> <p>The consequence of not doing this item is that PG&amp;E would be out of compliance with DOI's October 30, 2018 directive requesting PG&amp;E to conduct an Engineering Evaluation/Cost Analysis (EE/CA) to evaluate the need for a non-time critical removal action (NTCRA) to prevent contamination from migrating to federal land.</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>The Soil EE/CA evaluates the need for a NTCRA, in this case to remove contaminated soil on federal lands or at locations where contamination has the potential to migrate to federal land. The EE/CA identifies fourteen potential areas for a removal action and evaluates each removal action alternative (including a No Action Alternative) for cleanup effectiveness, implementability, and cost. Each of these potential action areas are on federal lands (Havasu National Wildlife Refuge) or at locations where contaminants in soil have the potential to migrate to federal land.</p> <p>Written by: Pacific Gas and Electric Company</p>                          |  |
| <p>Recommendations:</p> <p>Provide input to PG&amp;E.</p>   |  |
| <p>How is this information related to the Final Remedy or Regulatory Requirements:</p> <p>This submittal complies with the requirements of DOI's Soil EE/CA Approval Memorandum transmitted in their October 30, 2018 directive and is consistent with the Comprehensive Environmental Response, Compensation, and Liability Act and the National Oil and Hazardous Substances Pollution Contingency Plan.</p>  |  |
| <p>Other requirements of this information?</p> <p>None.</p>   |  |





## **Soil Engineering Evaluation/Cost Analysis**

**PG&E Topock Compressor Station, Needles, California**

Draft

May 2020

Pacific Gas and Electric Company



## Soil Engineering Evaluation/Cost Analysis

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## Executive Summary

This report presents an Engineering Evaluation/Cost Analysis (EE/CA) for a potential non-time-critical removal action (NTCRA) to address contaminated soil on land adjacent to the Pacific Gas and Electric Company (PG&E) Topock Compressor Station (TCS) in San Bernardino County, California. The TCS and adjacent land are collectively known as the Topock Project Site (Site). The lead regulatory agencies for cleanup at the Site are the U.S. Department of Interior (DOI) and the California Department of Toxic Substances Control (DTSC). The soil medium is currently in the Resource Conservation and Recovery Act (RCRA) Facility Investigation and Remedial Investigation (RFI/RI) phase of the cleanup process, with soil investigation activities (sampling and analysis) completed in 2017. Soil RFI/RI investigation results are presented in the third volume of the RFI/RI report for the Site (Draft RFI/RI Report Volume 3) (Jacobs, 2019a).

During evaluation of the RFI/RI soil investigation data, the U.S. Fish and Wildlife Service (USFWS) and DOI determined that there are specific areas outside of the TCS where concentrations of constituents in soil significantly exceeded background values or ecological and residential screening levels on federal land or in locations where constituents have the potential to migrate to federal land. On October 30, 2018, DOI directed PG&E in an Approval Memorandum to conduct an EE/CA to evaluate the need for an NTCRA to address contaminated soil and to evaluate and select technologies and remedial alternatives. The EE/CA Approval Memorandum (DOI, 2018b) cites the following National Contingency Plan (NCP) factors as the reasons an NTCRA is being considered:

- Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants
- High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate
- Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released

Based on these NCP factors and comparison of soil concentrations at the Site to screening levels, preliminary potential action areas (PAAs) were identified where soil concentrations significantly exceeded screening levels for total chromium, copper, lead, mercury, molybdenum, zinc, and dioxins/furans.

Concurrently with this screening process and identification of preliminary PAAs, a Human Health and Ecological Risk Assessment (HHERA) was conducted for the Site, as part of the RCRA/CERCLA process. The purpose of the HHERA was to use environmental sample data to identify constituents of concern (COCs), provide an estimate of how and to what extent human and ecological receptors might be exposed to these chemicals, and provide an assessment of the health effects associated with these chemicals (Arcadis, 2019). The HHERA was conducted in accordance with the methods and assumptions agreed upon in the various HHERA Risk Assessment Work Plans (RAWPs) (Arcadis, 2008a; 2009a; 2015). An HHERA report was submitted to DTSC and DOI in October 2019 (Arcadis, 2019) and is close to being finalized. An errata to the HHERA was submitted in February 2020 (Arcadis, 2020).

With consideration of the HHERA and the NCP factors identified in the EE/CA Approval Memorandum (DOI, 2018b), the following removal action objectives (RAOs) were identified:

- RAO 1: Reduce human and ecological risk related to the COCs in soil up to 10 feet below ground surface (bgs) on or adjacent to federal land by removing soil at locations identified as driving risk in the HHERA.
- RAO 2: Address elevated concentrations of contaminants in soil up to 10 feet bgs outside the TCS in or adjacent to wash areas that are within, or have the potential to migrate to, the Havasu National Wildlife Refuge (HNWR) during storm events.

- RAO 3: Remove debris, burnt material, and/or discolored soil associated with elevated hazardous substances identified during the RFI/RI within Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) up to 10 feet bgs.

The RAOs were used to refine the preliminary PAAs identified in the EE/CA Approval Memorandum. PAAs were identified in the following RFI/FI investigation areas:

- SWMU 1 – Former Percolation Bed (3 PAAs)
- AOC 1 – Area Around Former Percolation Bed (3 PAAs)
- AOC 9 – Southeast Fence Line (1 PAA)
- AOC 10 – East Ravine (4 PAAs)
- AOC 11 – Topographic Low Areas (1 PAA)
- AOC 14 – Railroad Debris Site (1 PAA)
- AOC 27 – MW-24 Bench (1 PAA)

To address the RAOs and in consideration of identified applicable or relevant and appropriate requirements (ARARs) as well as results from bench-scale tests, the following removal action alternatives were identified:

- **Alternative 1 – No Action.** Alternative 1 is included in and carried through the entire analysis of removal action alternatives as the baseline condition against which the performance of the remaining alternatives is evaluated. In Alternative 1, no removal action would take place.
- **Alternative 2 – Excavation and Offsite Disposal of All Material.** Alternative 2 involves excavation of soil within the PAAs and disposal offsite.
- **Alternative 3 – Excavation, Mechanical Separation, Offsite Disposal of Fines, and Reuse of Coarse Material.** Alternative 3 involves excavation of soil within the PAAs and mechanical separation to isolate fine material (less than 3/8 inch) and coarse material (greater than 3/8 inch). Fine material would be disposed of offsite, and coarse material would be used to backfill the excavation areas.
- **Alternative 4 – Excavation, Mechanical Separation, Offsite Disposal of Fines, Soil Washing of Coarse Material, and Reuse of Washed Coarse Material.** Alternative 4 is the same as Alternative 3 except that coarse material would be washed with water prior to reuse in order to remove fines adhered to the surface of the coarse material.

Based on the comparative analysis of the removal action alternatives against the criteria of effectiveness, implementability, and cost, the recommended alternative is:

- Alternative 3 – Excavation, Mechanical Separation, Offsite Disposal of Fines, and Reuse of Coarse Material

Alternative 3 is considered to be the most effective alternative evaluated and will provide a high degree of long-term effectiveness; reduction in toxicity, mobility, and volume (TMV); and short-term effectiveness. This alternative has been developed to meet RAOs protective of human health and the environment and comply with location-, chemical-, and action-specific ARARs and to-be-considered (TBC) criteria. Alternative 3 meets the RAOs as follows:

- RAO 1 – To reduce human and ecological risk related to the COCs in the soil on or adjacent to federal land, the locations recommended for removal in the HHERA are included in the excavation areas of Alternative 3.
- RAO 2 – To address elevated concentrations of contaminants (that is, concentrations significantly exceeding the numerical removal action goals [RAGs]) outside the TCS in or adjacent to wash areas that are within, or have the potential to migrate to, the HNWR during storms, areas with significant exceedances of numerical RAGs are included in the excavation areas of Alternative 3.
- RAO 3 – To remove debris, burnt material, and/or discolored soil associated with elevated hazardous substances, visually identified debris, burnt material, and/or discolored soils will be removed and disposed of offsite.

Alternative 3 also minimizes the volume of soil removed from the Site without requiring disposal of water generated during soil washing. The estimated cost of Alternative 3 is \$4,666,000. This cost is less than that of Alternatives 2 and 4.





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## Acronyms and Abbreviations

|              |   |
|--------------|---|
| 95UCL        | 95% upper confidence limit on the mean                                |
| AMM          | Avoidance and Minimization Measures                                   |
| AOC          | area of concern   |
| ARAR         | applicable or relevant and appropriate requirements                   |
| BAF          | bioaccumulation factor  |
| BCW          | Bat Cave Wash   |
| bgs          | below ground surface  |
| BIAMP        | Bird Impact Avoidance and Minimization Plan                           |
| BLM          | U.S. Bureau of Land Management  |
| BMP          | best management practice  |
| BNSF         | BNSF Railway  |
| BOR          | U.S. Bureau of Reclamation  |
| BTV          | background threshold value  |
| CalEPA       | California Environmental Protection Agency                            |
| CARB         | California Air Resources Board  |
| CCR          | California Code of Regulations  |
| CDFW         | California Department of Fish and Wildlife                            |
| Caltrans     | California Department of Transportation                               |
| CERCLA       | Comprehensive Environmental Response, Compensation, and Liability Act |
| CFR          | Code of Federal Regulations   |
| CH2M         | CH2M HILL, Inc.   |
| CHPMP        | Cultural and Historic Property Management Plan                        |
| COC          | constituent of concern  |
| COPC         | constituent of potential concern                                      |
| COPEC        | constituent of potential ecological concern                           |
| CrVI         | hexavalent chromium   |
| CSM          | conceptual site model   |
| DOI          | U.S. Department of the Interior                                       |
| dioxin/furan | dioxin and furan  |
| DTSC         | California Department of Toxic Substances Control                     |
| EcoSSL       | ecological soil screening level                                       |
| ECV          | ecological comparison value   |
| EE/CA        | Engineering Evaluation/Cost Analysis                                  |
| EPC          | exposure point concentration  |
| ERA          | ecological risk assessment  |

|                 |   |
|-----------------|---|
| ESL             | environmental screening level                           |
| FLPMA           | Federal Land Policy and Management Act                  |
| FOD             | frequency of detection                                  |
| ft              | feet  |
| ft bgs          | feet below ground surface                               |
| FRTR            | Federal Remediation Technologies Roundtable             |
| GANDA           | Garcia and Associates                                   |
| GHG             | greenhouse gas  |
| GSR             | green and sustainable remediation                       |
| HERO            | DTSC Human and Ecological Risk Office                   |
| HHERA           | human health and ecological risk assessment             |
| HHRA            | human health risk assessment                            |
| HI              | hazard index  |
| HNWR            | Havas National Wildlife Refuge                          |
| HQ              | hazard quotient   |
| ILCR            | incremental lifetime cancer risk                        |
| I-40            | Interstate 40   |
| Jacobs          | Jacobs Engineering Group Inc.                           |
| kg              | kilograms   |
| LOAEC           | lowest observed adverse effects concentration           |
| LOAEL           | lowest observed adverse effects level                   |
| LCR MSCP        | Lower Colorado River Multi-Species Conservation Program |
| mg/kg           | milligrams per kilogram                                 |
| mg/L            | milligrams per liter                                    |
| mm              | millimeters   |
| mph             | miles per hour  |
| NCP             | National Contingency Plan                               |
| ng/kg           | nanograms per kilogram                                  |
| ng/kg-bw/day    | nanograms per kilogram of body weight per day           |
| NO <sub>x</sub> | nitrogen oxides   |
| NPDES           | National Pollutant Discharge Elimination System         |
| NTCRA           | non-time-critical removal action                        |
| OCS             | outside the Compressor Station                          |
| OHV             | off-highway vehicle                                     |
| PG&E            | Pacific Gas and Electric Company                        |
| PA              | Programmatic Agreement                                  |
| PAA             | potential action area                                   |
| PAH             | polycyclic aromatic hydrocarbon                         |

|                  |  |
|------------------|--|
| PM <sub>10</sub> | particulate matter 10 micrometers or less  |
| RAG              | removal action goal                        |
| RAO              | removal action objectives                  |
| RAWP             | Risk Assessment Work Plan                  |
| RBRG             | risk-based remedial goals                  |
| RBC              | risk-based concentration                   |
| RCRA             | Resource Conservation and Recovery Act     |
| RFI              | RCRA facility investigation                |
| RI               | remedial investigation                     |
| RWQCB            | Regional Water Quality Control Board       |
| S/S              | solidification/stabilization               |
| SO <sub>x</sub>  | sulfur oxides                              |
| SWMU             | solid waste management unit                |
| TBC              | to-be-considered                           |
| TCLP             | toxicity characteristic leaching procedure |
| TCP              | traditional cultural property              |
| TCS              | Topock Compressor Station                  |
| TEQ              | toxicity equivalent                        |
| the Site         | Topock Project Site                        |
| TMV              | toxicity, mobility, volume                 |
| TPH              | total petroleum hydrocarbons               |
| TRV              | toxicity reference value                   |
| USACE            | U.S. Army Corps of Engineers               |
| USC              | U.S. Code                                  |
| USEPA            | U.S. Environmental Protection Agency       |
| USFWS            | U.S. Fish and Wildlife Service             |
| VOC              | volatile organic compounds                 |
| WDR              | Waste Discharge Requirements               |
| XRF              | x-ray fluorescence                         |





# 1. Introduction

This report presents an Engineering Evaluation/Cost Analysis (EE/CA) for a potential non-time-critical removal action (NTCRA) to address contaminated soil present on land adjacent to the Pacific Gas and Electric Company (PG&E) Topock Compressor Station (TCS) in San Bernardino County, California (Figure 1-1; figures and tables are presented at the end of this report). The TCS and adjacent land are collectively known as the Topock Project Site (Site). The regulatory framework for the NTCRA evaluated here and the purpose and organization of this EE/CA report are discussed in the following subsections.

## 1.1 Regulatory Framework

PG&E is conducting investigative and remedial activities at the Site under the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The California Department of Toxic Substances Control (DTSC) and the U.S. Department of Interior (DOI) are the lead regulatory agencies providing oversight of the environmental investigation and cleanup at the Site. The soil medium, which is the focus of this EE/CA, is currently in the RCRA Facility Investigation/Remedial Investigation (RFI/RI) phase of the cleanup process. RFI/RI activities have been conducted both within the TCS fence line and at adjacent land outside the TCS fence line. Soil RFI/RI investigation results are presented in the third volume of the RFI/RI report for the Site (Draft RFI/RI Report Volume 3) (Jacobs, 2019a). In advance of completion of the RFI/RI Report Volume 3, at the request of DOI (DOI, 2018a), PG&E submitted a Soil Investigation Data Package presenting the soil investigation results and comparing them to interim project screening levels for human and ecological receptors (PG&E, 2018).

During the RFI/RI soil investigation and after receipt of the Soil Investigation Data Package, the U.S. Fish and Wildlife Service (USFWS) and DOI evaluated the RFI/RI soil investigation data and determined that there are specific areas outside of the TCS where concentrations of constituents of potential concern to humans (COPCs) and constituents of potential ecological concern (COPECs) significantly exceed background values or ecological and human health screening levels. These areas, referred to in this report as potential action areas (PAAs), are located within or adjacent to active desert washes subject to potential scouring during rain events that could move contamination toward the Colorado River or spread the contamination footprint over a larger area. Because of this potential threat to public health and the environment, DOI directed PG&E to prepare an EE/CA to evaluate the need for a removal action to address contaminated soil in these PAAs (DOI, 2018b).

Removal actions are actions taken to address releases or threatened releases that require a prompt response. They may include the abatement, prevention, minimization, stabilization, mitigation, or elimination of the release or the threat of release. A removal action is authorized when there is release or threat of release of a hazardous substance into the environment or when an imminent and substantial danger to the public health welfare exists (CERCLA § 104). In addition, a removal action may be appropriate when taking early action could avoid the need for later, more expensive responses, even in cases where the risk of harm is less than imminent. Removal actions must, to the extent practicable, contribute to the efficient performance of any long-term remedial action for the release (40 Code of Federal Regulations [CFR] § 300.415(d); CERCLA § 104(b)).

There are three types of removal actions under CERCLA: emergency, time-critical, and non-time-critical. The primary difference between these types is the urgency of the threat and time frame in which an action must be initiated. NTCRAs are applicable in situation where the required action can start later than six months after it is determined a response is necessary. The National Contingency Plan (NCP) provides factors for determining the appropriateness of a removal action. These factors are (40 CFR § 300.415(b)(2)):

- (i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;
- (ii) Actual or potential contamination of drinking water supplies or sensitive ecosystems;

- (iii) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release;
- (iv) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate;
- (v) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;
- (vi) Threat of fire or explosion;
- (vii) The availability of other appropriate federal or state mechanisms to respond to the release; and
- (viii) Other situations or factors that may pose threats to public health or welfare or the environment.

DOI and its bureaus have been delegated the authority to conduct time-critical removal actions and NTCRAs to address contamination impacting DOI lands. In October 2018, DOI directed PG&E in an Approval Memorandum (DOI, 2018b [included as Appendix A]) to evaluate the need for an NTCRA for soil on federal lands or at locations where constituents have the potential to migrate to federal land, and to evaluate and select clean-up technologies and remedial alternatives. This Approval Memorandum documented DOI's rationale for this direction and cited the most applicable NCP factors for this determination as items (i), (iv), and (v).

Under 40 CFR § 300.415, DOI is required to conduct an EE/CA to evaluate the need for and prior to selecting an NTCRA. The goals of an EE/CA are to identify the objectives of the removal action and to analyze the effectiveness, implementability, and cost of various alternatives that may satisfy these objectives. An EE/CA documents the removal action alternatives and selection process. Where the extent of the contamination is well-defined and limited, NTCRAs also allow for the expedited cleanup of sites under CERCLA.

DOI will issue the EE/CA for public comment in accordance with 40 CFR § 300.415(n)(4). DOI will also comply with the Programmatic Agreement (PA) (BLM, 2010) regarding consultation with the signatories, invited signatories and Tribes, consistent with the National Historic Preservation Act, 54 U.S. Code (USC) § 300101 et seq. Written responses to significant comments will be summarized in a Responsiveness Summary following the response to comment process defined for the Site.

## 1.2 Purpose and Organization of Report

The purpose of this EE/CA report is to present the development and evaluation of removal action alternatives addressing contaminated soil on federal lands or at locations where constituents have the potential to migrate to federal land. Submittal of this document fulfills the requirements for NTCRAs defined by CERCLA and the NCP. This EE/CA has been performed in accordance with U.S. Environmental Protection Agency's (USEPA's) guidance document, *Guidance on Conducting Non-Time-Critical Removal Actions Under CERCLA* (USEPA, 1993). The purpose of this EE/CA is to:

- Satisfy environmental review and public information requirements for removal actions
- Satisfy Administrative Record requirements for documenting the removal action selection
- Provide a framework for evaluating and selecting removal action alternative technologies

This EE/CA report is organized as follows:

- **Section 1, Introduction**, presents the regulatory framework for the Site and the purpose and organization of the report.
- **Section 2, Site Characterization**, presents a description of the portions of the Site relevant to the EE/CA; a summary of previous investigations and remedial activities; the source, nature, and extent of contamination; analytical data; a summary of the human health and ecological risk assessment (HHERA) performed for the Site; and the basis for the NTCRA.

- **Section 3, Identification of Removal Action Objectives**, identifies the removal scope, applicable or relevant and appropriate requirements (ARARs), removal action objectives (RAOs), goals, schedule, and potential removal areas.
- **Section 4, Identification and Analysis of Removal Action Alternatives**, provides detailed descriptions of potential removal action alternatives and assesses each individual alternative against the criteria of effectiveness, implementability, and cost.
- **Section 5, Comparative Analysis of Removal Action Alternatives**, evaluates the relative performance of each alternative against the criteria of effectiveness, implementability, and cost.
- **Section 6, Recommended Removal Action Alternative**, identifies the alternative that best satisfies the evaluation criteria of effectiveness, implementability, and cost.
- **Section 7, References**, presents a list of works cited in this document.
- **Appendix A, Signed Approval Memorandum for an Engineering Evaluation/Cost Analysis at the PG&E Topock Compressor Station, San Bernardino County, CA**, presents the rationale for conducting an NTCRA at the Site and approval to proceed with this EE/CA.
- **Appendix B, Nature and Extent of Contamination**, presents tables with the RFI/RI soil investigation results for the investigation areas evaluated in this EE/CA screened against interim screening levels, which were used during the RFI/RI to guide delineation of the nature and extent of contamination.
- **Appendix C, Soil HHERA Executive Summary**, presents a summary of the HHERA report.
- **Appendix D, Derivation of Risk-Based Remediation Goals for Risk Drivers in Soil**, presents the derivation of risk-based remediation goals (RBRGs) for risk drivers in soil, as presented in the HHERA report.
- **Appendix E, Removal Objective 2 Data Screening**, contains tables and figures presenting RFI/RI soil investigation results for constituents evaluated in this EE/CA screened against removal action goals (RAGs).
- **Appendix F, Treatability Study Results, Laboratory Data Packages, and Data Validation Reports**, presents results of treatability testing performed to evaluate possible soil treatment technologies.
- **Appendix G, Cost Evaluation**, presents an evaluation of potential costs associated with removal action alternatives evaluated in this EE/CA.



## 2. Site Characterization

This section provides a summary of Site information relevant to this EE/CA, including Site description and background; previous investigations and remedial actions; the source, nature, and extent of soil contamination; analytical data; a summary of the HHERA conducted for the Site; and the basis for the NTCRA.

### 2.1 Site Description and Background

The TCS is located adjacent to the Colorado River in eastern San Bernardino County, California, approximately 12 miles southeast of Needles, California, north and south of Interstate 40 (I-40) (Figure 1-1). The TCS is an active facility that began operations in December 1951. The TCS compresses natural gas supplied from the southwestern United States for transport through pipelines to PG&E's service territory in central and northern California.

The surrounding Site includes land owned and/or managed by a number of government and private entities including PG&E, the U.S. Bureau of Reclamation ([BOR], the U.S. Bureau of Land Management [BLM]), the USFWS (which manages the Havasu National Wildlife Refuge [HNWR]), San Bernardino County, BNSF Railway (BNSF), the Fort Mojave Indian Tribe, and the Metropolitan Water District of Southern California (Figure 2-1). In addition, several other entities have easements and/or rights-of-way including the California Department of Transportation (Caltrans), Southern California Gas Company, Transwestern Pipeline Company, Mojave Pipeline Company, Kinder Morgan, Inc, PG&E, City of Needles Electric, Southwest Gas Corporation, and Frontier Communications.

#### 2.1.1 Areas of the Site Addressed in the EE/CA

This EE/CA develops and evaluates alternatives for a potential NTCRA at the 14 PAAs identified by the USFWS and DOI, which are located within the following seven RFI/RI investigation areas:

- Solid Waste Management Unit (SWMU) 1 – Former Percolation Bed (3 PAAs)
- Area of Concern (AOC) 1 – Area Around Former Percolation Bed (3 PAAs)
- AOC 9 – Southeast Fence Line (1 PAA)
- AOC 10 – East Ravine (4 PAAs)
- AOC 11 – Topographic Low Areas (1 PAA)
- AOC 14 – Railroad Debris Site (1 PAA)
- AOC 27 – MW-24 Bench (1 PAA)

These PAAs are outside the TCS fence line on federal lands or at locations where constituents have the potential to migrate to federal land (Figure 2-1). Selection of PAAs at the Site is discussed in Section 3.6. Descriptions of the RFI/RI investigation areas included in this EE/CA are provided in the following subsections.

##### 2.1.1.1 SWMU 1 – Former Percolation Bed and AOC 1 – Area Around Former Percolation Bed

AOC 1 and SWMU 1 are located west and north of the TCS within Bat Cave Wash (BCW; Figure 2-1). AOC 1 comprises a portion of BCW adjacent to the station including SWMU 1, as well as the portion of BCW extending north of SWMU 1 toward the Colorado River. SWMU 1 is the former percolation bed for TCS. From about 1964 to approximately 1971, the facility discharged wastewater from the cooling towers to the percolation bed (SWMU 1) and allowed it to percolate into the ground and/or evaporate. Historical aerial photo review indicates that, prior to the establishment of the bermed percolation bed, discharges to BCW may have extended as far downstream as the railroad tracks. Further north, near the mouth of BCW, thick vegetation, widening of the channel, and blockage of flow by National Trails Highway greatly reduces the energy of flow during runoff events, resulting in deposition of entrained soil within the vegetated area at the lower end of BCW. The area is heavily vegetated, predominately with salt cedar (also known as tamarisk), which is an invasive, exotic plant species. This heavily vegetated portion of BCW is a long-term depositional area that existed before the TCS was built. Depositional history and

patterns within this area are not known with certainty. AOC 1 is located partially on property owned by PG&E, BOR (managed by BLM), BNSF, and Fort Mojave Indian Tribe, as well as the HNWR (managed by USFWS), with PG&E as the easement holder.

A historic exploratory well that was likely used for water supply and disposal in the 1960s, TCS-4, is located within AOC 1, just north of the SWMU 1 boundary (CH2M, 2018). Soil samples collected near the TCS-4 well head contained dioxins and furans (dioxin/furan) toxicity equivalent (TEQ), total chromium, hexavalent chromium (CrVI), molybdenum, and zinc concentrations well above background concentrations. Additional sampling of pipe wrap material collected from the pipe connected to TCS-4 also contained exceedances for TEQ dioxins and furans as well as asbestos containing material (CH2M, 2015c). Well TCS-4 was decommissioned in 2016 (CH2M, 2016a).

#### **2.1.1.2 AOC 9 – Southeast Fence Line**

AOC 9 is located in the southeast portion of the facility, just south of the visitor parking lot and immediately east of (outside) the facility fence line (Figure 2-1). A small amount of discolored surface soil was encountered just outside the fence line on an extremely steep slope in 2000. About 1.5 cubic yards of the stained soil was removed and shipped offsite for disposal. Site conditions (the steepness and stability of the slope) limited the feasible extent of excavation at that time. AOC 9 is located entirely on property owned by PG&E.

#### **2.1.1.3 AOC 10 – East Ravine**

AOC 10 is located southeast of the TCS in a small ravine known as East Ravine. The ravine runs eastward toward the Colorado River. AOC 10 generally includes all of East Ravine as well as the specific areas shown on Figure 2-1. The ravine is approximately 1,600 feet (ft) long and is bisected by three constructed berms. Due to the berms, surface flow within the ravine does not typically reach the Colorado River. AOC 10 received fluids and waste discharge from the TCS including discharge from stormwater drain pipes, surface debris disposed of on the slopes of the ravine, and incidental overflows of wastewater via the former trench drain at the top of the station access road. Historical aerial photographs document a large impoundment area where well MW-58R is now located that was filled with liquids in the 1960s and 70s (CH2M, 2007a; 2007b). A greenish-grey layer also occurs here and is associated with elevated chromium contamination. Thin white powdery waste layers were also identified on the floor of the East Ravine (CH2M, 2009b). AOC 10 is located on both PG&E property and the HNWR.

#### **2.1.1.4 AOC 11 – Topographic Low Areas**

AOC 11 consists of topographic low areas on the northeast side of the TCS (Figure 2-1). While the principal drainage pathways leading away from the TCS have been identified, certain channels and storm drains drain into topographic low points or depressions. Runoff from the facility can collect at these low points and infiltrate or evaporate. AOC 11 is internally draining, so runoff into AOC 11 cannot reach the Colorado River due to topographic constraints. A stormwater pipe that captures runoff from I-40 and Park Moabi Road also discharges into AOC 11 north of 11a, immediately south of the I-40 crossing. AOC 11 is located on both PG&E property and the HNWR.

#### **2.1.1.5 AOC 14 – Railroad Debris Site**

AOC 14 is located outside the facility fence line approximately 1,000 ft north of the TCS and is currently bounded by the BNSF railroad tracks to the north, I-40 to the south, BCW to the west, and a former access road (Historic Route 66) to the east (Figure 2-1). AOC 14 currently contains miscellaneous construction debris related to construction of the railroad including chunks of asphalt, railroad ties, and piping. Asbestos-containing material and burned material from PG&E operations have also been disposed of within AOC 14. In addition to waste burning activities in the area, former TCS employees reported that water softening (lime) sludge was also disposed of in this area. A thin white layer assumed to be water softening material can be observed in the I-40 freeway cut. Employee reports suggest that a removal action for some of the debris and white powdery material was conducted in the mid-1990s; however, no documentation regarding the removal has been found (CH2M, 2006). The contours of the site suggest that some excavation may have occurred in the southern portion of the area. PG&E also



completed a cleanup action in AOC 14 in 1999 to address asbestos. Surface water runoff along the western side of AOC 14 flows into BCW (AOC 1). AOC 14 is located on property owned by BNSF, HNWR, and Caltrans.

#### 2.1.1.6 AOC 27 – MW-24 Bench

AOC 27 is located outside the facility fence line north of the TCS, south of I-40, and east of BCW (AOC 1) as shown on Figure 2-1. A former TCS employee indicated that AOC 27, informally known as the MW-24 bench, was formerly used as a waste disposal area. Prior to construction of I-40, this area was contiguous with AOC 14 to the north. Miscellaneous construction debris and burned material are present in AOC 27. Burned debris was observed in the eastern edge of the road cut on the road from AOC 27 to BCW (AOC 1). Runoff from AOC 27 flows into BCW (AOC 1). AOC 27 is located on property owned by PG&E, HNWR, and Caltrans. The area of impacts being evaluated in the EE/CA are located on HNWR property.

### 2.1.2 Geology and Hydrogeology

As described in detail in the *Final Groundwater Corrective Measures Study/Feasibility Study Report for SWMU 1/AOC 1 and AOC 10* (CH2M, 2009b), the Site is in the Basin and Range geomorphic province, characterized by roughly parallel north/south fault-block mountains separated by alluvial valleys. The oldest rocks in the surrounding area are exposed in the Chemehuevi Mountains and include Precambrian and Mesozoic-age metamorphic and igneous rocks. Miocene-age sedimentary and volcanic rocks, associated with the tectonic uplift and faulting in the region, were deposited on the metamorphic and plutonic bedrock complex. The bedrock basement formations are, in turn, overlain by younger Tertiary and Quaternary to Recent-age sedimentary deposits.

Groundwater occurs under unconfined to semi-confined conditions within alluvial fan and fluvial sediments beneath most of the Site. The alluvial sediments consist primarily of clayey/silty sand and clayey gravel deposits interfingered with more permeable sand and gravel deposits. The fluvial sediments similarly consist of interbedded sand, sandy gravel, and silt/clay. The saturated portion of the alluvial fan and fluvial sediments are collectively referred to as the Alluvial Aquifer. The water table in the Alluvial Aquifer has a very gently-sloping gradient throughout the Site and typically equilibrates to an elevation within 2 to 3 ft of the river level. Groundwater also resides in bedrock. Metamorphic bedrock underlying the Site is assumed to possess very low fracture permeability. Limited amount of rainfall recharge in the nearby mountains enters the Alluvial Aquifer via upward seepage from the bedrock underlying the Alluvial Aquifer. Due to the variable topography at the Site, the depth to groundwater ranges from as shallow as 5 feet below ground surface (ft bgs) in the floodplain next to the river to approximately 170 ft bgs in the upland alluvial terrace areas. RFI/RI Report Volume 2 provides a detailed description of hydrogeologic conditions at the Site (CH2M, 2009a).

### 2.1.3 Surface Water Hydrology

The primary surface water feature near the Site is the Colorado River, which is located to the east. The Site consists of a series of terraces divided by dry desert washes. The terraces are considerably eroded with very steep slopes. Incised drainage channels separate the alluvial terraces. The largest incised channel is BCW, a north-south trending dry wash. BCW flows on the surface only intermittently (as an ephemeral stream) following intense rainfall events and extends to the Colorado River.

Jurisdictional waters and wetlands at the Site have been delineated previously (CH2M, 2014a; 2014b; 2014c; 2015a). The U.S. Army Corps of Engineers (USACE) regulates wetlands at the Site and both the USACE and California Department of Fish and Wildlife (CDFW) regulate non-wetland waters (the ephemeral desert washes).

Figure 2-2 presents a map of jurisdictional wetlands and waters in the project area.

#### 2.1.4 Special Status Species

The following special-status wildlife, aquatic, avian, mammal, and plant species have been included in prior project environmental analyses related to remedial activities at the Site:

##### Special-Status Wildlife

- Southwestern willow flycatcher (*Empidonax traillii extimus*) – Federal listed and legally protected
- Agassiz's desert tortoise (*Gopherus agassizii*) – Federal and State listed and legally protected
- Yuma clapper rail (*Rallus longirostris yumanensis*) – Federal listed and legally protected

##### Special-Status Aquatic Species

- Bonytail chub (*Gila elegans*) – Federal and State listed and legally protected
- Razorback sucker (*Xyrauchen texanus*) – Federal and State listed and fully protected
- Flannelmouth sucker (*Catostomus latipinnis*) – covered under the Lower Colorado River Multi-Species Conservation Program (LCR MSCP)

##### Other Avian Species

- Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) – Federal and State listed and legally protected
- California black rail (*Laterallus jamaicensis corturniculus*) – State listed and fully protected
- Arizona Bell's vireo (*Vireo bellii arizonae*) – State listed and legally protected; also covered under the LCR MSCP
- Western least bittern (*Ixobrychus exilis hesperis*) – California species of concern (no formal protection)
- Sonoran yellow warbler (*Dendroica petechia sonorana*) – California species of concern (no formal protection); covered under the LCR MSCP
- Yellow breasted chat (*Icteria virens*) – California species of concern (no formal protection)
- Crissal thrasher (*Toxostoma crissale*) – California species of concern (no formal protection)

##### Other Mammal Species

- Ringtail cat (*Bassariscus astutus*) – California fully protected species
- Nelson's bighorn sheep (*Ovis canadensis nelsoni*) – California species of concern (no formal protection)
- Townsend's big eared bat (*Corynorhinus townsendii*) – California species of concern (no formal protection)
- Pallid bat (*Antrozous pallidus*) – California candidate threatened or endangered species
- Cave myotis (*Myotis velifer*) – California species of concern (no formal protection)
- Western mastiff bat (*Eumops perotis*) – California species of concern (no formal protection)

##### Other Reptile Species

- Northern Mexican garter snake (*Thamnophis eques megalops*) – Federal listed as threatened and legally protected



**California Native Plant Society Rare Plants**

- Mousetail suncup (*Chylismia arenaria*)
- Spiny-haired blazing-star (*Mentzelia tricuspidis*)
- Small-flowered androstephium (*Androstephium breviflorum*)
- Hillside palo verde (*Parkinsonia microphylla*)

The DOI, BLM, and USFWS will consider the effects of activities to Endangered Species Act listed and special status species within the PAAs prior to the selection or implementation of any soil cleanup action.

**2.1.5 Cultural and Historical Resources**

The areas to be evaluated within the EE/CA are within a larger area of traditional and cultural importance. Thousands of years of human history are evident in the area surrounding the TCS. Among the larger and better-known cultural resources on the Site is an expansive desert geoglyph or intaglio known as the Topock Maze. The BLM has determined that the project area is part of a traditional cultural property (TCP) or property of traditional religious and cultural significance and is part of what the Tribes have identified as a larger area of traditional and cultural importance, whose boundaries have yet to be defined and will not be defined within the scope of this action. The TCP within this area includes but is not limited to the Topock Maze.

In recognition of the cultural and historical significance of the area, planning of all remedial and removal activities at the Site considers minimizing impact to the cultural, historic, and biological resources. Any actions taken under an NTCRA will include measures to avoid, minimize, or mitigate impacts to cultural and historic resources by implementing the mitigation measures prescribed in the PA (BLM, 2010), the Cultural and Historic Properties Management Plan (BLM, 2012), the Cultural and Historic Properties Treatment Plan (AE, 2018), and in consultation with the Tribes and signatories/invited signatories to the PA. Measures currently include but are not limited to: avoidance of ground disturbance at historic and cultural properties to the maximum extent practicable; archaeological and Native American monitoring during earth-disturbing construction work; and periodic monitoring to assess site conditions throughout the duration of the NTCRA. Recognition of and respect for these cultural and historic resources and the spiritual values of the area is an important component of the selection and evaluation of removal action alternatives.

**2.2 Previous Investigations and Remedial Activities**

Environmental investigations have been underway at the Site since 1997. As directed by DTSC (DTSC, 2006), reporting of RFI/RI activities and results was separated into three volumes. The first two volumes covering Site background and history (RFI/RI Report Volume 1; CH2M, 2007a) and hydrogeologic characterization/groundwater and surface water investigation results (RFI/RI Report Volume 2; CH2M, 2009a) are complete. The first phase of the RFI/RI soil investigation was completed in 2008. The data were reviewed, and data gaps identified. From 2015 to 2017, PG&E conducted additional soil investigations to fill these data gaps. On June 20, 2017, DOI determined that the soil RFI/RI field work was complete (DOI, 2017). As stated in Section 1.1, the results are presented in the draft RFI/RI Report Volume 3. In advance of completion of the RFI/RI Report Volume 3, at the request of DOI (DOI, 2018a), PG&E submitted a data package presenting the soil investigation results and compared them to interim project screening levels for human and ecological receptors (PG&E, 2018).

Remedial activities have occurred at one of the RFI/RI investigations areas considered in this EE/CA: AOC 14 (Railroad Debris Site). As reported in the RFI/RI Report Volume 1 (CH2M, 2007a), PG&E employee reports suggested that a cleanup of white powdery material was conducted in the early 1990s; however, no documentation regarding the action has been found (Russell, 2006). The contours of the Site indicate excavation may have occurred. A roughly 1-foot-thick layer of white powdery material is present in the embankment immediately adjacent to I-40 and a thin lens of the same material is visible to the north of the excavation area. In addition, a 1998 investigation of the area indicated that a layer of white powdery material is present below the current soil surface (PG&E, 1999a). Sampling results indicate that

the white powder exceeded interim screening levels for calcium, magnesium, and sodium. Bulk samples of the white powder analyzed by polarized light microscopy indicated that asbestos fibers were present in AOC14-1 through -5, AOC14-9, AOC14-12, AOC14-13, and AOC14-SS1 and -SS4. To confirm the presence of asbestos fibers, the white powder sample was also analyzed by California Air Resources Board (CARB) Method 435 and transmission electron microscopy. CARB Method 435 did indicate that very low levels of asbestos were present in AOC14-2 and AOC14-SS1 (detected concentration of less than 0.1 percent, where the detection limit was less than 0.1 percent). Based on these results, a very small percentage of asbestos fibers (less than 0.1 percent) are present in the white powder and soil samples (Jacobs, 2019a).

Also reported in the RFI/RI Report Volume 1, an asbestos removal was completed at AOC 14 in 1999 (PG&E, 1999b). In November 1998, during soil sampling at AOC 14, a small amount of friable construction debris and transite were found. The friable material contained over 1 percent asbestos. The transite was non-friable, and after sampling, the trench was covered with clean fill material. PG&E removed the friable asbestos-containing material on April 14, 1999 and disposed of the material at an licensed landfill. Two shallow confirmation samples were collected of the underlying soils. At one sample location, asbestos was detected in the underlying soil. Additional sampling was implemented to characterize the extent of the asbestos in the soil underlying the loose construction material near this sample. On June 1, 1999, 14 additional samples were taken, and no asbestos was detected in any of the sample locations.

## 2.3 Source, Nature, and Extent of Contamination

The source, nature, and extent of the contamination in soil in SWMU 1, AOC 1, AOC 9, AOC 10, AOC 11, AOC 14, and AOC 27 is presented in the following subsections. Further details results are presented in the draft RFI/RI Report Volume 3 (Jacobs, 2019a).

### 2.3.1 Source of Contamination

From 1951 to 1985, PG&E added chromium to the water used in the cooling towers and other equipment at the TCS to prevent equipment corrosion. From 1951 to 1964, cooling tower wastewater containing CrVI was discharged into BCW. Later, treated wastewater was discharged into ponds for storage and evaporation, until chromium use was discontinued in 1985. Potential sources of dioxins/furans may include historical industrial activities, such as fire training exercises and burning of garbage. Other sources unrelated to TCS activities may include unauthorized dumping and burning, regional wildfires, combustion of diesel and leaded gasoline, and exhaust from cars, trucks, and trains (CH2M, 2017a).

### 2.3.2 Nature and Extent of Contamination

The nature and extent of soil contamination at the Site has been evaluated as part of the RFI/RI. Over the course of the RFI/RI soil investigation, constituent concentration data collected outside the TCS fence line have been screened against the following residential and ecological screening levels and background values for soil, which were identified as interim screening levels for the purpose of evaluating the nature and extent of contamination (Jacobs, 2019a).

- USEPA residential regional screening levels (USEPA, 2017)
- Residential DTSC screening levels (DTSC, 2017; 2018)
- Ecological comparison values (ECVs) (Arcadis, 2008b; 2009b)
- Background values (CH2M, 2009c; CH2M, 2017a; Jacobs, 2019b)
- California Regional Water Quality Control Board (RWQCB) environmental screening levels (ESLs) (RWQCB, 2016) (total petroleum hydrocarbons [TPH] only)

The results of the RFI/RI soil investigation were presented in a data package to DOI (PG&E, 2018) and are described in detail in the draft RFI/RI Report Volume 3 (Jacobs, 2019a). RFI/RI soil investigation results for the relevant investigation areas screened against the interim screening levels are presented in Appendix B.

As identified in DOI's 2018 Approval Memorandum (Appendix A) and tabulated in Appendix B, metals and dioxins/furans (assessed as dioxins furans TEQ<sup>1</sup>) were detected at concentrations significantly exceeding background values, ECVs, and/or residential human screening levels in certain locations, including in SWMU 1, AOC 1, AOC 10, AOC 14, and AOC 27 (areas located on federal land or in locations where constituents have the potential to migrate to federal land). Metals with elevated concentrations include total chromium, copper, lead, mercury, molybdenum, and zinc. Concentration of these constituents in soil are further evaluated in this EE/CA through comparison to risk-based values.

### 2.3.3 Conceptual Site Models

Conceptual site models (CSMs) for each SWMU and AOC were presented in the *Revised Final Soil RCRA Facility Investigation/ Remedial Investigation Work Plan, PG&E Topock Compressor Station, Needles, California* (CH2M, 2013) and updated in the draft RFI/RI Report Volume 3 (Jacobs, 2019a); summaries for each NTCRA area with a focus on contaminant migration pathways are presented in Exhibit 2-1.

## 2.4 Analytical Data

This EE/CA utilizes metal and dioxins/furans data tabulated and collected during the RFI/RI soil investigation. The results of the dioxins/furans nature and extent were presented in a data package to DOI in 2018 (PG&E, 2018) and are described in detail in the draft RFI/RI Report Volume 3 (Jacobs, 2019a). RFI/RI soil investigation results for the relevant investigation areas are presented in Appendix B. Appendix B draws from the RFI/RI soil investigation combined soil data set which, as described in the draft RFI/RI Report Volume 3, includes historical data collected prior to 2008 and data collected as part of the RFI/RI soil investigation (Jacobs, 2019a). The resulting combined data set is referred to in this report as the Combined Soil RFI/RI Data Set. The Combined Soil RFI/RI Data Set spans a wide range of dates, analytical parameters, and data quality. During data validation, the data were classified using three data usability categories based on data quality:

- Category 1 are suitable for all uses, including risk assessment and remedial action decisions.
- Category 2 data are suitable for use in characterization of the COPCs at the facility and to help define the nature and extent of contamination.
- Category 3 data are suitable only for use in qualitative characterization of the nature and extent of contamination.

Although all data categories are shown in Appendix B, only Category 1 data were considered in this EE/CA. Samples from soil that has been removed as part of a removal action are not included. Data for a small number of samples of other matrices (asphalt, concrete, debris, tar, and white powder) are included. Data collected during implementation of the Soil RFI/RI Work Plan (CH2M, 2013) and subsequent data gap work plans (CH2M, 2016b-d) were validated as described in the draft RFI/RI Report Volume 3 (Jacobs, 2019a).

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<sup>1</sup> Dioxins/furans TEQ values are calculated from 17 individual dioxin and furan congeners for human/mammal and avian receptors.

**Exhibit 2-1. Conceptual Site Models for RFI/RI Investigation Areas Addressed in this EE/CA**
*Soil Engineering Evaluation/Cost Analysis*
*PG&E Topock Compressor Station, Needles, California*

| SWMU/AOC         | Primary Source   | Primary Source Media         | Potential Release Mechanism   | Secondary Source Media   | Potential Secondary Release Mechanism  |
|------------------|--|------------------------------|---|--|--|
| SWMU 1 and AOC 1 | Runoff from TCS<br>Discharge of wastewater from TCS to BCW/ percolation bed  | Surface soil                 | <ul style="list-style-type: none"> <li>Percolation and/or infiltration</li> <li>Potential entrainment in stormwater/surface water runoff</li> </ul> | <ul style="list-style-type: none"> <li>Surface soil</li> <li>Shallow soil</li> <li>Potential sediments</li> <li>Potential groundwater<sup>b</sup></li> </ul> | <ul style="list-style-type: none"> <li>Wind erosion and atmospheric dispersion of surface soil</li> <li>Potential volatilization and atmospheric dispersion/enclosed space accumulation</li> <li>Potential discharge of groundwater to surface water<sup>a</sup></li> <li>Potential extracted groundwater<sup>b</sup></li> </ul> |
| AOC 9            | Runoff from TCS, TCS access road, and AOC 9 – Southeast Fence Line<br>Discharge from TCS via broken stormwater/ trench drain pipe    | Surface soil<br>Shallow soil | <ul style="list-style-type: none"> <li>Percolation and/or infiltration</li> <li>Potential entrainment in stormwater/surface water runoff</li> </ul> | <ul style="list-style-type: none"> <li>Surface soil</li> <li>Subsurface soil</li> <li>Potential groundwater<sup>b</sup></li> </ul>                           | <ul style="list-style-type: none"> <li>Wind erosion and atmospheric dispersion of surface soil</li> <li>Potential volatilization and atmospheric dispersion/enclosed space accumulation</li> <li>Potential extracted groundwater<sup>b</sup></li> </ul>  |
| AOC 10           | Runoff from TCS, TCS access road, and AOC 9 – Southeast Fence Line<br>Discharge from TCS via stormwater drains<br>Disposal of debris | Surface soil                 | <ul style="list-style-type: none"> <li>Percolation and/or infiltration</li> <li>Potential entrainment in stormwater/surface water runoff</li> </ul> | <ul style="list-style-type: none"> <li>Surface soil</li> <li>Subsurface soil</li> <li>Potential groundwater<sup>b</sup></li> </ul>                           | <ul style="list-style-type: none"> <li>Wind erosion and atmospheric dispersion of surface soil</li> <li>Potential volatilization and atmospheric dispersion/enclosed space accumulation</li> <li>Potential discharge of groundwater to surface water<sup>c</sup></li> <li>Potential extracted groundwater<sup>b</sup></li> </ul> |
| AOC 11           | Runoff from TCS, TCS access road, and I-40<br>Discharge from TCS via stormwater drains<br>Disposal of debris                         | Surface soil                 | <ul style="list-style-type: none"> <li>Percolation and/or infiltration</li> <li>Potential entrainment in stormwater/surface water runoff</li> </ul> | <ul style="list-style-type: none"> <li>Surface soil</li> <li>Subsurface soil</li> <li>Potential groundwater<sup>b</sup></li> </ul>                           | <ul style="list-style-type: none"> <li>Wind erosion and atmospheric dispersion of surface soil</li> <li>Potential volatilization and atmospheric dispersion</li> <li>Potential extracted groundwater<sup>b</sup></li> </ul>  |
| AOC 11           | Burned material  | Surface soil                 | <ul style="list-style-type: none"> <li>Percolation and/or infiltration</li> <li>Potential entrainment in stormwater/surface water runoff</li> </ul> | <ul style="list-style-type: none"> <li>Surface soil</li> <li>Subsurface soil</li> </ul>  | <ul style="list-style-type: none"> <li>Wind erosion and atmospheric dispersion of surface soil</li> </ul>  |

| SWMU/AOC          | Primary Source     | Primary Source Media | Potential Release Mechanism   | Secondary Source Media   | Potential Secondary Release Mechanism   |
|-------------------|--------------------|----------------------|---|--|---|
| AOC 14 and AOC 27 | Disposal of debris | Surface soil         | <ul style="list-style-type: none"> <li>Percolation and/or infiltration</li> <li>Potential entrainment in stormwater/surface water runoff</li> </ul> | <ul style="list-style-type: none"> <li>Subsurface soil</li> <li>Potential groundwater<sup>b</sup></li> </ul> | <ul style="list-style-type: none"> <li>Wind erosion and atmospheric dispersion of surface soil</li> <li>Potential volatilization and atmospheric dispersion</li> <li>Potential extracted groundwater<sup>b</sup></li> </ul> |
| AOC 14 and AOC 27 | Burned material    | Surface soil         | <ul style="list-style-type: none"> <li>Percolation and/or infiltration</li> <li>Potential entrainment in stormwater/surface water runoff</li> </ul> | <ul style="list-style-type: none"> <li>Subsurface soil</li> </ul>  | <ul style="list-style-type: none"> <li>Wind erosion and atmospheric dispersion of surface soil</li> </ul>   |

**Notes:**

<sup>a</sup> Discharge to surface water is an insignificant transport pathway as evaluated in the groundwater risk assessment (Arcadis, 2009a).

<sup>b</sup> No current or potential threat to groundwater from vadose zone soil was identified in the draft RFI/RI Report Volume 3 (Jacobs, 2019a).

<sup>c</sup> Discharge to surface water is an insignificant transport pathway as evaluated in the groundwater risk assessment (Arcadis, 2009a) and confirmed by the results of the sediment and porewater samples at the mouth of East Ravine.

AOC = area of concern

BCW = Bat Cave Wash

I-40 = Interstate 40

SWMU = solid waste management unit

TCS = Topock Compressor Station

## 2.5 Human Health and Ecological Risk Assessment Summary

A soil HHERA has been completed for the entire TCS Site. An HHERA report was submitted to DTSC and DOI in 2019 (Arcadis, 2019) and is close to being finalized. An errata to the HHERA was submitted in February 2020 (Arcadis, 2020). The objectives of the HHERA were to:

- Help determine the need for remedial action with respect to soil conditions
- Provide a basis for determining levels of constituents that can remain in soil at the Site and still be adequately protective of public health and the environment

The HHERA was conducted using the methodologies presented in the associated agency-approved HHERA Work Plans (Arcadis, 2008a, 2009, 2015) and included evaluating all constituents detected during the RFI/RI soil investigations to identify COPCs and/or COPECs that could potentially pose an unacceptable risk to human health or the ecological environment. The HHERA also developed RBRGs for the COPCs/COPECs that were driving potential risks and identified the specific areas of the Site that could be targeted for risk management.

Risk-based criteria (RBC) were derived during in the HHERA using the same approach and equations as for the development of the human health and ecological RBRGs (presented in Appendix D) for use in soil handling and management decisions. Human health RBCs for receptors identified in the HHERA are presented in Appendix RBC of the HHERA Report (Arcadis, 2019). Updated ecological RBCs for receptors identified in the HHERA are presented in the HHERA Errata (Arcadis, 2020).

The sections that follow provide a brief summary of the approach and the conclusions of the HHERA. An executive summary of the HHERA with additional detail is provided as Appendix C.

### 2.5.1 Data Evaluation and Exposure Point Concentration Calculation

As discussed in the HHERA report (Arcadis, 2019), only the highest quality data collected during the RFI/RI (Category 1) were used in the HHERA. Samples representative of soil that has since been removed as part of a prior removal action were not included. Data were grouped into datasets by individual potential exposure areas (for example, Bat Cave Wash [AOC1/SWMU1] or AOC 10) and into combined exposure areas (for example, all exposure areas outside the Compressor Station [OCS]) based on assumptions about how the human and ecological receptors at the Site could be exposed to the soils.

Data for each potential exposure area were also grouped according to exposure depth. Humans were assumed to contact soil from 0 to 10 ft bgs and ecological receptors were assumed to contact soil from 0 to 6 ft bgs. Additionally, for the two soil potential exposure areas encompassing wash areas (Bat Cave Wash [AOC1/SWMU1] and AOC 10), two scouring scenarios were evaluated. The 2-foot scouring scenario assumes that the top 2 ft of soil is removed during potential future scouring resulting from surface runoff following heavy rainfalls. Similarly, in the 5-foot scouring scenario, 5 ft of soil is assumed to be removed during scouring. Datasets were adjusted so that potential exposures for the human health receptors were from the 'new' surface to a depth of 10 ft bgs, and the ecological exposures were from the 'new' surface to 6 ft bgs.

Within each depth interval, interim intervals were defined based on specific receptor activities. COPCs and COPECs were identified using various statistical comparisons and tests to assess whether the constituents were detected at concentrations above background levels; organic constituents without background values were selected as COPCs/COPECs, if detected. Exposure point concentrations (EPCs) (the representative concentration potentially contacted by the potential receptors), based on the 95% upper confidence limit on the mean (95UCL), were estimated for the specific depth intervals relevant to various receptors and exposure scenarios.



### 2.5.2 Human Health Risk Assessment Overview

Potential human receptors were evaluated as four main categories: worker, recreational user, tribal user, and hypothetical resident. The primary potentially complete exposure pathways evaluated were soil direct contact exposure pathways (that is, incidental ingestion, inhalation, and dermal exposure). Worker types evaluated were long-term maintenance worker, short-term maintenance worker, and commercial worker (assumed to work inside the TCS fence line only). Worker activities outside the TCS fence line could include intrusive activities associated with contacting soil up to 10 ft bgs. Recreation user types evaluated were camper, hiker, hunter, and off-highway vehicle (OHV) rider (or all-terrain vehicle rider). Recreational users were evaluated for exposure to soil up to 3 ft bgs outside the TCS fence line. Tribal use was associated with exposure outside the TCS fence line, and exposure was assumed to occur from the inhalation pathway only (that is, inhalation of dust arising from wind erosion or volatile organic compounds [VOCs] that may volatilize from soil). The hypothetical future residential user was evaluated, as requested by the BLM, and was assumed to contact soil up to 10 ft bgs and to grow and consume vegetables, fruits, and poultry from the Site. This hypothetical future residential user evaluation was included in the HHRA for informational purposes only. As stated in DOI's (2015) Land Use Memo, "DOI will not utilize a future residential scenario on Federal lands within the project area when evaluating cleanup options in the Feasibility Study phase."

Incremental lifetime cancer risks (ILCRs) and noncancer hazard indices (HIs) were estimated for potential exposures to constituents in soil and/or soil gas. Cumulative ILCRs (sum of chemical-specific ILCRs) posed by the Site should not exceed  $1 \times 10^{-6}$  to  $1 \times 10^{-4}$ . As stated in the HHERA report, the DTSC point of departure for excess incremental lifetime cancer risk is  $1 \times 10^{-6}$ . A cumulative non-cancer HI that is less than or equal to 1 implies that the predicted exposure is not expected to result in adverse, non-cancer health effects.

As described in the HHERA Work Plan (Arcadis, 2008a) and HHERA (Arcadis, 2019), the human populations that could be present in the areas outside the TCS (i.e., maintenance workers, recreational users, and tribal users) would more likely be exposed randomly, over the course of a lifetime, to soil present in all potential exposure areas outside of TCS, rather than have a lifetime of contact limited to the area of a single SWMU/AOC. Therefore, the combination of all exposure areas outside the TCS fence line (the OCS exposure area) is the scenario in the HHERA considered to most appropriately represent both current and potential future exposures for maintenance workers, recreational users, and tribal users.

### 2.5.3 Ecological Risk Assessment Overview

Potential ecological receptors evaluated included plants, terrestrial invertebrates, and representative small- and large home range wildlife (that is, birds and mammals). The primary potential exposure pathways for soil were determined to be direct contact or incidental ingestion of surface soil (0 to 0.5 ft bgs), shallow soil (0 to 3 ft bgs), and/or subsurface soil (0 to 6 ft bgs) and, for mammals and birds, uptake and subsequent ingestion of COPECs in biota. Hazard quotients (HQs) were estimated for each potential receptor population and exposure area using EPCs developed for each COPEC over the appropriate soil exposure intervals in accordance with the agency-approved HHERA Work Plans (Arcadis, 2008a; 2009; 2015). Multiple sets of exposure (for example, EPCs) and toxicity assumptions (for example, toxicity reference values [TRVs]) were evaluated, proceeding from generic to more refined assumptions. Risk drivers were identified based on those COPECs for which unacceptable community/population level risk (that is, HQs greater than 1 for plants and soil invertebrate communities and lowest observable adverse effect level (LOAEL)-based HQs for wildlife populations [or LOAEL-based HQs greater than 10 for dioxin TEQ]) were predicted using the most refined exposure and effects assumptions (that is, selected TRVs, area-weighted EPCs, and site-specific site use factor) and additional supporting lines of evidence. For threatened or endangered species and other species of concern observed onsite (ring-tail cat and bats, respectively), a qualitative assessment was completed based on surrogate and representative receptors.

#### 2.5.4 HHERA Conclusions

Several complete pathways of exposure to COPCs/COPECs are present at the Site, both now and potentially in the future. The HHERA generally found no unacceptable risk for most human and ecological receptors. Of the potential human receptors, no unacceptable risk was identified for all relevant potential exposure areas for tribal users, hunters, and commercial and short- and long- term maintenance workers. Of the potential ecological receptors, no unacceptable risk was identified for all relevant potential exposure areas for special-status species, large home-range receptors, herbivorous and insectivorous birds, and herbivorous small mammals.

For certain human recreators and desert shrew (insectivorous small mammals), the potential for unacceptable risk was identified in nine localized areas in the following exposure areas: the SWMU 1 exposure area (within Bat Cave Wash), the AOC 9 exposure area (including portions of the RFI/RI investigation area known as AOC 10), and/or the AOC 10 exposure area.

The potential for unacceptable risk was also identified for plants and invertebrates; however, only generic risk-based screening levels were available to estimate HQs and, as discussed in the HHERA, there is low confidence in the ability to predict risk to plants and invertebrates at the Site based on these generic screening levels. For plants, risk conclusions were based primarily on communities observed during floristic surveys at the Site. Vegetation communities observed at the Site during the floristic surveys conducted in 2013 (GANDA and CH2M, 2013) and in 2017 (CH2M, 2017b) are typical of Mojave Desert plant communities. More than 100 different vascular plant species have been observed at the Site and documented in these survey reports. The floristic survey observations indicate relatively sparse vegetative cover with a variety of species representative of the region, consistent with desert habitats in general and the Lower Colorado River Valley subdivision of the Sonoran Desert in particular (MacMahon, 1988; Brown, 1994).

Although vegetative cover is sparse, no obvious impairment of the plant community was observed in the vicinity of the Site and it provides the important habitat functions necessary for ecological receptors that inhabit the area. However, it should be noted that adverse effects to plant community composition would be difficult to detect given that the habitat is dominated by low-density species like creosote bush. The lack of any noticeable impairment does not mean that plants have not been affected at the Site. Plant communities have been affected by human impacts related to over 60 years of transportation and energy development activities and remedial activities at the Site, potentially resulting in the creation of environments that favor the establishment/dominance of certain plant species. Since plant community composition, distribution, and diversity are affected by human disturbance, it would be very difficult to distinguish between changes in the plant community due to human activities versus contaminant impacts on growth or reproduction due to chemical releases associated with the Site. Because chemical impacts, if they are occurring, are difficult to distinguish from changes associated with physical human disturbances, the potential for adverse effects to the health of the plant community can be considered to be low and therefore risk drivers were not identified for plants.

To summarize, the risk drivers or constituents of concern (COCs) for human recreators and the desert shrew are dioxin/furan TEQ, total chromium (desert shrew only), CrVI (recreator only), and copper (desert shrew only).

#### 2.5.5 Risk-Based Remedial Goals for Risk Drivers

The HHERA (Arcadis, 2019) presents RBRGs for COPCs/COPECs in soil that most significantly contribute to estimates of unacceptable risk to human health and/or ecological receptors (that is, risk drivers or COCs). RBRGs are concentrations that do not present unacceptable risk to human health and ecological receptors. An RBRG is a proposed health-protective target cleanup concentration that can be used, in combination with other factors such as background concentrations, as a starting point for making risk management decisions. RBRGs are calculated for constituents in soil for a given potential receptor where the findings of the HHERA suggest some form of risk management may be warranted. As stated in the HHERA, the RBRGs are not intended to be a bright line, nor used on a point by point basis to identify locations that may warrant risk management. Rather, and consistent with the HHERA approach, RBRGs



are applied based on the potential exposure area of interest (that is, the 95UCL for the potential exposure area should be less than or equal to the RBRG).

### 2.5.5.1 Human Health RBRGs

Consistent with USEPA guidance (1991), a risk-based process was used in the HHERA to estimate RBRGs for COPCs that drive soil risk concerns above *de minimis* risk levels (Arcadis, 2019). For compounds identified as carcinogens, negligible or *de minimis* risk levels were defined in accordance with state and federal guidance as one in one million ( $1 \times 10^{-6}$ ). DTSC and USEPA ultimately have authority to allow for residual risks to be within the risk management range of  $1 \times 10^{-4}$  to  $1 \times 10^{-6}$ . As indicated in the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR 300), cancer risks between  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$  fall within a risk management range. This is generally referred to as the acceptable risk range. Within this estimated cancer risk range, there is flexibility for risk managers in deciding what action, if any, is necessary and appropriate for the protection of human health.

For dioxins TEQ, the HHERA notes that DTSC's Human and Ecological Risk Office supports the use of residential and indoor commercial worker remedial goals equal to 10 times the theoretical potential cancer risk of  $1 \times 10^{-6}$  (equal to that associated with a theoretical potential cancer risk of  $1 \times 10^{-5}$ ). This regulatory approach is based on studies of bioavailability of dioxins that demonstrate exposure under normal residential and indoor commercial conditions has minimal influence of the serum of exposed individuals. Recreational users are assumed to have the same intake rates via ingestion, dermal contact, and inhalation exposure pathways as under a residential scenario, but exposure occurs on a less frequent basis than assumed under a residential scenario. Therefore, potential exposure to dioxin TEQ in soil for the recreational users over a lifetime would be less than for a hypothetical resident. As such, the HHERA concludes that RBRGs for recreational users equal to 10 times the theoretical potential cancer risk of  $1 \times 10^{-6}$  (that is,  $1 \times 10^{-5}$ ) may be appropriate for the Site.

As described in the HHERA, human health RBRGs were calculated for CrVI and dioxin TEQ, as these were the significant contributors to risks above *de minimis* levels, under the camper, hiker and OHV rider potential exposure scenarios. As none of the risk drivers were based on the potential for adverse noncancer effects (i.e., the noncancer HIs were below 1 for relevant exposure scenarios), the human health RBRGs are all based on the potential for carcinogenic effects. RBRGs protective of potential human receptors are summarized in Exhibit 2-2. Risk levels of  $1 \times 10^{-4}$ ,  $1 \times 10^{-5}$ , and  $1 \times 10^{-6}$  are shown in the exhibit. Additional information regarding derivation of the RBRGs is presented in Appendix D.

## Exhibit 2-2. Human Health Risk-Based Remediation Goals

### Soil Engineering Evaluation/Cost Analysis

#### PG&E Topock Compressor Station, Needles, California

| Risk Drivers for Potential Recreational Users | Human Health RBRG | RBRG Basis   |
|---|-------------------|--|
| Chromium, hexavalent                          | 3.1 mg/kg         | Off-highway vehicle rider at $1 \times 10^{-6}$ risk |
| Chromium, hexavalent                          | 31 mg/kg          | Off-highway vehicle rider at $1 \times 10^{-5}$ risk |
| Chromium, hexavalent                          | 310 mg/kg         | Off-highway vehicle rider at $1 \times 10^{-4}$ risk |
| Dioxin/furan TEQ                              | 100 ng/kg         | Hiker at $1 \times 10^{-6}$ risk                     |
| Dioxin/furan TEQ                              | 1,000 ng/kg       | Hiker at $1 \times 10^{-5}$ risk                     |
| Dioxin/furan TEQ                              | 10,000 ng/kg      | Hiker at $1 \times 10^{-4}$ risk                     |

mg/kg = milligrams per kilogram

ng/kg = nanograms per kilogram

RBRG = risk-based remedial goal

TEQ = toxicity equivalent

### 2.5.5.2 Ecological RBRGs

The HHERA identified the following risk drivers and potential exposure areas as presenting an unacceptable risk to one or more potential ecological receptors:

- Bat Cave Wash [AOC1/SWMU1] exposure area (baseline) – dioxin TEQ for small mammals
- AOC 9 exposure area (including portions of RFI/RI investigation area known as AOC 10) – CrVI and copper for plants; CrVI, total chromium, and copper for invertebrates; total chromium, copper, and dioxin TEQ for small mammals
- AOC 10 exposure area – CrVI and total chromium for plants; total chromium for invertebrates; and total chromium and dioxin TEQ for small mammals.

Vegetation communities observed at the Site during the floristic surveys conducted in 2013 (GANDA and CH2M, 2013) and in 2017 (CH2M, 2017b) are typical of Mojave Desert plant communities. As noted in Section 2.5.4 and in the HHERA, the floristic surveys provide site-specific observations that suggest the presence of healthy plant communities at the Site. This is considered a reasonable line of evidence than the exceedances of generic plant screening values have low ability to predict toxicity in plants. Therefore, these generic screening levels for plants and soil invertebrates are not recommended for use as RBRGs at the Site. Because the key risk COPECs with HQs greater than 1 for plants and soil invertebrates (CrVI and total chromium) tend to be co-located with risk drivers for human receptors and shrews, risk management considered for the protection of wildlife receptors potentially exposed to total chromium will also reduce risk to plants and invertebrates.

For potential wildlife receptors, RBRGs based on protection of wildlife populations were derived for insectivorous small mammals (desert shrew), the only potential wildlife receptor identified with the potential for unacceptable risk associated with exposure to COPECs in soil at this Site. The RBRGs for small home range insectivorous mammals (desert shrew) were derived using the dietary dose model used to estimate HQs in the predictive ERAs. The RBRGs were calculated using Microsoft Excel Solver software that determines the soil concentration for a target HQ equal to 1.

For dioxin TEQ, a range of RBRGs were calculated using alternate and more robust bioaccumulation factor (BAF) and TRV approaches/values. The congener-specific BAFs (EPA 1999, Fagervold et al. 2010) and a recommended mammalian dioxin TRV developed in Section 6.7.5 of the HHERA Report of 30 nanograms per kilogram body weight per day (ng/kg-bw/day) derived using the USEPA's Ecological Screening Level approach were used to calculate the RBRGs protective of insectivorous small mammals.

Ecological RBRGs are summarized in Exhibit 2-3. Additional information regarding derivation of the RBRGs is presented in Appendix D.

#### Exhibit 2-3. Ecological Risk-Based Remediation Goals

##### Soil Engineering Evaluation/Cost Analysis

##### PG&E Topock Compressor Station, Needles, California

| Risk Driver for Shrew | BAF                   | LOAEL-based Mammalian TRV                | Ecological RBRG |
|-----------------------|-----------------------|--|-----------------|
| Chromium, total       | ERA / RAWP            | ERA / HHERA Work Plan                    | 145 mg/kg       |
| Copper                | ERA / RAWP            | ERA / HHERA Work Plan                    | 145 mg/kg       |
| Dioxin/furan TEQ      | EPA 1999              | 30 ng/kg-day (geomean of rodent studies) | 190 ng/kg       |
| Dioxin/furan TEQ      | Fagervold et al. 2010 | 30 ng/kg-day (geomean of rodent studies) | 360 ng/kg       |

BAF = bioaccumulation factor

ERA = ecological risk assessment

HHERA = Human Health and Ecological Risk Assessment

LOAEL = lowest observed adverse effects level

RAWP = Risk Assessment Work Plan

RBRG = risk-based remedial goal

TEQ = toxicity equivalent

TRV = toxicity reference value

### 2.5.6 HHERA Key Findings

Overall, the HHERA found no potentially unacceptable risk to most human and ecological receptors exposed to COPCs/COPECs in soil at the Site, both within the TCS (inside the compressor station exposure area) and exposure areas outside the TCS. Estimated risks were determined to be acceptable for all relevant exposure areas for the following receptors:

- Human Health Receptors
  - Tribal User and hunter
  - Workers (Commercial and Short- and Long-term Maintenance Workers).
- Ecological Receptors
  - Special-status species (state- and federal-listed threatened and endangered wildlife species and state species of concern), including ring-tailed cat, cave myotis, and pallid bats
  - Large home range receptors (desert kit fox, Nelson's desert bighorn sheep, red-tailed hawk, and Yuma myotis)
  - Herbivorous and insectivorous birds (Gambel's quail and cactus wren)
  - Herbivorous small mammals (Merriam's kangaroo rat).

For the remaining receptors (camper, hiker, OHV rider, and desert shrew), the potential for unacceptable risk was identified as being driven by a limited number of compounds (i.e., dioxin/furan TEQ and CrVI for human health; dioxin/furan TEQ, total chromium, and copper for ecological receptors) in nine localized areas within SWMU 1, AOC 9, and/or AOC 10.

As an example of applying RBRGs, the RBRGs described in the preceding sections were used to identify locations driving risk above acceptable levels for relevant human and ecological receptors. That process revealed a total of nine locations in three exposure areas (SWMU 1, AOC 9, and AOC 10) as associated with unacceptable risk. Those locations are as follows:

Protection of human recreators (four total locations for the 0 to 3 ft bgs interval):

- Dioxin/furan TEQ: SWMU1-25 in OCS / SWMU 1
- CrVI: AOC10-20, #10 in AOC 9, and MW-58BR\_S in AOC 10.

Protection of desert shrew (seven total locations for the 0 to 0.5 ft bgs interval):

- Dioxin TEQ (based on RBRG of 190 ng/kg): SWMU1-25 in Bat Cave Wash; PA-20, AOC10-23, and PA-21 in AOC 9; and AOC10c-4 in AOC 10
- Total chromium: AOC10-20 in AOC 9
- Copper: AOC10-21 in AOC 9.

In total, the nine locations fall within three main exposure areas: SWMU 1 (near SWMU1-25) in Bat Cave Wash, AOC 9 along the TCS fence line (which is within the RFI/RI investigation area known as AOC 10), and AOC 10 within the AOC10c subarea (i.e., drainage depression behind the middle berm in the East Ravine).

## 2.6 Basis for Removal Action

As documented in the EE/CA Approval Memorandum (DOI, 2018b) and described in Section 1.1, this EE/CA considers an NTCRA to address the following NCP factors:

- Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants
- High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate

- Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released

As summarized in Section 2.5, the overall findings of the HHERA support that remedial or removal action addressing hexavalent chromium, total chromium, copper, and dioxin/furan TEQ at the nine locations described in Section 2.5.7 will reduce overall calculated risks to levels that are protective of human health and potential ecological receptors. It is proposed that an NTCRA address these locations.

In addition, in accordance with the cited NCP factors, this EE/CA also evaluates high levels of COPCs/COPECs in soils largely at or near the surface that may migrate as well as weather conditions that may cause COPC/COPECs to migrate (especially scouring). As identified in the EE/CA Approval Memorandum (DOI, 2018b) and summarized in Section 2.3.2, high levels of the following COPCs/COPECs have been measured in soil on federal land or in locations where constituents have the potential to migrate to federal land: total chromium, copper, lead, mercury, molybdenum, zinc, and dioxins/furans. It is proposed that the NTCRA also address these locations. A detailed description of each location recommended for inclusion under the NTCRA along the rationale are presented in Section 3.6.

### **3. Identification of Removal Action Objectives**

This section identifies the scope, objectives, and goals of the NTCRA.

#### **3.1 Statutory Limits on Removal Actions**

This removal action will not be USEPA fund-financed; therefore, statutory limits for removal action do not apply.

#### **3.2 Determination of Removal Scope**

The scope of the potential removal action alternatives evaluated in this EE/CA is limited to soil and other solid-phase matrices including sediment, white powder, black sandy material, and debris on federal land or in locations where constituents have the potential to migrate to federal land. The removal action will be limited to PAAs identified in the EE/CA Approval Memorandum and further refined in this EE/CA.

Specifically, PAAs are located within the following RFI/RI investigation areas: SWMU 1, AOC 1, AOC 9, AOC 10, AOC 11, AOC 14, and AOC 27.

#### **3.3 Identification of Applicable or Relevant and Appropriate Requirements**

To assist with the determination of the RAOs and the development and screening of removal action alternatives, applicable or relevant and appropriate requirements (ARARs) have been identified for the Site. ARARs are cleanup standards, standards of control, and other substantive environmental protection requirements, criteria, or limitations promulgated under federal or state law. As indicated by the USEPA (1988), ARARs may be either “applicable” or “relevant and appropriate.” Distinct from ARARs, USEPA’s regulations also acknowledge to-be-considered (TBC) criteria that may be helpful in evaluating remedies, but for which compliance is not required (USEPA, 1988).

ARARs and TBC criteria fall into three types: chemical-specific, location-specific, and action-specific. The identified criteria for this removal action are presented in Table 3-1.

#### **3.4 Removal Action Objectives and Goals**

The Site-specific ARARs and TBC criteria and the NCP factors described in Section 1.1 were used to define RAOs for the proposed NTCRA. The following subsections describes these RAOs and associated removal action goals (RAGs).

##### **3.4.1 Description of Removal Action Objectives and Goals**

As described in Section 1.1, an NTCRA at the Site is being evaluated based on the following NCP factors per 40 CFR § 300.415(b)(2):

- Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants
- High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate
- Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released

Based on these factors, consideration of ARARs, and the information presented in Section 2.5, several RAOs have been developed. The RAOs and the specific RAGs associated with each RAO are presented in Exhibit 3-1. The RAGs are the specific metrics associated with each RAO. The RAGs are used in this EE/CA to refine the extents of the preliminary PAAs first presented in the EE/CA Approval Memorandum (DOI, 2018b) and to evaluate treatment technologies. The RAGs will also be used to guide the potential NTCRA and evaluate its completeness.

**Exhibit 3-1. Removal Action Objectives and Goals**

*Soil Engineering Evaluation/Cost Analysis*

*PG&E Topock Compressor Station, Needles, California*

| Removal Action Objective   | Removal Action Goal  |
|--|--|
| <p>RAO 1: Reduce human and ecological risk related to the COCs in soil up to 10 ft bgs on or adjacent to federal land by removing soil at locations identified as driving risk in the HHERA.</p>                       | <p>In order to meet RAO 1, the recommendations of HHERA will be followed, that is, removal action alternatives will include removal of soil at the following locations identified in the HHERA:</p> <p>Protection of potential human recreators (four total locations for the 0- to 3-ft bgs depth interval):</p> <ul style="list-style-type: none"> <li>• Dioxin TEQ: SWMU1-25</li> <li>• Hexavalent chromium: AOC10-20, #10, and MW-58BR_S</li> </ul> <p>Protection of desert shrew (up to seven total locations for the 0- to 0.5-ft bgs depth interval):</p> <ul style="list-style-type: none"> <li>• Dioxin/furan TEQ (based on RBRG of 190 ng/kg): SWMU1-25, PA-20, AOC10-23, PA-21, and AOC10c-4</li> <li>• Total chromium: AOC10-20</li> <li>• Copper: AOC10-21</li> </ul> <p>Following the NTCRA, risk will be recalculated for the relevant exposure areas and compared to numerical RAGs, specifically RBRGs defined in the HHERA. Risk calculations will be performed during implementation of the removal action alternative and will include existing soil concentration data for sample locations not removed in the NTCRA and new data from confirmation samples. RAO 1 will be met when the residual 95UCL for the potential exposure area is less than or equal to the RBRG. Where human health drives risk, the RBRG protective of risk at <math>1 \times 10^{-6}</math> will be used. Relevant RBRGs are presented in Exhibit 3-2.</p> |
| <p>RAO 2: Address elevated concentrations of contaminants in soil up to 10 ft bgs outside the TCS in or adjacent to wash areas that are within, or have the potential to migrate to, the HNWR during storm events.</p> | <p>In order to meet RAO 2, removal action alternatives will address soil within the HNWR or that may migrate to the HNWR from 0 to 10 ft bgs with elevated concentrations of contaminants (specifically, hexavalent chromium, total chromium, copper, lead, mercury, molybdenum, zinc, and/or dioxins/furans). Identification of areas with elevated concentrations have been guided in this EE/CA by comparing individual soil concentration results (from existing RFI/RI data) to a set of numerical RAGs described in Section 3.4.2 and identifying the factor of exceedance of this numerical RAG. Confirmation samples will be collected during the NTCRA and compared to numerical RAGs to confirm the completeness of removal activities.</p>  |
| <p>RAO 3: Remove debris, burnt material, and/or discolored soil associated with elevated hazardous substances as identified during the RFI/RI within SWMUs and AOCs up to 10 ft bgs.</p>                               | <p>In order to meet RAO 3, removal action alternatives will address visually identified debris, burnt material, and/or discolored soil from 0 to 10 ft bgs. RAO 3 will rely on visual identification of material rather than comparison of soil concentrations to numerical RAGs. Areas with observed debris, burnt material and/or discolored soil are preliminarily identified for the purpose of evaluating removal action alternatives and costing in Section 3.6 and will be refined based on visual observation during the NTCRA. The completeness of the NTCRA will be confirmed through visual observation and confirmation sampling for COCs.</p>   |

**Notes:**

95UCL = 95% upper confidence limit on the mean

AOC = area of concern

bgs = below ground surface

COC = constituent of concern

EE/CA = Engineering Evaluation/Cost Analysis

ft = feet

HHERA = human health and ecological risk assessment

HNWR = Havasu National Wildlife Refuge

ng/kg = nanograms per kilogram

NTRCA = Non-time-critical removal action

RAG = removal action goal

RAO = removal action objective

RBRG = risk-based remedial goals

RFI/RI = RCRA facility investigation/remedial investigation

SWMU = solid waste management unit

TEQ = toxicity equivalent

TCS = Topock Compressor Station

### 3.4.2 Numerical Removal Action Goals

As described in Exhibit 3-1, RAO 1 will be met when the residual 95UCL for the potential exposure area is less than or equal to the RBRG. Where human health drives risk, the RBRG protective of risk at  $1 \times 10^{-6}$  will be used. The relevant RBRGs, which are applicable to hexavalent chromium, total chromium, copper, and dioxin/furan TEQ, are presented in Exhibit 3-2. Derivation of the RBRGs is presented in Appendix D.

#### Exhibit 3-2. Numerical Removal Action Goals (RAGs)

##### Soil Engineering Evaluation/Cost Analysis

##### PG&E Topock Compressor Station, Needles, California

| Contaminant                   | Numerical RAG | Basis  | Source                                  | Applicable RAO                            |
|-------------------------------|---------------|--|---|---|
| Chromium, hexavalent          | 3.1 mg/kg     | Off-highway vehicle rider at $1 \times 10^{-6}$ risk | RBRG calculated in HHERA                | RAO 1 <sup>a</sup> and RAO 2 <sup>b</sup> |
| Chromium, total               | 145 mg/kg     | Desert shrew   | RBRG calculated in HHERA                | RAO 1 <sup>a</sup> and RAO 2 <sup>b</sup> |
| Copper                        | 145 mg/kg     | Desert shrew   | RBRG calculated in HHERA                | RAO 1 <sup>a</sup> and RAO 2 <sup>b</sup> |
| Dioxin/furan TEQ <sup>c</sup> | 100 ng/kg     | Off-highway vehicle rider at $1 \times 10^{-6}$ risk | RBRG calculated in HHERA                | RAO 1 <sup>a</sup> and RAO 2 <sup>b</sup> |
| Lead                          | 36 mg/kg      | Cactus wren  | RBC calculated in HHERA<br>Appendix RBC | RAOs 2 <sup>b</sup>                       |
| Mercury                       | 1 mg/kg       | Cactus wren  | RBC calculated in HHERA<br>Appendix RBC | RAOs 2 <sup>b</sup>                       |
| Molybdenum                    | 22 mg/kg      | Desert shrew   | RBC calculated in HHERA<br>Appendix RBC | RAOs 2 <sup>b</sup>                       |
| Zinc                          | 1,050 mg/kg   | Cactus wren  | RBC calculated in HHERA<br>Appendix RBC | RAOs 2 <sup>b</sup>                       |

#### Notes:

<sup>a</sup> For RAO 1, the residual 95UCL for the potential exposure area will be compared to the RBRG.

<sup>b</sup> For RAO 2, individual soil samples are and will be compared directly to the RBRG to identify significant exceedances.

<sup>c</sup> Dioxin/Furan TEQs for humans and mammals are calculated using the same toxic equivalency factors. The dioxin/furan RAG is protective of both human recreators and the desert shrew. The RBC for protection of the desert shrew is 190 ng/kg.

95UCL = 95 percent upper confidence limit on the mean

HHERA = Human Health and Ecological Risk Assessment

mg/kg = milligram(s) per kilogram

ng/kg = nanogram(s) per kilogram

RAG = removal action goal

RBC = risk-based concentration

RBRG = risk-based remedial goal

TEQ = toxicity equivalent

To support the EE/CA process and implementation of the proposed NTCRA, numerical RAG values were also identified to support RAO 2. These are referred to in this report as numerical RAGs. Chemical-specific ARARs (that is, cleanup standards promulgated under federal or state law) are often used to guide NTCRAs; however, no chemical-specific ARARs were identified by DOI for purposes of this EE/CA at the Site (Table 3-1). In the absence of applicable ARARs, numerical RAGs will be risk-based values (that is, RBRGs and risk-based concentrations [RBCs] calculated in the HHERA). The numerical RAGs are intended to be a tool in identifying areas with elevated concentrations of contaminants in soil.

Numerical RAGs are presented in Exhibit 3-2. For constituents identified as driving risk in the HHERA (CrVI, total chromium, copper, and dioxins/furans), the numerical RAG is the RBRG identified in the HHERA. Where human health drives risk, the RBRG protective of risk at  $1 \times 10^{-6}$  will be used. For other constituents identified in the EE/CA Approval Memorandum (lead, mercury, molybdenum, and zinc), RBCs developed during the HHERA for use in soil handling and management decisions, will be used.



Note that the ecological RBCs for these four metals are lower than the human health RBCs, and because of the generic nature of the RBCs for plants and soil invertebrates, and other uncertainties associated with their development, the HHERA Report does not recommend the plant and soil invertebrate RBCs for soil-management decisions at the Site. The basis used for selection of the numerical RAGs for lead, mercury, molybdenum, and zinc is as follows:

- **Lead** – The minimum lead RBC is the ecological RBC of 36 mg/kg. This value is based on protection of cactus wren, and is lower than all other ecological RBCs, including plants and soil invertebrates, and human health RBCs. It is greater than background concentrations (soil background threshold value [BTV] = 8.39 mg/kg). The cactus wren RBC of 36 mg/kg is recommended as the RBC for lead.
- **Mercury** – The two lowest mercury RBCs are ecological RBCs for soil invertebrates (0.1 mg/kg) and plants (0.3 mg/kg). Both values were derived by the Oak Ridge National Laboratory (Efroymson et al. 1997a,b) and the authors have low confidence in their ability to predict risk based on the extremely small datasets evaluated. The lowest observed adverse effects concentration (LOAEC) used to derive the soil invertebrate RBC is 0.5 mg/kg. The only other effects data evaluated by Efroymson et al. (1997a) was a chronic LOAEC of 12.5 mg/kg for methylmercury, and in this study a concentration of methylmercury at 2.5 mg/kg had no effects. For plants, the RBC is based on a secondary source, citing unspecified toxic effects in unspecified plant species; the only other effects data evaluated by Efroymson et al. (1997b) were more than two orders of magnitude higher. The next lowest RBC is the ecological RBC of 1.0 mg/kg, protective of cactus wren. This value was derived using toxicity data for organic forms of mercury, which are unlikely to be present in desert soils. Inorganic mercury is less toxic to wildlife than organic mercury (USEPA, 1995) and using inorganic mercury toxicity data to derive wildlife RBCs would result in higher RBC values for both birds and mammals. No BTV is available for comparison to the RBCs. Due to low confidence in the soil invertebrate and plant RBCs and the conservative nature of the wildlife RBCs (based on organic mercury), the cactus wren RBC of 1.0 mg/kg is recommended as the RBC for mercury.
- **Molybdenum** - The lowest molybdenum RBC is the ecological RBC for plants (2 mg/kg); no RBC is available for soil invertebrates. The plant value was derived by Oak Ridge National Laboratory (Efroymson et al. 1997b) and the authors have low confidence in its ability to predict risk based on the extremely small dataset evaluated. Only a single secondary study reporting unspecified effects in plants was available as the basis of the RBC. Efroymson et al. (1997b) include additional information that molybdenum toxicity to plants has never been reported, and that low concentrations of this element are used to fertilize legumes, which contain nitrogen-fixing bacteria that require molybdenum. The next lowest RBC is the ecological RBC of 22 mg/kg protective of desert shrew. This value was calculated by Sample et al. (1996) and is based on a chronic LOAEL for mouse reproduction. For comparison, the molybdenum BTV is 1.87 mg/kg. Due to the low confidence in the plant RBC, the next lowest RBC based on the desert shrew of 22 mg/kg is recommended as the RBC for molybdenum.
- **Zinc** - The lowest zinc RBC is 120 mg/kg for soil invertebrates. This is an ecological soil screening level (EcoSSL) derived by USEPA (2008) based on a relatively robust dataset consisting of five studies, a variety of test soils, and at least three test species. For comparison, the next lowest RBC is 160 mg/kg for plants (EcoSSL); the minimum wildlife RBC is 1,050 mg/kg for cactus wren; and the zinc BTV is 58 mg/kg. Zinc is an essential element for plants and wildlife. Although there is a higher relative confidence in the plant and invertebrate EcoSSLs compared with the screening levels from the Oak Ridge National Laboratory (Efroymson et al., 1997a; 1997b), the HHERA does not recommend using RBCs for plants and invertebrates for soil management decisions at the Site. Therefore, the lowest wildlife RBC of 1,050 mg/kg based on the cactus wren is the recommended RBC for zinc.

### 3.5 Determination of Removal Schedule

The total project period to construct the selected alternative will depend on the selected removal action. A detailed schedule will be prepared and included in the final EE/CA following the comment period.



### 3.6 Potential Action Areas

The PAAs are portions of the Site that do not meet the RAOs. As described in Section 2.3, PAAs were initially identified in the EE/CA Approval Memorandum (DOI, 2018b) based on significant exceedances of background values, ECVs, and/or residential screening since the RFI/RI soil samples were collected (especially in Bat Cave Wash). The lateral extents of the PAA are presented here for the purpose of comparing removal action alternatives and developing cost estimates. It is anticipated that the lateral extent of these areas may be refined during the work planning phase and based on observations and sampling made during implementation of the NTCRA.

The lateral extent of the preliminary PAAs were refined in this EE/CA based on consideration of the following:

- **Inclusion of locations contributing most significantly to calculated unacceptable risk (to address RAO 1).** Nine locations identified in the HHERA as contributing most significantly to levels of calculated unacceptable risk for ecological receptors and risks above *de minimis* levels for potential human receptors were included in the refined PAA lateral extents.
- **Comparison of soil data to numerical RAGs (to address RAO 2).** Data from the RFI/RI soil investigation (the Combined Soil RFI/RI Data Set) were compared to the numerical RAGs. Only Category 1 data were considered. Data for each constituent considered in this EE/CA were categorized based on the degree to which they exceeded the corresponding numerical RAGs. Specifically, factors of exceedance were calculated by dividing the constituent concentration in soil by the numerical RAG. The results of this evaluation are summarized in Figures 3-1 through 3-3, which show the highest factor of exceedance for any constituent considered in this EE/CA at any depth between 0 and 10 ft bgs. Additional tables and figures presenting the detailed screening of data for individual constituents against each of the numerical RAGs is presented in Appendix E. Locations identified as significantly exceeding the numerical RAGs were included in the refined PAA lateral extents.
- **Inclusion of debris, burnt material, and/or discolored soil with elevated hazardous substances (to address RAO 3).** Refinement of the lateral extent of the PAAs considered areas where debris, burnt material, and/or discolored soil have been observed. Areas where debris, burnt material, and/or discolored soil have been observed in the past were included in the refined PAA lateral extents.

PAAs were identified in SWMU 1, AOC 1, AOC 9, AOC 10, AOC 11, AOC 14, and AOC 27. Other RFI/RI investigation areas (for example, AOC 4 – Debris Ravine) were considered, but significant exceedances were not identified. Refined extents of the PAAs are presented on Figures 3-1 through 3-3. A list of PAAs is presented in Exhibit 3-3 along with the rationale for inclusion as a PAA. For the purposes developing and comparing removal action alternatives and costs, the approximate surface area, assumed excavation depth, and soil volume in each PAA is also presented in Exhibit 3-3. Areas, depths, and volumes are estimates only; the actual extent and depth of excavation will be dependent on constituent concentrations measured in the RFI/RI, observations during removal, and the results of confirmation sampling after removal.

**Exhibit 3-3. Potential Action Areas: Surface Areas and Volumes**

*Soil Engineering Evaluation/Cost Analysis*

*PG&E Topock Compressor Station, Needles, California*

| Investigation Area                         | Potential Action Area Identified in EE/CA Approval Memorandum | Existing Condition <sup>a</sup>  | Surface Area (ft <sup>2</sup> ) | Assumed Excavation Depth (ft)* | Volume <sup>b</sup> (cubic yards) |
|--|---|--|---------------------------------|--------------------------------|-----------------------------------|
| SWMU 1 – Former Percolation Bed            | SWMU 1 PAA #1   | Existing conditions within this PAA do not meet RAOs 1, 2, and 3.<br>Includes SWMU1-25, which is associated with unacceptable risk to ecological receptors and human health risks above <i>de minimis</i> levels (does not meet RAO 1).<br>Soil data collected at several locations significantly exceed numerical RAG(s) for RAO 2 (Figure 3-1). This area is vulnerable to weather-related soil migration and is partially within the HNWR.<br>Discolored soil is present in the shallow soil between boring locations SWMU1-25 and SWMU1-1 (does not meet RAO 3). | 6,886                           | 10                             | 2,550                             |
| SWMU 1 – Former Percolation Bed            | SWMU 1 PAA #2   | Existing conditions within this PAA do not meet RAOs 2 and 3.<br>Soil data collected at several locations significantly exceed numerical RAG(s) for RAO 2 (Figure 3-1). This area is vulnerable to weather-related soil migration and is partially within the HNWR.<br>White powder is present in soil within this PAA (does not meet RAO 3).  | 2,380                           | 10                             | 882                               |
| SWMU 1 – Former Percolation Bed            | SWMU 1 PAA #3   | Existing conditions within this PAA do not meet RAO 2.<br>Soil data collected at one location significantly exceed numerical RAG(s) for RAO 2 (Figure 3-1). This area is vulnerable to weather-related soil migration.   | 114                             | 5                              | 21                                |
| AOC 1 – Area Around Former Percolation Bed | AOC 1 PAA #1  | Existing conditions within this PAA do not meet RAO 2.<br>Soil data collected at one location significantly exceed numerical RAG(s) for RAO 2 (Figure 3-2). This area is vulnerable to weather-related soil migration.   | 351                             | 10                             | 130                               |
| AOC 1 – Area Around Former Percolation Bed | AOC 1 PAA #2  | Existing conditions within this PAA do not meet RAOs 2 and 3.<br>Soil data collected at several locations significantly exceed numerical RAG(s) for RAOs 2 (Figure 3-1). This area is vulnerable to weather-related soil migration.<br>Discolored soil is present in the area around former well TCS-4 (does not meet RAO 3).  | 1,912                           | 10                             | 708                               |
| AOC 1 – Area Around Former Percolation Bed | AOC 1 PAA #3  | Existing conditions within this PAA do not meet RAO 2.<br>Soil data collected at several locations exceed numerical RAG(s) for RAOs 2 (Figure 3-1). This area is vulnerable to weather-related soil migration.   | 473                             | 5                              | 88                                |
| AOC 9 – Southeast Fence Line               | AOC 9 PAA #1  | Existing conditions within this PAA do not meet RAOs 1 and 2.<br>Includes #10, which is associated with unacceptable risk to ecological receptors and human health risks above <i>de minimis</i> levels (does not meet RAO 1).<br>Soil data collected at several locations significantly exceed numerical RAG(s) for RAOs 2 (Figure 3-3). This area is vulnerable to weather-related soil migration.   | 210                             | 5                              | 39                                |
| AOC 10 – East Ravine                       | AOC 10 PAA #1   | Existing conditions within this PAA do not meet RAOs 1 and 2.<br>Includes AOC10-20, AOC10-21, AOC10-23, PA-20, and PA-21, which are associated with unacceptable risk to ecological receptors and/or human health risks above <i>de minimis</i> levels (does not meet RAO 1).<br>Soil data collected at several locations significantly exceed numerical RAG(s) for RAOs 2 (Figure 3-3). This area is vulnerable to weather-related soil migration.  | 5,843                           | 5                              | 1,082                             |

| Investigation Area             | Potential Action Area Identified in EE/CA Approval Memorandum | Existing Condition <sup>a</sup>  | Surface Area (ft <sup>2</sup> ) | Assumed Excavation Depth (ft)* | Volume <sup>b</sup> (cubic yards) |
|--------------------------------|---|--|---------------------------------|--------------------------------|-----------------------------------|
| AOC 10 – East Ravine           | AOC 10 PAA #2   | Existing conditions within this PAA do not meet RAOs 1 and 2.<br>Includes MW-58BR_S and AOC10c-4, which are associated with unacceptable risk to ecological receptors and/or human health risks above <i>de minimis</i> levels (does not meet RAO 1).<br>Soil data collected at several locations significantly exceed numerical RAG(s) for RAOs 2 (Figure 3-3). This area is vulnerable to weather-related soil migration and is partially within the HNWR. | 5,873                           | 5                              | 1,088                             |
| AOC 10 – East Ravine           | AOC 10 PAA #3   | Existing conditions within this PAA do not meet RAOs 2 and 3.<br>Soil data collected at one location exceed one numerical RAG for RAO 2 (Figure 3-3). This area is within the HNWR.<br>Discolored soil and debris are present.   | 379                             | 5                              | 70                                |
| AOC 10 – East Ravine           | AOC 10 PAA #4   | Existing conditions within this PAA do not meet RAO 2.<br>Soil data collected at several locations exceed numerical RAG(s) for RAOs 2 (Figure 3-3). This area is within the HNWR.  | 646                             | 5                              | 120                               |
| AOC 11 – Topographic Low Areas | AOC 11 PAA #1   | Existing conditions within this PAA do not meet RAO 2.<br>Soil data collected at several locations significantly exceed numerical RAG(s) for RAOs 2 (Figure 3-3). This area is vulnerable to weather-related soil migration and is within the HNWR.  | 1,917                           | 5                              | 355                               |
| AOC 14 – Railroad Debris Site  | AOC 14 PAA #1   | Existing conditions within this PAA do not meet RAOs 2 and 3.<br>Soil data collected at several locations significantly exceed numerical RAG(s) for RAOs 2 (Figure 3-2). This area is vulnerable to weather-related soil migration.<br>Burnt material, trash, and debris are present (does not meet RAO 3).  | 1,513                           | 5                              | 280                               |
| AOC 27 – MW-24 Bench           | AOC 27 PAA #1   | Existing conditions within this PAA do not meet RAOs 2 and 3.<br>Soil data collected at several locations significantly exceed numerical RAG(s) for RAOs 2 (Figure 3-2). This area is vulnerable to weather-related soil migration.<br>Burnt material, trash, and debris are present (does not meet RAO 3).  | 545                             | 5                              | 101                               |
| <b>Total</b>                   | --  | --   | <b>29,043</b>                   | --                             | <b>7,513</b>                      |

**Notes:**

<sup>a</sup> Data considered were for soil samples collected between 0 and 10 feet bgs (or the deepest depth sampled, if less than 10 feet bgs). Some locations for which data do not significantly exceed the numerical RAGs but are adjacent to or bounded by locations with significant exceedances were included. There were two primary reasons for this: (1) it would not be practical to address the significant exceedances during a removal action without addressing the adjacent or nearby locations, and (2) soil at the Site has likely been redistributed since RFI/RI soil samples were collected (especially in Bat Cave Wash). PAA lateral extent refinement also considered relevant site features such as topography that impact the practical extent of removal activities.

<sup>b</sup> For simplicity, volume calculations do not include cut slope volumes.

AOC = area of concern  
bgs = below ground surface  
EE/CA = Engineering Evaluation/Cost Analysis  
ft = feet  
PAA = potential action area

RAG = removal action goal  
RAO = removal action objective  
SWMU = solid waste management unit  
PAA = potential action area



## 4. Identification and Analysis of Removal Action Alternatives

Several potential removal action alternatives have been identified that meet the RAOs. This section describes the treatment technologies identified, provides detailed descriptions of removal action alternatives, and summarizes the screening criteria used to assess removal action alternatives. The Guidance on Conducting NTCRAs (USEPA, 1993) notes that only a limited number of alternatives appropriate for addressing the RAOs should be identified and assessed. Consistent with remedial activities at this Site, an effort was made to identify alternatives that minimize the volume of material removed from the Site.

### 4.1 Treatment Technology Identification and Testing

#### 4.1.1 Treatment Technology Identification

Several treatment technologies that could potentially meet one or more of the RAOs were identified as appropriate based on engineering judgment. Technology identification considered current knowledge regarding soil treatment and remedial options. A brief description of each technology or treatment process is provided below.

- **Excavation and Offsite Disposal.** Contaminated soil is excavated, transported, and disposed of at a permitted offsite disposal facility. Pretreatment may be required to meet land disposal requirements of the offsite facility; however, this is not expected to be necessary for Topock Site soils. Excavation and offsite disposal is a well-proven and readily implementable technology for treatment of the soil (FRTR, 2007).
- **Excavation and Ex-Situ Treatment.** Contaminated soil is excavated and treated. Treatment methods evaluated in this EE/CA are mechanical separation, soil washing, thermal treatment, chemical reduction, and solidification/stabilization.
  - **Mechanical Separation.** Soil particles are physically separated using a mechanical sieve. This process physically separates coarse granular materials from fine soil particles where most of the contaminant mass is adsorbed. Fine soil particles are further treated or disposed of, and coarse material is returned to the Site. Mechanical separation is appropriate for metals and dioxins/furans. CERCLA defines soil as having particle size under 2 millimeters (mm); RCRA allows for particles under 9 mm (approximately 3/8-inch) (USEPA, 2002). Mechanical testing was retained for bench-scale testing, as described below.
  - **Soil Washing.** Soil particles are tumbled with water to physically desorb contaminants adsorbed onto the fine soil particles. Soil washing can be enhanced by adding a reagent to the water such as a surfactant, leaching agent, or chelating agent. Wash water can be recycled through the soil washing system. Wash water may be further treated or disposed of directly in accordance with regulatory requirements. Soil washing is appropriate for metals and dioxins/furans. Mechanical testing was retained for bench-scale testing, as described below.
  - **Thermal Treatment.** Soil is heated, and contaminants are desorbed, vaporized, and/or destroyed through processes such as combustion. Thermal treatment is appropriate for dioxins/ furans but is not an effective treatment method for metals.
  - **Ex-Situ Chemical Reduction.** Reagents are added that react with targeted constituents in soil to chemically convert hazardous contaminants to non-hazardous or less toxic compounds that are more stable, less mobile, and/or inert. Reductants can be applied ex-situ using commercially available mixing equipment. Chemical reduction is a common treatment for chromium (FRTR, 2007). Chemical reduction is appropriate for stabilization of CrVI; however, this approach will not reduce total chromium mass. Chemical reduction of dioxins/furans is feasible under certain conditions; however, performance of this technology is poorly characterized and generally lacking in commercial suppliers capable of supplying field-scale treatment services.

- **Solidification/Stabilization (S/S).** Can be implemented ex-situ or in-situ and involves use of various chemical additives to physically bind or encapsulate target contaminants within a stabilized mass (solidification) or to chemically reduce the contaminants' mobility by inducing chemical reaction between the stabilizing agent and the contaminants; treated materials may range from inert solid granules to void-free monoliths. Materials stabilized in-situ would remain onsite. For that reason, materials stabilized in-situ must be resistant to natural erosion forces including wind and water scour. Conditions at this Site severely limit options for permanent protection of stabilized materials from natural erosion forces; accordingly, the use of in-situ stabilization is not considered practical.

Ex-situ S/S could be effective at the Site but is not implementable due to space constraints. In an ex-situ S/S scenario, excavated soil from the PAAs would be consolidated and stabilized with a cement-type mixture. Contaminants would be bound within a solid mass, or monolith. The resulting monolith of material would need to be capped and maintained in perpetuity to reduce direct exposure and future migration risks. There are limited areas on the TCS or within PG&E property where S/S-treated material could be safely placed. Placement would need to avoid areas with vehicle traffic, as S/S-treated material could be prone to cracking under the stress of vehicles. Based on the volume of soil to be treated, including the added 15% S/S reagent volume, placement of S/S-treated material on PG&E property would be impractical due lack of space for placement of over 8,500 cubic yards of material.

The following technologies were retained for alternative development or further evaluation in bench-scale laboratory treatability testing:

- Excavation and offsite disposal
- Excavation and ex-situ treatment with mechanical separation
- Excavation and ex-situ treatment with soil washing

#### 4.1.2 Bench-Scale Treatability Testing

Mechanical separation and soil washing were evaluated with treatability studies to determine whether this treatment technology would be effective at remediating both dioxins/furans and metals at the bench scale. Appendix F presents the detailed narrative and results from these bench-scale tests. In May 2019, soil samples were collected from seven locations within BCW and sent to Hazen Research, Inc. (Golden, Colorado). The samples were collected at locations known to contain elevated contamination concentrations in soil in BCW.

The lab performed baseline testing to establish the particle size distribution, volumetric size distribution, bulk density, and contaminant concentrations.

##### Mechanical Separation

Soil samples sent to the lab ranged from fines (<200 US mesh [0.074 mm]) to about 3 inches in diameter. Samples were sieved at ¾ inch to remove cobbles and rocks that were too large for bench-scale processing. The sub-¾ inch soil was further dry-sieved into representative splits at the 4 (4.67 mm), 10 (2 mm), 30 (0.595 mm), 35 (0.5 mm), 70 (0.210 mm), 100 (0.149 mm), and 200 (0.074 mm) US mesh to determine particle size distribution. Select finer fractions were analyzed for total chromium, hexavalent chromium, and zinc. This analysis provided the approximate distribution of contamination with respect to particle size. A summary of the results is presented in Exhibit 4-1. The results confirm that soil fractions less than ¼ inch exceed the RAGs. Higher contaminant concentrations were found in the finer fractions. The bench-scale testing supports the conclusion that sieving out the fine soil fraction will reduce the overall metals concentration in soil.

Material greater than ¼ inch was not tested for contaminants during the bench-scale testing, as it does not qualify as a soil, and the laboratory cannot analyze this material without pulverization due to the large grain sizes. Material was not pulverized as pulverization was not representative of exposure pathway assumptions and natural conditions. Material greater than ¼ inch is not expected to exceed the RAGs.

**Exhibit 4-1. Average Soil Concentrations by Particle Size***Soil Engineering Evaluation/Cost Analysis**PG&E Topock Compressor Station, Needles, California*

| Particle Size                    | Average Hexavalent Chromium Concentration <sup>a</sup> (mg/kg) | Average Total Chromium Concentration <sup>a</sup> (mg/kg) | Average Zinc Concentration <sup>a</sup> (mg/kg) |
|----------------------------------|--|---|---|
| Greater than ¼ inch              | NA   | NA  | NA  |
| Less than ¼ inch                 | 12   | 930   | 94  |
| ¼ inch to 4 US mesh              | 5.7  | 470   | 69  |
| 4 US mesh to 70 US mesh          | 15   | 1,200   | 100   |
| 70 US mesh to 200 US mesh        | 18   | 1,800   | 150   |
| Less than 200 US mesh            | 32   | 3,700   | 240   |
| <b>Numerical RAG<sup>b</sup></b> | <b>3.1</b>   | <b>145</b>  | <b>1,050</b>                                    |

**Notes:**<sup>a</sup> Averages are the arithmetic mean of seven samples collected in Bat Cave Wash.<sup>b</sup> Please refer to Exhibit 3-2 for additional information regarding the numerical RAGs.

mg/kg = milligrams per kilogram

NA = not analyzed; material greater than ¼ inch was not tested for contaminants during the bench-scale testing, as it does not qualify as a soil, and the laboratory cannot analyze this material without pulverization.

**Soil Washing**

Soil washing was evaluated at laboratory scale with Site soil that exhibited the highest contaminant concentration values sieved to the sub-¼ inch fraction. Testing was performed using a small-scale batch washing system designed to mimic the action of a trommel screen which would be used in the field for a full-scale soil washing system. Soil samples were washed using tap water and a Union Carbide Triton X-100 surfactant mixture. The washed soil was wet sieved at 35 and 70 mesh (0.5 and 0.21 mm respectively) with the oversize fraction dried and the undersize fraction filtered and dried before contaminant concentration analysis. Although the Triton X-100 was applied using a high dosage, the aqueous concentration of contaminants in wash water was not appreciably changed. As expected, soil washing concentrated the metal and dioxin compounds in the undersized 35/70 mesh fraction, but the 35/70 oversized mesh fraction only showed an order of magnitude reduction in dioxin/furan TEQ value calculated for mammals, and the metals analyzed (total chromium, CrVI, and zinc) yielded concentration values that were greater than the numerical RAGs. For example, total chromium was 1,644 mg/kg in the parent sample and ranged from 540 to 720 mg/kg in the oversize washed samples, compared to the total chromium numerical RAG of 145 mg/kg. Overall, bench-scale results suggest that the soil washing would not effectively reduce contaminant concentration values in soil below the RAGs for material at or below ¼ inch. Soil washing was, however, demonstrated effective in removing fines present on the outer surfaces of coarser materials that may contain contaminants.

Soil washing for the fine soil fraction (designated as material less than 1/4 inch) was not retained for detailed analysis since bench-scale testing was unable to achieve the necessary contaminant reduction to meet the numeric RAGs established under RAO 2. In laboratory testing the coarse fraction constitutes materials which are larger than 1/4 inch. However, based on the treatability testing results, mechanical separation with subsequent water washing of the coarse fractions is expected to meet the numerical RAGs.

**4.2 Detailed Description of Alternatives**

Three removal action alternatives have been developed to address the RAOs at the Site. A total of four alternatives including No Action were analyzed in this EE/CA. They are:



- Alternative 1 – No Action
- Alternative 2 – Excavation and Offsite Disposal of All Material
- Alternative 3 – Excavation, Mechanical Separation, Offsite Disposal of Fines, and Reuse of Coarse Material
- Alternative 4 – Excavation, Mechanical Separation, Offsite Disposal of Fines, Soil Washing of Coarse Material, and Reuse of Washed Coarse Material

Alternative descriptions are provided in the following subsections. Details regarding implementation of the various alternatives and associated technologies are presented for the purpose of developing costs and supporting comparative analysis of identified alternatives; accordingly, details and assumptions described herein are subject to future change. Details regarding the selected removal action will be refined during the design stage and will be presented in the Removal Action Work Plan to be developed after a removal action is selected. Cost analyses for each alternative are presented in Appendix G.

#### **4.2.1 Alternative 1 – No Action**

Alternative 1 is included in and carried through the entire EE/CA process as the baseline condition against which the performance of the remaining alternatives is evaluated. In Alternative 1, no removal action would take place. The contaminated media would be left in place, without removal, treatment, or other mitigation measures to reduce the potential for future exposure to Site contaminants. Because no removal action would be implemented, Site conditions would be unchanged and long-term risks due to exposure to Site contamination would remain the same as described in Section 2.5.

#### **4.2.2 Alternative 2 – Excavation and Offsite Disposal of All Material**

Alternative 2 consists of excavation of soil and other soil-like material (such as white powder) as well as debris and burnt material to meet RAOs followed by the offsite disposal of excavated materials at an approved disposal facility. Excavation would occur within the PAAs shown on Figures 3-1 through 3-3. The major components of Alternative 2 are:

- Site preparation
- Soil excavation
- Confirmation sampling
- Excavation backfill
- Waste transportation
- Waste disposal
- Site restoration (regrading and revegetation)

It is important to note that the removal areas shown on Figures 3-1 through 3-3 are approximate and were used primarily to estimate the removal costs. Exhibit 3-3 provides the assumed soil areas and depths used for the scope and cost estimate. The actual removal area extent and depth would be guided by a phased approach of field screening with confirmatory sampling supported by offsite laboratory analysis. Soil samples would be analyzed for metals in the field using an x-ray fluorescence (XRF) analyzer and for dioxins/furans in the laboratory using a modified SW8290 method to shorten analytical turn-around times. Additional lateral excavation may be required depending on the results of visual observations, field XRF measurements, or post-excavation confirmation samples. Upon completion of the soil removal, the final confirmation sample results would be entered into the risk assessment to calculate the post-treatment risk at the Site.

Site preparation would include mobilization and setup of support facilities including access routes, site surveys, vegetation removal, and establishment of soil erosion and sediment controls. Cultural resources and biological pre-construction field verifications would be performed prior to any intrusive work. Coordination with USFWS and CDFW would occur to ensure applicable management measures are implemented during the removal action to avoid and protect sensitive habitats and wildlife in the work areas. The removal action would comply with all applicable measures and stipulations of the PA and the Cultural and Historic Property Management Plan (CHPMP). Equipment and support facilities (e.g.,



excavators, loaders, office trailer, storage containers, sanitary facilities, etc.) would be mobilized to the Site and staged at approved locations. Utility clearance surveys, vegetation removal, and access routes would be improved where necessary to provide access to the areas marked for excavation (Figure 4-1). Grubbing of root systems associated with smaller vegetation would be performed incidentally to the excavation of contaminated soil from the indicated areas. Vegetation removal would be minimized to the practical extent needed to complete the removal action. Erosion and sediment control measures would be established to ensure that soil disturbance activities do not adversely impact downgradient surface water bodies and floodplains. Throughout the removal action implementation, erosion and sediment controls would be regularly inspected and maintained until excavation and backfilling are demonstrated complete. An erosion and sediment control plan would be prepared as part of the Removal Action Work Plan.

The estimated quantity of soil to be removed from all PAAs is approximately 11,300 tons. Excavation operations would be performed by qualified excavation personnel with current Hazardous Waste Operations and Emergency Response (HAZWOPER) training, as required by the Occupational Health and Safety Administration (OSHA). Standard dust control techniques would be used during removal activities to mitigate fugitive dust emissions. Engineering controls would be used to minimize erosion during storm events and would remain in effect until the excavated area is stabilized and revegetation is complete, if appropriate. The health and safety plan submitted as part of the Removal Action Work Plan would specify the dust suppression techniques, air monitoring requirements, and action levels necessary to ensure worker safety, as well as the Site access controls necessary to prevent members of the public from being exposed to contamination during removal operations. Excavation areas will be controlled to limit falls and minimize wildlife entrapment. Following excavation, material would be stockpiled at a location agreed upon by landowners and stakeholders. Stockpiled soil would be managed in accordance with the Removal Action Work Plan prior to offsite disposal; proposed soil processing and staging areas are shown on Figure 4-1.

After XRF readings show acceptable levels, confirmation sampling would be performed to confirm the extent of excavation. Confirmation samples would be collected from the bottoms and sidewalls of each excavation area and analyzed for contaminants to verify RAGs have been met. Based on the confirmation sampling results, additional excavation would be conducted, as necessary, to remove residual soil that exceeds cleanup goals.

Excavated waste would be transported offsite to an appropriate waste disposal facility. For the purposes of this EE/CA it is assumed that approximately 40 waste characterization samples (at least one per 250 tons and at least one per PAA) would be collected and analyzed for the full toxicity characteristic leaching procedure (TCLP) waste characterization suite, metals, VOCs, semivolatile organic compounds (SVOCs), and TPH. The waste characterization sampling would be in accordance with the approved Soil Management Plan for the Topock Groundwater Remedy (Appendix L of the Construction/Remedial Action Work Plan [CH2M, 2015b]) and would be described in the Removal Action Work Plan. Hazardous waste would be transported to a RCRA Subtitle C (i.e., permitted) facility, and non-hazardous waste would be transported to a Subtitle D facility. Soil with TCLP-chromium concentrations greater than 5.0 milligrams per liter (mg/L) as determined by waste characterization sampling results would be classified as hazardous waste based on chromium toxicity, and thus would be subject to special transportation and disposal requirements. In the absence of Site-specific TCLP data, for the purposes of the cost estimate (Appendix G), it is estimated that 70 percent (7,900 tons) would be classified as non-hazardous waste and would be disposed of at a Subtitle D facility, and that 30 percent (3,400 tons) would be classified as hazardous waste suitable for disposal at a Subtitle C landfill.

After confirming that the RAGs have been met, the excavated areas would be backfilled and re-graded to the approximate original contours, ensuring appropriate site drainage and maintaining current exposure depth intervals (described in Section 2.5). The preference would be to use onsite material generated during groundwater remedy construction for backfill if available as it appropriately matches grain size distribution of excavated materials. Material from the BOR quarry (Figure 4-1) may be used for backfill for the PAAs. Import material would be used only as needed to achieve acceptable grades. Backfill material would be sampled to verify that the material meets RAGs. Within BCW, grading of areas around excavations may be performed to reduce slopes of excavation cut faces. Compaction specifications would be calculated during preparation of the Removal Action Work Plan.

Revegetation activities would begin immediately following removal action, if applicable, with the intent to offset loss of habitat incurred during excavation, as represented by the loss of mature plants and trees. In general, the revegetation approach would be informed by the preconstruction condition, as documented through ground photographic records, topographic/aerial maps, and pre-construction archaeological and biological field verifications. The goal is to restore the areas affected by the removal action as closely as possible to preconstruction conditions. Specific information related to the impacts, generalized locations for restoration activities, and revegetation procedures would be presented in the Removal Action Work Plan.

#### **4.2.3 Alternative 3 – Excavation, Mechanical Separation, Offsite Disposal of Fines, and Reuse of Coarse Material**

Alternative 3 incorporates all the components of Alternative 2 except that coarse-grained material (greater than 3/8") would not be disposed of offsite. For the purposes of the EE/CA alternative analysis, the coarse fraction constitutes materials larger than 3/8 inch and the fine fraction is material less than 3/8 inch, as this is the finest particle size that can readily be screened using typical construction equipment. Under this Alternative, contaminated soil would be excavated and mechanically separated. Fines (assumed for this EE/CA to be material less than 3/8 inch) would be collected and disposed of at an offsite facility, and the remaining coarse material (assumed for this EE/CA to be material greater than 3/8 inch) would be returned to the excavation site. The major components of Alternative 3 are:

- Site preparation (as described for Alternative 2)
- Soil excavation (as described for Alternative 2)
- Confirmation sampling (as described for Alternative 2)
- Mechanical separation
- Stockpile construction and management for fine and coarse soil
- Waste disposal
- Coarse material reuse
- Site restoration (regrading and revegetation; as described for Alternative 2)

Excavated soil would be mechanically separated onsite using a sequential combination of equipment such as a bar screen, hopper, trommel, and/or vibratory screening tables. Coarse particles greater than 3/8 inch would be separated, stockpiled, and returned to the excavation areas as backfill. Material greater than 3/8 inch would be sampled to verify that the material meets RAGs. Material greater than 3/8 inch is not defined as soil per RCRA (USEPA, 2002), and for the purpose of this EECA it is assumed that the material would not exceed the RAGs on a mg/kg basis. If material greater than 3/8 inch does not meet RAGs, then the material would be disposed of at an approved offsite facility as described in Alternative 2. Fine soil less than 3/8 inch would be collected, stockpiled, and disposed of at an approved offsite facility. The preferred area for mechanical separation is within BCW, which would greatly reduce the amount of truck traffic for transport to and from the separator, as shown on Figures 3-1 and 4-1. Temporary engineering controls, such as k-rails or jersey barriers, would be installed around work areas and excavation areas to route stormwater around work areas and equipment in the event of a storm event. The main access road to/from Bat Cave Wash would be regularly maintained to ensure accessibility to/from the work areas for workers and equipment in the event of a storm event. Dust suppression measures such as water addition would be implemented during screening as determined necessary by site conditions and established best management practices (BMPs). Excess water used for dust control is not anticipated to be generated. Trash, debris, burnt material, and discolored soil would be stockpiled separately for offsite disposal without mechanical separation.

Waste classified as hazardous by characterization sampling would be transported to a RCRA Subtitle C (i.e., permitted) facility, and non-hazardous waste would be transported to a Subtitle D facility. The total mass of soil to be disposed of offsite is estimated to be approximately 7,500 tons. Soil with TCLP-chromium concentrations greater than 5.0 mg/L as determined by waste characterization sampling results would be classified as hazardous waste based on chromium toxicity, and thus would be subject to special transportation and disposal requirements. In the absence of Site-specific TCLP data, it is estimated that 30 percent (2,250 tons) would be classified as hazardous waste and need to be disposed of at a Subtitle C facility, and that 70 percent (5,250 tons) would be classified as non-hazardous waste suitable for disposal at a Subtitle D landfill.

Upon confirmation sampling results of excavation area extent, coarse material greater than 3/8 inch diameter would be returned to the excavated areas and re-graded with clean backfill to match the approximate original contours as described for Alternative 2.

Revegetation activities would be conducted as described for Alternative 2.

#### 4.2.4 Alternative 4 – Excavation, Mechanical Separation, Offsite Disposal of Fines, Soil Washing of Coarse Material, and Reuse of Washed Coarse Material

Alternative 4 incorporates all the components of Alternative 3 (including excavation components described for Alternative 2), with the addition of washing the excavated material greater than 3/8 inch with water before returning it to the excavated areas. Waste wash water would be tested and discharged to the TCS evaporation ponds, if suitable. The major components of Alternative 4 are:

- Site preparation (as described for Alternative 2)
- Soil excavation (as described for Alternative 2)
- Confirmation sampling (as described for Alternative 2)
- Mechanical separation (as described for Alternative 3)
- Stockpile construction and management for fine and coarse soil (as described for Alternative 3)
- Coarse material soil washing
- Waste disposal (as described for Alternative 3)
- Coarse material reuse (as described for Alternative 2)
- Site restoration (regrading and revegetation; as described for Alternative 2)

Prior to coarse fraction reuse, this alternative would include a final washing step for the removal of fines present among and on the surface of large materials excavated from each removal area. Coarse soil (greater than 3/8 inch) retained by screening would be washed with water. The washing process is estimated to require 35,000 gallons of water. Wash water would be recycled to the extent practical without treatment. Spent wash water is assumed to be suitable to be trucked for discharge to the TCS evaporation ponds.

Washed coarse material greater than 3/8-inch diameter would be returned to the excavated areas and re-graded with clean backfill to match the approximate original contours as described for Alternative 2.

Revegetation activities would be conducted as described for Alternative 2.

### 4.3 Evaluation Process and Criteria

The alternatives described in Section 4.2 have been evaluated against the criteria of effectiveness, implementability, and cost as described in the *Guidance on Conducting Non-Time-Critical Removal Actions Under CERCLA* (USEPA, 1993). These criteria are summarized as follows:

- **Effectiveness.** This criterion addresses the overall protection of human health and the environment that would be achieved by the alternative based on the following factors:
  - **Compliance with ARARs.** Used to determine whether an alternative meets the substantive portions of federal and state ARARs.
  - **Long-term Effectiveness and Permanence.** Assesses long-term effectiveness in maintaining protection of human health and the environment after the RAOs have been met. The magnitude of residual risk and adequacy and reliability of the post-removal Site control measures (such as long-term engineering or administrative controls, if applicable) are taken into consideration.
  - **Reduction in Toxicity, Mobility, and Volume (TMV) through Treatment.** Reflects the statutory preference of USEPA for selecting remedial/removal actions that employ treatment technologies resulting in permanent and significant reductions of TMV of the hazardous substances as their principal element. This criterion is satisfied when treatment is used to reduce the principal threats

at a site through destruction of toxic contaminants, irreversible reduction in contaminant mobility, or reduction of total volume of contaminated media.

- **Short-term Effectiveness.** Assesses the effects of an alternative in protecting human health and the environment during construction and implementation before the RAOs have been met. The duration of time until the RAOs are met is also considered.
- **Implementability.** This criterion addresses the overall technical and administrative feasibility of implementing an alternative based on the following factors:
  - **Technical Feasibility.** Assesses the ability to construct and operate the technology, reliability of the technology, ease of undertaking additional remedial/removal actions, and the ability to monitor effectiveness of the source control action.
  - **Administrative Feasibility.** Assesses the activities required to coordinate with other offices, agencies, and third-parties (for example, permitting, access, and right-of-way).
  - **Availability of Services and Materials.** Evaluates the availability of appropriate offsite treatment, storage capacity, and disposal services; necessary equipment and specialists; services and materials, including the potential for competitive bidding; and the availability of prospective technologies.
  - **State Acceptance.** State acceptance will be considered in the final selection of an alternative in the Action Memorandum. This factor cannot be evaluated until DTSC has had an opportunity to comment on the EE/CA. Comments on this report will be considered prior to finalizing the EE/CA and developing the Action Memorandum.
  - **Community Acceptance.** Community acceptance will be considered in the final selection of a source control alternative. This factor cannot be considered until the public has had an opportunity to comment on this report. Additionally, DOI, USFWS, and BLM have a responsibility to consult with the Native American Tribes regarding the proposed actions. Once public comment and consultation is complete, all input will be considered prior to finalizing the EE/CA and developing the Action Memorandum. .
- **Cost.** This criterion considers capital costs associated with implementing the removal action.

A qualitative evaluation of green and sustainable remediation (GSR) metrics has been incorporated into the development and evaluation of the alternatives where appropriate – especially within evaluation of short-term effectiveness. The goal of considering GSR during remedy selection is to allow sustainability to be considered within the decision-making process in order to avoid the use of wasteful and ecologically unfriendly remedies and remedy implementation where greener approaches can also meet the RAOs.

## 4.4 Detailed Individual Analysis of Alternatives

Detailed analyses of the removal action alternatives have been performed to assess how and to what extent each alternative meets the criteria defined in Section 4.3. The detailed analyses of alternatives against the EE/CA criteria of effectiveness, implementability, and cost and associated are presented in Table 4-1.

Cost estimates presented as part of the detailed analysis have been developed based on the design assumptions and are presented for comparative purposes only. The final costs of the selected remedy will depend on actual labor and material costs, competitive market conditions, final project scope, the implementation schedule, and other variables. The cost estimates are considered Class 4 as defined by the Association for the Advancement of Cost Engineering. Alternative costs presented herein are order-of-magnitude estimates with an intended accuracy range of plus 50 to minus 30 percent. The range applies only to the alternatives as they are described in this report and does not account for changes in the scope of the alternatives. The cost estimates are presented in Appendix G.

## 5. Comparative Analysis of Removal Action Alternatives

The detailed evaluations described in Section 4.4 were used to develop a comparative analysis of removal action alternatives. The purpose of the comparative analysis is to compare and rank the relative performance of each alternative against the criteria defined in Section 4.3: effectiveness, implementability, and cost. The following subsections present this analysis with a summary provided in Exhibit 5-1. Throughout the discussion and in Exhibit 5-1 the performance of each alternative against the specified criterion is ranked in order of least, low, moderate, better, and best in relation to the other alternatives. The comparative analysis focuses on performance against the RAOs 1 through 3. All alternatives (except Alternative 1 [No Action]) would address RAO 3 using the same treatment technology, excavation and offsite disposal, and therefore would perform equally against this objective.

### 5.1 Effectiveness

A comparison of the alternatives against effectiveness criteria is provided in the following subsections.

#### 5.1.1 Overall Protection of Human Health and the Environment

Alternative 1 (No Action) would not provide overall protection of human health, because the risk to human health and ecological receptors would not be mitigated. Furthermore, this alternative provides no reduction for current or future potential migration of contaminants from areas that require remediation. Alternatives 2 through 4, which involve removing soil from locations with chemicals contributing most significantly to unacceptable human health or ecological risk, would meet RAOs designed to be protective of human health and the environment.

#### 5.1.2 Compliance with Identified Applicable or Relevant and Appropriate Requirements and TBCs

Although no chemical-specific ARARs were identified by DOI for the purposes of this EE/CA, it is PG&E's understanding that DOI will make management decisions using certain identified chemical-specific TBCs; therefore, the chemical-specific TBCs will be used in the comparative analysis of the remedial alternatives.

Alternative 1 would not meet the chemical-specific TBCs. Alternatives 2 through 4, as described in this EE/CA, were designed to comply with location- and action-specific ARARs. Alternatives 2 through 4 were designed to meet the numerical RAGs which were derived from the first two identified chemical-specific RBCs.

Because Alternative 1 (No Action) would not provide overall protection of human health, it is not included in the comparative analysis against the remaining effectiveness criteria.

#### 5.1.3 Long-term Effectiveness and Permanence

Long-term effectiveness and permanence consider the magnitude of residual risk and the adequacy and reliability of post-removal site control measures. Alternative 2 poses the least residual risk (that is, ranks best against this criterion). Because all excavated material would be disposed of offsite, no residuals would remain in place in the PAAs. Alternatives 3 and 4 rank slightly lower, because contaminants potentially adhered to coarse material replaced in excavation areas would remain within the PAAs. In the case of Alternative 4, soil washing is anticipated to be more effective in removing soil fines (dust) adhered to the coarse material that may contain contaminants than Alternative 3. For all viable alternatives (Alternatives 2 through 4) risk calculations, confirmation sampling, and visual observation would be performed to ensure RAOs 1 through 3 were met, and therefore Alternatives 2 through 4 would all provide long-term effectiveness. Alternatives 2 through 4 would not require post-removal site controls. Overall, Alternative 2 would provide the best long-term effectiveness and permanence, followed by Alternatives 3 and 4.

**Exhibit 5-1. Comparative Analysis of Alternatives**

*Soil Engineering Evaluation/Cost Analysis*

*PG&E Topock Compressor Station, Needles, California*

| Criteria  | Alternative 1:<br>No Action | Alternative 2:<br>Excavation and Offsite<br>Disposal of All Material | Alternative 3:<br>Excavation, Mechanical<br>Separation, Offsite Disposal<br>of Fines, and Reuse of<br>Coarse Material | Alternative 4:<br>Excavation, Mechanical Separation,<br>Offsite Disposal of Fines, Soil<br>Washing of Coarse Material, and<br>Reuse of Washed Coarse Material |
|---|-----------------------------|--|---|---|
| Effectiveness – Protection of Human Health & Environment  | -                           | +  | +   | +   |
| Effectiveness – Compliance with ARARS                     | +*                          | +  | +   | +   |
| Effectiveness – Long-Term Effectiveness and Permanence    | NA                          | ●  | ●   | ●   |
| Effectiveness – Reduction in TMV through Treatment        | NA                          | ●  | ●   | ●   |
| Effectiveness – Short-Term Effectiveness                  | NA                          | ●  | ●   | ●   |
| Effectiveness – Time Until RAOs are Achieved              | NA                          | Approx. 4 months   | Approx. 5 months  | Approx. 5 months  |
| Implementability – Technical Feasibility                  | NA                          | ●  | ●   | ●   |
| Implementability – Administrative Feasibility             | NA                          | ●  | ●   | ●   |
| Implementability – Availability of Services and Materials | NA                          | ●  | ●   | ●   |
| Cost – Estimated Total Cost (US Dollars)                  | NA                          | \$5,398,000  | \$4,666,000   | \$5,222,000   |

**Notes:**

\* There were no chemical-specific ARARs identified for the Site. Alternative 1 does not comply with chemical-specific TBC criteria.

ARAR = applicable or relevant and appropriate requirement

NA = not applicable

RAO = removal action objective

TBC = to-be-considered

TMV = toxicity, mobility, volume

Threshold Criteria

- Unacceptable (does not meet criterion)

+ Acceptable (meets criterion)

Balancing Criteria (Relative Performance of Criterion)

○ Low

● Least

● Moderate

● Better

● Best



#### **5.1.4 Reduction in Toxicity, Mobility, and Volume through Treatment**

Reduction in TMV through treatment considers the overall reduction in TMV at the completion of the removal action, including the amount of material destroyed or treated, the degree to which this treatment is irreversible, and the type and quantity of residuals remaining after treatment. This criterion reflects the statutory preference of USEPA for selecting remedial/removal actions that employ treatment technologies resulting in permanent and significant reductions of TMV of the hazardous substances as their principal element.

No hazardous material would be destroyed in Alternatives 2 through 4, because destructive treatment technologies would not adequately meet RAOs 2 through 4. The primary difference between the alternatives is the reduction in volume of hazardous materials. Alternatives 3 and 4 would concentrate contaminants into the smallest volume, specifically the fine soil fraction, which would be disposed of offsite. Alternative 4 would also generate excess wash water, which would be discharged to existing TCS evaporation ponds once sampling confirmed acceptability. Alternative 2 would not provide any reduction in waste volume—all excavated material would be disposed of offsite without any reduction in the volume of material disposed of.

The processes used in Alternatives 2 through 4 are all irreversible (excavation, mechanical separation, soil washing, and offsite disposal). Alternative 3 may leave some residuals in place (in the form of contaminants in fines adhered to the coarse soil fraction). Regardless of supplemental contaminant removal, Alternative 3 is anticipated to fully satisfy the RAOs and RAGs established for the project.

Overall, Alternatives 3 and 4 provide better reduction in TMV than Alternative 2. The reduction of TMV under Alternative 3 is expected to be similar or equal to that under Alternative 4. This statement is supported by laboratory-scale testing results, as surfactant application to screened soil was generally ineffective in further contaminant reduction. Accordingly, incremental contaminant removal (if any) by water washing does not provide Alternative 4 with greater reduction in contaminant TMV compared to Alternative 3.

#### **5.1.5 Short-term Effectiveness**

Short-term effectiveness considers protection of the community, workers, and environment during the removal action, as well as the time until the RAOs are met. Included in this evaluation is a qualitative evaluation of GSR metrics, such as emissions of greenhouse gases (GHGs) and criteria pollutants, consumption of resources, ecological impacts, worker safety/accident risk, and community impacts. GHG emissions can also be considered under long-term effectiveness because GHGs are residuals of remedial or removal activities that do not attenuate for a long period of time; however, for the purposes of document organization, all discussion of GSR metrics in the alternative analyses is presented under short-term effectiveness.

In Alternatives 2 through 4, the public can be protected using normal health and safety protocols including dust suppression and air monitoring. Access to excavation areas will be controlled to minimize risk of falls. Some risk to the public is associated with transportation of hazardous material offsite (this risk would be lower for Alternatives 3 and 4 because less material would be transported offsite). Some risk to workers would be encountered during excavation and transportation of soil in Alternatives 2 through 4; however, workers can be protected using conventional occupational health and safety protocols. In Alternatives 3 and 4, mechanical separation would generate dust that may pose risk to workers, but again, workers can be protected using normal health and safety protocols and appropriate dust control measures. Overall, Alternative 2 is least favorable from a short-term risk perspective, as it requires the greatest volume material to be transported, which presents the highest risk for public exposure during transit and offsite disposal operations.

In Alternatives 2 through 4, removal action activities would produce GHG emissions, energy usage, and air emissions of criteria pollutants (nitrogen oxides [NO<sub>x</sub>], sulfur oxides [SO<sub>x</sub>], and particulate matter 10 micrometers or less in diameter [PM<sub>10</sub>]). Qualitatively, Alternative 3 is anticipated to perform most favorably against GSR metrics because the volume of material transported for disposal is low (compared to Alternative 2) and the input of supplemental wash water is not required (as is the case for the soil

washing operation considered by Alternative 4). In all cases, once initial construction activities are completed, the alternative would not require any additional energy inputs.

The time to meet RAOs for Alternatives 2 through 4 is less than 1 year. Alternative 2 is expected to take approximately 4 months to complete, and Alternatives 4 and 5 are expected to take about 5 months to complete. In all cases, no operation and maintenance period would be required.

Overall, Alternative 3 provides better short-term effectiveness than Alternatives 2 and 4.

## **5.2 Implementability**

A comparison of the alternatives against the implementability criteria is provided in the following subsections. This discussion does not include Alternative 1 (No Action) as it would not be effective.

### **5.2.1 Technical Feasibility**

Technical feasibility considers the ability to construct and operate the technology, the reliability of the technology, the ease of undertaking additional source control actions (if necessary), and the ability to monitor the effectiveness of the removal action.

Alternatives 2 and 3 are both highly feasible. Excavation (for Alternatives 2 and 3) and mechanical separation (for Alternative 3) are straightforward. The soil washing step in Alternative 4 is comparatively less feasible. It requires more steps than mechanical separation alone, including washing and separation of washed material from wastewater, and disposal of wastewater.

The alternatives considered are founded on the use of excavation, which is considered a reliable technology. There are many remediation contractors capable of providing the necessary services to complete the remedy; excavation, transportation and disposal services are considered readily available. Since Alternative 2 includes offsite disposal it has the highest implementability of comparative alternatives. Mechanical separation equipment applied in Alternatives 3 and 4 and the soil washing step in Alternative 4 are reliable, but fewer contractors may be available to implement screening and washing operations. The integration of water for soil washing in Alternative 4 adds another layer of complexity to an environment where natural resources are already scarce; for this reason, Alternative 4 is considered the least implementable. Alternatives 2 through 4 all offer a high ease of undertaking additional actions and a high ability to monitor removal action effectiveness. Risk calculations, confirmation sampling, and visual observation would be performed to ensure RAOs 1 through 3 were met.

Overall, Alternative 2 is the most technically feasible alternative, followed by Alternative 3. Alternative 4 is comparatively the least feasible.

### **5.2.2 Administrative Feasibility**

Administrative feasibility considers the ease of coordinating with other offices, agencies, and third parties. Alternatives 2 through 4 would all require review by the current land owners/managers (BLM, Caltrans, USFWS) and other stakeholders (including the Tribes). Alternative 3 is anticipated to have the highest administrative feasibility, primarily because it minimizes the volume of soil removed from the Site. The Tribes have expressed a preference for minimizing the volume of soil removed due to the cultural and historical significance of the Site. Alternative 4 also minimizes the volume of soil removed from the Site, but disposal of water generated during soil washing in the TCS evaporation ponds must meet WDR Order No. R7-2018-0022. If it becomes necessary to amend the WDRs for the ponds to accept wastewater from the proposed removal action, a revised Report of Waste Discharge (ROWD) would be required.

Alternatives 2 through 4 would require staging of excavated material (for disposal) and stockpile management for soil screened during treatment operations. Selection of an appropriate staging area would require consultation and agreement with landowners and other project stakeholders.



Alternatives 2 through 4 would require activities within the right-of-way maintained by Caltrans for work in AOC 14. Given the limited access to AOC 14, equipment may need to be lifted by crane onto AOC 14 and a lane closure of I-40 would be needed. Lane closure would require Caltrans approval and coordination with the California Highway Patrol. To access AOC 14, personnel and equipment would also need to cross the BNSF railroad tracks.

Alternatives 2 through 4 would require the closure of certain areas during excavation activities to hikers and other recreators. This closure would need to be coordinated with land owners/managers.

Alternative 2 is anticipated to be the least administratively feasible because it would result in the greatest volume of soil removed from the Site.

### **5.2.3 Availability of Services**

This criterion considers the availability of necessary services, equipment, specialists, and prospective technologies. For Alternatives 2 through 4, the prospective technologies and offsite disposal services are all highly available. Excavation equipment and specialists are highly available. Equipment and specialists for mechanical separation and soil washing are available but limited. Overall, the services for Alternative 2 are most available, followed by the services for Alternatives 3 and 4.

## **5.3 Cost**

This criterion considers capital costs associated with implementing the removal action. A detailed cost evaluation for Alternatives 2 through 4 is presented in Appendix G. A summary of the total estimated costs is presented in Exhibit 5-1. Because no operation and maintenance is anticipated with Alternatives 2 through 4, there is no anticipated operation and maintenance cost. The cost estimates have been developed based on the design assumptions presented in the alternatives descriptions (Section 4.2) and are presented primarily for the purpose of comparing the alternatives. The final costs of the selected remedy will depend on actual labor and material costs, competitive market conditions, final project scope, implementation schedule, and other variables. Consistent with USEPA guidance, the cost estimates are order-of-magnitude estimates with an intended accuracy range of plus 50 percent to minus 30 percent. The range applies only to the alternatives as they are described in this report and does not account for changes in scope of the alternatives.



## 6. Recommended Removal Action Alternative

Based on the comparative analysis of the removal action alternatives against the criteria of effectiveness, implementability, and cost as summarized in Exhibit 5-1, the recommended alternative is **Alternative 3 – Excavation, Mechanical Separation, Offsite Disposal of Fines, and Reuse of Coarse Material**. This alternative provides the best balance against all EE/CA evaluation criteria as summarized in the following subsections.

### 6.1 Effectiveness

Alternative 3 is considered to be the most effective alternative evaluated. This alternative has been developed to meet RAOs protective of human health and the environment and comply with location-, chemical-, and action-specific ARARs. It would meet the RAOs as follows:

- RAO 1 – To reduce human and ecological risk related to the contaminants in the soil on or adjacent to federal land, the locations recommended for removal in the HHERA are included in the excavation areas of Alternative 3.
- RAO 2 – To address elevated concentrations of contaminants (that is, concentrations significantly exceeding the numerical RAGs) outside the TCS in or adjacent to wash areas that are within, or have the potential to migrate to, the HNWR during storm events, areas with significant exceedances of numerical RAGs are included in the excavation areas of Alternative 3.
- RAO 3 – To remove debris, burnt material, and/or discolored soil associated with elevated hazardous substances, visually identified debris, burnt material, and/or discolored soils would be removed and disposed of offsite.

### 6.2 Implementability

Alternative 3 is considered to be highly implementable. It is technically feasible from a construction standpoint. Alternative 3 minimizes the volume of soil removed from the Site and imported backfill needed, without requiring the large quantities of wastewater to be disposed as needed for Alternative 4. Water used for dust control is expected to be effective at removing soil fines (dust) adhered to coarse-grain fractions. Excess water is not anticipated to be generated and would be absorbed by the fine-grain fraction disposed of offsite. All necessary services and materials are available.

### 6.3 Cost

The estimated total cost of Alternative 3 is \$4,666,000. This cost is less than that of Alternatives 2 and 4.



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## Tables



**Table 3-1a. Potential Applicable or Relevant and Appropriate Requirements (ARARs) or Other Factors To Be Considered (TBCs): Chemical-Specific***Soil Engineering Evaluation/Cost Analysis**PG&E Topock Compressor Station, Needles, California*

| Item No. | ARARs or TBCs and Citation  | Determination | Description and Applicability  |
|----------|---|---------------|--|
| 1        | Draft Risk-Based Remediation Goals (RBRGs) for Risk Drivers in Soil at Topock Site <sup>a</sup>                       | TBC           | Draft Human Health and Ecological RBRGs were estimated for two significant contributors to soil risks at the Topock Site, namely total chromium, CrVI, copper, and dioxin/furan TEQ. The RBRGs will become final when the draft Soil Human Health and Ecological Risk Assessment Report is approved by DTSC and DOI.   |
| 2        | Draft Risk-Based Concentrations (RBCs) for Soil Management Purposes <sup>a</sup>                                      | TBC           | Draft Human Health and Ecological RBCs were estimated for purposes of soil management at the Topock Site. The RBCs will become final when the draft Soil Human Health and Ecological Risk Assessment Report is approved by DTSC and DOI.   |
| 3        | Soil Ecological Comparison Values (ECVs) <sup>b</sup>   | TBC           | Soil ECVs were developed for Topock COPCs (metals and polycyclic aromatic hydrocarbons [PAHs]) using both lowest observed adverse effect levels or concentrations and no-adverse effect levels or concentrations based on target toxicity values (i.e., values below which no unacceptable risk is expected) for the protection of the ecological receptors at the PG&E Topock Site based on the representative receptors selected for the ecological risk assessment. |
| 4        | Ambient or Background Soil Concentrations at Topock Site <sup>c,d,e</sup>   | TBC           | Ambient or background levels of inorganic chemicals in soils in/around the PG&E Topock Site were calculated to assist in remedial planning, risk assessment, as well as remedial and soil management decision making.  |
| 5        | DTSC HHRA Note Number 2, Dioxin-TEQ Soil Remediation Goals for Sites in California <sup>f</sup>                       | TBC           | The DTSC Human and Ecological Risk Office (HERO) recommends the following remedial goal for soils contaminated by dioxins and dioxin like-compounds:<br><ul style="list-style-type: none"> <li>• Dioxins/furans TEQ Humans – 50 ng/kg</li> </ul>   |
| 6        | DTSC HHRA Note Number 3, DTSC-modified Screening Levels <sup>g</sup>  | TBC           | The DTSC HERO HHRA Note Number 3 presents recommended screening levels for constituents in soil, tap water, and ambient air.   |
| 7        | USEPA "Regional Screening Levels for Chemical Contaminants at Superfund Sites" <sup>h</sup>                           | TBC           | Establishes comparison values for residential and commercial/industrial exposures to soil, air, and tap water for screening chemicals at Superfund sites.  |
| 8        | San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels for residential direct exposure | TBC           | Conservative screening levels for chemicals found at sites with contaminated soil and groundwater. These levels are intended to help expedite the identification and evaluation of potential environmental concerns at contaminated sites. ESLs address a range of media (soil, groundwater, soil gas, and indoor air) and a range of concerns (e.g., impacts to drinking water, vapor intrusion, and impacts to aquatic habitat).                                     |
| 9        | Occupational Safety and Health Act (29 U.S. Code (USC) § 651, et seq.; 29 CFR § 1910.1026)                            | TBC           | Sets standards for workers engaged in activities associated with remedial actions under the National Contingency Plan, including occupational exposure to hexavalent chromium. Pursuant to the NCP preamble, Occupational Safety and Health Act standards are not ARARs but may be included as TBCs.   |

**Notes:**<sup>a</sup> Arcadis. 2019. Final Soil Human Health and Ecological Risk Assessment Report, Topock Compressor Station, Needles, California. October.<sup>b</sup> Arcadis. 2018. Topock Compressor Station – Technical Memorandum 3: Ecological Comparison Values for Metals and Polycyclic Aromatic Hydrocarbons in Soil. May 28.<sup>c</sup> CH2M. 2009c. Final Soil Background Investigation at Pacific Gas and Electric Company Topock Compressor Station, Needles, California.<sup>d</sup> CH2M. 2017a. Ambient Study of Dioxins and Furans at PG&E Topock Compressor Station, Needles, California, October 13.<sup>e</sup> CH2M. 2019. Determination of Thallium Ambient/ Background Concentration at PG&E Topock Compressor Station, Needles, California, August 13.<sup>f</sup> DTSC. 2017. Human Health Risk Assessment (HHRA) Note Number 2: Soil Remedial Goals for Dioxins and Dioxin-like Compounds for Consideration at California Hazardous Waste Sites – (April 2017).<sup>g</sup> DTSC. 2019. [Human Health Risk Assessment \(HHRA\) Note Number 3: DTSC-modified Screening Levels \(DTSC-SLs\)](https://dtsc.ca.gov/human-health-risk-hero/) – (April 2019). <https://dtsc.ca.gov/human-health-risk-hero/><sup>h</sup> USEPA. 2019. [Regional Screening Levels \(RSLs\) for Chemical Contaminants at Superfund Sites](https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables). May. <https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables>

**Table 3-1b. Potential Applicable or Relevant and Appropriate Requirements (ARARs) or Other Factors To Be Considered (TBCs): Location-Specific**

*Soil Engineering Evaluation/Cost Analysis*

*PG&E Topock Compressor Station, Needles, California*

| Item No. | ARARs or TBCs and Citation   | Determination            | Description and Applicability   |
|----------|--|--------------------------|---|
| 10       | Federal Land Policy and Management Act (FLPMA) (43 USC § 1701, et seq.)  | Applicable               | In managing public lands, BLM is directed to take any action necessary to prevent unnecessary or undue degradation of the lands. Actions taken on the public land (i.e., BLM-managed land) portions of the Topock Site should provide the optimal balance between authorized resource use and the protection and long-term sustainability of sensitive resources. Figure 2-1 shows property managed by BLM.   |
| 11       | U.S. Department of Interior, Bureau of Land Management, <i>Approved Resource Management Plan and Final Environmental Impact Statement</i> , May 2007 | TBC                      | The Resource Management Plan provides further direction on how FLPMA requirements will be satisfied.  |
| 12       | National Wildlife Refuge System Administration Act (16 USC § 668dd-ee, 50 CFR § 27)  | Applicable               | This Act governs the use and management of the Havasu National Wildlife Refuge portion of the Topock Site. It requires that the USFWS evaluate ongoing and proposed activities and uses to ensure that such activities are appropriate and compatible with the mission of the National Wildlife Refuge System, as well as the specific purposes for which the HNWR was established. Prior to the selection of a removal action by DOI/USFWS, that removal action must be found by the Refuge Manager to be both an appropriate use of the HNWR and compatible with the mission of the HNWR and the Refuge System as a whole. Any removal action proposed to be implemented on the HNWR that was not selected by DOI/USFWS would be subject to the formal appropriate use/compatibility determination process.<br><br>Portions of the Site are located in the HNWR (Figure 2-1). |
| 13       | Executive Order 8647 (6 CFR 593)   | TBC                      | This Executive Order establishes the HNWR for the primary purpose of providing migratory bird habitat. Any response action selected must be appropriate and compatible with this purpose, as determined by the Refuge Manager.  |
| 14       | Appropriate Use Policy<br>603 FW 1   | TBC                      | This policy elaborates on the appropriate uses of a National Wildlife Refuge, ensuring that such uses contribute to fulfilling the specific refuge's purposes and the National Refuge System's mission.   |
| 15       | Compatibility Policy<br>603 FW 2   | TBC                      | This policy specifies the guidelines for determining the compatibility of proposed uses of a National Wildlife Refuge. This determination is done once a proposed use is deemed appropriate.  |
| 16       | Lower Colorado River National Wildlife Refuges, Comprehensive Management Plan (1994-2014)  | TBC                      | The Comprehensive Management Plan provides further direction on how compliance with the National Wildlife Refuge System Administration Act, as amended, shall be achieved.  |
| 17       | Fish and Wildlife Conservation Act (16 USC §§ 2901-2911)   | Relevant and Appropriate | Federal departments and agencies are encouraged to utilize their authority to conserve nongame fish and wildlife and their habitats and assist States in the development of their conservation plans.   |
| 18       | Fish and Wildlife Coordination Act (16 USC § 661-667e)   | Applicable               | This Act requires that any federally-funded or authorized modification of a stream or other water body must provide adequate provisions for conservation, maintenance, and management of wildlife resources and their habitat. Necessary measures should be taken to mitigate, prevent, and compensate for project-related losses of wildlife resources.  |
| 19       | National Historic Preservation Act (54 USC § 300101, et seq., 36 CFR Part 800)   | Applicable               | This statute and the implementing regulations require that a federal agency undertaking a removal action at or near historic properties must take into account the effects of such undertaking on the historic properties. The federal agency must determine, based on consultation, if an undertaking's effects would be adverse and seek ways that could avoid, mitigate, or minimize such adverse effects on a National Register eligible property. The agency must then specify how adverse effects will  |

| Item No. | ARARs or TBCs and Citation   | Determination            | Description and Applicability  |
|----------|--|--------------------------|--|
|          |  |                          | <p>be avoided or mitigated or acknowledge that such effects cannot be avoided or mitigated. Measures to avoid or mitigate adverse effects of any selected removal action that are adopted by the agency through federal consultation must be implemented by the removal action to comply with the National Historic Preservation Act.</p> <p>Properties on and near the Site that are eligible for or listed on the National Register of Historic Places include Native American cultural resources and elements of the historic "built environment." In recognition of this, all removal activities will be conducted in ways that avoid, minimize, or mitigate adverse effects to cultural and historic properties within the Area of Potential Effects in accordance with the Programmatic Agreement (BLM, 2010, as amended 2016), the Cultural and Historic Properties Management Plan (BLM, 2012), the Cultural and Historic Properties Treatment Plan (AE, 2018), and in consultation with the Tribes.</p> |
| 20       | National Register Bulletin 38  | TBC                      | Guidelines for evaluating and documenting traditional cultural properties.   |
| 21       | Preservation Brief 36  | TBC                      | Guidelines for planning, treating, and managing historic landscapes.   |
| 22       | National Archaeological and Historical Preservation Act (16 USC § 469, et seq.)                | Applicable               | This statute requires the evaluation and preservation of historical and archaeological data that might otherwise be irreparably lost or destroyed through any alteration of terrain as a result of federal construction projects or a federally licensed activity.   |
| 23       | Archaeological Resources Protection Act (16 USC § 470aa-ii, et seq., 43 CFR Part 7)            | Applicable               | This statute provides for the protection of archeological resources located on public and tribal lands. The Act establishes criteria that must be met for the land manager's approval of any excavation or removal of archaeological resources if a proposed activity involves soil disturbances.  |
| 24       | Historic Sites Act (54 USC § 320101 et seq., 36 CFR Part 65)                                   | Applicable               | Pursuant to this Act, federal agencies must consider the existence and location of historic sites, buildings, and objects of national significance, using information provided by the National Park Service, to avoid undesirable impacts upon such landmarks. There are no designated historic landmarks within the Site, although Public Law 106-45, 113 Stat. 224 (1999), provides for a cooperative program "for the preservation of the Route 66 corridor" through grants and other measures.   |
| 25       | Executive Order 11593  | TBC                      | This Order directs the Federal Agencies to initiate measures for the protection and enhancement of the cultural environment. These measures include assuring that steps are taken to make records, drawings, and/or maps and have such items deposited in the Library of Congress when, as the result of a federal action, a property listed on the National Register of Historic Places is to be substantially altered.   |
| 26       | Native American Graves Protection and Repatriation Act (25 USC § 3001 et seq., 43 CFR Part 10) | Applicable               | This Act regulates the removal and trafficking of human remains and cultural items, including funerary and sacred objects. If removal activities result in the discovery of Native American human remains or related objects, these requirements must be met. Portions of the Site contain archaeological areas that may contain human remains.  |
| 27       | Religious Freedom Restoration Act (42 USC § 2000bb, et seq.)                                   | Relevant and appropriate | Under this Act, the government shall not substantially burden a person's exercise of religion, unless the application of the burden is in furtherance of a compelling government interest, and it is the least restrictive means of furthering that compelling interest. To constitute a "substantial burden" on the exercise of religion, a government action must (1) force individuals to choose between following the tenets of their religion and receiving a governmental benefit or (2) coerce individuals to act contrary to their religious beliefs by the threat of civil or criminal sanctions. If any removal action selected imposes a substantial burden on a person's exercise of religion, it must be in furtherance of a compelling government interest and be the least restrictive means of achieving that interest.  |
| 28       | American Indian Religious Freedom Act (42 USC § 1996, et seq.)                                 | Relevant and appropriate | This Act requires that the United States protect and preserve for American Indians their inherent right of freedom to believe, express, and exercise their traditional religions.  |
| 29       | Executive Order 13175  | TBC                      | Federal Agencies are to conduct regular and meaningful consultation and collaboration with tribal officials in the development and implementation of federal policies that have tribal implications.   |

| Item No. | ARARs or TBCs and Citation   | Determination | Description and Applicability   |
|----------|--|---------------|---|
| 30       | Executive Order 12898  | TBC           | Federal agencies shall conduct “activities that substantially affect human health or the environment, in a manner that ensures that such programs, policies, and activities do not have the effect of excluding persons (including populations) from participation in, denying persons (including populations) the benefits of, or subjecting persons (including populations) to discrimination under such programs, policies, and activities, because of their race, color, or national origin.” |
| 31       | Executive Order 13352  | TBC           | The Department of Interior shall, to the extent permitted by law, “implement laws relating to the environment and natural resources in a manner that promotes cooperative conservation.”  |
| 32       | Indian Sacred Sites (Executive Order 13007)                                      | TBC           | In managing federal lands, the United States “shall, to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions, (1) accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners, and (2) avoid adversely affecting the physical integrity of such sacred sites.”  |
| 33       | Resource Conservation and Recovery Act (42 USC § 6901, et seq., 40 CFR § 264.18) | Applicable    | These regulations promulgated under RCRA establish Seismic and Floodplain considerations which must be followed for treatment, storage, or disposal facilities constructed, operated, or maintained within certain distances of fault lines and floodplains.<br><br>Portions of the Topock Site are located on or near a 100-year floodplain.   |
| 34       | Floodplain Management and Wetlands Protection (40 CFR § 6.302(a) & (b))          | Applicable    | Before undertaking an action, agencies are required to perform certain measures in order to avoid the long- and short- term impacts associated with the destruction of wetlands and the occupancy and modification of floodplains and wetlands.<br><br>The regulation sets forth requirements as means of carrying out the provisions of Executive Orders 11988 and 11990.  |
| 35       | Executive Order 11988 – Floodplain Management                                    | TBC           | Executive Order 11988 requires evaluation of the potential effects of actions that take place in a floodplain to avoid, to the extent possible, adverse impacts.  |
| 36       | Executive Order 11990 – Responsibilities of Federal Agencies to Protect Wetlands | TBC           | Executive Order 11990 requires that potential impacts to wetlands be considered, and as practical, destruction, loss, or degradation of wetlands be avoided.  |



**Table 3-1c. Potential Applicable or Relevant and Appropriate Requirements (ARARs) or Other Factors To Be Considered (TBCs):  
Action-Specific**

*Soil Engineering Evaluation/Cost Analysis*

*PG&E Topock Compressor Station, Needles, California*

| Item No. | ARARs or TBCs and Citation  | Determination            | Description and Applicability   |
|----------|---|--------------------------|---|
| 37       | Clean Water Act. Stormwater Management (33 U.S.C. § 1342, 40 CFR Part 122, 40 CFR Part 125) | Relevant and appropriate | These regulations define the necessary requirements with respect to the discharge of stormwater under the National Pollutant Discharge Elimination System (NPDES) program. These regulations will apply if proposed removal actions disturb more than 1 acre of soil and result in stormwater runoff that comes in contact with any removal activity, or if proposed removal actions involve specified industrial activities. NPDES requirements regulate discharges of pollutants from any point source into waters of the United States.  |
| 38       | Federal Water Pollution Control Act (Clean Water Act) (33 USC § 1344, 40 CFR § 230.10)      | Applicable               | <p>This section of the Clean Water Act prohibits certain activities with respect to on-site wetlands and waterways. No discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed activity which would have less adverse impact to the aquatic ecosystem.</p> <p>Minimization measures will be implemented to minimize impacts to wetland and non-wetland waters of the United States within the PAAs. All efforts will be taken to avoid jurisdictional resources to the extent practicable. Although the USACE did not provide a list of measures that may be taken to reduce impacts to jurisdictional waters and wetlands for the Topock groundwater remedy, the CDFW requires compliance with Avoidance and Minimization Measures (AMMs) in lieu of a Lake or Streambed Alteration Agreement pursuant to CERCLA Section 121(e) for all work conducted in CDFW jurisdictional washes (CDFW, 2013).</p> <p>Any soil removal action in CDFW jurisdictional washes will adhere to the same AMMs.</p> |
| 39       | Endangered Species Act (16 USC § 1531, et seq., 50 CFR Part 402)                            | Applicable               | <p>The Endangered Species Act and its implementing regulations makes it unlawful to remove or "take" threatened and endangered plants and animals and protects their habitats by prohibiting certain activities.</p> <p>Examples of endangered species in or around the Topock Site may include, but are not limited to, southwestern willow flycatcher, desert tortoise, Colorado pikeminnow, razorback sucker, and bonytail chub. Removal action selected for the Site will not result in the take of, or adverse impacts to, threatened and endangered species or their habitats, as determined based on consultation with the U.S. Fish and Wildlife Service under section 7 of the Endangered Species Act. Mitigation measures will be implemented in accordance with the Programmatic Biological Assessment (CH2M, 2007b) and the Bird Impact Avoidance and Minimization Plan (BIAMP) (CH2M, 2014d) to avoid project-related risks to endangered species that could result from removal actions.</p>  |
| 40       | Migratory Bird Treaty Act (16 USC §§ 703-712)   | Applicable               | <p>This Act makes it unlawful to "take, capture, kill" or otherwise impact a migratory bird or any nest or egg of a migratory bird. The Havasu National Wildlife Refuge, part of which makes up the Topock Site, was created as a refuge and breeding ground for migratory birds and other wildlife; therefore, there is potential for contact with migratory birds during proposed removal activities.</p> <p>The BIAMP specifies measures to avoid project-related risks to avian wildlife that could result from project activities. The BIAMP will be implemented during removal action.</p>  |
| 41       | Executive Order 13186 – Responsibilities of Federal Agencies to Protect Migratory Birds     | TBC                      | This Order directs executive departments and agencies to take certain actions to further implement the Migratory Bird Treaty Act, including supporting the conservation intent of the migratory bird conventions by integrating bird conservation principles, measures, and practices into agency activities and by avoiding or minimizing, to the extent practicable, adverse impacts on migratory bird resources when conducting agency actions.  |

| Item No. | ARARs or TBCs and Citation  | Determination            | Description and Applicability  |
|----------|---|--------------------------|--|
| 42       | California Code of Regulations (CCR) Title 27, Environmental Protection                         | Applicable               | <p>Title 27 regulates discharges of wastewater to land, including but not limited to, evaporation ponds, percolation ponds, or subsurface leach fields.</p> <p>Any disposal of wastewater to the existing TCS evaporation ponds must meet the Waste Discharge Requirements (WDRs) Order No. R7-2018-0022. If it becomes necessary to amend the WDRs for the ponds to accept wastewater from the proposed removal action, a revised Report of Waste Discharge (ROWD) would be required.</p>   |
| 43       | Hazardous Waste Control Law and Regulations (22 CCR Division 4.5, Chapters 11, 12, 14, 18)      | Applicable               | <p>The California Hazardous Waste Control Law and Regulations establish requirements for hazardous waste generators; operators of hazardous waste treatment, storage, or disposal units; and for corrective action taken in response to releases of hazardous waste from regulated units. Hazardous waste generators must determine if their waste is hazardous, manage the waste in accordance to specified requirements for accumulation in tanks and containers, use a hazardous waste manifest for offsite transportation of hazardous waste, send hazardous waste to an appropriately permitted offsite treatment or disposal facility, and retain specified records. These requirements will apply to all hazardous waste generated by onsite remedial activities. Units constructed to treat hazardous waste as part of the remediation must comply with additional operational and closure requirements.</p> <p>The management of excavated or displaced materials will be in accordance with the Groundwater Remedy Soil Management Plan (CH2M, 2015b).</p>   |
| 44       | Mohave Desert Air Quality Management District, Rule 403 – Fugitive Dust                         | Applicable               | <p>This rule sets the standards to minimize fugitive dust emissions from remedial actions. For example,</p> <ul style="list-style-type: none"> <li>• Must take “every reasonable precaution” to minimize dust emissions from soil disturbing activities (e.g., excavation, grading, land clearing).</li> <li>• Must take “every reasonable precaution” to keep their operations from depositing visible particulate matter on public roadways (clean equipment prior to travel on paved streets, remove any deposited material promptly).</li> <li>• If peak winds are less than 25 miles per hour (mph) and 15-minute average wind speed is less than 15 mph: <ul style="list-style-type: none"> <li>– Must not conduct transport, handling, construction or storage activities that cause fugitive dust that remains visible beyond the property line, and</li> <li>– Must not cause PM concentrations in excess of 100 micrograms per cubic meter, measured as the difference between upwind and downwind samples collected on high volume samplers at the property line for a minimum of 5 hours.</li> </ul> </li> </ul> |
| 45       | Requirement for Land Use Covenants (22 CCR § 67391.1)   | Relevant and Appropriate | <p>This regulation requires appropriate restrictions on use of property in the event that a proposed remedial alternative results in hazardous materials remaining at the property at levels that are not suitable for unrestricted use of the land. This is an ARAR with respect to privately-owned land at the Topock Site.</p> <p>A Land Use Covenant and Agreement was made between PG&amp;E and DTSC for PG&amp;E property (APN 0650-161-08) at the Site. Removal action selected for the Site will be conducted in compliance with the Environmental Restrictions of the Covenant.</p>   |
| 46       | Clean Air Act (42 USC §§ 7401, et seq.)<br>National Ambient Air Quality Standards (40 CFR § 50) | Relevant and Appropriate | <p>These ambient air quality standards define levels of air quality to protect the public health. National Ambient Air Quality Standards are not enforceable in and of themselves, but they may be used as guidance if removal activities create potential air quality impacts.</p>  |
| 47       | Federal Noxious Weed Act of 1974 Public Law 93-629 (7 USC 2801, et seq.)                        | Applicable               | <p>Requires the use of integrated management systems to control or contain undesirable plant species. Applicable to on-Site response activities to control, eradicate, or prevent or retard the spread of such weeds.</p>  |
| 48       | Executive Order 13112 – Management of Invasive Species  | TBC                      | <p>Requires that each Federal agency whose action may affect the status of invasive species to take certain actions to prevent the introduction of invasive species and provide for their control and to minimize the economic, ecological, and human health impacts that invasive species cause.</p>  |

AMM = Avoidance and Minimization Measures  
ARAR = applicable or relevant and appropriate requirements  
BIAMP = Bird Impact Avoidance and Minimization Plan  
BLM = U.S. Bureau of Land Management  
CCR = California Code of Regulations  
CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act  
CFR = Code of Federal Regulations  
COPC = constituent of potential concern  
CrVI – hexavalent chromium  
DOI = U.S. Department of the Interior  
DTSC = California Department of Toxic Substance Control  
ECV = ecological comparison values  
ESL = environmental screening level  
FLPMA = Federal Land Policy and Management Act  
HERO = DTSC Human and Ecological Risk Office  
HHRA = human health and risk assessment

HNWR = Havasu National Wildlife Refuge  
mph = miles per hour  
NCP = National Oil and Hazardous Substance Pollution Contingency Plan  
NPDES = National Pollutant Discharge Elimination System  
PAH = polycyclic aromatic hydrocarbons  
PG&E = Pacific Gas and Electric Company  
RBRG = risk-based remediation goals  
RCRA = Resource Conservation and Recovery Act  
ROWD = Report of Waste Discharge  
TBC = to-be-considered  
TCS = Topock Compressor Station  
TEQ = toxicity equivalent  
USC = U.S. Code  
USEPA = U.S. Environmental Protection Agency  
USFWS = U.S. Fish and Wildlife Service  
WDR = Waste Discharge Requirements



Table 4-1. Individual Analysis of Alternatives

Soil Engineering Evaluation/Cost Analysis

PG&E Topock Compressor Station, Needles, California

| Criteria  | Alternative 1: No Action  | Alternative 2: Excavation and Offsite Disposal of All Material  | Alternative 3: Excavation, Mechanical Separation, Offsite Disposal of Fines, Reuse of Coarse Material   | Alternative 4: Excavation, Mechanical Separation, Offsite Disposal of Fines, Soil Washing of Coarse Material, Reuse of Washed Coarse Material  |
|---|---|---|---|--|
| EFFECTIVENESS   |   |   |   |  |
| Overall Protection of Human Health and the Environment                            | Will not be protective of human health and the environment. Current risks to human health and the environment would not be mitigated. | Protective. Alternative 2 was designed to meet RAOs protective of human health and the environment. Current risks to human health and the environment would be mitigated.   | Protective. Alternative 3 was designed to meet RAOs protective of human health and the environment. Current risks to human health and the environment would be mitigated.   | Protective. Alternative 4 was designed to meet RAOs protective of human health and the environment. Current risks to human health and the environment would be mitigated.  |
| Compliance with ARARs and Other Criteria, Advisories, and Guidance                | No chemical-specific ARARs were identified, however, TBC criteria will not be met.  | Alternative 2 was developed to be compliant with location-, and action-specific ARARs, and certain chemical-specific TBCs.  | Alternative 3 was developed to be compliant with location-, and action-specific ARARs, and certain chemical-specific TBCs.  | Alternative 4 was developed to be compliant with location-, and action-specific ARARs, and certain chemical-specific TBCs.   |
| Long-term Effectiveness and Permanence  |   |   |   |  |
| Magnitude of Residual Risk  | No reduction in risk will be achieved.  | Soil will be removed to meet RAOs..<br><br>Risk calculations, confirmation sampling, and visual observation will be performed to ensure RAOs 1 through 3 are met.   | Soil will be removed and mechanically separated to meet RAOs. Coarse material greater than 3/8 inch diameter will be returned to the excavated areas with a balance of clean fill to match original contours. Site related contaminants associated with soil fines (dust) may remain adhered to the large, coarse soil fraction separated after excavation; residual contaminants, if present, are not anticipated to pose significant exposure or migration risk.<br><br>Risk calculations, confirmation sampling, and visual observation will be performed to ensure RAOs 1 through 3 are met.  | Soil will be removed and mechanically separated to meet RAOs. Coarse material greater than 3/8 inch diameter will be washed to remove most site-related contaminants that may remain in dust adhered to the larger size materials. After washing soil will be returned to the excavated areas with a balance of clean fill to match original contours. Residual contaminants, if present, are not anticipated to pose significant exposure or migration risk.<br><br>Risk calculations, confirmation sampling, and visual observation will be performed to ensure RAOs 1 through 3 are met.  |
| Adequacy and Reliability of Controls  | No controls will be implemented.  | Excavation will adequately meet RAOs. Excavation itself has no controls to be maintained.   | Excavation and size separation will adequately meet RAOs. Excavation itself has no controls to be maintained.   | Excavation, size separation, and soil washing will adequately meet RAOs. Excavation itself has no controls to be maintained.   |
| Reduction in Toxicity, Mobility, and Volume through Treatment                     |   |   |   |  |
| Treatment Process Used and Materials Treated                                      | No treatment processes will be implemented.   | Excavation will remove soil to meet RAOs. Excavated soil will not be treated before disposal.   | Excavation and mechanical separation will remove and treat soil to meet RAOs. Excavated soil will be mechanically separated into fine and coarse fractions. The fine fraction will be disposed offsite without treatment. The coarse fraction, which is not anticipated to exceed RAOs, will be reused as fill material.  | Excavation, mechanical separation, and soil washing will remove and treat soil to meet RAOs. The soil will be mechanical separated into the fine and coarse fraction. The fine fraction will disposable disposed offsite. The coarse fraction will be washed with water to remove adhered fine soil and reused as fill material. Wash water will be discharged to on-site wastewater ponds (the TCS evaporation ponds).  |
| Amount of Hazardous Material Destroyed  | No hazardous materials will be destroyed.   | No hazardous materials will be destroyed; destructive treatment technologies will not adequately meet RAOs.   | No hazardous materials will be destroyed; destructive treatment technologies will not adequately meet RAOs.   | No hazardous materials will be destroyed; destructive treatment technologies will not adequately meet RAOs.  |
| Degree of Expected Reductions in Toxicity, Mobility, and Volume through Treatment | No reduction in toxicity, mobility, and volume will be achieved.  | No reduction in toxicity, mobility, or volume will be achieved. All excavated will be appropriately disposed offsite.   | The volume of impacted soil will be reduced through mechanical size separation, which will concentrate contaminants in the fine fraction. This will reduce the volume of impacted soil by approximately half.   | The volume of impacted soil will be reduced through mechanical size separation, which will concentrate contaminants in the fine fraction. This will reduce the volume of impacted soil by approximately half.<br><br>Soil washing will generate waste water that will require disposal.  |
| Degree to Which Treatment is Irreversible   | No treatment will be implemented.   | Excavation and offsite disposal will be irreversible.   | Excavation, mechanical separation, and offsite disposal will be irreversible.   | Excavation, mechanical separation, soil washing, and offsite disposal will be irreversible.  |
| Type and Quantity of Residuals or Untreated Wastes Remaining After Treatment      | Existing waste will remain in place.  | Excavation and disposal will meet RAOs. All soil not meeting RAOs will be removed from the potential action areas. Risk calculations, confirmation sampling, and visual observation will be performed to ensure RAOs 1 through 3 are met. | Excavation and disposal or treatment will meet RAOs. All soil not meeting RAOs will be removed from the potential action areas, mechanically size separated, and the coarse material reused as fill material.<br><br>It is possible that site-related contaminants that may be associated with dust adhered to the large, coarse soil fraction will remain in place. There is no way of reliably and reproducibly measuring this fraction; however, the mass and corresponding mass concentration are anticipated to be insignificant. Risk calculations, confirmation sampling, and visual observation will be performed to ensure RAOs 1 through 3 are met. | Excavation and disposal or treatment will meet RAOs. All soil not meeting RAOs will be removed from the potential action areas, mechanically size separated, and the coarse material reused as fill material after washing.<br><br>Site related contaminants potentially associated with dust adhered to the large, coarse soil fraction will be removed from the soil through soil washing and transferred to the soil washing wastewater. It is assumed that wastewater will be discharged to existing TCS evaporation ponds, as appropriate. Disposal of wastewater to the ponds must meet requirements specified in the action-specific ARARs.<br><br>Risk calculations, confirmation sampling, and visual observation will be performed to ensure RAOs 1 through 3 are met. |

| Criteria   | Alternative 1: No Action   | Alternative 2: Excavation and Offsite Disposal of All Material  | Alternative 3: Excavation, Mechanical Separation, Offsite Disposal of Fines, Reuse of Coarse Material  | Alternative 4: Excavation, Mechanical Separation, Offsite Disposal of Fines, Soil Washing of Coarse Material, Reuse of Washed Coarse Material   |
|--|--|---|--|---|
| Short-term Effectiveness   |  |   |  |   |
| Protection of Community During Removal Actions                           | Because there is no action taken, there will be no construction-related impacts on the community due to removal action implementation. Existing threats will remain. | The public can be protected using BMPs including fugitive dust suppression and perimeter air monitoring. Some risk to the public is associated with transportation of hazardous material offsite.   | The public can be protected using BMPs including fugitive dust suppression and air monitoring and appropriate material transportation requirements. Some risk to the public is associated with transportation of hazardous material (less hazardous material will be transported offsite than in Alternative 2).   | The public can be protected using BMPs including fugitive dust suppression and air monitoring and appropriate material transportation requirements. Some risk to the public is associated with transportation of hazardous material (less hazardous material will be transported offsite than in Alternative 2).  |
| Protection of Workers During Removal Actions                             | Because there is no action taken, there will be no construction related impacts to workers due to removal action implementation. Existing threats will remain.       | Some risk to workers will be encountered during excavation and transportation of contaminated soil; however, workers can be protected by following requirements and protocols in project-specific health and safety plans.  | Some risk to workers will be encountered during excavation and transportation of contaminated soil; however, workers can be protected by following requirements and protocols in project-specific health and safety plans.<br><br>Dust generated during mechanical separation of soil will also pose some risk to workers, but again, workers can be protected using normal health and safety protocols.   | Some risk to workers will be encountered during excavation and transportation of contaminated soil; however, workers can be protected by following requirements and protocols in project-specific health and safety plans.<br><br>Dust generated during mechanical separation of soil will also pose some risk to workers, but again, workers can be protected using normal health and safety protocols.  |
| Environmental Impacts  | Because there is no action taken, there will be no construction related impacts to the environment. Existing threats will remain.                                    | Coordination with USFWS and CDFW will occur to ensure applicable management measures are implemented during the removal action to avoid and protect sensitive habitats and wildlife in the work areas.<br><br>The removal action will comply with all applicable measures and stipulations of the Programmatic Agreement (PA) and the Cultural and Historic Property Management Plan (CHPMP).<br><br>BMPs including engineered controls, if needed, implemented during removal action activities will control and minimize potential spills and releases into the environment.<br><br>Removal action activities will use energy and produce greenhouse gas emissions and air emissions of criteria pollutants (NO <sub>x</sub> , SO <sub>x</sub> , PM <sub>10</sub> ). This alternative will result in transportation of a greater volume of waste (and associated energy inputs and emissions) than Alternatives 3 and 4. Once initial construction activities are completed, the alternative will not require any additional energy inputs. | Coordination with USFWS and CDFW will occur to ensure applicable management measures are implemented during the removal action to avoid and protect sensitive habitats and wildlife in the work areas.<br><br>The removal action will comply with all applicable measures and stipulations of the PA and the CHPMP.<br><br>BMPs including engineered controls, if needed, implemented during removal action activities will control and minimize potential spills and releases into the environment.<br><br>Removal action activities will use energy and produce greenhouse gas emissions and air emissions of criteria pollutants (NO <sub>x</sub> , SO <sub>x</sub> , PM <sub>10</sub> ). This alternative will require less transportation of waste than Alternative 2 but will require energy inputs related to mechanical separation. Once initial construction activities are completed, the alternative will not require any additional energy inputs. | Coordination with USFWS and CDFW will occur to ensure applicable management measures are implemented during the removal action to avoid and protect sensitive habitats and wildlife in the work areas.<br><br>The removal action will comply with all applicable measures and stipulations of the PA and the CHPMP.<br><br>BMPs including engineered controls, if needed, implemented during removal action activities will control and minimize potential spills and releases into the environment.<br><br>Removal action activities will use energy and produce greenhouse gas emissions and air emissions of criteria pollutants (NO <sub>x</sub> , SO <sub>x</sub> , PM <sub>10</sub> ). This alternative will require less transportation of waste than Alternative 2 but will require energy inputs and water usage related to mechanical separation and soil washing. Once initial construction activities are completed, the alternative will not require any additional energy inputs. |
| Time Until RAOs are Met  | The RAOs will not be met.  | Approximately 4 months.   | Approximately 5 months.  | Approximately 5 months.   |
| IMPLEMENTABILITY   |  |   |  |   |
| Technical Feasibility  |  |   |  |   |
| Ability to Construct and Operate the Technology                          | Not applicable. No additional construction or operation will be required.  | Excavation is a proven technology that has been implemented at Topock.  | Excavation and mechanical separation are proven technologies that have been implemented at Topock.   | Excavation and mechanical separation are proven technologies that have been implemented at Topock. Soil washing is well understood but requires relatively more steps including washing and separation of washed material from wastewater.  |
| Reliability of the Technology  | Not applicable.  | Excavation is a reliable technology.  | Excavation and mechanical separation are reliable technologies. The addition of mechanical separation may add some risk of schedule delays related to equipment malfunction.   | Excavation, mechanical separation, and soil washing are reliable technologies. The addition of mechanical separation and soil washing may add some risk of schedule delays related to equipment malfunction.  |
| Ease of Undertaking Additional Removal or Remedial Actions, if Necessary | Alternative offers a high ease of undertaking additional actions.  | Alternative offers a high ease of undertaking additional actions.   | Alternative offers a high ease of undertaking additional actions.  | Alternative offers a high ease of undertaking additional actions.   |
| Ability to Monitor Effectiveness of the Removal or Remedial Action       | Alternative offers a high ability to monitor remedy effectiveness.   | Alternative offers a very high ability to monitor removal action effectiveness. Risk calculations, confirmation sampling, and visual observation will be performed to ensure RAOs 1 through 3 are met.  | Alternative offers a very high ability to monitor removal action effectiveness. Risk calculations, confirmation sampling, and visual observation will be performed to ensure RAOs 1 through 3 are met.   | Alternative offers a very high ability to monitor removal action effectiveness. Risk calculations, confirmation sampling, and visual observation will be performed to ensure RAOs 1 through 3 are met.  |

| Criteria   | Alternative 1: No Action   | Alternative 2: Excavation and Offsite Disposal of All Material  | Alternative 3: Excavation, Mechanical Separation, Offsite Disposal of Fines, Reuse of Coarse Material  | Alternative 4: Excavation, Mechanical Separation, Offsite Disposal of Fines, Soil Washing of Coarse Material, Reuse of Washed Coarse Material   |
|--|----------------------------|---|--|---|
| Administrative Feasibility   |                            |   |  |   |
| Ease of Coordinating with Other Offices, Agencies, and Third-Parties           | No coordination necessary. | <p>All alternatives require review by the current land owners/managers (BLM, Caltrans, USFWS) and other stakeholders (including the Tribes).</p> <p>This alternative will result in the greatest volume of soil removed from the Site. The Tribes have expressed a preference for minimizing the volume of soil removed due to the cultural and historical significance of the Site.</p> <p>Selection of an appropriate staging area will require consultation and agreement with landowners and other stakeholders.</p> <p>Excavation activities in AOC 14 are within the Caltrans right-of-way and will require a lane closure of I-40 for equipment access. Lane closure will require Caltrans approval and coordination with the California Highway Patrol. Access will also need to be coordinated with BNSF for any personnel and equipment to cross over BNSF tracks.</p> <p>Excavation activities will require closure of specific areas to hikers and other recreators. This closure would need to be coordinated with land owners/managers.</p> | <p>All alternatives require review by the current land owners (BLM, Caltrans, USFWS) and other stakeholders (including the Tribes).</p> <p>This alternative minimizes the volume of soil removed from the Site.</p> <p>Selection of an appropriate staging and processing areas will require consultation and agreement with landowners and other stakeholders.</p> <p>Excavation activities in AOC 14 are within the Caltrans right-of-way and will require a lane closure of I-40 for equipment access. Lane closure will require Caltrans approval and coordination with the California Highway Patrol. Access will also need to be coordinated with BNSF for any personnel and equipment to cross over BNSF tracks.</p> <p>Excavation activities will require closure of specific areas to hikers and other recreators. This closure would need to be coordinated with land owners/managers.</p> | <p>All alternatives require review by the current land owners (BLM, Caltrans, USFWS) and other stakeholders (including the Tribes).</p> <p>This alternative minimizes the volume of soil removed from the Site.</p> <p>Wastewater generated during soil washing will require disposal. This EE/CA assumes wastewater will be disposed in the TCS evaporation ponds. Discharge to the TCS evaporation ponds must meet Waste Discharge Requirements Order No. R7-2018-0022. If it becomes necessary to amend the WDRs for the ponds to accept wastewater from the proposed removal action, a revised ROWD would be required.</p> <p>Selection of an appropriate staging and processing areas will require consultation and agreement with landowners and other stakeholders.</p> <p>Excavation activities in AOC 14 are within the Caltrans right-of-way and will require a lane closure of I-40 for equipment access. Lane closure will require Caltrans approval and coordination with the California Highway Patrol. Access will also need to be coordinated with BNSF for any personnel and equipment to cross over BNSF tracks.</p> <p>Excavation activities will require closure of specific areas to hikers and other recreators. This closure would need to be coordinated with land owners/managers.</p> |
| Availability of Services and Materials   |                            |   |  |   |
| Availability of Offsite Treatment, Storage, and Disposal Services and Capacity | Not applicable.            | Offsite disposal is available.  | Offsite disposal is available.   | Offsite disposal is available.  |
| Availability of Necessary Equipment and Specialists                            | None required.             | Necessary equipment and specialists for the alternative are highly available.   | Necessary equipment and specialists for the alternative are available but limited.   | Necessary equipment and specialists for the alternative are available but limited.  |
| Availability of Prospective Technologies                                       | None required.             | All prospective technologies are highly available.  | All prospective technologies are highly available.   | All prospective technologies are highly available.  |
| COST   |                            |   |  |   |
| Total Capital Cost   |                            | \$5,398,000   | \$4,666,000  | \$5,222,000   |

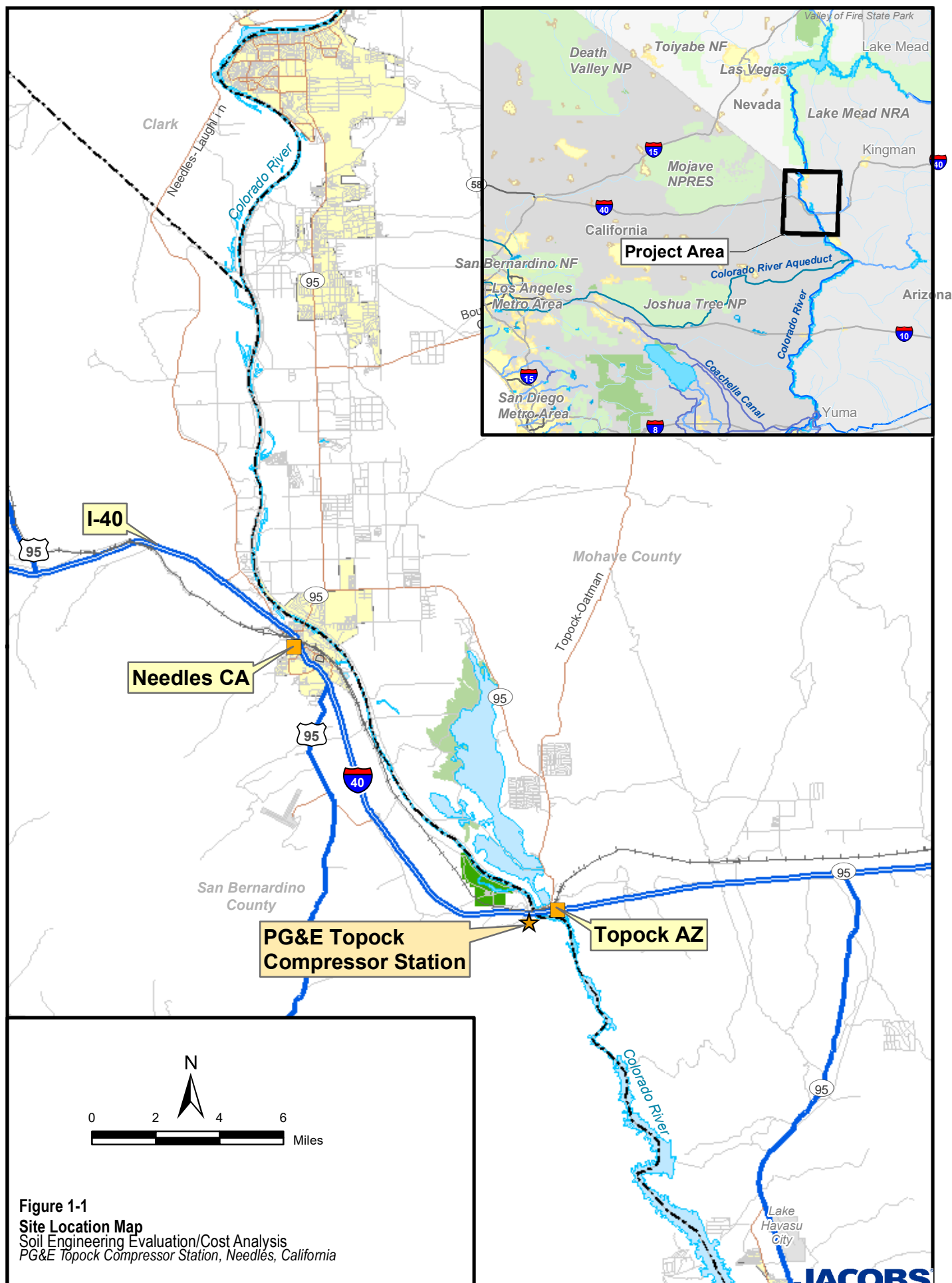
ARAR = applicable or relevant and appropriate requirements  
BLM = U.S. Bureau of Land Management  
BMP = best management practice  
Caltrans = California Department of Transportation  
CDFW = California Department of Fish and Wildlife  
CHPMP = Cultural and Historic Property Management Plan  
EE/CA = Engineering Evaluation/Cost Analysis  
NO<sub>x</sub> = nitrogen oxides  
PA = Programmatic Agreement  
PM<sub>10</sub> = particulate matter 10 micrometers or less  
RAO = removal action objectives  
ROWD = Report of Waste Discharge  
SO<sub>x</sub> = sulfur oxides  
TCS = Topock Compressor Station  
USFWS = U.S. Fish and Wildlife Service  
WDR = Waste Discharge Requirements





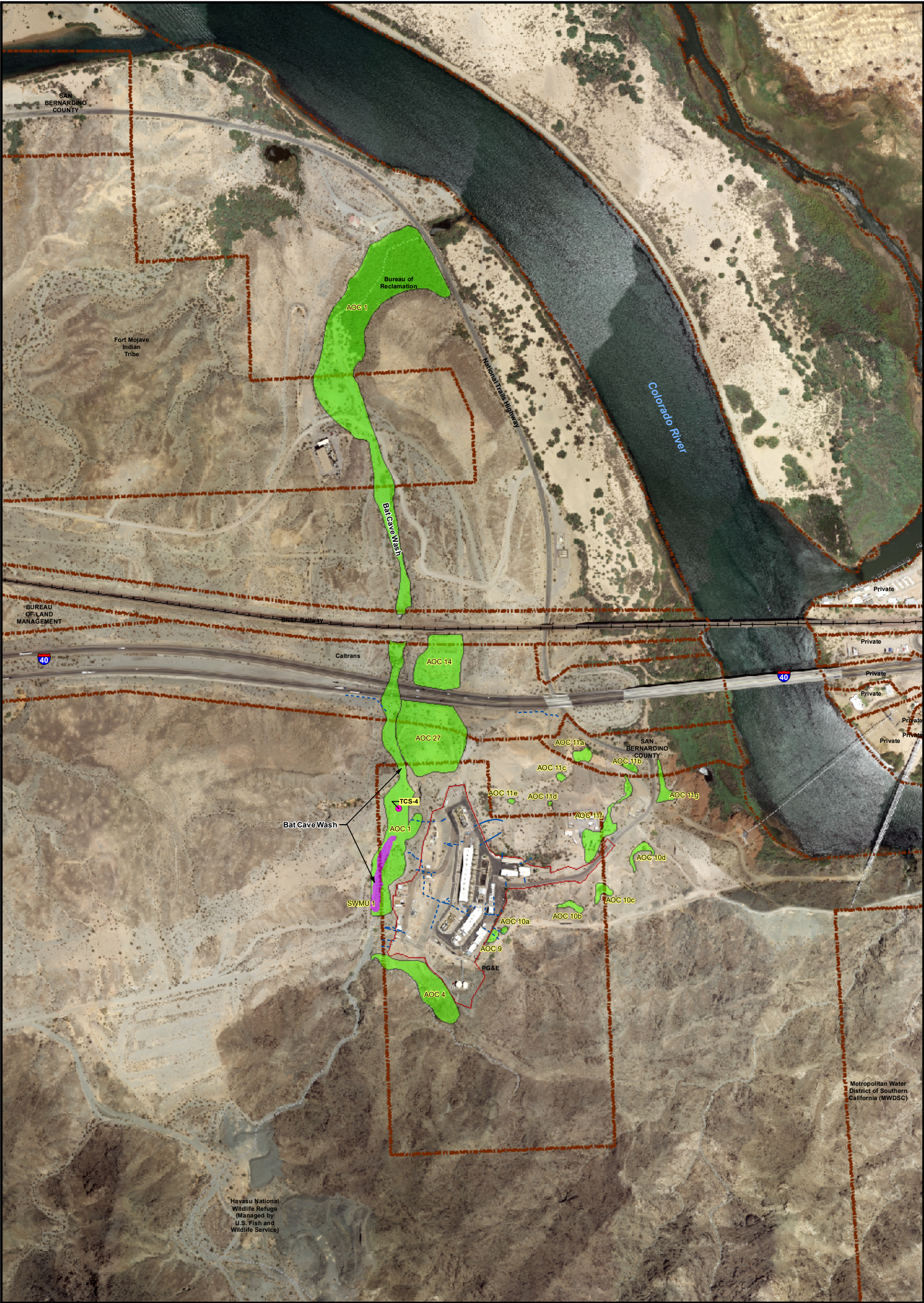
## Figures





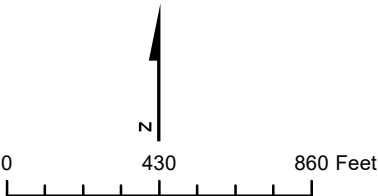






- LEGEND**
- Area of Concern (AOC)
  - Solid Waste Management Unit (SWMU)
  - Stormwater Piping Below Ground
  - Stormwater Piping Above Ground
  - Topock Compressor Station Fence Line
  - Parcel Boundaries

Notes:  
RFI/RI = Resource Conservation and Recovery  
Act Facility Investigation/Remedial Investigation



**Figure 2-1**  
**RFI/RI Investigation Areas Evaluated**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California









**LEGEND**

- Jurisdictional Waters and Wetlands
- Parcel Boundaries
- Topock Compressor Station Fence Line
- Potential Action Area

0 425 850 Feet

N

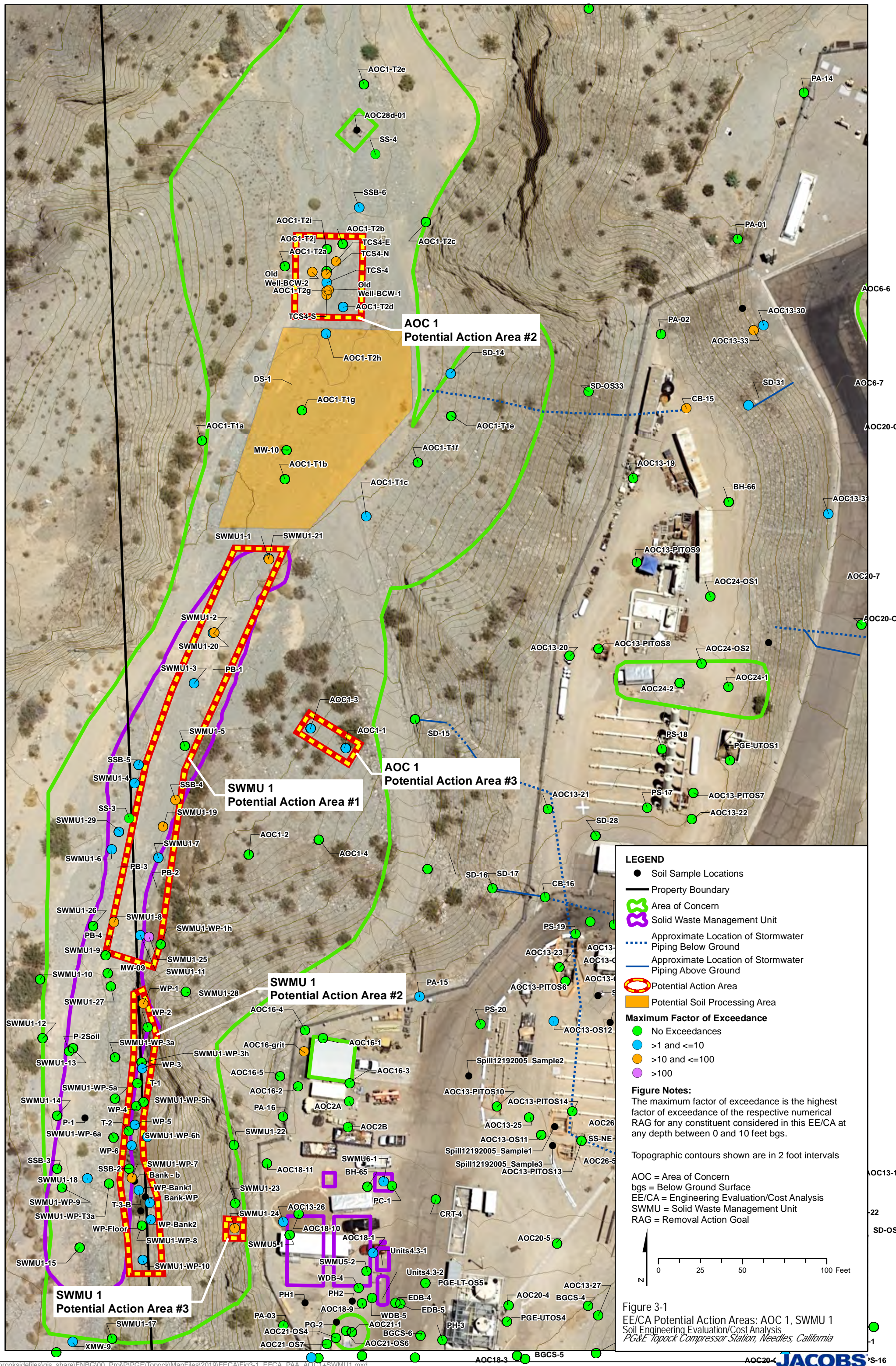
**Figure 2-2**  
**Jurisdictional Waters and Wetlands**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

**JACOBS**





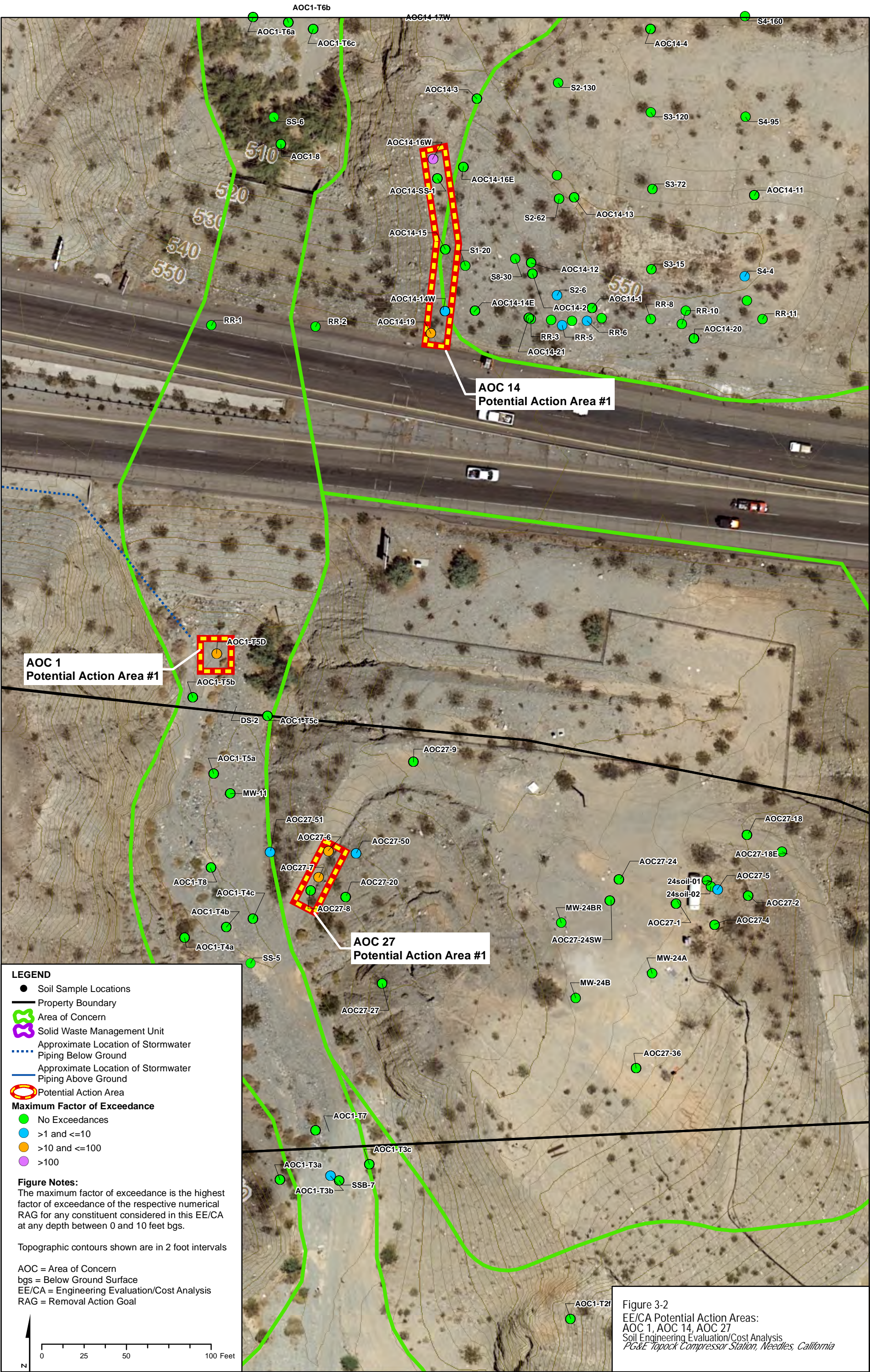


















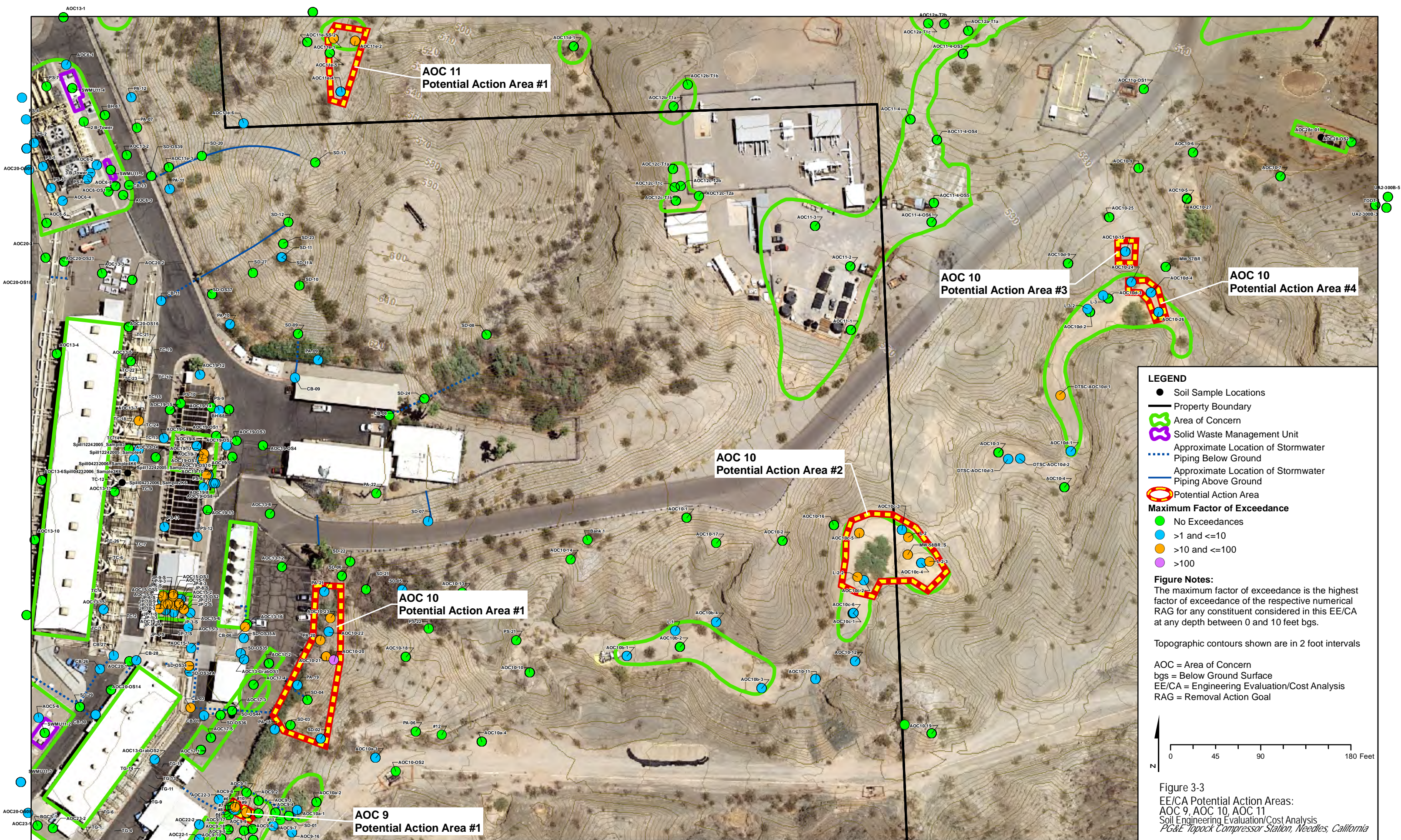
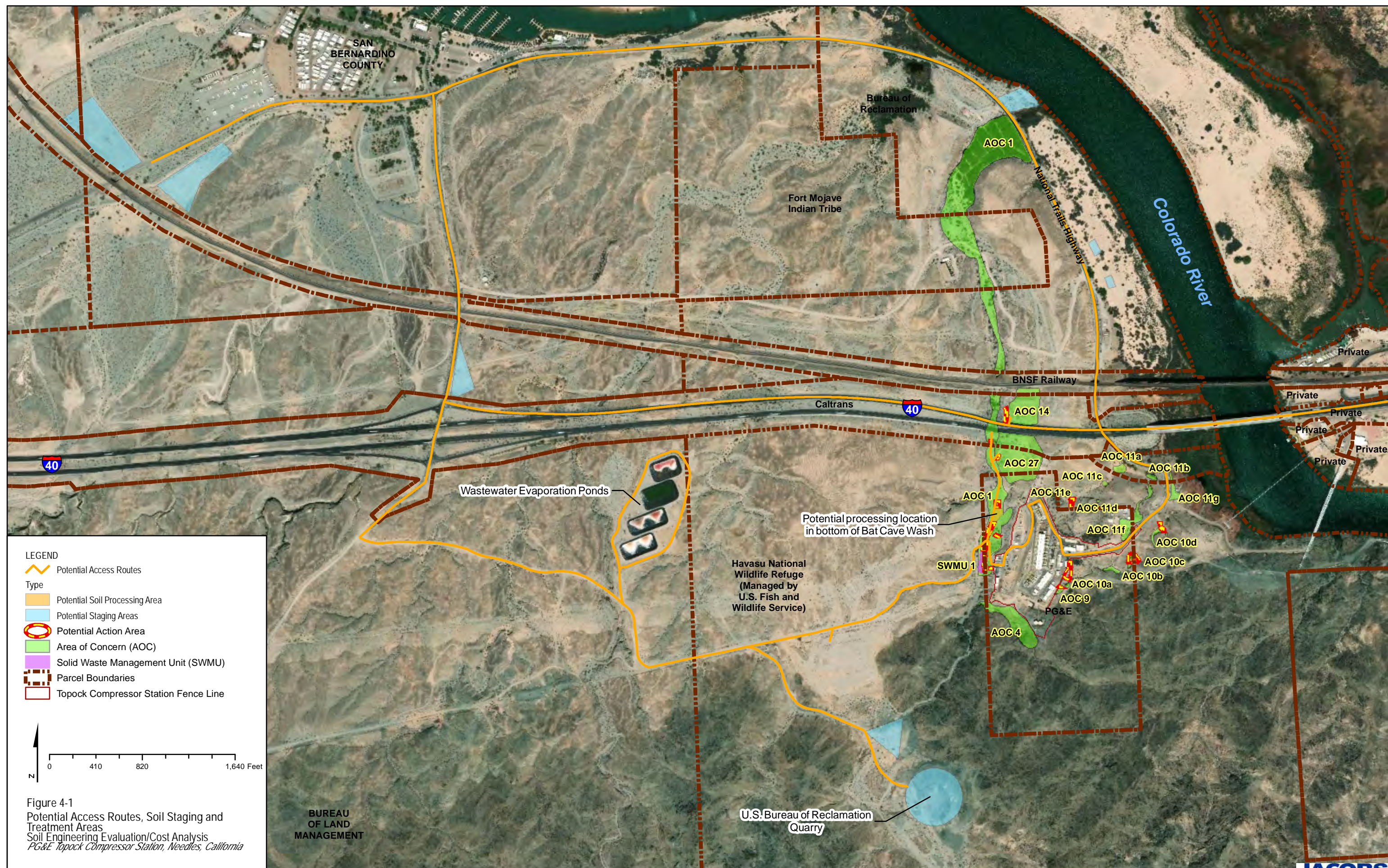


Figure 3-3  
 EE/CA Potential Action Areas:  
 AOC 9, AOC 10, AOC 11  
 Soil Engineering Evaluation/Cost Analysis  
 PG&E Topock Compressor Station, Needles, California















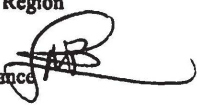
**Appendix A**  
**Signed Approval Memorandum for an**  
**Engineering Evaluation/Cost Analysis at the**  
**PG&E Topock Compressor Station,**  
**San Bernardino County, CA**



**Memorandum**

**To:** Michaela E. Noble, Director  
Office of Environmental Policy & Compliance

**Through:** Amy Lueders, Director  
U.S. Fish and Wildlife Service, Southwest Region

**Through:** William Lodder, ECLM Team Lead  
Office of Environmental Policy & Compliance 

**From:** Pamela Innis, CHF Remedial Project Manager

**Subject:** Approval Memorandum for an Engineering Evaluation/Cost Analysis at the Pacific Gas and Electric Topock Compressor Station, San Bernardino County, CA

The purpose of this memorandum is to request approval to proceed with an Engineering Evaluation/Cost Analysis (EE/CA) to evaluate non-time critical removal action alternatives at the Pacific Gas and Electric (PG&E) Topock Compressor Station Remediation Site (Site) to address contaminated soil at Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) within the Site. At this time, the Department of the Interior (DOI) expects PG&E to prepare the EE/CA and, if warranted, to implement any removal action that the DOI subsequently selects based on the findings of the EE/CA and subject to the DOI oversight.

**I. Site Background**

Investigative and remedial activities at the Site date to the 1980s with the identification of solid waste management units through a RCRA facility assessment. Since 1996, there have been multiple phases of investigation at the Topock site to collect soil data to evaluate the nature and extent of contamination at up to forty SWMUs, AOCs, and Undesignated Areas. Soil investigation activities were completed in 2017. Eleven areas are located on or adjacent to Federal lands, of which five areas contain contaminant concentrations significantly above background values, ecological comparison values, and/or residential human screening levels. Below are descriptions and background information for those five areas.

**AOC 1 and SWMU 1 – Former percolation bed and surrounding area**

AOC 1 and SWMU 1 are located outside the facility fence line west of the compressor station within Bat Cave Wash (Figure 1). AOC 1 comprises a portion of Bat Cave Wash

adjacent to the station including SWMU 1, as well as the portion of Bat Cave Wash extending to the north of SWMU 1 toward the Colorado River. SWMU 1 is the former percolation bed located in Bat Cave Wash. From about 1964 to approximately 1971, the facility discharged wastewater to the percolation bed (SWMU 1) and allowed water to percolate into the ground and/or evaporate. Historical aerial photos indicate that, prior to the establishment of the bermed percolation bed, discharges to Bat Cave Wash may have extended as far downstream as the railroad tracks (just of Figure 1 to the north). Further north, near the mouth of Bat Cave Wash, the thick vegetation, widening of the channel, and blockage of flow by National Trails Highway greatly reduces the energy of flow during runoff events, resulting in deposition of entrained soil within the vegetated area at the lower end of Bat Cave Wash. The area is heavily vegetated, predominately with salt cedar (also known as tamarisk), which is an aggressive, non-native plant species. This heavily vegetated portion of Bat Cave Wash is a long-term depositional area that existed before the compressor station was built, although the depositional history and patterns within this area are not well known. AOC 1 is located partially on PG&E property, the Havasu National Wildlife Refuge (HNWR), Bureau of Reclamation property (managed by Bureau of Land Management), BNSF Railway Company (BNSF) property, and Fort Mojave Indian Tribe property with PG&E as an easement holder. SWMU 1 is located on both PG&E property and the HNWR.

#### **AOC 10 – East Ravine**

AOC 10 is located outside the facility fence line southeast of the compressor station in a small ravine known as east ravine. The ravine runs eastward toward the Colorado River. AOC 10 generally includes all of east ravine as well as the specific areas shown on Figure 2. The ravine is approximately 1,600 feet long and is bisected by three constructed berms. Due to the berms, surface flow within the ravine does not typically reach the Colorado River. AOC 10 likely received runoff from the compressor station, the access road to the compressor station, and AOC 9; discharge from stormwater drain pipes; surface debris on the slopes of the ravine; and incidental overflows of wastewater via the former trench drain at the top of the station access road. AOC 10 is located on both PG&E property and the HNWR.

#### **AOC 14 – Railroad Debris Site**

AOC 14 is located outside the facility fence line approximately 1,000 feet north of the compressor station and is currently bounded by the BNSF railway tracks to the north, Interstate 40 to the south, Bat Cave Wash to the west, and a former access road to the east (Figure 1). AOC 14 currently contains miscellaneous construction debris related to construction of the rail line including chunks of asphalt, railroad ties, and piping. Asbestos-containing material and burned material have also been identified within AOC 14. Former compressor station employees reported that water softening (lime) sludge was disposed of in this area. An asbestos removal action was completed in 1999. Surface water

runoff along the western side of AOC 14 flows into Bat Cave Wash (AOC 1). AOC 14 is located on property owned by BNSF, Bureau of Land Management, HNWR, and CalTrans Right-of-Way.

#### **AOC 27 – MW-24 Bench**

AOC 27 is located outside the facility fence line north of the compressor station, south of Interstate 40, and east of Bat Cave Wash (AOC 1) shown on Figure 1. A former PG&E Topock Compressor Station Employee indicated that AOC 27, informally known as MW-24 bench, was used as a waste disposal area. Miscellaneous construction debris and burned material are present in AOC 27. The burned debris occurs along the eastern edge of the road cut on the road from AOC 27 to Bat Cave Wash (AOC 1). Runoff from AOC 27 likely flowed into Bat Cave Wash (AOC 1). AOC 27 is located on HNWR and the Caltrans Right-of-Way.

## **II. Threat to Public Health, Welfare, or the Environment**

Metals and dioxins and furans were detected at concentrations significantly exceeding background values, ecological comparison values (ECVs) and/or residential human health screening levels in certain locations within AOC 1, SWMU 1, AOC 10, AOC 14, and AOC 27. For the purposes of this memorandum, those locations that are located on Federal land or have the potential to migrate to Federal land are called "potential action areas", and are discussed below.

Metals with elevated concentrations include total chromium, copper, lead, mercury, molybdenum, and zinc. Dioxins and furans toxicity equivalent (TEQ) values are calculated from 17 individual dioxin and furan congeners for human/mammal and avian receptors.

#### **Contaminant Information for AOC 1 and SWMU 1**

Total chromium and dioxins and furan TEQs were detected at concentrations significantly exceeding background value/ecological comparison values and/or residential human screening levels at several locations within AOC 1 and SWMU 1. Four potential action areas (one in SWMU 1 and three in AOC 1) have been identified within AOC 1 and SWMU 1 that contain soil samples with high factors of exceedance of total chromium and dioxin and furans (See Figure 1). These areas are located on Federal land or have the potential to migrate to Federal land. Figure 1 presents TEQ-avian concentrations compared to the TEQ avian ECV of 16 nanograms per kilogram (ng/kg). Locations with elevated total chromium concentrations generally correspond to the locations with elevated dioxin and furan concentrations.

Table 1 presents the soil sample concentrations in AOC 1 and SWMU 1 potential action areas compared to respective screening levels and the factors of exceedance of each screening level.

**Summary of exceedances:**

- Total chromium concentrations range from 41 to 4,400 milligrams per kilogram (mg/kg); maximum detected concentration was in AOC 1, potential action area #2 at Old Well-BCW-2 (4 to 5 feet below ground surface (bgs)). The total chromium background value is 39.8 mg/kg.
- TEQ-avian concentrations range from 20 to 11,000 ng/kg; maximum detected concentration was in SWMU 1, potential action area #1 at SWMU1-25 (0 to 1 foot bgs). The TEQ-avian ECV is 16 ng/kg.
- TEQ-human concentrations range from 51 to 12,000 nanograms per kilogram (ng/kg; maximum detected concentration was also at SWMU1-25 (0 to 1 foot bgs). The TEQ-human residential screening level is 50 ng/kg.
- TEQ-mammal concentrations range from 6.4 to 12,000 ng/kg; maximum detected concentration was again at SWMU1-25 (0 to 1 foot bgs). The TEQ-mammal screening level is based on a background concentration of 5.58 ng/kg.

**Contaminant Information for AOC 10**

Copper, total chromium, lead, mercury, and dioxins and furans were detected at concentrations significantly exceeding background value/ecological comparison values and/or residential human screening levels at several locations within AOC 10. Five proposed action areas have been identified within AOC 10 that contain soil samples with high factors of exceedance of metals and dioxin and furans (See Figure 2). These areas are located on Federal land or have the potential to migrate to Federal land. Figure 2 presents TEQ-avian concentrations compared to the TEQ avian ECV of 16 ng/kg. Locations with elevated metals concentrations generally correspond to the locations with elevated dioxin and furan concentrations.

Table 2 presents the soil sample concentrations in AOC 10 proposed action areas compared to respective screening levels, and the factors of exceedance of each screening level.

**Summary of exceedances:**

- Total chromium concentrations range from 41 to 4,000 mg/kg; maximum detected concentration was in proposed action area #2 at MW-58BR\_S (1.5 to 2 feet bgs). The total chromium background value is 39.8 mg/kg.
- Copper concentrations range from 17 to 3,100 mg/kg; maximum detected concentration was in proposed action area #1 at AOC10-21 (0 to 0.5 foot bgs). The copper background value is 16.8 mg/kg.
- Lead concentrations range from 8.9 to 920 mg/kg; maximum detected concentration was also at AOC10-21 (0 to 0.5 foot bgs). The lead background value is 8.39 mg/kg.



- Mercury concentrations range from 0.12 to 35 mg/kg; maximum detected concentration was also at AOC10-21 (0 to 0.5 foot bgs). The mercury ECV is 0.0125 mg/kg.
- TEQ-avian concentrations range from 27 to 1,100 ng/kg; maximum detected concentration was in proposed action area #1 at PA-20 (0 to 1 foot bgs). TEQ-avian ECV is 16 ng/kg.
- TEQ-human concentrations range from 53 to 1,600 ng/kg; maximum detected concentration was also at PA-20 (0 to 1 foot bgs). TEQ-human residential screening level is 50 ng/kg.
- TEQ-mammal concentrations range from 8.8 to 1,600 ng/kg; maximum detected concentration was also at PA-20 (0 to 1 foot bgs). The TEQ-mammal screening level is based on a background concentration of 5.58 ng/kg.

#### **Contaminant Information for AOC 14**

Lead and dioxins and furans were detected at concentrations significantly exceeding background value/ecological comparison values and/or residential human screening levels at several locations within AOC 14. One proposed action area has been identified within AOC 14 that contain soil samples with high factors of exceedance of lead and dioxin and furans (See Figure 1). These areas are located on Federal land or have the potential to migrate to Federal land. Figure 1 presents TEQ-avian concentrations compared to the TEQ avian ECV of 16 ng/kg. Locations with elevated lead concentrations correspond to the locations with elevated dioxin and furan concentrations.

Table 3 presents the soil sample concentrations in AOC 14 proposed action areas compared to respective screening levels, and the factors of exceedance of each screening level.

#### **Summary of exceedances:**

- Lead concentrations range from 15 to 1,600 mg/kg and the maximum detected concentration was in proposed action area #1 at AOC14-19 (2 to 3 feet bgs). The lead background value is 8.39 mg/kg.
- TEQ-avian concentrations range from 21 to 780 ng/kg; maximum detected concentration was in proposed action area #1 at AOC14-14W (5 to 5.5 feet bgs). TEQ-avian ECV is 16 ng/kg.
- TEQ-human concentrations range from 140 to 480 ng/kg; maximum detected concentration was also at AOC14-14W (5 to 5.5 feet bgs). TEQ-human residential screening level is 50 ng/kg.
- TEQ-mammal concentrations range from 6 to 480 ng/kg; maximum detected concentration was also at AOC14-14W (5 to 5.5 feet bgs). The TEQ-mammal screening level is based on a background concentration of 5.58 ng/kg.

### **Contaminant Information for AOC 27**

Copper, lead, mercury, zinc, and dioxins and furans were detected at concentrations significantly exceeding background value/ecological comparison values and/or residential human screening levels at several locations within AOC 27.

One proposed action area has been identified within AOC 27 that contain soil samples with high factors of exceedance of metals and dioxin and furans (See Figure 1). These areas are located on Federal land. Figure 1 presents TEQ-avian concentrations compared to the TEQ avian ECV of 16 ng/kg. Locations with elevated metals concentrations correspond to the locations with elevated dioxin and furan concentrations.

Table 4 presents the soil sample concentrations in AOC 27 proposed action area compared to respective screening levels, and the factors of exceedance of each screening level.

#### **Summary of exceedances:**

- Copper concentrations ranged from 18 to 1,000 mg/kg; maximum detected concentration was in proposed action area #1 at AOC27-7 (2 to 3 feet bgs). The copper background value is 16.8 mg/kg.
- Lead concentrations ranged from 8.4 to 630 mg/kg; maximum detected concentration was in proposed action area #1 at AOC27-6 (0 to 1 foot bgs). The lead background value is 8.39 mg/kg.
- Detected mercury concentrations ranged from 0.12 to 0.95 mg/kg (the reporting limit exceeded the screening level); maximum detected concentration was also at AOC27-7 (2 to 3 feet bgs). The mercury ECV is 0.0125 mg/kg.
- Zinc concentrations ranged from 74 to 1,300 mg/kg; maximum detected concentration was also at AOC27-7 (2 to 3 feet bgs). The zinc background value is 58 mg/kg.
- TEQ-avian concentrations range from 32 to 260 ng/kg; maximum detected concentration was also at AOC27-7 (2 to 3 feet bgs). TEQ-avian ECV is 16 ng/kg.
- TEQ-human concentrations range from 57 to 230 ng/kg; maximum detected concentration was also at AOC27-7 (2 to 3 feet bgs). TEQ-human residential screening level is 50 ng/kg.
- TEQ-mammal concentrations range from 5.8 to 230 ng/kg; maximum detected concentration was also at AOC27-7 (2 to 3 feet bgs). The TEQ-mammal screening level is based on a background concentration of 5.58 ng/kg.

### **Evaluation of Threat**

Sufficient evidence exists to justify the preparation of an EE/CA. The goals of the EE/CA are to identify removal action objectives for the AOCs; analyze the effectiveness, implementability, and cost of various alternatives that satisfy these objectives; and recommend a removal action alternative. The primary concerns are potential impacts to ecological receptors and specific human exposures. Several AOC locations are within active wash areas where ephemeral discharges could move contamination toward the Colorado River. If this removal action is not taken, then necessary cleanup work will be delayed until



after completion of a site-wide Remedial Investigation/ Feasibility Study and Record of Decision (ROD), during which time contaminant migration and unacceptable exposures will continue to occur. It is anticipated that the ROD will be completed in 2022, at the earliest.

### **III. Statutory Basis for Action**

The information presented in this memorandum indicates that actual or threatened releases of hazardous substances from these sites present a substantial threat to public health and the environment. Based on this information, further evaluation, in the form of an EE/CA, is warranted to evaluate alternatives that may be necessary to address such risks. The results of this EE/CA will provide the basis for the selection of a removal action to prevent, minimize, or mitigate risks to public health and the environment.

### **IV. Factors for Determining Appropriateness of a Removal Action Section**

The National Contingency Plan (NCP) provides factors for determining the appropriateness of a removal action. Factors found in 40 C.F.R. § 300.415(b)(2) most applicable to current conditions at the TCS AOCs include: the actual or potential contamination of drinking water supplies or sensitive ecosystems; actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants; high levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate; and weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released. In accordance with 40 C.F.R. § 300.415(b)(4) of the NCP, the DOI has determined that a planning period of at least six months exists before on-site activities could be initiated; therefore, an EE/CA must be conducted prior to selecting a non-time critical removal action.

### **V. Enforcement/Proposed Actions/Cost Estimates**

The DOI has entered into an Administrative Order on Consent (AOC) with PG&E to conduct this work. Pursuant to this AOC, PG&E will prepare the EE/CA and implement any subsequent removal action selected by the DOI. The DOI estimates that the approximate cost of proposed removal actions could range from ten to forty million dollars.

### **VI. Public Involvement**

The DOI will issue the EE/CA for public comment in accordance with section 300.415(n)(4) and anticipates the EE/CA will be available for public comment in 2019. The DOI will also comply with (former) Section 106 of the National Historic Preservation Act, 54 U.S.C. § 300101 et. seq.

**VII. Approval/Disapproval**

The conditions at the PG&E Topock Compressor Station Remediation Site AOCs and SWMUs meet the NCP criteria for undertaking an EE/CA that will provide the basis for the selection of a removal action, if warranted. Therefore, I am requesting approval to proceed with an EE/CA. Your approval or disapproval should be indicated below.

Director, Office of Environmental Policy and Compliance

Approve: Matthew Zell Date: 10/18/18

Disapprove: \_\_\_\_\_ Date: \_\_\_\_\_

U.S. Fish and Wildlife Service

Approve: Richard Meyers Date: 10/16/2018

Disapprove: \_\_\_\_\_ Date: \_\_\_\_\_



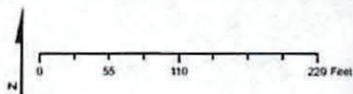
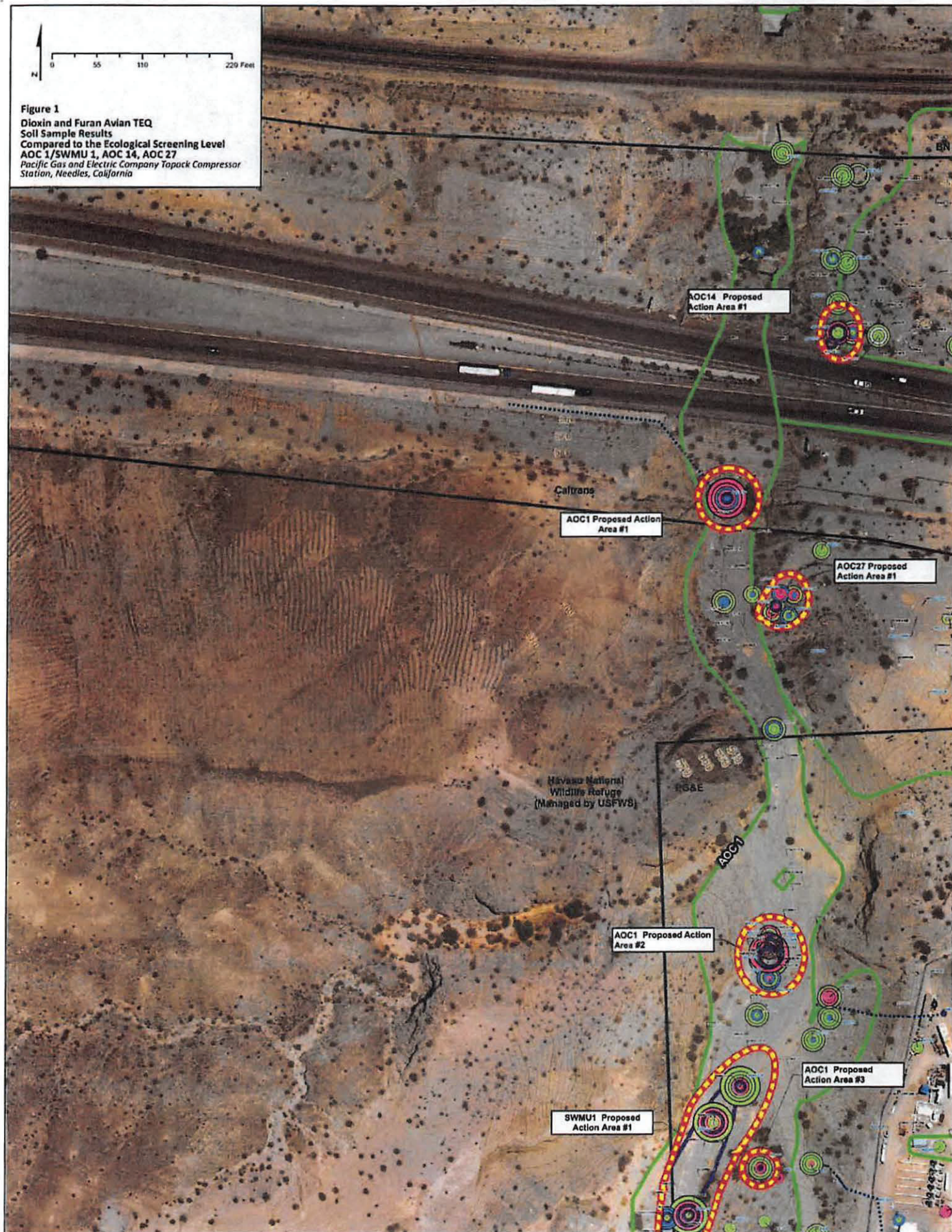


Figure 1  
Dioxin and Furan Avian TEQ  
Soil Sample Results  
Compared to the Ecological Screening Level  
AOC 1/SWMU 1, AOC 14, AOC 27  
Pacific Gas and Electric Company Topack Compressor  
Station, Needles, California





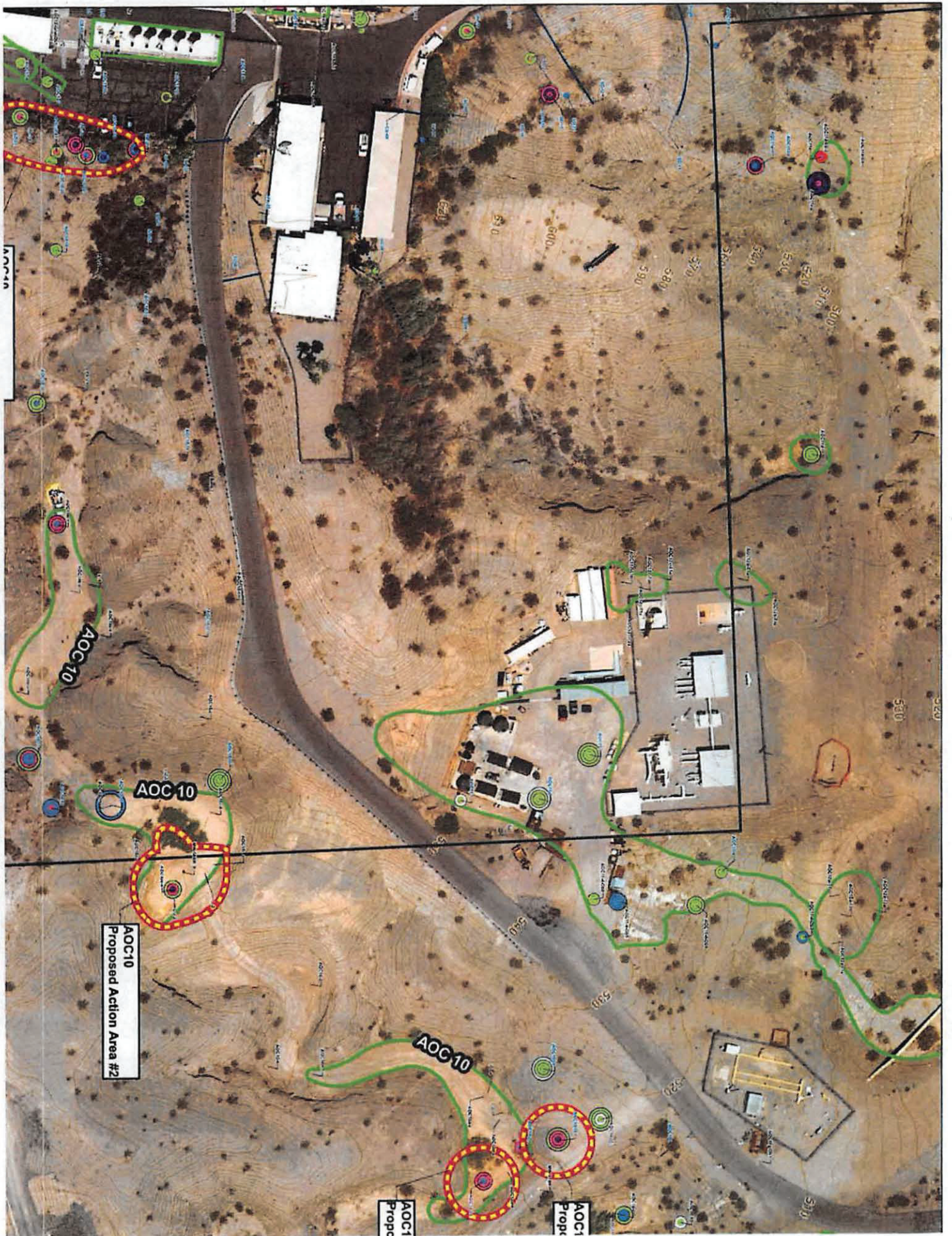




TABLE 1

Proposed Action Areas, AOC 1 and SWMU 1

Pacific Gas and Electric Company Topock Compressor Station, Needles, California

| Screening Level Type<br>Screening Level Value * | Chromium, Total     |                   |                         | TEQ Arsen         |                      | TEQ Human         |                      | TEQ Mammals       |                      |
|---|---------------------|-------------------|-------------------------|-------------------|----------------------|-------------------|----------------------|-------------------|----------------------|
|   | BKG                 | ECV               | ECV                     | RES               | CDM                  | BKG               | ECV                  | BKG               | ECV                  |
|   | 39.80               | 36.3              | 16                      | 50                | 200                  | 5.58              | 1.6                  |                   |                      |
| Location *                                      | Depth<br>(feet bps) | Result<br>(mg/kg) | Factor of<br>Exceedance | Result<br>(ng/kg) | Factor of Exceedance | Result<br>(ng/kg) | Factor of Exceedance | Result<br>(ng/kg) | Factor of Exceedance |
| <b>AOC 1 Potential Action Area #1</b>           |                     |                   |                         |                   |                      |                   |                      |                   |                      |
| AOCL-TSb  | 0-0.5               | 26                |                         |                   |                      |                   |                      |                   |                      |
|   | 2-3                 | 41                | 1                       | 1                 |                      |                   |                      |                   |                      |
|   | 5-6                 | 61                | 2                       | 2                 |                      |                   |                      |                   |                      |
| AOCL-TSD  | 0-1                 | 23                |                         |                   |                      |                   |                      |                   |                      |
|   | 2-3                 | 89                | 2                       | 2                 | 7.4                  | 10                | 38                   | 10                | 2                    |
|   | 5-6                 | 80                | 2                       | 2                 | 600                  | 1100              | 22                   | 1100              | 197                  |
|   | 9-10                | 23                | 2                       | 2                 | 58                   | 92                | 2                    | 92                | 16                   |
| Samples Exceeding SL (%)                        |                     | -                 | 50%                     | 50%               | -                    | -                 | 50%                  | -                 | 100%                 |
| Total # of Samples                              |                     | 8                 |                         | 4                 | 4                    | 4                 |                      | 4                 |                      |

TABLE 1

Proposed Action Areas, AOC 1 and SWMU 1

Pacific Gas and Electric Company Topock Compressor Station, Needles, California

| Pacific Gas and Electric Company ropack compressor station, Nevada, Conforming |                   |                      |                   |                      |                      |                      |                   |                      |                   |
|--|-------------------|----------------------|-------------------|----------------------|----------------------|----------------------|-------------------|----------------------|-------------------|
| Screening Level Type<br>Screening Level Value *                                | Chromium, Total   |                      |                   | TEQ Arsenic          |                      | TEQ Human            |                   | TEQ Mammals          |                   |
|  | BKG               | ECV                  | ECV               | Result               | Factor of Exceedance | Result               | COM               | BKG                  | ECV               |
| Depth<br>(feet bgs)  | Result<br>(mg/kg) | Factor of Exceedance | Result<br>(mg/kg) | Factor of Exceedance | Result<br>(mg/kg)    | Factor of Exceedance | Result<br>(mg/kg) | Factor of Exceedance | Result<br>(mg/kg) |
| AOC 1 Proposed Action Area #2  |                   |                      |                   |                      |                      |                      |                   |                      |                   |
| AOC1-T2b   | 26                |                      |                   |                      |                      |                      |                   |                      |                   |
| 0-0.5  | 26                |                      |                   |                      |                      |                      |                   |                      |                   |
| 2-3  | 26                |                      |                   |                      |                      |                      |                   |                      |                   |
| 5-6  | 53                | 1                    | 1                 |                      |                      |                      |                   |                      |                   |
| 9-10   | 18                |                      |                   |                      |                      |                      |                   |                      |                   |
| AOC1-T2d   | 46                | 1                    | 1                 |                      |                      |                      |                   |                      |                   |
| 0-0.5  | 24                | 27                   | 24                |                      |                      |                      |                   |                      |                   |
| 2-3  | 970               | 9                    | 10                |                      |                      |                      |                   |                      |                   |
| 5-6  | 370               | 4                    | 4                 |                      |                      |                      |                   |                      |                   |
| 9-10   | 140               |                      |                   |                      |                      |                      |                   |                      |                   |
| AOC1-T2g   | 2100              | 59                   | 58                | 89                   | 6                    | 130                  | 3                 | 23                   | 81                |
| AOC1-T2h   | 0-1               | 100                  | 3                 | 21                   | 1                    | 34                   |                   | 6                    | 21                |
| 2-3  | 24                |                      |                   | 12                   |                      | 19                   |                   | 3                    | 12                |
| 5-6  | 200               | 5                    | 6                 | 1.2                  |                      | 1.9                  |                   | 1.9                  | 1                 |
| 9-10   | 28                |                      |                   | 15                   |                      | 21                   |                   | 21                   | 13                |
| AOC1-T2i   | 25                |                      |                   | 7.9                  |                      | 25                   |                   | 4                    | 16                |
| 0-1  | 16                |                      |                   | 0.75                 |                      | 14                   |                   | 3                    | 9                 |
| 2-3  | 40                |                      |                   | 2.2                  |                      | 0.91                 |                   |                      |                   |
| 5-6  | 31                | 1                    | 1                 | 8.6                  |                      | 32                   |                   | 6                    | 20                |
| 9-10   | 21                |                      |                   | 2.2                  | 1                    | 4.8                  |                   | 3                    | 3                 |
| AOC1-T2j   | 18                |                      |                   | 3.6                  |                      | 13                   |                   | 2                    | 8                 |
| 0-1  | 16                |                      |                   | 0.65                 |                      | 4.8                  |                   | 4.8                  | 3                 |
| 2-3  | 4200              | 106                  | 116               | 250                  | 16                   | 0.71                 |                   | 0.71                 |                   |
| 5-6  | 4400              | 111                  | 121               | 100                  |                      | 350                  |                   | 63                   | 219               |
| Old Well-BCW-1   | 3400              | 85                   | 94                | 600                  | 6                    | 230                  | 7                 | 41                   | 144               |
| Old Well-BCW-2   | 13                |                      |                   | 3                    | 38                   | 870                  | 5                 | 870                  | 156               |
| TCSA-E   | 3400              | 85                   | 94                | 74                   |                      | 4.6                  | 17                | 4.6                  | 3                 |
| 5-6  | 3400              | 85                   | 94                | 150                  | 5                    | 110                  | 2                 | 110                  | 69                |
| TCSA-N   | 3300              | 83                   | 91                | 130                  | 9                    | 210                  | 4                 | 38                   | 131               |
| 4-5  | 840               | 21                   | 23                | 34                   | 8                    | 180                  | 4                 | 180                  | 113               |
| TCSA-S   | 2200              | 55                   | 61                | 47                   | 2                    | 47                   |                   | 8                    | 29                |
| 5-6  | 33                | 48%                  | 48%               | 21                   | 48%                  | 21                   | 35%               | 71%                  | 90%               |
| Samples Exceeding SL (%)   |                   |                      |                   |                      |                      |                      |                   |                      |                   |
| Total # of Samples   | 33                |                      |                   | 21                   |                      | 21                   |                   | 21                   |                   |

TABLE 1

Proposed Action Areas, AOC 1 and SWMU 1

Pacific Gas and Electric Company Topock Compressor Station, Needles, California

| Pacific Gas and Electric Company TOPSOX Compressor Station, Napa, California |       |                 |                      |     |                |                      |     |                |                      |      |                |                      |     |
|--|-------|-----------------|----------------------|-----|----------------|----------------------|-----|----------------|----------------------|------|----------------|----------------------|-----|
| Screening Level Type *   |       | Chromium, Total |                      |     | TEQ Arsenic    |                      |     | TEQ Human      |                      |      | TEQ Mammals    |                      |     |
| Screening Level Value *  |       | Result (mg/kg)  | BKG                  | ECV | Result (ug/kg) | Factor of Exceedance | ECV | Result (ug/kg) | RES                  | COM  | Result (ug/kg) | BKG                  | ECV |
| Location *   |       | Depth (feet/ft) | Factor of Exceedance |     |                | Factor of Exceedance |     |                | Factor of Exceedance |      |                | Factor of Exceedance |     |
| SWMU 2 Proposed Action Area #1   |       |                 |                      |     |                |                      |     |                |                      |      |                |                      |     |
| SSB-4  | 3     | 1520            | 38                   | 42  |                |                      |     |                |                      |      |                |                      |     |
|  | 1     | 10.1            |                      |     |                |                      |     |                |                      |      |                |                      |     |
|  | 10    | 201             | 5                    | 6   |                |                      |     |                |                      |      |                |                      |     |
| SSB-5  | 6     | 297             | 7                    | 8   |                |                      |     |                |                      |      |                |                      |     |
|  | 3     | 1440            | 36                   | 40  |                |                      |     |                |                      |      |                |                      |     |
|  | 1     | 521             | 13                   | 14  |                |                      |     |                |                      |      |                |                      |     |
| SWMU1-1  | 10    | 31.6            |                      |     |                |                      |     |                |                      |      |                |                      |     |
|  | 6     | 617             | 16                   | 17  |                |                      |     |                |                      |      |                |                      |     |
|  | 0-0.5 | 44              | 1                    | 1   |                |                      |     |                |                      |      |                |                      |     |
|  | 2-3   | 67              | 2                    | 2   |                |                      |     |                |                      |      |                |                      |     |
|  | 5-6   | 3200            | 80                   | 88  |                |                      |     |                |                      |      |                |                      |     |
|  | 9-10  | 55              | 1                    | 2   |                |                      |     |                |                      |      |                |                      |     |
| SWMU1-11   | 0-0.5 | 200             | 5                    | 6   |                |                      |     |                |                      |      |                |                      |     |
|  | 2-3   | 840             | 21                   | 23  |                |                      |     |                |                      |      |                |                      |     |
|  | 0-1   | 1400            | 35                   | 39  |                |                      |     |                |                      |      |                |                      |     |
| SWMU1-19   | 2-3   | 23              |                      |     | 3              | 850                  | 53  |                |                      |      | 3.9            | 1100                 | 197 |
|  | 5-6   | 680             | 17                   | 19  |                | 25                   | 2   |                |                      | 5.5  | 41             | 7                    | 26  |
|  | 9-10  | 2100            | 53                   | 58  |                | 170                  | 11  |                | 4                    | 1.05 | 210            | 38                   | 131 |
| SWMU1-2  | 0-0.5 | 26              |                      |     |                |                      |     |                |                      |      |                |                      | 2   |
|  | 2-3   | 36              |                      |     |                |                      |     |                |                      |      |                |                      | 688 |
|  | 5-6   | 44              | 1                    | 1   |                |                      |     |                |                      |      |                |                      | 2   |
| SWMU1-20   | 9-10  | 2000            | 50                   | 55  |                |                      |     |                |                      |      |                |                      | 3   |
|  | 1-1.5 |                 |                      |     | 3.4            |                      |     |                |                      |      | 5.5            |                      | 2   |
|  | 2-3   |                 |                      |     | 2.8            |                      |     |                |                      |      | 3.7            |                      | 2   |
| SWMU1-21   | 5-6   |                 |                      |     | 78             |                      | 5   |                | 2                    |      | 110            | 20                   | 69  |
|  | 9-10  |                 |                      |     | 780            |                      | 49  |                | 19                   | 4.75 | 950            | 170                  | 594 |
|  | 0-1   |                 |                      |     | 65             |                      | 4   |                | 4                    |      | 190            | 34                   | 119 |
|  | 2-3   |                 |                      |     | 580            |                      | 36  |                | 17                   | 4.35 | 870            | 156                  | 544 |
|  | 5-6   |                 |                      |     | 23             |                      | 1   |                | 41                   |      | 41             | 7                    | 26  |
|  | 9-10  |                 |                      |     | 0.57           |                      |     |                | 1.8                  |      | 1.8            |                      | 1   |

TABLE 1

Proposed Action Areas, AOC 1 and SWMU 1  
Pacific Gas and Electric Company Topock Compressor Station, Needles, California

| PCB, Dioxin and furan compound, topsoil, compressor station, needles, California |       |                      |      |                |                      |                      |                      |                |                      |       |      |
|--|-------|----------------------|------|----------------|----------------------|----------------------|----------------------|----------------|----------------------|-------|------|
| Screening Level Type *   |       | Chromium, Total      |      |                | TEQ Aven             |                      | TEQ Human            |                | TEQ Mammals          |       |      |
| Screening Level Value *  |       | BKG                  | ECV  | ECV            | Result               | Factor of Exceedance | Result               | COM            | Result               | BKG   | ECV  |
|  |       | 39.80                | 36.3 | 16             |                      |                      |                      | RES            |                      | 5.58  | 1.6  |
| Depth (feet bgs)   |       | Factor of Exceedance |      | Result (ng/kg) | Factor of Exceedance | Result (ng/kg)       | Factor of Exceedance | Result (ng/kg) | Factor of Exceedance |       |      |
| SWMU1-1 Proposed Action Area #1 (Confined)                                       |       |                      |      |                |                      |                      |                      |                |                      |       |      |
| SWMU1-25   | 0-1   | 2000                 | 50   | 55             | 11000                | 688                  | 12000                | 240            | 60                   | 12000 | 2151 |
|  | 2-3   | 450                  | 11   | 12             | 5.4                  |                      | 9.9                  |                |                      | 9.9   | 2    |
|  | 5-6   | 200                  | 5    | 6              | 4.2                  |                      | 6.4                  |                |                      | 6.4   | 1    |
|  | 9-10  | 17                   |      |                | 1.9                  |                      | 2.6                  |                |                      | 2.6   |      |
| SWMU1-29   | 0-0.5 | 19                   |      |                | 5                    |                      | 7.8                  |                |                      | 7.8   | 1    |
|  | 2-3   | 1100                 | 28   | 30             | 250                  | 16                   | 320                  | 6              | 1.6                  | 320   | 57   |
|  | 5-6   | 270                  | 7    | 7              | 15                   |                      | 19                   |                |                      | 19    | 3    |
|  | 9-10  | 98                   | 2    | 3              | 9.3                  |                      | 15                   |                |                      | 15    | 3    |
| SWMU1-3  | 0-0.5 | 28                   |      |                |                      |                      |                      |                |                      |       |      |
|  | 2-3   | 41                   | 1    | 1              |                      |                      |                      |                |                      |       |      |
|  | 5-6   | 1300                 | 33   | 36             |                      |                      |                      |                |                      |       |      |
|  | 9-10  | 96                   | 2    | 3              |                      |                      |                      |                |                      |       |      |
| SWMU1-4  | 0-0.5 | 17                   |      |                |                      |                      |                      |                |                      |       |      |
|  | 2-3   | 870                  | 22   | 24             |                      |                      |                      |                |                      |       |      |
|  | 5-6   | 100                  | 3    | 3              |                      |                      |                      |                |                      |       |      |
|  | 7-8   | 40                   | 1    | 1              |                      |                      |                      |                |                      |       |      |
| SWMU1-5  | 9-10  | 47                   | 1    | 1              |                      |                      |                      |                |                      |       |      |
|  | 0-0.5 | 220                  | 6    | 6              |                      |                      |                      |                |                      |       |      |
|  | 2-3   | 270                  | 7    | 7              |                      |                      |                      |                |                      |       |      |
|  |       | 27                   |      |                |                      |                      |                      |                |                      |       |      |
| SWMU1-6  | 0-0.5 | 27                   |      |                |                      |                      |                      |                |                      |       |      |
|  | 2-3   | 630                  | 16   | 17             |                      |                      |                      |                |                      |       |      |
|  | 5-6   | 330                  | 8    | 9              |                      |                      |                      |                |                      |       |      |
|  | 9-10  | 51                   | 1    | 1              |                      |                      |                      |                |                      |       |      |
| SWMU1-7  | 0-0.5 | 120                  | 3    | 3              |                      |                      |                      |                |                      |       |      |
|  | 2-3   | 970                  | 24   | 27             |                      |                      |                      |                |                      |       |      |
|  | 5-6   | 1600                 | 40   | 44             |                      |                      |                      |                |                      |       |      |
|  |       | 15                   |      |                |                      |                      |                      |                |                      |       |      |
| Samples Exceeding SL (%)   |       | -                    | 70%  | 70%            | -                    | 50%                  | -                    | 40%            | 30%                  | -     | 75%  |
| Total # of Samples   |       | 54                   |      |                | 20                   |                      | 20                   |                |                      | 20    |      |



TABLE 1

Proposed Action Areas, AOC 1 and SWMU 1

Pacific Gas and Electric Company Topock Compressor Station, Needles, California

| Pacific Gas and Electric Company Topock Compressor Station, Needles, California |                   |                      |      |                   |                      |                   |                      |      |                   |                      |      |      |
|---|-------------------|----------------------|------|-------------------|----------------------|-------------------|----------------------|------|-------------------|----------------------|------|------|
| Screening Level Type<br>Screening Level Value *                                 | Chromium, Total   |                      |      | TEQ Avian         |                      | TEQ Human         |                      |      | TEQ Mammals       |                      |      |      |
|   | BKG               | ECV                  |      | ECV               |                      | RES               | COM                  |      | BKG               | ECV                  |      |      |
|   | 39.80             | 36.3                 |      | 16                |                      | 50                | 200                  |      | 5.58              | 1.6                  |      |      |
| Depth<br>(feet bgs)   | Result<br>(mg/kg) | Factor of Exceedance |      | Result<br>(ng/kg) | Factor of Exceedance | Result<br>(ng/kg) | Factor of Exceedance |      | Result<br>(ng/kg) | Factor of Exceedance |      |      |
| ADC 1 Proposed Action Area #3   |                   |                      |      |                   |                      |                   |                      |      |                   |                      |      |      |
| ADCI-3  | 0 - 0.5           | 410                  | 10   | 11                | 250                  | 16                | 330                  | 7    | 1.65              | 330                  | 59   | 206  |
|   | 2 - 3             | 210                  | 5    | 6                 | 130                  | 8                 | 180                  | 4    |                   | 180                  | 32   | 113  |
| Samples Exceeding SL (%)  |                   | -                    | 100% | 100%              | -                    | 100%              | -                    | 100% | 50%               | -                    | 100% | 100% |
| Total # of Samples  |                   | 2                    |      |                   | 2                    |                   | 2                    |      |                   | 2                    |      |      |

\* Screening levels are presented in the same units shown for the results.

\* For simplicity, some locations/depths without exceedances are not shown. The number of samples reflects the full dataset.

bgs = below ground surface

BKG = Background Level

COM = Commercial Screening Level

ECV = Ecological Screening Level

FoE = Factor of exceedance

RES = Residential Screening Level

SL = Screening level

TEQ = toxicity equivalent

mg/kg = milligrams per kilogram

ng/kg = nanograms per kilogram



TABLE 2  
Proposed Action Areas, AOC 10  
Pacific Gas and Electric Company Topack Compressor Station, Needles, California

|                                |                  | Chromium, Total |                      |     |  | Copper         |                      |      |       | Lead           |                      |       |      | Mercury        |                      |      |     | TEQ Avian      |                      | TEQ Human      |                      |     | TEQ Mammals    |                      |     |      |      |      |
|--------------------------------|------------------|-----------------|----------------------|-----|--|----------------|----------------------|------|-------|----------------|----------------------|-------|------|----------------|----------------------|------|-----|----------------|----------------------|----------------|----------------------|-----|----------------|----------------------|-----|------|------|------|
| Screening Level Type           |                  | BKG             | ECV                  |     |  | BKG            | ECV                  | RES  | COM   | BKG            | ECV                  | RES   | COM  | ECV            | RES                  | COM  |     | ECV            |                      | RES            | COM                  |     | BKG            | ECV                  |     |      |      |      |
| Screening Level Value *        |                  | 39.80           | 35.3                 |     |  | 16.8           | 20.6                 | 3100 | 47000 | 8.39           | 0.0166               | 80    | 320  | 0.0125         | 1                    | 4.5  |     | 16             |                      | 50             | 200                  |     | 5.58           | 1.6                  |     |      |      |      |
| Location                       | Depth (feet bgs) | Result (mg/kg)  | Factor of Exceedance |     |  | Result (mg/kg) | Factor of Exceedance |      |       | Result (mg/kg) | Factor of Exceedance |       |      | Result (mg/kg) | Factor of Exceedance |      |     | Result (mg/kg) | Factor of Exceedance | Result (mg/kg) | Factor of Exceedance |     | Result (mg/kg) | Factor of Exceedance |     |      |      |      |
| AOC 10 Proposed Action Area #1 |                  |                 |                      |     |  |                |                      |      |       |                |                      |       |      |                |                      |      |     |                |                      |                |                      |     |                |                      |     |      |      |      |
| AOC10-21                       | 0-0.5            | 270             | 7                    | 7   |  | 3100           | 185                  | 150  |       | 920            | 110                  | 55422 | 12   | 3              | 35                   | 2800 | 35  | 8              | 33                   | 2              | 53                   | 1   | 53             | 9                    | 33  |      |      |      |
|                                | 2-3              | 8.1             |                      |     |  | 5              |                      |      |       | 2.9            |                      | 175   |      |                | 0.099                |      |     |                | 0.33                 |                | 0.22                 |     | 0.22           |                      |     |      |      |      |
| AOC10-23                       | 0-1              | 72              | 2                    | 2   |  | 140            | 8                    | 7    |       | 30             | 4                    | 1807  |      |                | 0.24                 | 19   |     |                | 440                  | 28             | 1100                 | 22  | 6              | 1100                 | 197 | 688  |      |      |
|                                | 1-2              | 130             | 3                    | 4   |  | 22             | 1                    | 1    |       | 22             | 3                    | 1325  |      |                | 0.1                  |      |     |                | 6.3                  |                | 8.8                  |     | 2              | 6                    | 6   |      |      |      |
|                                | 2-3              | 5.5             |                      |     |  | 4.2            |                      |      |       | 2.2            |                      | 133   |      |                | 0.1                  |      |     |                | 9.7                  |                | 17                   |     | 3              | 11                   | 11  |      |      |      |
| PA-19                          | 0-1              | 34              |                      |     |  | 160            | 10                   | 8    |       | 30             | 4                    | 1807  |      |                | 0.12                 |      |     |                | 150                  | 9              | 220                  | 4   | 1              | 220                  | 39  | 138  |      |      |
|                                | 2-3              |                 |                      |     |  |                |                      |      |       |                |                      |       |      |                |                      |      |     |                | 0.95                 |                | 0.62                 |     | 0.62           |                      |     |      |      |      |
|                                | 5-6              |                 |                      |     |  |                |                      |      |       |                |                      |       |      |                |                      |      |     |                | 1.5                  |                | 0.89                 |     | 0.89           |                      |     |      |      |      |
| PA-20                          | 0-1              | 33              |                      |     |  | 11             |                      |      |       | 23             | 3                    | 1386  |      |                | 0.1                  |      |     |                | 1100                 | 69             | 1600                 | 32  | 8              | 1600                 | 287 | 1000 |      |      |
|                                | 2-3              |                 |                      |     |  |                |                      |      |       |                |                      |       |      |                |                      |      |     |                | 27                   | 2              | 53                   | 1   | 53             | 9                    | 33  |      |      |      |
|                                | 5-6              |                 |                      |     |  |                |                      |      |       |                |                      |       |      |                |                      |      |     |                | 63                   | 4              | 130                  | 3   | 130            | 23                   | 81  |      |      |      |
| PA-21                          | 0-1              | 49              |                      |     |  | 26             | 2                    | 1    |       | 32             | 4                    | 1928  |      |                | 0.1                  |      |     |                | 320                  | 20             | 580                  | 12  | 3              | 580                  | 104 | 363  |      |      |
|                                | 2-3              |                 |                      |     |  |                |                      |      |       |                |                      |       |      |                |                      |      |     |                | 9.5                  |                | 14                   |     | 3              | 9                    | 9   |      |      |      |
|                                | 5-6              |                 |                      |     |  |                |                      |      |       |                |                      |       |      |                |                      |      |     |                | 38                   | 2              | 73                   | 1   | 73             | 13                   | 46  |      |      |      |
| SD-04                          | 0-1              | 10              |                      |     |  | 5.1            |                      |      |       | 2.7            |                      | 163   |      |                | 0.1                  |      |     |                |                      |                |                      |     |                |                      |     |      |      |      |
|                                | 2-3              | 8               |                      |     |  | 4.4            |                      |      |       | 2.5            |                      | 151   |      |                | 0.1                  |      |     |                |                      |                |                      |     |                |                      |     |      |      |      |
| Samples Exceeding SL (%)       |                  | -               | 30%                  | 30% |  | -              | 50%                  | 50%  | 0%    | 0%             | -                    | 60%   | 100% | 10%            | 10%                  | -    | 20% | 10%            | 10%                  | -              | 57%                  | -   | 57%            | 29%                  | -   | 79%  | 79%  |      |
| Total # of Samples             |                  | 10              |                      |     |  | 10             |                      |      |       | 10             |                      |       |      |                | 10                   |      |     |                | 14                   |                | 14                   |     | 14             |                      | 14  |      |      |      |
| AOC 10 Proposed Action Area #2 |                  |                 |                      |     |  |                |                      |      |       |                |                      |       |      |                |                      |      |     |                |                      |                |                      |     |                |                      |     |      |      |      |
| AOC10c-4                       | 0-0.5            | 120             | 3                    | 3   |  | 46             | 3                    | 2    |       | 36             | 4                    | 2169  |      |                | 0.1                  |      |     |                | 220                  | 14             | 360                  | 7   | 2              | 360                  | 65  | 225  |      |      |
|                                | 2-3              | 90              | 2                    | 2   |  | 19             | 1                    |      |       | 8.9            | 1                    | 536   |      |                | 0.1                  |      |     |                | 44                   | 3              | 66                   | 1   |                | 66                   | 12  | 41   |      |      |
|                                | 5-6              | 27              |                      |     |  | 14             |                      |      |       | 2.6            |                      | 157   |      |                | 0.1                  |      |     |                | 2.3                  |                | 3.1                  |     |                | 3.1                  |     | 2    |      |      |
|                                | 9-10             | 92              | 2                    | 3   |  | 25             | 1                    | 1    |       | 13             | 2                    | 783   |      |                | 0.1                  |      |     |                |                      |                |                      |     |                |                      |     |      |      |      |
| L-2                            | 2                | 3360            | 84                   | 93  |  | 211            | 13                   | 10   |       |                |                      |       |      |                |                      |      |     |                |                      |                |                      |     |                |                      |     |      |      |      |
|                                | 0                | 86.8            | 2                    | 2   |  | 42.7           | 3                    | 2    |       |                |                      |       |      |                |                      |      |     |                |                      |                |                      |     |                |                      |     |      |      |      |
| L-2-3                          | -2               | 2740            | 69                   | 75  |  | 288            | 17                   | 14   |       |                |                      |       |      |                |                      |      |     |                |                      |                |                      |     |                |                      |     |      |      |      |
| MW-588R_5                      | 1.5-2            | 4000            | 101                  | 110 |  | 300            | 18                   | 15   |       | 160            | 19                   | 9639  | 2    |                | 0.33                 | 26   |     |                | -                    |                | -                    |     |                | -                    | 67% | 100% |      |      |
| Samples Exceeding SL (%)       |                  | -               | 88%                  | 88% |  | -              | 88%                  | 75%  | 0%    | 0%             | -                    | 80%   | 100% | 20%            | 0%                   | 0%   | -   | 20%            | 0%                   | 0%             | -                    | 67% | -              | 67%                  | 33% | -    | 67%  | 100% |
| Total # of Samples             |                  | 8               |                      |     |  | 8              |                      |      |       | 5              |                      |       |      |                | 5                    |      |     |                | 3                    |                | 3                    |     | 3              |                      | 3   |      |      |      |
| AOC 10 Proposed Action Area #3 |                  |                 |                      |     |  |                |                      |      |       |                |                      |       |      |                |                      |      |     |                |                      |                |                      |     |                |                      |     |      |      |      |
| AOC10-15                       | 0-1              | 70              | 2                    | 2   |  | 27             | 2                    | 1    |       | 21             | 3                    | 1265  |      |                | 0.1                  |      |     |                | 180                  | 11             | 290                  | 6   | 1              | 290                  | 52  | 181  |      |      |
|                                | 2-3              | 41              | 1                    | 1   |  | 22             | 1                    | 1    |       | 17             | 2                    | 1024  |      |                | 0.1                  |      |     |                | 74                   | 5              | 110                  | 2   |                | 110                  | 20  | 69   |      |      |
|                                | 5-6              | 33              |                      |     |  | 14             |                      |      |       | 7.6            |                      | 458   |      |                | 0.1                  |      |     |                | 49                   | 3              | 77                   | 2   |                | 77                   | 14  | 48   |      |      |
|                                | 9-10             | 17              |                      |     |  | 11             |                      |      |       | 1.5            |                      | 90    |      |                | 0.1                  |      |     |                | 3.2                  |                | 2.9                  |     |                | 2.9                  |     | 2    |      |      |
| Samples Exceeding SL (%)       |                  | -               | 50%                  | 50% |  | -              | 50%                  | 50%  | 0%    | 0%             | -                    | 50%   | 100% | 0%             | 0%                   | -    | 0%  | 0%             | 0%                   | -              | 75%                  | -   | 75%            | 25%                  | -   | 75%  | 100% |      |
| Total # of Samples             |                  | 4               |                      |     |  | 4              |                      |      |       | 4              |                      |       |      |                | 4                    |      |     |                | 4                    |                | 4                    |     | 4              |                      | 4   |      |      |      |
| AOC 10 Proposed Action Area #4 |                  |                 |                      |     |  |                |                      |      |       |                |                      |       |      |                |                      |      |     |                |                      |                |                      |     |                |                      |     |      |      |      |
| AOC10-26                       | 0-0.5            |                 |                      |     |  |                |                      |      |       |                |                      |       |      |                |                      |      |     |                | 7.8                  |                | 9.5                  |     |                | 9.5                  | 2   | 6    |      |      |
|                                | 2-3              |                 |                      |     |  |                |                      |      |       |                |                      |       |      |                |                      |      |     |                | 140                  | 9              | 180                  | 4   |                | 180                  | 32  | 113  |      |      |
|                                | 2.5-2.7          | 340             | 9                    | 9   |  | 40             | 2                    | 2    |       | 18             | 2                    | 1084  |      |                | 0.15                 | 12   |     |                | 300                  | 19             | 410                  | 8   | 2              | 410                  | 73  | 256  |      |      |
|                                | 4.5-5            |                 |                      |     |  |                |                      |      |       |                |                      |       |      |                |                      |      |     |                | 86                   | 5              | 100                  | 2   |                | 100                  | 18  | 63   |      |      |
| AOC10d-4                       | 0-0.5            | 29              |                      |     |  | 25             | 1                    | 1    |       | 25             | 3                    | 1506  |      |                | 0.1                  |      |     |                |                      |                |                      |     |                |                      |     |      |      |      |
|                                | 2-3              | 130             | 3                    | 4   |  | 27             | 2                    | 1    |       | 26             | 3                    | 1566  |      |                | 0.11                 |      |     |                |                      |                |                      |     |                |                      |     |      |      |      |
|                                | 5-6              | 66              | 2                    | 2   |  | 21             | 1                    | 1    |       | 17             | 2                    | 1024  |      |                | 0.1                  |      |     |                |                      |                |                      |     |                |                      |     |      |      |      |
|                                | 9-10             | 32              |                      |     |  | 16             |                      |      |       | 5.2            |                      | 313   |      |                | 0.1                  |      |     |                |                      |                |                      |     |                |                      |     |      |      |      |
| Samples Exceeding SL (%)       |                  | -               | 60%                  | 60% |  | -              | 80%                  | 80%  | 0%    | 0%             | -                    | 80%   | 100% | 0%             | 0%                   | -    | 20% | 0%             | 0%                   | -              | 75%                  | -   | 75%            | 25%                  | -   | 100% | 100% |      |
| Total # of Samples             |                  | 5               |                      |     |  | 5              |                      |      |       | 5              |                      |       |      |                | 5                    |      |     |                | 4                    |                | 4                    |     | 4              |                      | 4   |      |      |      |

TABLE 2

Proposed Action Areas, AOC 10

Pacific Gas and Electric Company Topock Compressor Station, Needles, California

|                                | Chromium, Total   |                         |     |    | Copper            |                      |      |       | Lead              |                      |      |      | Mercury           |                      |     | TEQ Avian |                   | TEQ Human               |                   | TEQ Mammals             |                   |                         |
|--------------------------------|-------------------|-------------------------|-----|----|-------------------|----------------------|------|-------|-------------------|----------------------|------|------|-------------------|----------------------|-----|-----------|-------------------|-------------------------|-------------------|-------------------------|-------------------|-------------------------|
| Screening Level Type           | BKG               | ECV                     |     |    | BKG               | ECV                  | RES  | COM   | BKG               | ECV                  | RES  | COM  | ECV               | RES                  | COM | ECV       |                   | RES                     | COM               | BKG                     | ECV               |                         |
| Screening Level Value *        | 39.80             | 36.3                    |     |    | 16.8              | 20.6                 | 3100 | 47000 | 8.39              | 0.0166               | 80   | 320  | 0.0125            | 1                    | 4.5 |           |                   | 50                      | 200               | 5.58                    | 1.6               |                         |
| Depth<br>(feet bgs)            | Result<br>(mg/kg) | Factor of<br>Exceedance |     |    | Result<br>(mg/kg) | Factor of Exceedance |      |       | Result<br>(mg/kg) | Factor of Exceedance |      |      | Result<br>(mg/kg) | Factor of Exceedance |     |           | Result<br>(ng/kg) | Factor of<br>Exceedance | Result<br>(ng/kg) | Factor of<br>Exceedance | Result<br>(ng/kg) | Factor of<br>Exceedance |
| AOC 10 Proposed Action Area #3 |                   |                         |     |    |                   |                      |      |       |                   |                      |      |      |                   |                      |     |           |                   |                         |                   |                         |                   |                         |
| AOC10c-3                       | 0-0.5             | 110                     | 3   | 3  | 42                | 3                    | 2    |       | 32                | 4                    | 1928 |      | 0.1               |                      |     |           |                   |                         |                   |                         |                   |                         |
|                                | 2-3               | 690                     | 17  | 19 | 60                | 4                    | 3    |       | 31                | 4                    | 1867 |      | 0.1               |                      |     |           |                   |                         |                   |                         |                   |                         |
|                                | 5-6               | 29                      |     |    | 9                 |                      |      |       | 4.5               |                      | 271  |      | 0.1               |                      |     |           |                   |                         |                   |                         |                   |                         |
|                                | 9-10              | 22                      |     |    | 11                |                      |      |       | 2.7               |                      | 163  |      | 0.1               |                      |     |           |                   |                         |                   |                         |                   |                         |
| Samples Exceeding SL (%)       | -                 | 50%                     | 50% |    | -                 | 50%                  | 50%  | 0%    | 0%                | -                    | 50%  | 100% | 0%                | 0%                   | -   | 0%        | 0%                | 0%                      | -                 | #DIV/0!                 | -                 | #DIV/0!                 |
| Total # of Samples             | 4                 |                         |     |    | 4                 |                      |      |       | 4                 |                      |      |      | 4                 |                      |     | 0         |                   | 0                       |                   | 0                       |                   |                         |

\* Screening levels are presented in the same units shown for the results.

bgs = below ground surface

BKG = Background Level

COM = Commercial Screening Level

ECV = Ecological Screening Level

FoE = Factor of exceedance

RES = Residential Screening Level

SL = Screening level

TEQ = toxicity equivalent

mg/kg = milligrams per kilogram

ng/kg = nanograms per kilogram



TABLE 3

Proposed Action Area, AOC 14

Pacific Gas and Electric Company Tapock Compressor Station, Needles, California

| Pacific Gas and Electric Company Turbine Compressor Station, Needles, California |            |         |                      |       |     |           |                      |           |                      |             |                      |    |     |     |
|--|------------|---------|----------------------|-------|-----|-----------|----------------------|-----------|----------------------|-------------|----------------------|----|-----|-----|
|  |            | Lead    |                      |       |     | TEQ Avian |                      | TEQ Human |                      | TEQ Mammals |                      |    |     |     |
| Screening Level Type   |            | BKG     | ECV                  | RES   | COM | ECV       |                      | RES       | COM                  | BKG         | ECV                  |    |     |     |
| Screening Level Value *  |            | 8.39    | 0.0166               | 80    | 320 | 16        |                      | 50        | 200                  | 5.58        | 1.6                  |    |     |     |
| Depth  | Result     |         |                      |       |     | Result    | Factor of Exceedance | Result    |                      | Result      |                      |    |     |     |
| Location   | (feet bgs) | (mg/kg) | Factor of Exceedance |       |     | (ng/kg)   | Factor of Exceedance | (ng/kg)   | Factor of Exceedance | (ng/kg)     | Factor of Exceedance |    |     |     |
| AOC 14 Proposed Action Area #1   |            |         |                      |       |     |           |                      |           |                      |             |                      |    |     |     |
| AOC14-14E  | 0 - 1      | 7.2     |                      | 434   |     | 2.6       |                      | 4.6       |                      | 4.6         | 3                    |    |     |     |
|  | 2 - 3      | 3.5     |                      | 211   |     | 7.4       |                      | 14        |                      | 14          | 9                    |    |     |     |
|  | 5 - 5.5    | 2.1     |                      | 127   |     | 21        | 1                    | 32        |                      | 32          | 20                   |    |     |     |
|  | 6 - 7      | 2.1     |                      | 127   |     | 1.8       |                      | 2.5       |                      | 2.5         | 2                    |    |     |     |
|  | 9 - 10     | 2.6     |                      | 157   |     | 3.5       |                      | 6.6       |                      | 6.6         | 4                    |    |     |     |
| AOC14-14W  | 0 - 1      | 15      | 2                    | 904   |     | 2.5       |                      | 3.5       |                      | 3.5         | 2                    |    |     |     |
|  | 2 - 3      | 3.4     |                      | 205   |     | 1.1       |                      | 1.1       |                      | 1.1         |                      |    |     |     |
|  | 5 - 5.5    | 160     | 19                   | 9639  | 2   | 780       | 49                   | 480       | 10                   | 480         | 300                  |    |     |     |
|  | 6 - 7      | 70      | 8                    | 4217  |     | 33        | 2                    | 27        |                      | 27          | 17                   |    |     |     |
|  | 9 - 10     | 2.6     |                      | 157   |     | 3.4       |                      | 6         |                      | 6           | 4                    |    |     |     |
| AOC14-19   | 2 - 3      | 1600    | 191                  | 96386 | 20  | 5         | 210                  | 13        | 140                  | 3           | 140                  | 25 | 88  |     |
|  | 3 - 4      | 6.3     |                      | 380   |     |           | 1.3                  |           | 1.2                  |             | 1.2                  |    |     |     |
| Samples Exceeding SL (%)   |            | •       | 33%                  | 100%  | 17% | 8%        | •                    | 33%       | •                    | 17%         | 8%                   | •  | 58% | 83% |
| Total # of Samples   |            | 12      |                      |       |     |           | 12                   |           | 12                   |             | 12                   |    |     |     |

\* Screening levels are presented in the same units shown for the results.

bgs = below ground surface

BKG = Background Level

COM = Commercial Screening Level

ECV = Ecological Screening Level

FoE = Factor of exceedance

RES = Residential Screening Level

SL = Screening level

TEQ = toxicity equivalent

mg/kg = milligrams per kilogram

ng/kg = nanograms per kilogram

TABLE 4

Proposed Action Area, AOC 27

Pacific Gas and Electric Company Topock Compressor Station, Needles, California

| Pacific Gas and Electric Company Topsoil Compressor Station, Needles, California |        |                   |                      |      |                   |                      |        |                   |                      |         |                   |                      |     |                   |                      |        |                   |                      |     |                   |                      |             |     |
|--|--------|-------------------|----------------------|------|-------------------|----------------------|--------|-------------------|----------------------|---------|-------------------|----------------------|-----|-------------------|----------------------|--------|-------------------|----------------------|-----|-------------------|----------------------|-------------|-----|
| Screening Level Type<br>Screening Level Value *                                  |        | Copper            |                      |      |                   | Lead                 |        |                   |                      | Mercury |                   |                      |     | Zinc              |                      |        |                   | TEQ Avian            |     | TEQ Human         |                      | TEQ Mammals |     |
|  |        | BKG               | ECV                  | RES  | COM               | BKG                  | ECV    | RES               | COM                  | ECV     | RES               | COM                  | BKG | ECV               | RES                  | COM    | ECV               | 16                   | RES | COM               | 200                  | BKG         | ECV |
|  |        | 16.8              | 20.6                 | 3100 | 47000             | 8.39                 | 0.0166 | 80                | 320                  | 0.0125  | 1                 | 4.5                  | 58  | 0.164             | 23000                | 350000 |                   |                      | 50  | 200               |                      | 5.58        | 1.6 |
| Depth<br>(feet bgs)  |        | Result<br>(mg/kg) | Factor of Exceedance |      | Result<br>(mg/kg) | Factor of Exceedance |        | Result<br>(mg/kg) | Factor of Exceedance |         | Result<br>(mg/kg) | Factor of Exceedance |     | Result<br>(ng/kg) | Factor of Exceedance |        | Result<br>(ng/kg) | Factor of Exceedance |     | Result<br>(ng/kg) | Factor of Exceedance |             |     |
| AOC 27 Proposed Action Area #1   |        |                   |                      |      |                   |                      |        |                   |                      |         |                   |                      |     |                   |                      |        |                   |                      |     |                   |                      |             |     |
| AOC27-20   | 0 - 1  | 9.2               |                      |      | 8.4               | 1                    | 506    |                   | 0.1                  |         |                   | 38                   | 232 |                   | 13                   |        | 19                |                      |     | 19                | 3                    | 12          |     |
|  | 2 - 3  | 9.7               |                      |      | 4.6               |                      | 277    |                   | 0.1                  |         |                   | 42                   | 256 |                   | 4                    |        | 5.8               |                      |     | 5.8               | 1                    | 4           |     |
|  | 5 - 6  | 27                | 2                    | 1    | 15                | 2                    | 904    |                   | 0.13                 | 10      |                   | 74                   | 1   | 451               |                      | 8      |                   | 10                   |     | 10                | 2                    | 6           |     |
|  | 9 - 10 | 11                |                      |      | 2.7               |                      | 163    |                   | 0.1                  |         |                   | 41                   | 250 |                   |                      |        |                   |                      |     |                   |                      |             |     |
| AOC27-50   | 0 - 1  | 25                | 1                    | 1    | 73                | 9                    | 4398   |                   | 0.13                 | 10      |                   | 250                  | 4   | 1524              |                      | 13     |                   | 12                   |     | 12                | 2                    | 8           |     |
|  | 2 - 3  | 100               | 6                    | 5    | 190               | 23                   | 11446  | 2                 | 0.47                 | 38      |                   | 330                  | 6   | 2012              |                      | 59     | 4                 | 57                   | 1   | 57                | 10                   | 36          |     |
|  | 5 - 6  | 7.9               |                      |      | 2.1               |                      | 127    |                   | 0.13                 | 10      |                   | 39                   | 238 |                   | 0.5                  |        | 0.41              |                      |     | 0.41              |                      |             |     |
|  | 9 - 10 | 9.1               |                      |      | 2.1               |                      | 127    |                   | 0.12                 | 10      |                   | 38                   | 232 |                   |                      |        |                   |                      |     |                   |                      |             |     |
| AOC27-6  | 0 - 1  | 500               | 30                   | 24   | 630               | 75                   | 37952  | 8                 | 0.51                 | 41      |                   | 700                  | 12  | 4268              |                      | 120    | 8                 | 120                  | 2   | 120               | 22                   | 75          |     |
|  | 2 - 3  | 76                | 5                    | 4    | 37                | 4                    | 2229   |                   | 0.26                 | 21      |                   | 130                  | 2   | 793               |                      | 32     | 2                 | 32                   |     | 32                | 6                    | 20          |     |
|  | 5 - 6  | 18                | 1                    |      | 51                | 6                    | 3072   |                   | 0.14                 | 11      |                   | 92                   | 2   | 561               |                      | 6.2    |                   | 6.9                  |     | 6.9               | 1                    | 4           |     |
| AOC27-7  | 0 - 1  | 580               | 35                   | 28   | 170               | 20                   | 10241  | 2                 | 0.32                 | 26      |                   | 420                  | 7   | 2561              |                      | 110    | 7                 | 110                  | 2   | 110               | 20                   | 69          |     |
|  | 2 - 3  | 1000              | 60                   | 49   | 570               | 68                   | 34337  | 7                 | 0.95                 | 76      |                   | 1300                 | 22  | 7927              |                      | 260    | 16                | 230                  | 5   | 230               | 41                   | 144         |     |
|  | 5 - 6  | 9.8               |                      |      | 2.6               |                      | 157    |                   | 0.1                  |         |                   | 38                   | 232 |                   | 4.1                  |        | 4.3               |                      |     | 4.3               |                      | 3           |     |
| AOC27-8  | 1 - 2  | 29                | 2                    | 1    | 24                | 3                    | 1446   |                   | 0.17                 | 14      |                   | 93                   | 2   | 567               |                      | 36     | 2                 | 33                   |     | 33                | 6                    | 21          |     |
|  | 5 - 6  | 15                |                      |      | 6.1               |                      | 367    |                   | 0.1                  |         |                   | 45                   | 274 |                   | 2.9                  |        | 2.8               |                      |     | 2.8               |                      | 2           |     |
| Samples Exceeding SL (%)   |        | -                 | 56%                  | 50%  | 0%                | 0%                   | -      | 63%               | 100%                 | 25%     | 13%               | -                    | 69% | 0%                | 0%                   | -      | 56%               | 100%                 | 0%  | 0%                | -                    | 43%         |     |
| Total # of Samples   |        | 16                |                      |      |                   |                      | 16     |                   |                      |         |                   | 16                   |     |                   |                      | 14     |                   |                      |     | 14                |                      |             |     |

\* Screening levels are presented in the same units shown for the results.

bgs = below ground surface

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TEQ = toxicity equivalent

mg/kg = milligrams per kilogram

ng/kg = nanograms per kilogram

## **Appendix B**

### **Nature and Extent of Contamination**





TABLE B-1a  
Sample Results: Metals  
SWMU 1 – Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |            |            |            |                      |                 |        |        |             |             |            |          |          |            |            |          |        |
|--|----------|----------------|-------------|----------------|---------|------------|------------|------------|----------------------|-----------------|--------|--------|-------------|-------------|------------|----------|----------|------------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410        | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39        | 0.0125      | 1.37       | 27.3     | 1.47     | 5.15       | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000     | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400         | 11          | 390        | 1,500    | 390      | 390        | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE         | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80          | 1           | NE         | 490      | NE       | 390        | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330        | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166      | 0.0125      | 2.25       | 0.607    | 0.177    | 5.15       | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410        | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39        | NE          | 1.37       | 27.3     | 1.47     | NE         | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium     | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead        | Mercury     | Molybdenum | Nickel   | Selenium | Silver     | Thallium   | Vanadium | Zinc   |
| Category 1   |          |                |             |                |         |            |            |            |                      |                 |        |        |             |             |            |          |          |            |            |          |        |
| MW-09  | 06/30/97 | 1              | N           | ---            | ---     | ---        | ---        | ---        | ND (0.05)            | 15              | ---    | 7.2    | ---         | ---         | ---        | 7.6      | ---      | ---        | ---        | ---      | 19.7   |
|  | 06/30/97 | 3.5            | N           | ---            | ---     | ---        | ---        | ---        | 0.06                 | 4.1             | ---    | 3.1    | ---         | ---         | ---        | 3.6      | ---      | ---        | ---        | ---      | 11.8   |
|  | 06/30/97 | 3.5            | FD          | ---            | ---     | ---        | ---        | ---        | 0.21                 | 7.6             | ---    | 3.5    | ---         | ---         | ---        | 3.7      | ---      | ---        | ---        | ---      | 12.6   |
|  | 06/30/97 | 6              | N           | ---            | ---     | ---        | ---        | ---        | ND (0.05)            | 11.8            | ---    | 6.4    | ---         | ---         | ---        | 7.7      | ---      | ---        | ---        | ---      | 21     |
|  | 07/01/97 | 10             | N           | ---            | ---     | 91         | ---        | ---        | ND (0.05)            | 42.2            | ---    | 6.8    | 2.7         | ---         | ND (0.2)   | 9.7      | ---      | ---        | ---        | 21.8     | 29     |
|  | 06/30/97 | 20             | N           | ---            | ---     | ---        | ---        | ---        | ND (0.05)            | 9               | ---    | 7.1    | ---         | ---         | ---        | 9.1      | ---      | ---        | ---        | ---      | 21.7   |
|  | 07/01/97 | 30             | N           | ---            | ---     | 28.8       | ---        | ---        | ND (0.05)            | 16.3            | ---    | 12.4   | 3.9         | ---         | ND (0.2)   | 15.3     | ---      | ---        | ---        | 31       | 29.4   |
|  | 06/30/97 | 40             | N           | ---            | ---     | ---        | ---        | ---        | ND (0.05)            | 9.7             | ---    | 7.5    | ---         | ---         | ---        | 9        | ---      | ---        | ---        | ---      | 22.5   |
|  | 07/01/97 | 50             | N           | ---            | ---     | 83.8       | ---        | ---        | ND (0.05)            | 11.7            | ---    | 14.7   | 3.2         | ---         | ND (0.2)   | 11.3     | ---      | ---        | ---        | 20.3     | 23.3   |
|  | 06/30/97 | 60             | N           | ---            | ---     | ---        | ---        | ---        | ND (0.05)            | 28.8            | ---    | 17.4   | ---         | ---         | ---        | 20.2     | ---      | ---        | ---        | ---      | 34.4   |
|  | 06/30/97 | 70             | N           | ---            | ---     | ---        | ---        | ---        | ND (0.05)            | 8.9             | ---    | 10     | ---         | ---         | ---        | 10.2     | ---      | ---        | ---        | ---      | 19     |
|  | 07/01/97 | 87             | N           | ---            | ---     | 94         | ---        | ---        | ND (0.05)            | 9.8             | ---    | 10.2   | 8.4         | ---         | ND (0.2)   | 11.6     | ---      | ---        | ---        | 33       | 126    |
| 07/01/97   | 87       | FD             | ---         | ---            | ---     | ---        | ---        | 0.06       | 11.9                 | ---             | 11.4   | ---    | ---         | ---         | 11.7       | ---      | ---      | ---        | ---        | 121      |        |
| SWMU1-1  | 10/16/08 | 0 - 0.5        | N           | ND (2.4) J*    | 3.5     | 120        | ND (1.2) * | ND (1.2) * | 0.524                | 44              | 11     | 12     | 4.2         | ND (0.12) * | ND (1.2)   | 16       | ND (1.2) | ND (1.2)   | ND (2.4) * | 38       | 41     |
|  | 10/16/08 | 2 - 3          | N           | ND (2.1) *     | 3       | 110        | ND (1) *   | ND (1)     | 0.462                | 67              | 7.5    | 9.4    | 3           | ND (0.1) *  | ND (1)     | 15       | ND (1)   | ND (1)     | ND (2.1) * | 32       | 37     |
|  | 10/16/08 | 5 - 6          | N           | ND (2.1) *     | ND (1)  | 94         | ND (1) *   | ND (1)     | 14.1                 | 3,200           | 7.3    | 9.5    | 4.5         | ND (0.1) *  | 7.8        | 12       | ND (1)   | ND (1)     | ND (2.1) * | 45       | 76     |
|  | 10/16/08 | 9 - 10         | N           | ND (2.1) *     | 2.2     | 83         | ND (1) *   | ND (1)     | 0.907                | 55              | 6.9    | 8.6    | 1.7         | ND (0.1) *  | ND (1)     | 11       | ND (1)   | ND (1)     | ND (2.1) * | 27       | 89     |
| SWMU1-2  | 10/15/08 | 0 - 0.5        | N           | ND (2) *       | 4.7     | 110        | ND (1) *   | ND (1)     | ND (0.401)           | 26              | 7.3    | 22     | 6.5         | ND (0.1) *  | ND (1)     | 14       | ND (1)   | ND (1)     | ND (2) *   | 35       | 37     |
|  | 10/15/08 | 2 - 3          | N           | ND (2) *       | 2.6     | 110        | ND (1) *   | ND (1)     | ND (0.404)           | 36              | 9.3    | 10     | 3.7         | ND (0.1) *  | ND (1)     | 15       | ND (1)   | ND (1)     | ND (2) *   | 33       | 38     |
|  | 10/15/08 | 5 - 6          | N           | ND (2) *       | 3.2     | 120        | ND (1) *   | ND (1)     | ND (0.404)           | 44              | 8.9    | 12     | 6.1         | ND (0.1) *  | 3          | 16       | ND (1)   | ND (1)     | ND (2) *   | 33       | 38     |
|  | 10/15/08 | 9 - 10         | N           | ND (2.1) *     | ND (1)  | 130        | ND (1) *   | ND (1)     | 22.8                 | 2,000           | 10     | 15     | 4           | ND (0.1) *  | 2.8        | 16       | ND (1)   | ND (1)     | ND (2.1) * | 41       | 100    |
| SWMU1-3  | 10/06/08 | 0 - 0.5        | N           | ND (2) *       | 2.7     | 94         | ND (1) *   | ND (1)     | ND (0.405)           | 28              | 9.9    | 11     | 3.9         | ND (0.1) *  | ND (1)     | 15       | ND (1)   | ND (1)     | ND (2) *   | 37       | 33     |
|  | 10/06/08 | 2 - 3          | N           | ND (2.1) *     | 2.5     | 130        | ND (1) *   | ND (1)     | ND (0.413)           | 41              | 9.2    | 9.4    | 2.3         | ND (0.1) *  | 1.5        | 16       | ND (1)   | ND (1)     | ND (2.1) * | 35       | 38     |
|  | 10/06/08 | 2 - 3          | FD          | ND (2) *       | 2.8     | 120        | ND (1) *   | ND (1)     | ND (0.41)            | 38              | 8.6    | 9      | 2.9         | ND (0.1) *  | 1.4        | 14       | ND (1)   | ND (1)     | ND (2) *   | 34       | 37     |
|  | 10/06/08 | 5 - 6          | N           | ND (2.1) *     | ND (1)  | 140        | ND (1) *   | ND (1)     | 22.7                 | 1,300           | 8.9    | 11     | 3.8         | ND (0.1) *  | 4.2        | 12       | ND (1)   | ND (1)     | ND (2.1) * | 37       | 78     |
|  | 10/06/08 | 9 - 10         | N           | ND (2.1) *     | 3       | 60         | ND (1) *   | ND (1)     | 1.55 J               | 96              | 9.4    | 11     | 2.7         | ND (0.11) * | ND (1)     | 18       | ND (1)   | ND (1)     | ND (2.1) * | 32       | 140    |
|  | 10/06/08 | 19 - 20        | N           | ND (2.1) *     | 5.6     | 250        | ND (2.1) * | ND (1)     | ND (0.416)           | 20              | 9.1    | 10     | 2.9         | ND (0.1) *  | ND (2.1) * | 13       | ND (1)   | ND (2.1)   | ND (4.1) * | 34       | 39     |
|  | 10/06/08 | 29 - 30        | N           | ND (2.1) *     | 10      | 59         | ND (5.3) * | ND (1.1) * | ND (0.424)           | 21              | 8.8    | 15     | 2.4         | ND (0.1) *  | ND (5.3) * | 16       | ND (1.1) | ND (5.3) * | ND (11) *  | 32       | 38     |
|  | 10/06/08 | 39 - 40        | N           | ND (2.1) *     | 5.3     | 45         | ND (2.1) * | ND (1)     | ND (0.424)           | 22              | 8.6    | 8.5    | 2.7         | ND (0.1) *  | ND (2.1) * | 14       | ND (1)   | ND (2.1)   | ND (4.2) * | 31       | 35     |
|  | 10/06/08 | 49 - 50        | N           | ND (2.1) *     | 5.6     | 63         | ND (2.1) * | ND (1.1) * | ND (0.405)           | 25              | 9.8    | 12     | 3.2         | ND (0.11) * | ND (2.1) * | 17       | ND (1.1) | ND (2.1)   | ND (4.3) * | 35       | 39     |
|  | 10/06/08 | 59 - 60        | N           | ND (2.1) *     | 5.3     | 99         | ND (2.1) * | ND (1)     | ND (0.418)           | 38              | 9.6    | 14     | 3           | ND (0.1) *  | 2.1        | 20       | ND (1)   | ND (2.1)   | ND (4.1) * | 37       | 36     |
|  | 10/07/08 | 69 - 70        | N           | ND (2.1) *     | 5.2     | 64         | ND (2.1) * | ND (1)     | ND (0.42)            | 29              | 9.9    | 14     | 2.6         | ND (0.1) *  | ND (2.1) * | 19       | ND (1)   | ND (2.1)   | ND (4.2) * | 38       | 38     |
|  | 10/07/08 | 79 - 80        | N           | ND (2.2) *     | 6.6     | 350        | ND (2.2) * | ND (1.1) * | ND (0.427)           | 20              | 8.3    | 13     | 3.1         | ND (0.11) * | ND (2.2) * | 14       | ND (1.1) | ND (2.2)   | ND (4.5) * | 35       | 39     |
| 10/07/08   | 79 - 80  | FD             | ND (2.3) *  | 5.1            | 340     | ND (1.1) * | ND (1.1) * | ND (0.441) | 21                   | 7.3             | 15     | 2.6    | ND (0.11) * | 1.3         | 14         | ND (1.1) | ND (1.1) | ND (2.3) * | 31         | 34       |        |
| SWMU1-4  | 10/15/08 | 0 - 0.5        | N           | ND (2) J*      | 2.9     | 75         | ND (1) *   | ND (1)     | ND (0.401)           | 17              | 5.6    | 6.8    | 2.6         | ND (0.1) *  | ND (1)     | 9.5      | ND (1)   | ND (1)     | ND (2) *   | 34       | 26     |
|  | 10/15/08 | 2 - 3          | N           | ND (2.1) *     | ND (1)  | 130        | ND (1) *   | ND (1)     | 4.95                 | 870             | 7.3    | 11     | 3.6         | ND (0.1) *  | 1.7        | 13       | ND (1)   | ND (1)     | ND (2.1) * | 36       | 72     |
|  | 10/15/08 | 5 - 6          | N           | ND (2.1) *     | 1.8     | 100        | ND (1) *   | ND (1)     | 1.39                 | 100             | 7.6    | 10     | 1.8         | ND (0.1) *  | ND (1)     | 10       | ND (1)   | ND (1)     | ND (2.1) * | 36       | 170    |
|  | 10/15/08 | 7 - 8          | N           | ND (2.1) *     | 2.1     | 89         | ND (1) *   | ND (1)     | ND (0.415)           | 40              | 7.5    | 7.6    | 1.6         | ND (0.1) *  | ND (1)     | 9.8      | ND (1)   | ND (1)     | ND (2.1) * | 31       | 120    |
|  | 10/15/08 | 9 - 10         | N           | ND (2.1) *     | 2.1     | 95         | ND (1) *   | ND (1)     | ND (0.414)           | 23              | 7.5    | 7.9    | 1.7         | ND (0.1) *  | ND (1)     | 10       | ND (1)   | ND (1)     | ND (2.1) * | 33       | 110    |
|  | 10/15/08 | 13 - 14        | N           | ND (2.1) *     | 2.4     | 110        | ND (1) *   | ND (1)     | ND (0.413)           | 18              | 7.4    | 7.1    | 1.7         | ND (0.1) *  | ND (1)     | 11       | ND (1)   | ND (1)     | ND (2.1) * | 31       | 67     |

TABLE B-1a  
Sample Results: Metals  
SWMU 1 – Former Percolation Bed  
*Soil Engineering Evaluation/Cost Analysis*  
*PG&E Topock Compressor Station, Needles, California*

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |        |             |            |        |          |            |            |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|-------------|------------|--------|----------|------------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125      | 1.37       | 27.3   | 1.47     | 5.15       | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11          | 390        | 1,500  | 390      | 390        | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1           | NE         | 490    | NE       | 390        | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125      | 2.25       | 0.607  | 0.177    | 5.15       | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE          | 1.37       | 27.3   | 1.47     | NE         | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury     | Molybdenum | Nickel | Selenium | Silver     | Thallium   | Vanadium | Zinc   |
| SWMU1-5  | 10/15/08 | 9 - 10         | N           | ND (2.1) *     | 2.6     | 71     | ND (1) *   | ND (1)     | 0.874                | 47              | 7      | 8.3    | 2.1    | ND (0.1) *  | ND (1)     | 9.9    | ND (1)   | ND (1)     | ND (2.1) * | 28       | 100    |
|  | 10/15/08 | 13 - 14        | N           | ND (2.1) *     | 5.4     | 58     | ND (2.1) * | ND (1)     | ND (0.42)            | 21              | 8.3    | 7.9    | 2.8    | ND (0.1) *  | ND (2.1) * | 13     | ND (1)   | ND (2.1)   | ND (4.2) * | 30       | 42     |
|  | 10/15/08 | 13 - 14        | FD          | ND (2.1) *     | 5.8     | 48     | ND (2.1) * | ND (1)     | ND (0.423)           | 21              | 8      | 8      | 2.9    | ND (0.1) *  | ND (2.1) * | 13     | ND (1)   | ND (2.1)   | ND (4.2) * | 31       | 44     |
|  | 10/15/08 | 15 - 16        | N           | ND (2.1) *     | 5.4     | 63     | ND (2.1) * | ND (1)     | ND (0.414)           | 21              | 8.1    | 9.1    | 2.8    | ND (0.1) *  | ND (2.1) * | 13     | ND (1)   | ND (2.1)   | ND (4.1) * | 31       | 34     |
|  | 10/15/08 | 19 - 20        | N           | ND (2.1) *     | 4.3     | 180    | ND (1.1) * | ND (1.1) * | ND (0.423)           | 19              | 8.6    | 11     | 3.1    | ND (0.11) * | 1.5        | 12     | ND (1.1) | ND (1.1)   | ND (2.1) * | 32       | 37     |
| SWMU1-6  | 10/15/08 | 0 - 0.5        | N           | ND (2) *       | 2.4     | 110    | ND (1) *   | ND (1)     | 1.32                 | 220             | 8.8    | 11     | 3.3    | ND (0.1) *  | 1.2        | 12     | ND (1)   | ND (1)     | ND (2) *   | 41       | 42     |
|  | 10/15/08 | 2 - 3          | N           | ND (2) *       | 2.1     | 95     | ND (1) *   | ND (1)     | 2.15                 | 270             | 8.1    | 12     | 2.6    | ND (0.1) *  | 1.9        | 13     | ND (1)   | ND (1)     | ND (2) *   | 39       | 46     |
|  | 10/15/08 | 5 - 6          | N           | ND (2) *       | 2.6     | 81     | ND (1) *   | ND (1)     | ND (0.405)           | 32              | 7.7    | 10     | 2.6    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)     | ND (2) *   | 34       | 29     |
|  | 10/15/08 | 9 - 10         | N           | ND (2) *       | 2.4     | 79     | ND (1) *   | ND (1)     | 0.531                | 33              | 8.3    | 8.6    | 1.7    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)     | ND (2) *   | 33       | 88     |
| SWMU1-7  | 10/15/08 | 0 - 0.5        | N           | ND (2) *       | 3.3     | 98     | ND (1) *   | ND (1)     | ND (0.403)           | 27              | 8.7    | 13     | 6.6    | ND (0.1) *  | ND (1)     | 15     | ND (1)   | ND (1)     | ND (2) *   | 37       | 38     |
|  | 10/15/08 | 2 - 3          | N           | ND (2) *       | ND (1)  | 97     | ND (1) *   | ND (1)     | 6.45                 | 630             | 9      | 14     | 3.6    | ND (0.1) *  | 1.7        | 15     | ND (1)   | ND (1)     | ND (2) *   | 36       | 130    |
|  | 10/15/08 | 5 - 6          | N           | ND (2.1) *     | 1.2     | 100    | ND (1) *   | ND (1)     | 5.3                  | 330             | 8.1    | 20     | 2.8    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2.1) * | 35       | 190    |
|  | 10/15/08 | 9 - 10         | N           | ND (2) *       | 2.4     | 100    | ND (1) *   | ND (1)     | 0.517                | 51              | 8.2    | 9.2    | 1.9    | ND (0.1) *  | ND (1)     | 14 J   | ND (1)   | ND (1)     | ND (2) *   | 34       | 150    |
|  | 10/15/08 | 9 - 10         | FD          | ND (2) *       | 2.4     | 99     | ND (1) *   | ND (1)     | 0.554                | 47              | 7.9    | 8.3    | 1.6    | ND (0.1) *  | ND (1)     | 11 J   | ND (1)   | ND (1)     | ND (2) *   | 32       | 150    |
| SWMU1-8  | 10/15/08 | 0 - 0.5        | N           | ND (2) *       | 2.9     | 86     | ND (1) *   | ND (1)     | 0.618                | 120             | 8.2    | 9.1    | 4.7    | ND (0.1) *  | ND (1)     | 14     | ND (1)   | ND (1)     | ND (2) *   | 38       | 36     |
|  | 10/15/08 | 2 - 3          | N           | ND (2.1) *     | 1.5     | 100    | ND (1) *   | ND (1)     | 22.3                 | 970             | 8.2    | 11     | 3.5    | ND (0.1) *  | 2.2        | 14     | ND (1)   | ND (1)     | ND (2.1) * | 36       | 160    |
|  | 10/15/08 | 5 - 6          | N           | ND (2.1) *     | ND (1)  | 120    | ND (1) *   | ND (1)     | 9.25                 | 1,600           | 9.2    | 22     | 3.3    | ND (0.1) *  | 3.2        | 16     | ND (1)   | ND (1)     | ND (2.1) * | 46       | 120    |
|  | 10/15/08 | 9 - 10         | N           | ND (2.2) *     | 3.9     | 39     | ND (1.1) * | ND (1.1) * | ND (0.433)           | 15              | 7      | 7.1    | 2.8    | ND (0.11) * | ND (1.1)   | 11     | ND (1.1) | ND (1.1)   | ND (2.2) * | 28       | 32     |
| SWMU1-9  | 10/14/08 | 0 - 0.5        | N           | ND (2.1) *     | 2.9     | 110    | ND (1) *   | ND (1)     | 0.697                | 87              | 8.7    | 10     | 2.9    | ND (0.11) * | 1.4        | 16     | ND (1)   | ND (1)     | ND (2.1) * | 36       | 37     |
|  | 10/14/08 | 2 - 3          | N           | ND (2.1) *     | 5.6     | 140    | ND (1) *   | ND (1)     | ND (0.42)            | 13              | 4.5    | 5.9    | 5      | ND (0.11) * | ND (1)     | 8.6    | ND (1)   | ND (1)     | ND (2.1) * | 21       | 26     |
|  | 10/14/08 | 5 - 6          | N           | ND (2.1) *     | 5.8     | 45     | ND (2.1) * | ND (1)     | ND (0.417)           | 26              | 8.9    | 8.1    | 3.1    | ND (0.1) *  | ND (2.1) * | 15     | ND (1)   | ND (2.1)   | ND (4.1) * | 34       | 39     |
|  | 10/14/08 | 9 - 10         | N           | ND (2.1) *     | 4.3     | 150    | ND (1.1) * | ND (1.1) * | ND (0.425)           | 22              | 9      | 11     | 3.2    | ND (0.1) *  | ND (1.1)   | 16     | ND (1.1) | ND (1.1)   | ND (2.1) * | 35       | 38     |
| SWMU1-10   | 10/14/08 | 0 - 0.5        | N           | ND (2) *       | 2.8     | 91     | ND (1) *   | ND (1)     | ND (0.401)           | 19              | 7.8    | 11     | 2.6    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2) *   | 30       | 32     |
|  | 10/14/08 | 2 - 3          | N           | ND (2) *       | 2.5     | 100    | ND (1) *   | ND (1)     | ND (0.403)           | 26              | 8.8    | 13     | 2.2    | ND (0.1) *  | 1.8        | 13     | ND (1)   | ND (1)     | ND (2) *   | 31       | 33     |
|  | 10/14/08 | 5 - 6          | N           | ND (2.1) *     | 3.9     | 44     | ND (1) *   | ND (1)     | ND (0.413)           | 21              | 10     | 8.4    | 2.9    | ND (0.1) *  | ND (1)     | 15     | ND (1)   | ND (1)     | ND (2.1) * | 36       | 42     |
|  | 10/14/08 | 5 - 6          | FD          | ND (2.1) *     | 3.4     | 48     | ND (1) *   | ND (1)     | ND (0.413)           | 22              | 9.4    | 10     | 2.9    | ND (0.1) *  | ND (1)     | 14     | ND (1)   | ND (1)     | ND (2.1) * | 36       | 41     |
|  | 10/14/08 | 9 - 10         | N           | ND (2.1) *     | 4.9     | 51     | ND (1.1) * | ND (1.1) * | ND (0.431)           | 25              | 9.6    | 15     | 3.6    | ND (0.11) * | ND (1.1)   | 17     | ND (1.1) | ND (1.1)   | ND (2.1) * | 37       | 44     |
| SWMU1-11   | 10/15/08 | 0 - 0.5        | N           | ND (2.1) *     | 3.6     | 61     | ND (1.1) * | ND (1.1) * | 1.81                 | 200             | 8.4    | 11     | 3.8    | ND (0.11) * | 1.2        | 15     | ND (1.1) | ND (1.1)   | ND (2.1) * | 34       | 65     |
|  | 10/15/08 | 2 - 3          | N           | ND (2.1) *     | 2.2     | 92     | ND (1.1) * | ND (1.1) * | 8.82                 | 840             | 8.1    | 11     | 4.3    | ND (0.11) * | 4          | 13     | ND (1.1) | ND (1.1)   | ND (2.1) * | 34       | 120    |
|  | 10/15/08 | 5 - 6          | N           | ND (2.1) *     | 5.7     | 37     | ND (2.1) * | ND (1.1) * | ND (0.431)           | 34              | 9.3    | 12     | 3.2    | ND (0.11) * | ND (2.1) * | 16     | ND (1.1) | ND (2.1)   | ND (4.3) * | 35       | 96     |
|  | 10/15/08 | 9 - 10         | N           | ND (2.1) *     | 4.7     | 36     | ND (1.1) * | ND (1.1) * | ND (0.432)           | 22              | 9      | 10     | 3.4    | ND (0.11) * | ND (1.1)   | 15     | ND (1.1) | ND (1.1)   | ND (2.1) * | 35       | 43     |
| SWMU1-12   | 10/14/08 | 0 - 0.5        | N           | ND (2) *       | 2.8     | 100    | ND (1) *   | ND (1)     | ND (0.403)           | 19              | 8      | 8.5    | 2.7    | ND (0.1) *  | ND (1)     | 11     | ND (1)   | ND (1)     | ND (2) *   | 32       | 31     |
|  | 10/14/08 | 2 - 3          | N           | ND (2) *       | 4.6     | 88     | ND (2) *   | ND (1)     | ND (0.406)           | 24              | 9.5    | 11     | 2.3    | ND (0.1) *  | ND (2) *   | 16     | ND (1)   | ND (2)     | ND (4) *   | 34       | 37     |
|  | 10/14/08 | 5 - 6          | N           | ND (2) *       | 5.5     | 57     | ND (2) *   | ND (1)     | ND (0.412)           | 20              | 9.6    | 13     | 2.7    | ND (0.1) *  | ND (2) *   | 15     | ND (1)   | ND (2)     | ND (4.1) * | 35       | 40     |
|  | 10/14/08 | 9 - 10         | N           | ND (2.1) *     | 10      | 42     | ND (5.2) * | ND (1)     | ND (0.419)           | 21              | 9.7    | 11     | 3.1    | ND (0.1) *  | ND (5.2) * | 16     | ND (1)   | ND (5.2) * | ND (10) *  | 34       | 41     |
| SWMU1-13   | 10/14/08 | 0 - 0.5        | N           | ND (2) J*      | 3.3     | 120    | ND (1) *   | ND (1)     | ND (0.407)           | 23              | 7.1    | 14     | 5.3    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2) *   | 33       | 35     |
|  | 10/14/08 | 2 - 3          | N           | ND (2) *       | 9.7     | 160    | ND (5.1) * | ND (1)     | ND (0.409)           | 28              | 9.3    | 11     | 3.5    | ND (0.1) *  | ND (5.1) * | 15     | ND (1)   | ND (5.1)   | ND (10) *  | 36       | 39     |
|  | 10/14/08 | 2 - 3          | FD          | ND (2) *       | 9.3     | 170    | ND (5.1) * | ND (1)     | ND (0.411)           | 27              | 8.7    | 11     | 3.5    | ND (0.1) *  | ND (5.1) * | 14     | ND (1)   | ND (5.1)   | ND (10) *  | 34       | 39     |
|  | 10/14/08 | 5 - 6          | N           | ND (2.1) *     | 6.4     | 85     | ND (2.1) * | ND (1)     | ND (0.416)           | 34              | 11     | 13     | 2.8    | ND (0.1) *  | ND (2.1) * | 20     | ND (1)   | ND (2.1)   | ND (4.1) * | 40       | 44     |
|  | 10/14/08 | 9 - 10         | N           | ND (2.1) *     | 5.7     | 49     | ND (1) *   | ND (1)     | ND (0.426)           | 30              | 12     | 16     | 3.5    | ND (0.1) *  | ND (1)     | 20     | ND (1)   | ND (1)     | ND (2.1) * | 43       | 45     |

TABLE B-1a  
Sample Results: Metals  
SWMU 1 – Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |          |            |            |                      |                 |        |        |            |              |            |          |            |            |            |          |        |
|--|----------|----------------|-------------|----------------|---------|----------|------------|------------|----------------------|-----------------|--------|--------|------------|--------------|------------|----------|------------|------------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410      | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39       | 0.0125       | 1.37       | 27.3     | 1.47       | 5.15       | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000   | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400        | 11           | 390        | 1,500    | 390        | 390        | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE       | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80         | 1            | NE         | 490      | NE         | 390        | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330      | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166     | 0.0125       | 2.25       | 0.607    | 0.177      | 5.15       | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410      | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39       | NE           | 1.37       | 27.3     | 1.47       | NE         | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium   | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead       | Mercury      | Molybdenum | Nickel   | Selenium   | Silver     | Thallium   | Vanadium | Zinc   |
| SWMU1-14   | 10/14/08 | 0 - 0.5        | N           | ND (2) *       | 2.3     | 96       | ND (1) *   | ND (1)     | ND (0.404)           | 20              | 8.8    | 8.2    | 2.6        | ND (0.1) *   | ND (1)     | 13       | ND (1)     | ND (1)     | ND (2) *   | 33       | 33     |
|  | 10/14/08 | 2 - 3          | N           | ND (2) *       | 2.8     | 120      | ND (1) *   | ND (1)     | ND (0.408)           | 19              | 7.9    | 14     | 2.3        | ND (0.1) *   | ND (1)     | 12       | ND (1)     | ND (1)     | ND (2) *   | 31       | 33     |
|  | 10/14/08 | 5 - 6          | N           | ND (2) *       | 5.8     | 73       | ND (2) *   | ND (1)     | ND (0.413)           | 28              | 11     | 17     | 3.4        | ND (0.1) *   | ND (2) *   | 20       | ND (1)     | ND (2)     | ND (4.1) * | 40       | 42     |
|  | 10/14/08 | 9 - 10         | N           | ND (2.1) *     | 5.6     | 67       | ND (1) *   | ND (1)     | ND (0.415)           | 52              | 13     | 35     | 3.9        | ND (0.1) *   | ND (1)     | 32       | ND (1)     | ND (1)     | ND (2.1) * | 48       | 45     |
| SWMU1-15   | 09/22/08 | 0 - 0.5        | N           | ND (2) J*      | 2.6     | 130      | ND (1) *   | ND (1)     | 1.14                 | 25              | 8.7    | 12     | 4.1        | ND (0.1) *   | 1.9        | 15       | ND (1)     | ND (1)     | ND (2) *   | 34       | 36     |
|  | 09/22/08 | 2 - 3          | N           | ND (2.1) *     | 2.8     | 130      | ND (1.1) * | ND (1.1) * | ND (0.422)           | 23              | 9.3    | 11     | 3          | ND (0.11) *  | 1.2        | 17       | ND (1.1)   | ND (1.1)   | ND (2.1) * | 32       | 34     |
|  | 09/22/08 | 5 - 6          | N           | ND (2.1) *     | 4.5     | 100      | ND (2.1) * | ND (1.1) * | ND (0.424)           | 41              | 12     | 18     | 4.5        | ND (0.11) *  | ND (2.1) * | 28       | ND (1.1)   | ND (2.1)   | ND (4.3) * | 44       | 46     |
|  | 09/22/08 | 9 - 10         | N           | ND (2.1) *     | 4.7     | 230      | ND (2.1) * | ND (1)     | ND (0.419)           | 58              | 15     | 24     | 4.4        | ND (0.11) *  | ND (2.1) * | 43       | ND (1)     | ND (2.1)   | ND (4.1) * | 55       | 50     |
|  | 09/22/08 | 9 - 10         | FD          | ND (2.1) *     | 5.1     | 190      | ND (2.1) * | ND (1)     | ND (0.42)            | 60              | 15     | 23     | 4.5        | ND (0.1) *   | ND (2.1) * | 44       | ND (2.1) * | ND (2.1)   | ND (4.1) * | 53       | 50     |
|  | 09/22/08 | 19 - 20        | N           | ND (2.1) *     | 5.5     | 81       | ND (2.1) * | ND (1.1) * | ND (0.425)           | 51              | 14     | 41     | 4.5        | ND (0.11) *  | ND (2.1) * | 37       | ND (1.1)   | ND (2.1)   | ND (4.2) * | 53       | 50     |
|  | 09/22/08 | 29 - 30        | N           | ND (2.1) *     | 7.4     | 110      | ND (5.3) * | ND (1.1) * | ND (0.433)           | 54              | 14     | 23     | 5.4        | ND (0.11) *  | ND (5.3) * | 39       | ND (1.1)   | ND (5.3) * | ND (11) *  | 51       | 54     |
|  | 09/22/08 | 39 - 40        | N           | ND (2.1) *     | 4       | 56       | ND (1) *   | ND (1)     | ND (0.422)           | 40              | 12     | 23     | 3          | ND (0.1) *   | ND (1)     | 27       | ND (1)     | ND (1)     | ND (2.1) * | 48       | 47     |
|  | 09/22/08 | 49 - 50        | N           | ND (2.2) *     | 6.7     | 160      | ND (2.2) * | ND (1.1) * | ND (0.439)           | 55              | 13     | 25     | 5.4        | ND (0.11) *  | ND (2.2) * | 39       | ND (1.1)   | ND (2.2)   | ND (4.3) * | 57       | 59     |
|  | 09/22/08 | 59 - 60        | N           | ND (2.1) *     | 8.4     | 110      | ND (5.3) * | ND (1.1) * | ND (0.449)           | 47              | 14     | 23     | 3          | ND (0.1) *   | ND (5.3) * | 34       | ND (1.1)   | ND (5.3) * | ND (11) *  | 51       | 49     |
|  | 09/22/08 | 59 - 60        | FD          | ND (2.1) *     | 5.6     | 110      | ND (2.1) * | ND (1.1) * | ND (0.411)           | 44              | 15     | 24     | 4.3        | ND (0.1) *   | ND (2.1) * | 31       | ND (1.1)   | ND (2.1)   | ND (4.2) * | 52       | 47     |
|  | 09/22/08 | 69 - 70        | N           | ND (2.1) *     | 6.1     | 47       | ND (1.1) * | ND (1.1) * | ND (0.43)            | 39              | 13     | 25     | 3.8        | ND (0.11) *  | ND (1.1)   | 27       | ND (1.1)   | ND (1.1)   | ND (2.1) * | 42       | 53     |
|  | 09/22/08 | 79 - 80        | N           | ND (2.1) *     | 4.4     | 94       | ND (1.1) * | ND (1.1) * | ND (0.43)            | 28              | 11     | 20     | 3.2        | ND (0.11) *  | ND (1.1)   | 19       | ND (1.1)   | ND (1.1)   | ND (2.1) * | 38       | 60     |
| 09/23/08   | 89 - 90  | N              | ND (4) *    | 3.7            | 560     | ND (2) * | ND (2) *   | ND (0.4)   | 6.5                  | 6.2             | ND (4) | ND (2) | ND (0.1) * | ND (2) *     | 7          | ND (2) * | ND (2)     | ND (4) *   | 15         | 21       |        |
| SWMU1-16   | 09/21/08 | 0 - 0.5        | N           | ND (2) *       | 2.6     | 83       | ND (1) *   | ND (1)     | ND (0.405)           | 10              | 4.5    | 5.2    | 2.3        | ND (0.099) * | ND (1)     | 6.8      | ND (1)     | ND (1)     | ND (2) *   | 20       | 21     |
|  | 09/21/08 | 2 - 3          | N           | ND (2) *       | 1.7     | 99       | ND (1) *   | ND (1)     | ND (0.408)           | 18              | 7.9    | 8.3    | 2          | ND (0.1) *   | 1          | 11       | 1.1        | ND (1)     | ND (2) *   | 32       | 34     |
|  | 09/21/08 | 5 - 6          | N           | ND (2) *       | 1.6     | 110      | ND (1) *   | ND (1)     | ND (0.406)           | 18              | 7.8    | 8.9    | 2          | ND (0.1) *   | ND (1)     | 11       | 1.6        | ND (1)     | ND (2) *   | 32       | 35     |
| SWMU1-17   | 09/21/08 | 0 - 0.5        | N           | ND (2) *       | 3.7     | 210      | ND (2) *   | ND (1)     | ND (0.403)           | 27              | 11     | 16     | 3.5        | ND (0.1) *   | ND (2) *   | 19       | ND (2) *   | ND (2)     | ND (4) *   | 47       | 46     |
|  | 09/21/08 | 2 - 3          | N           | ND (2) *       | 4.3     | 180      | ND (2) *   | ND (1)     | ND (0.405)           | 29              | 10     | 12     | 3.9        | ND (0.1) *   | ND (2) *   | 20       | ND (1)     | ND (2)     | ND (4) *   | 40       | 40     |
|  | 09/21/08 | 5 - 6          | N           | ND (2) *       | 2.8     | 130      | ND (2) *   | ND (1)     | ND (0.407)           | 29              | 10     | 12     | 3.1        | ND (0.1) *   | 2.4        | 18       | ND (1)     | ND (2)     | ND (4) *   | 39       | 44     |
|  | 09/21/08 | 9 - 10         | N           | ND (2) *       | 3.9     | 110      | ND (2) *   | ND (1)     | ND (0.408)           | 43 J            | 13     | 26     | 4.4        | ND (0.1) *   | ND (2) *   | 32       | ND (2) *   | ND (2)     | ND (4) *   | 46       | 41     |
|  | 09/21/08 | 9 - 10         | FD          | ND (2) *       | 4.1     | 110      | ND (2) *   | ND (1)     | ND (0.408)           | 53 J            | 14     | 24     | 4.7        | ND (0.1) *   | ND (2) *   | 37       | ND (1)     | ND (2)     | ND (4) *   | 51       | 46     |
| SWMU1-18   | 01/07/16 | 0 - 1          | N           | ND (2.2) *     | 1.7     | 93       | ND (1.1) * | ND (1.1) * | 2.6                  | 16              | 7.7    | 7.4    | 2          | 0.28         | ND (1.1)   | 13       | ND (1.1)   | ND (1.1)   | ND (2.2) * | 29       | 30     |
|  | 01/07/16 | 2 - 3          | N           | ND (2.1) *     | 2.9     | 150      | ND (1.1) * | ND (1.1) * | ND (0.22)            | 26              | 9.4    | 20     | 2.5        | 0.27         | ND (1.1)   | 21       | ND (1.1)   | ND (1.1)   | ND (2.1) * | 38       | 40     |
|  | 01/07/16 | 5 - 6          | N           | ND (2.2) *     | 1.5     | 83       | ND (1.1) * | ND (1.1) * | ND (0.22)            | 110             | 7      | 8.5    | 2.1        | 0.3          | ND (1.1)   | 13       | ND (1.1)   | ND (1.1)   | ND (2.2) * | 26       | 130    |
|  | 01/07/16 | 9 - 10         | N           | ND (2.1) *     | 3.5     | 55       | ND (1.1) * | ND (1.1) * | ND (0.21)            | 41              | 12     | 17     | 2.6        | 0.34         | ND (1.1)   | 27       | ND (1.1)   | ND (1.1)   | ND (2.1) * | 47       | 43     |
|  | 01/07/16 | 14 - 15        | N           | ND (2.1) *     | 2.9     | 62 J     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 48              | 12     | 19 J   | 2.4        | 0.35         | ND (1.1)   | 38       | ND (1.1)   | ND (1.1)   | ND (2.1) * | 45       | 41     |
|  | 01/07/16 | 14 - 15        | FD          | ND (2.1) *     | 3.2     | 94 J     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 50              | 12     | 25 J   | 3.5        | 0.29         | ND (1.1)   | 40       | ND (1.1)   | ND (1.1)   | ND (2.1) * | 48       | 44     |
|  | 01/07/16 | 19 - 20        | N           | ND (2.2) *     | 3.4     | 110      | ND (1.1) * | ND (1.1) * | ND (0.22)            | 50              | 14     | 21     | 3.6        | 0.33         | ND (1.1)   | 41       | ND (1.1)   | ND (1.1)   | ND (2.2) * | 53       | 49     |
|  | 01/07/16 | 29 - 30        | N           | ND (2.1) *     | 2.5     | 59       | ND (1.1) * | ND (1.1) * | ND (0.21)            | 29              | 8.9    | 22     | 2          | 0.29         | ND (1.1)   | 23       | ND (1.1)   | ND (1.1)   | ND (2.1) * | 33       | 33     |
|  | 01/07/16 | 39 - 40        | N           | ND (2.2) *     | 3.3     | 96       | ND (1.1) * | ND (1.1) * | ND (0.21)            | 42              | 12     | 19     | 2.9        | 0.29         | ND (1.1)   | 28       | ND (1.1)   | ND (1.1)   | ND (2.2) * | 50       | 44     |
|  | 01/08/16 | 49 - 50        | N           | ND (2.4) J*    | 4.6     | 66 J     | ND (1.2) * | ND (1.2) * | ND (0.24)            | 33 J            | 11     | 19     | 4.2        | 0.27         | ND (1.2)   | 28       | ND (1.2) J | ND (1.2)   | ND (2.4) * | 47       | 46 J   |
|  | 01/08/16 | 59 - 60        | N           | ND (2.6) *     | 5.6     | 84       | ND (1.3) * | ND (1.3) * | ND (0.26)            | 27              | 10     | 16     | 5.6        | 0.31         | ND (1.3)   | 22       | ND (1.3)   | ND (1.3)   | ND (2.6) * | 44       | 54     |
|  | 01/08/16 | 69 - 70        | N           | ND (2.3) *     | 2.8     | 72       | ND (1.1) * | ND (1.1) * | ND (0.23)            | 21              | 9.1    | 13     | 2.5        | ND (0.12) *  | ND (1.1)   | 16       | ND (1.1)   | ND (1.1)   | ND (2.3) * | 37       | 41     |
|  | 01/08/16 | 79 - 80        | N           | ND (2.5) *     | 3.2     | 41       | ND (1.3) * | ND (1.3) * | ND (0.25)            | 28              | 9      | 17     | 2.1        | ND (0.13) *  | ND (1.3)   | 22       | ND (1.3)   | ND (1.3)   | ND (2.5) * | 37       | 37     |

TABLE B-1a  
Sample Results: Metals  
SWMU 1 – Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |        |             |            |        |          |          |            |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|-------------|------------|--------|----------|----------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125      | 1.37       | 27.3   | 1.47     | 5.15     | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11          | 390        | 1,500  | 390      | 390      | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1           | NE         | 490    | NE       | 390      | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125      | 2.25       | 0.607  | 0.177    | 5.15     | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE          | 1.37       | 27.3   | 1.47     | NE       | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury     | Molybdenum | Nickel | Selenium | Silver   | Thallium   | Vanadium | Zinc   |
| SWMU1-19   | 01/09/16 | 0 - 1          | N           | ND (2.1) *     | 7.8     | 86     | ND (1) *   | ND (1)     | 1.3                  | 1,400           | 5.7    | 10     | 3.5    | ND (0.1) *  | 1.1        | 7.7    | ND (1)   | ND (1)   | ND (2.1) * | 34       | 160    |
|  | 01/09/16 | 2 - 3          | N           | ND (2.1) *     | 1.9     | 89     | ND (1.1) * | ND (1.1) * | 22                   | 23              | 6.6    | 8.8    | 1.8    | ND (0.11) * | ND (1.1)   | 16     | ND (1.1) | ND (1.1) | ND (2.1) * | 26       | 34     |
|  | 01/09/16 | 5 - 6          | N           | ND (2.1) *     | 3.5     | 74     | ND (1) *   | ND (1)     | 4.9                  | 680             | 5.7    | 9.9    | 1.8    | ND (0.1) *  | ND (1)     | 8.9    | ND (1)   | ND (1)   | ND (2.1) * | 32       | 87     |
|  | 01/09/16 | 9 - 10         | N           | ND (2) *       | 3.8     | 110    | ND (1) *   | ND (1)     | 22                   | 2,100           | 6.1    | 18     | 2.4    | ND (0.1) *  | ND (1)     | 9.2    | ND (1)   | ND (1)   | ND (2) *   | 37       | 120    |
|  | 01/09/16 | 14 - 15        | N           | ND (2.1) *     | 1.6     | 67     | ND (1) *   | ND (1)     | 6.8                  | 240             | 6.3    | 23     | 1.6    | ND (0.1) *  | ND (1)     | 9.7    | ND (1)   | ND (1)   | ND (2.1) * | 27       | 150    |
|  | 01/09/16 | 19 - 20        | N           | ND (2.2) *     | 5.2     | 53     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 24 J            | 8      | 12     | 3.3    | ND (0.11) * | ND (1.1)   | 17     | ND (1.1) | ND (1.1) | ND (2.2) * | 34       | 120    |
|  | 01/09/16 | 19 - 20        | FD          | ND (2.1) *     | 2.5     | 64     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 31 J            | 8.5    | 11     | 1.9    | ND (0.11) * | ND (1.1)   | 19     | ND (1.1) | ND (1.1) | ND (2.1) * | 38       | 110    |
|  | 01/09/16 | 29 - 30        | N           | ND (2.1) *     | 2.4     | 33     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 19              | 9.1    | 59     | 1.8    | ND (0.11) * | ND (1.1)   | 20     | ND (1.1) | ND (1.1) | ND (2.1) * | 34       | 35     |
|  | 01/09/16 | 39 - 40        | N           | ND (2.1) *     | 2.5     | 22     | ND (1) *   | ND (1)     | ND (0.21)            | 16              | 7.1    | 14     | 1.7    | ND (0.1) *  | ND (1)     | 16     | ND (1)   | ND (1)   | ND (2.1) * | 29       | 33     |
|  | 01/09/16 | 49 - 50        | N           | ND (2.1) *     | 2.7     | 87     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 32              | 11     | 28     | 2.2    | ND (0.1) *  | ND (1.1)   | 23     | ND (1.1) | ND (1.1) | ND (2.1) * | 43       | 40     |
|  | 01/09/16 | 59 - 60        | N           | ND (2.1) *     | 2.7     | 66     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 29              | 8.9    | 16     | 2.5    | 0.24        | ND (1.1)   | 18     | ND (1.1) | ND (1.1) | ND (2.1) * | 34       | 38     |
|  | 01/10/16 | 69 - 70        | N           | ND (2.1) *     | 3.6     | 130    | ND (1) *   | ND (1)     | ND (0.21)            | 22              | 9.2    | 17     | 2.6    | 0.23        | ND (1)     | 18     | ND (1)   | ND (1)   | ND (2.1) * | 36       | 38     |
|  | 01/10/16 | 79 - 80        | N           | ND (2.1) *     | 2.5     | 85     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 16              | 8.2    | 10     | 1.6    | 0.27        | ND (1.1)   | 14     | ND (1.1) | ND (1.1) | ND (2.1) * | 31       | 34     |
| SWMU1-20   | 01/13/16 | 14 - 15        | N           | ND (2.1) *     | 1.9     | 68     | ND (1) *   | ND (1)     | 8.9                  | 190             | 8.2    | 12     | 1.6    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2.1) * | 30       | 110    |
|  | 01/13/16 | 14 - 15        | FD          | ND (2.1) *     | 1.7     | 76     | ND (1) *   | ND (1)     | 7.9                  | 200             | 9.7    | 9.9    | 2.2    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2.1) * | 32       | 98     |
|  | 01/13/16 | 19 - 20        | N           | ND (2.1) *     | 2.2     | 69     | ND (1) *   | ND (1)     | ND (0.21)            | 23              | 7.9    | 8      | 1.8    | ND (0.11) * | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2.1) * | 31       | 37     |
|  | 01/13/16 | 29 - 30        | N           | ND (2.1) *     | 2       | 63     | ND (1) *   | ND (1)     | ND (0.21)            | 14              | 9      | 11     | 1.2    | ND (0.1) *  | ND (1)     | 10     | ND (1)   | ND (1)   | ND (2.1) * | 27       | 30     |
|  | 01/14/16 | 39 - 40        | N           | ND (2.1) *     | 2.4     | 29     | ND (1) *   | ND (1)     | ND (0.21)            | 18              | 8.6    | 13     | 1.7    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2.1) * | 32       | 36     |
|  | 01/14/16 | 49 - 50        | N           | ND (2.2) *     | 2.3     | 28     | ND (1.1) * | ND (1.1) * | ND (0.22)            | 15              | 8.6    | 8      | 2      | ND (0.11) * | ND (1.1)   | 13     | ND (1.1) | ND (1.1) | ND (2.2) * | 31       | 37     |
|  | 01/14/16 | 59 - 60        | N           | ND (2.1) *     | 2.1     | 32     | ND (1) *   | ND (1)     | ND (0.21)            | 21              | 7.7    | 38     | 1.2    | ND (0.1) *  | ND (1)     | 15     | ND (1)   | ND (1)   | ND (2.1) * | 29       | 32     |
|  | 01/14/16 | 69 - 70        | N           | ND (2) *       | 1.9     | 56     | ND (1) *   | ND (1)     | ND (0.2)             | 23              | 9.4    | 10     | 1.2    | ND (0.1) *  | ND (1)     | 14     | ND (1)   | ND (1)   | ND (2) *   | 34       | 34     |
|  | 01/14/16 | 79 - 80        | N           | ND (2.1) *     | 2.5     | 100    | ND (1) *   | ND (1)     | ND (0.21)            | 27              | 10     | 11     | 1.7    | ND (0.1) *  | ND (1)     | 16     | ND (1)   | ND (1)   | ND (2.1) * | 39       | 41     |
| SWMU1-21   | 01/26/16 | 14 - 15        | N           | ND (2.1) *     | 1.9     | 64     | ND (1) *   | ND (1)     | 0.5                  | 19              | 7.5    | 13     | 1.4    | ND (0.1) *  | ND (1)     | 10     | ND (1)   | ND (1)   | ND (2.1) * | 31       | 78     |
|  | 01/26/16 | 19 - 20        | N           | ND (2) *       | ND (1)  | 77     | ND (1) *   | ND (1)     | 0.3                  | 16              | 7.4    | 8.7    | ND (1) | ND (0.1) *  | ND (1)     | 9.1    | ND (1)   | ND (1)   | ND (2) *   | 29       | 69     |
|  | 01/27/16 | 29 - 30        | N           | ND (2.1) *     | 2.5     | 50     | ND (1) *   | ND (1)     | ND (0.21)            | 16              | 8      | 11     | 1.3    | ND (0.1) *  | ND (1)     | 12     | ND (1) J | ND (1)   | ND (2.1) * | 28       | 34     |
|  | 01/27/16 | 39 - 40        | N           | ND (2.1) *     | 2.3     | 35     | ND (1) *   | ND (1)     | ND (0.21)            | 14              | 8.1    | 7.9    | 1.3    | ND (0.1) *  | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2.1) * | 29       | 37     |
|  | 01/27/16 | 49 - 50        | N           | ND (2.1) *     | 2.6     | 26     | ND (1) *   | ND (1)     | ND (0.21)            | 14              | 7.7    | 9      | 1.5    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2.1) * | 27       | 33     |
|  | 01/27/16 | 59 - 60        | N           | ND (2.1) *     | 3.1     | 45     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 22              | 9.6    | 12     | 1.7    | ND (0.1) *  | ND (1.1)   | 17     | ND (1.1) | ND (1.1) | ND (2.1) * | 32       | 41     |
|  | 01/27/16 | 69 - 70        | N           | ND (2.1) *     | 2.6     | 54     | ND (1) *   | ND (1)     | ND (0.21)            | 23              | 9.2    | 10     | 1.5    | ND (0.1) *  | ND (1)     | 17     | ND (1)   | ND (1)   | ND (2.1) * | 34       | 40     |
|  | 01/27/16 | 79 - 80        | N           | ND (2.2) *     | 3.1     | 330 J  | ND (1.1) * | ND (1.1) * | ND (0.22)            | 19              | 7.6    | 16     | 1.2    | ND (0.11) * | ND (1.1)   | 15     | ND (1.1) | ND (1.1) | ND (2.2) * | 29       | 32     |
|  | 01/27/16 | 79 - 80        | FD          | ND (2.2) *     | 3.4     | 120 J  | ND (1.1) * | ND (1.1) * | ND (0.22)            | 17              | 7.5    | 11     | 1.3    | ND (0.11) * | ND (1.1)   | 14     | ND (1.1) | ND (1.1) | ND (2.2) * | 29       | 35     |
| SWMU1-22   | 12/17/15 | 0 - 1          | N           | ND (2) *       | 3.6     | 140    | ND (1) *   | ND (1)     | ND (0.2)             | 18              | ---    | 12     | 6.5    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2) *   | 26       | 33     |
| SWMU1-23   | 12/17/15 | 0 - 1          | N           | ND (2) *       | 2.7     | 120    | ND (1) *   | ND (1)     | 0.36                 | 23              | 7.2    | 11     | 7.5    | ND (0.1) *  | ND (1)     | 14     | ND (1)   | ND (1)   | ND (2) *   | 31       | 39     |
| SWMU1-24   | 12/17/15 | 0 - 1          | N           | ND (2) *       | 3.5     | 170    | ND (1) *   | ND (1)     | 1.6                  | 55              | 7.1    | 13     | 6.5    | ND (0.1) *  | ND (1)     | 15     | ND (1)   | ND (1)   | ND (2) *   | 29       | 44     |
| SWMU1-25   | 01/26/16 | 0 - 1          | N           | 18             | 14      | 210    | ND (1) *   | ND (1)     | 42                   | 2,000           | 7.6    | 12     | 4.4    | ND (0.1) *  | 20         | 12     | ND (1)   | ND (1)   | ND (2.1) * | 38       | 60     |
|  | 01/26/16 | 2 - 3          | N           | 2.4            | 2.7     | 53     | ND (1.1) * | ND (1.1) * | 9.5                  | 450             | 8.5    | 13     | 1.6    | ND (0.11) * | ND (1.1)   | 18     | ND (1.1) | ND (1.1) | ND (2.1) * | 35       | 200    |
|  | 01/26/16 | 5 - 6          | N           | ND (2.1) *     | 2.5     | 30     | ND (1.1) * | ND (1.1) * | 2.3                  | 200             | 7.4    | 14     | 1.6    | ND (0.11) * | ND (1.1)   | 12     | ND (1.1) | ND (1.1) | ND (2.1) * | 29       | 170    |
|  | 01/26/16 | 9 - 10         | N           | ND (2.1) *     | 3.1     | 24     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 17              | 8.5    | 11     | 2.1    | ND (0.11) * | ND (1.1)   | 12     | ND (1.1) | ND (1.1) | ND (2.1) * | 29       | 37     |



TABLE B-1a  
Sample Results: Metals  
SWMU 1 – Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |                       |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |        |             |            |        |          |            |             |          |        |
|--|-----------------------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|-------------|------------|--------|----------|------------|-------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |                       |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125      | 1.37       | 27.3   | 1.47     | 5.15       | 0.78        | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |                       |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11          | 390        | 1,500  | 390      | 390        | 0.78        | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |                       |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1           | NE         | 490    | NE       | 390        | NE          | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |                       |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125      | 2.25       | 0.607  | 0.177    | 5.15       | 2.32        | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |                       |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE          | 1.37       | 27.3   | 1.47     | NE         | NE          | 52.2     | 58     |
| Location   | Date                  | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury     | Molybdenum | Nickel | Selenium | Silver     | Thallium    | Vanadium | Zinc   |
| SWMU1-28   | 02/14/17              | 0 - 0.5        | N           | ND (2) *       | 1.7     | 140    | ND (1) *   | 1.3        | ND (0.2)             | 15              | 7.1    | 9.1    | 1.6    | ND (0.1) *  | ND (1)     | 9.7    | ND (1) J | ND (1) J   | ND (2) J*   | 27       | 31     |
|  | 02/14/17              | 0 - 0.5        | FD          | ND (2) *       | 1.9     | 140    | ND (1) *   | 1.4        | ND (0.2)             | 16              | 7.7    | 13     | 1.5    | ND (0.1) *  | ND (1)     | 10     | ND (1) J | ND (1) J   | ND (2) J*   | 28       | 34     |
|  | 02/14/17              | 2 - 3          | N           | ND (2) *       | 1.4     | 97     | ND (1) *   | 1.2        | ND (0.2)             | 13              | 6.6    | 8.3    | 3      | ND (0.1) *  | ND (1)     | 8.3    | ND (1) J | ND (1) J   | ND (2) J*   | 24       | 31     |
| SWMU1-29   | 02/16/17              | 0 - 0.5        | N           | ND (2) *       | ND (1)  | 70     | ND (1) *   | 1.5        | ND (0.2)             | 19              | 7.3    | 8.5    | 1.2    | ND (0.1) *  | ND (1)     | 9.9    | ND (1) J | ND (1) J   | ND (2) J*   | 33       | 28 J   |
|  | 02/16/17              | 2 - 3          | N           | 13             | 7.2     | 89     | ND (1) *   | 1.1        | 17                   | 1,100           | 5.6    | 8.7    | 2.3    | ND (0.1) *  | 1.2        | 8      | ND (1) J | ND (1) J   | ND (2.1) J* | 29       | 41     |
|  | 02/16/17              | 5 - 6          | N           | 2.6            | 1.6     | 73     | ND (1) *   | 1.2        | 5.6                  | 270             | 7.2    | 11     | ND (1) | ND (0.1) *  | ND (1)     | 11     | ND (1) J | ND (1) J   | ND (2.1) J* | 26       | 33     |
|  | 02/16/17              | 9 - 10         | N           | ND (2.1) *     | ND (1)  | 54     | ND (1) *   | 1.2        | 1.4                  | 98              | 7.2    | 13     | 1.1    | ND (0.1) *  | ND (1)     | 9.7    | ND (1) J | ND (1) J   | ND (2.1) J* | 27       | 140    |
| SWMU1-WP-1h  | 10/07/08              | 0 - 0.5        | N           | ND (2.1) *     | 4.5     | 53     | ND (1) *   | ND (1)     | ND (0.418)           | 25              | 8.3    | 11     | 3.9    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)     | ND (2.1) *  | 32       | 38     |
|  | 10/07/08              | 2 - 3          | N           | ND (2.1) *     | 4.4     | 40     | ND (1) *   | ND (1)     | ND (0.418)           | 17              | 7.2    | 8.9    | 2.8    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)     | ND (2.1) *  | 30       | 34     |
|  | 10/07/08              | 5 - 6          | N           | ND (2.1) *     | 3.7     | 23     | ND (1.1) * | ND (1.1) * | ND (0.417)           | 15              | 7      | 7.1    | 2.5    | ND (0.11) * | ND (1.1)   | 11     | ND (1.1) | ND (1.1)   | ND (2.1) *  | 26       | 39     |
|  | 10/07/08              | 9 - 10         | N           | ND (2.1) *     | 3.8     | 29     | ND (1) *   | ND (1)     | ND (0.422)           | 28              | 8      | 8.7    | 2.9    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)     | ND (2.1) *  | 29       | 58     |
| SWMU1-WP-3a  | 10/14/08              | 0 - 0.5        | N           | ND (2.1) *     | 3.1     | 100    | ND (1.1) * | ND (1.1) * | ND (0.419)           | 27              | 7.4    | 11     | 3.6    | ND (0.11) * | ND (1.1)   | 13     | ND (1.1) | ND (1.1)   | ND (2.1) *  | 33       | 40     |
|  | 10/14/08              | 2 - 3          | N           | ND (2.1) *     | 2.3     | 100    | ND (1) *   | ND (1)     | ND (0.419)           | 20              | 8      | 9.4    | 2.3    | ND (0.11) * | 1.1        | 11     | ND (1)   | ND (1)     | ND (2.1) *  | 38       | 34     |
|  | 10/14/08              | 5 - 6          | N           | ND (2.1) *     | 6       | 68     | ND (2.1) * | ND (1.1) * | ND (0.425)           | 27              | 14     | 15     | 6.2    | ND (0.11) * | ND (2.1) * | 17     | ND (1.1) | ND (2.1)   | ND (4.2) *  | 37       | 45     |
|  | 10/14/08              | 7 - 8          | N           | ND (2.1) *     | 6       | 69     | ND (2.1) * | ND (1)     | ND (0.417)           | 23              | 9.3    | 11     | 3.4    | ND (0.1) *  | ND (2.1) * | 18     | ND (1)   | ND (2.1)   | ND (4.1) *  | 36       | 39     |
|  | 10/14/08              | 9 - 10         | N           | ND (2.1) *     | 12      | 120    | ND (5.1) * | ND (1)     | ND (0.415)           | 66              | 14     | 21     | 2.8    | ND (0.1) *  | ND (5.1) * | 45     | ND (1)   | ND (5.1)   | ND (10) *   | 51       | 46     |
|  | 10/14/08              | 9 - 10         | FD          | ND (2.1) *     | 12      | 120    | ND (5.1) * | ND (1)     | ND (0.414)           | 66              | 15     | 22     | 2.7    | ND (0.1) *  | ND (5.1) * | 45     | ND (1)   | ND (5.1)   | ND (10) *   | 52       | 47     |
|  | 10/14/08              | 11 - 12        | N           | ND (2.1) *     | 5.1     | 56     | ND (1) *   | ND (1)     | ND (0.421)           | 30              | 12     | 27     | 4      | ND (0.1) *  | ND (1)     | 23     | ND (1)   | ND (1)     | ND (2.1) *  | 40       | 40     |
|  | 10/14/08              | 13 - 14        | N           | ND (2.1) *     | 5.5     | 40     | ND (1) *   | ND (1)     | ND (0.426)           | 28              | 10     | 31     | 3.8    | ND (0.1) *  | ND (1)     | 21     | ND (1)   | ND (1)     | ND (2.1) *  | 39       | 40     |
| SWMU1-WP-3h  | 10/07/08              | 0 - 0.5        | N           | ND (2.1) *     | 5.1     | 40     | ND (2.1) * | ND (1.1) * | ND (0.433)           | 17              | 7.4    | 6.3    | 1.8    | ND (0.11) * | ND (2.1) * | 11     | ND (1.1) | ND (2.1)   | ND (4.3) *  | 25       | 33     |
|  | 10/07/08              | 2 - 3          | N           | ND (2) *       | 2.4     | 89     | ND (1) *   | ND (1)     | ND (0.404)           | 17              | 7.6    | 8.6    | 2.1    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2) *    | 30       | 34     |
|  | 10/07/08              | 5 - 6          | N           | ND (2) *       | 2.8     | 92     | ND (1) *   | ND (1)     | ND (0.404)           | 21              | 8.7    | 7.8    | 2.4    | ND (0.1) *  | ND (1)     | 15     | ND (1)   | ND (1)     | ND (2) *    | 31       | 36     |
| SWMU1-WP-5a  | 10/05/08              | 0 - 0.5        | N           | ND (2) J*      | 2.4     | 91     | ND (1) *   | ND (1)     | ND (0.405)           | 19              | 8      | 11     | 3.9    | ND (0.1) *  | 1          | 11     | ND (1)   | ND (1)     | ND (2) *    | 36       | 35     |
|  | 10/05/08              | 2 - 3          | N           | ND (2) *       | 2.3     | 100    | ND (1) *   | ND (1)     | ND (0.408)           | 19              | 8.9    | 9.2    | 2.4    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2) *    | 33       | 35     |
|  | 10/05/08              | 5 - 6          | N           | ND (2.1) *     | 6.7     | 120    | ND (2.1) * | ND (1)     | ND (0.419)           | 53              | 13     | 17     | 3.9    | ND (0.1) *  | ND (2.1) * | 38     | ND (1)   | ND (2.1)   | ND (4.1) *  | 52       | 42     |
|  | 10/05/08              | 5 - 6          | FD          | ND (2.1) *     | 12      | 120    | ND (5.2) * | ND (1)     | ND (0.42) J          | 58              | 15     | 19     | 3.5    | ND (0.1) *  | ND (5.2) * | 42     | ND (1)   | ND (5.2) * | ND (10) *   | 56       | 46     |
|  | 10/05/08              | 7 - 8          | N           | ND (2.1) *     | 6.6     | 100    | ND (2.1) * | ND (1)     | ND (0.416)           | 53              | 12     | 18     | 4.1    | ND (0.1) *  | ND (2.1) * | 37     | ND (1)   | ND (2.1)   | ND (4.1) *  | 44       | 41     |
|  | 10/05/08              | 9 - 10         | N           | ND (2.1) *     | 6.4     | 76     | ND (2.1) * | ND (1)     | ND (0.421)           | 43              | 13     | 21     | 4.2    | ND (0.1) *  | ND (2.1) * | 33     | ND (1)   | ND (2.1)   | ND (4.2) *  | 47       | 47     |
|  | 10/05/08              | 11 - 12        | N           | ND (2.1) *     | 6.8     | 50     | ND (2.1) * | ND (1)     | ND (0.416)           | 36              | 11     | 26     | 3.5    | ND (0.1) *  | ND (2.1) * | 26     | ND (1)   | ND (2.1)   | ND (4.1) *  | 43       | 42     |
|  | 10/05/08              | 13 - 14        | N           | ND (2.1) *     | 4.9     | 92     | ND (1) *   | ND (1)     | ND (0.422)           | 27              | 11     | 13     | 3.5    | ND (0.1) *  | ND (1)     | 20     | ND (1)   | ND (1)     | ND (2.1) *  | 40       | 52     |
| SWMU1-WP-5h  | 10/07/08              | 0 - 0.5        | N           | ND (2.2) J*    | 3.4     | 73     | ND (1.1) * | ND (1.1) * | ND (0.43)            | 14              | 12     | 12     | 2.7    | ND (0.11) * | ND (1.1)   | 9.5    | ND (1.1) | ND (1.1)   | ND (2.2) *  | 23       | 31     |
|  | 10/07/08 <sup>Θ</sup> | 2 - 3          | N           | ND (2.1) *     | 5.3     | 130    | ND (2.1) * | ND (1.1) * | ND (0.435)           | 33              | 8.7    | 12     | 4.9    | ND (0.11) * | ND (2.1) * | 14     | ND (1.1) | ND (2.1)   | ND (4.3) *  | 31       | 46     |
|  | 10/07/08              | 5              | N           | ND (2.1) *     | 3.2     | 110    | ND (1) *   | ND (1)     | ND (0.415)           | 23              | 8.5    | 11     | 3.3    | ND (0.1) *  | ND (1)     | 14     | ND (1)   | ND (1)     | ND (2.1) *  | 33       | 40     |

TABLE B-1a  
Sample Results: Metals  
SWMU 1 – Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |                       |                |             | Metals (mg/kg) |          |         |            |            |                      |                 |        |        |        |             |            |        |          |            |            |          |        |
|--|-----------------------|----------------|-------------|----------------|----------|---------|------------|------------|----------------------|-----------------|--------|--------|--------|-------------|------------|--------|----------|------------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |                       |                |             | 0.285          | 11       | 410     | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125      | 1.37       | 27.3   | 1.47     | 5.15       | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |                       |                |             | 31             | 0.68     | 15,000  | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11          | 390        | 1,500  | 390      | 390        | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |                       |                |             | NE             | 0.11     | NE      | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1           | NE         | 490    | NE       | 390        | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |                       |                |             | 0.285          | 11.4     | 330     | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125      | 2.25       | 0.607  | 0.177    | 5.15       | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |                       |                |             | NE             | 11       | 410     | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE          | 1.37       | 27.3   | 1.47     | NE         | NE         | 52.2     | 58     |
| Location   | Date                  | Depth (ft bgs) | Sample Type | Antimony       | Arsenic  | Barium  | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury     | Molybdenum | Nickel | Selenium | Silver     | Thallium   | Vanadium | Zinc   |
| SWMU1-WP-6a  | 10/05/08              | 0 - 0.5        | N           | ND (2) *       | 2.9      | 100     | ND (1) *   | ND (1)     | ND (0.405)           | 32              | 9.3    | 10     | 7.2    | ND (0.1) *  | 2.5        | 15     | ND (1)   | ND (1)     | ND (2) *   | 30       | 35     |
|  | 10/05/08              | 2 - 3          | N           | ND (2) *       | 2.3      | 81      | ND (1) *   | ND (1)     | ND (0.404)           | 19              | 8.8 J  | 10     | 2.3    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2) *   | 34       | 35     |
|  | 10/05/08              | 2 - 3          | FD          | ND (2) *       | 2.4      | 82      | ND (1) *   | ND (1)     | ND (0.403)           | 19              | 11 J   | 9.2    | 2.2    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2) *   | 34       | 33     |
|  | 10/05/08              | 5 - 6          | N           | ND (2.1) *     | 6.2      | 180     | ND (2.1) * | ND (1)     | ND (0.413)           | 41              | 12     | 19     | 3.2    | ND (0.1) *  | ND (2.1) * | 27     | ND (1)   | ND (2.1)   | ND (4.1) * | 43       | 44     |
|  | 10/05/08              | 7 - 8          | N           | ND (2.1) *     | 6        | 66      | ND (2.1) * | ND (1)     | ND (0.414)           | 35              | 10     | 18     | 3.5    | ND (0.1) *  | ND (2.1) * | 24     | ND (1)   | ND (2.1)   | ND (4.1) * | 40       | 38     |
|  | 10/05/08              | 9 - 10         | N           | ND (2) *       | 11       | 98      | ND (5.1) * | ND (1)     | ND (0.412)           | 26              | 11     | 14     | 2.4    | ND (0.1) *  | ND (5.1) * | 19     | ND (1)   | ND (5.1)   | ND (10) *  | 40       | 39     |
|  | 10/05/08              | 11 - 12        | N           | ND (2) *       | 4.3      | 71      | ND (1) *   | ND (1)     | ND (0.411)           | 51              | 10     | 17     | 3.1    | ND (0.1) *  | 3.6        | 22     | ND (1)   | ND (1)     | ND (2) *   | 38       | 35     |
|  | 10/05/08              | 13 - 14        | N           | ND (2) *       | 6.7      | 110     | ND (2) *   | ND (1)     | ND (0.41)            | 60              | 14     | 15     | 3.6    | ND (0.1) *  | ND (2) *   | 43     | ND (1)   | ND (2)     | ND (4.1) * | 55       | 43     |
| SWMU1-WP-6h  | 10/06/08 <sup>Θ</sup> | 0 - 0.5        | N           | ND (2) *       | 4.7      | 150     | ND (2) *   | ND (1)     | 4.98                 | 130             | 8.8    | 15     | 5.5    | ND (0.1) *  | ND (2) *   | 17     | ND (1)   | ND (2)     | ND (4.1) * | 37       | 87     |
|  | 10/06/08              | 2 - 3          | N           | ND (2.1) *     | 5.5      | 70      | ND (1) *   | ND (1)     | 0.538                | 23              | 19     | 61     | 6.6    | ND (0.1) *  | ND (1)     | 15     | ND (1)   | ND (1)     | ND (2.1) * | 36       | 34     |
|  | 10/06/08              | 5 - 6          | N           | ND (2) *       | 2.7      | 100     | ND (1) *   | ND (1)     | ND (0.406)           | 19              | 8      | 10     | 2.4    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2) *   | 34       | 36     |
|  | 10/06/08              | 5 - 6          | FD          | ND (2) *       | 2.7      | 100     | ND (1) *   | ND (1)     | ND (0.405)           | 20              | 8.1    | 12     | 2.3    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2) *   | 32       | 37     |
|  | 10/06/08              | 9 - 10         | N           | ND (2.1) *     | 4.1      | 100     | ND (1.1) * | ND (1.1) * | ND (0.409)           | 41              | 9.4    | 23     | 3.5    | ND (0.11) * | ND (1.1)   | 27     | ND (1.1) | ND (1.1)   | ND (2.1) * | 36       | 39     |
| SWMU1-WP-7   | 10/06/08              | 0 - 0.5        | N           | ND (2.1) *     | ND (5.3) | 160     | ND (5.3) * | ND (1.1) * | 0.566                | 2,600           | 7.2    | 11     | 13     | ND (0.11) * | 7.1        | 15     | ND (1.1) | ND (5.3) * | ND (11) *  | 35       | 88     |
|  | 10/06/08 <sup>Θ</sup> | 2 - 3          | N           | ND (2.2) *     | 6        | 190     | ND (2.2) * | ND (1.1) * | 18.2                 | 1,200           | 7.4    | 16     | 5.7    | ND (0.11) * | 3.4        | 17     | ND (1.1) | ND (2.2)   | ND (4.4) * | 35       | 56     |
|  | 10/06/08              | 5 - 6          | N           | ND (2.1) *     | 3        | 110     | ND (1) *   | ND (1)     | 6.17                 | 21              | 8      | 11     | 2.7    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2.1) * | 31       | 34     |
|  | 10/06/08              | 9 - 10         | N           | ND (2.1) *     | 3        | 82      | ND (1) *   | ND (1)     | ND (0.417)           | 23              | 7.2    | 15     | 2.7    | ND (0.11) * | ND (1)     | 15     | ND (1)   | ND (1)     | ND (2.1) * | 30       | 31     |
| SWMU1-WP-8   | 10/06/08              | 0 - 0.5        | N           | ND (2) *       | 5.4      | 150     | ND (2) *   | ND (1)     | ND (0.402)           | 35              | 7.5    | 13     | 6.9    | ND (0.1) *  | ND (2) *   | 16     | ND (1)   | ND (2)     | ND (4.1) * | 31       | 47     |
|  | 10/06/08              | 2 - 3          | N           | ND (2.1) *     | 5.1      | 160     | ND (2.1) * | ND (1.1) * | 0.541                | 26              | 7.9    | 10     | 4.1    | ND (0.1) *  | ND (2.1) * | 17     | ND (1.1) | ND (2.1)   | ND (4.2) * | 32       | 32     |
|  | 10/06/08              | 5 - 6          | N           | ND (2) *       | 2.7      | 130     | ND (1) *   | ND (1)     | ND (0.407)           | 19              | 8.3    | 10     | 2.7    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)     | ND (2) *   | 34       | 38     |
|  | 10/06/08              | 9 - 10         | N           | ND (2) J*      | 2.9      | 120     | ND (1) *   | ND (1)     | ND (0.411)           | 22              | 7.9    | 9.8    | 2.6    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2) *   | 38       | 38     |
| SWMU1-WP-9   | 09/21/08              | 0 - 0.5        | N           | ND (2) *       | 2.4      | 100     | ND (1) *   | ND (1)     | ND (0.406)           | 26              | 7.6    | 8.2    | 2.9    | ND (0.1) *  | 2.1        | 12     | ND (1)   | ND (1)     | ND (2) *   | 30       | 33     |
|  | 09/21/08              | 2 - 3          | N           | ND (2) *       | 2.7      | 150 J   | ND (1) *   | ND (1)     | ND (0.407)           | 34 J            | 9.5 J  | 15     | 2.3    | ND (0.1) *  | 1.2        | 20 J   | 2.5      | ND (1)     | ND (2) *   | 35       | 34     |
|  | 09/21/08              | 2 - 3          | FD          | ND (2.1) *     | 2.1      | 1,900 J | ND (1) *   | ND (1)     | ND (0.409)           | 20 J            | 5.9 J  | 10     | 2.7    | ND (0.1) *  | ND (1)     | 12 J   | ND (1)   | ND (1)     | ND (2.1) * | 32       | 34     |
|  | 09/21/08              | 5 - 6          | N           | ND (2) *       | 4.2      | 75      | ND (2) *   | ND (1)     | ND (0.416)           | 39              | 13     | 15     | 3.2    | ND (0.1) *  | ND (2) *   | 26     | 1.3      | ND (2)     | ND (4.1) * | 49       | 43     |
|  | 09/21/08              | 7 - 8          | N           | ND (2.1) *     | 4.8      | 58      | ND (2.1) * | ND (1)     | ND (0.416)           | 28              | 10     | 14     | 3.5    | ND (0.1) *  | ND (2.1) * | 20     | ND (1)   | ND (2.1)   | ND (4.1) * | 39       | 45     |
|  | 09/21/08              | 9 - 10         | N           | ND (2) *       | 4.7      | 77      | ND (2) *   | ND (1)     | ND (0.411)           | 37              | 12     | 15     | 3.3    | ND (0.1) *  | ND (2) *   | 28     | ND (1)   | ND (2)     | ND (4.1) * | 43       | 43     |
|  | 09/21/08              | 11 - 12        | N           | ND (2.1) *     | 7.1      | 88      | ND (5.2) * | ND (1)     | ND (0.422)           | 68              | 16     | 23     | 4      | ND (0.11) * | ND (5.2) * | 51     | ND (1)   | ND (5.2) * | ND (10) *  | 56       | 56     |
|  | 09/21/08              | 13 - 14        | N           | ND (2.1) *     | 5.3      | 91      | ND (2.1) * | ND (1)     | ND (0.423)           | 60              | 15     | 22     | 4.9    | ND (0.11) * | ND (2.1) * | 46     | ND (1)   | ND (2.1)   | ND (4.2) * | 56       | 52     |
| SWMU1-WP-10  | 10/05/08              | 0 - 0.5        | N           | ND (2.1) *     | 4.4      | 150     | ND (2.1) * | ND (1)     | 6.64                 | 540             | 7.1    | 11     | 8.3    | ND (0.1) *  | ND (2.1) * | 15     | ND (1)   | ND (2.1)   | ND (4.1) * | 32       | 56     |
|  | 10/05/08 <sup>Θ</sup> | 2 - 3          | N           | ND (2.1) *     | 5.3      | 180     | ND (5.2) * | ND (1)     | 3.85                 | 1,400           | 8.8    | 18     | 10     | ND (0.1) *  | ND (5.2) * | 16     | ND (1)   | ND (5.2) * | ND (10) *  | 39       | 360    |
|  | 10/05/08              | 5 - 6          | N           | ND (2.1) *     | 5.5      | 81      | ND (2.1) * | ND (1.1) * | 0.494 J              | 50              | 8      | 12     | 3.6    | ND (0.11) * | ND (2.1) * | 15     | ND (1.1) | ND (2.1)   | ND (4.3) * | 33       | 53     |
|  | 10/05/08              | 9 - 10         | N           | ND (2.1) *     | 4.8      | 110     | ND (2.1) * | ND (1.1) * | 2.31                 | 250             | 9.4    | 11     | 5.4    | ND (0.11) * | ND (2.1) * | 18     | ND (1.1) | ND (2.1)   | ND (4.2) * | 33       | 83     |

TABLE B-1a  
Sample Results: Metals  
SWMU 1 – Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |        |             |            |        |          |            |            |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|-------------|------------|--------|----------|------------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125      | 1.37       | 27.3   | 1.47     | 5.15       | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11          | 390        | 1,500  | 390      | 390        | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1           | NE         | 490    | NE       | 390        | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125      | 2.25       | 0.607  | 0.177    | 5.15       | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE          | 1.37       | 27.3   | 1.47     | NE         | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury     | Molybdenum | Nickel | Selenium | Silver     | Thallium   | Vanadium | Zinc   |
| SWMU1-WP-T3a   | 10/05/08 | 0 - 0.5        | N           | ND (2) J*      | 2.6     | 110    | ND (1) *   | ND (1)     | ND (0.41)            | 25              | 10     | 11     | 2.8    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2) *   | 38       | 39     |
|  | 10/05/08 | 2 - 3          | N           | ND (2) *       | 2       | 92     | ND (1) *   | ND (1)     | ND (0.411)           | 18              | 9.2    | 12     | 2.9    | ND (0.1) *  | ND (1)     | 11     | ND (1)   | ND (1)     | ND (2) *   | 32       | 35     |
|  | 10/05/08 | 5 - 6          | N           | ND (2.1) *     | 4.1     | 82     | ND (1.1) * | ND (1.1) * | ND (0.431)           | 26              | 11     | 16     | 3.4    | ND (0.11) * | ND (1.1)   | 19     | ND (1.1) | ND (1.1)   | ND (2.1) * | 38       | 40     |
|  | 10/05/08 | 5 - 6          | FD          | ND (2.1) *     | 4.2     | 80     | ND (1.1) * | ND (1.1) * | ND (0.438)           | 26              | 10     | 15     | 3.7    | ND (0.11) * | 1.1        | 19     | ND (1.1) | ND (1.1)   | ND (2.1) * | 38       | 39     |
|  | 10/05/08 | 7 - 8          | N           | ND (2.1) *     | 6.1     | 86     | ND (2.1) * | ND (1.1) * | ND (0.429)           | 38              | 12     | 19     | 4.4    | ND (0.11) * | ND (2.1) * | 28     | ND (1.1) | ND (2.1)   | ND (4.3) * | 43       | 44     |
|  | 10/05/08 | 9 - 10         | N           | ND (2) *       | 5.1     | 140    | ND (2) *   | ND (1)     | ND (0.406)           | 71              | 13     | 20     | 3.4    | ND (0.1) *  | 6.4        | 29     | ND (1)   | ND (2)     | ND (4.1) * | 44       | 42     |
|  | 10/05/08 | 11 - 12        | N           | ND (2.1) *     | 7.1     | 92     | ND (2.1) * | ND (1)     | ND (0.42)            | 50              | 15     | 17     | 4.5    | ND (0.1) *  | ND (2.1) * | 38     | ND (1)   | ND (2.1)   | ND (4.2) * | 54       | 42     |
|  | 10/05/08 | 13 - 14        | N           | ND (2.1) *     | 11      | 100    | ND (5.3) * | ND (1.1) * | ND (0.424)           | 62              | 14     | 30     | 3.8    | ND (0.11) * | ND (5.3) * | 45     | ND (1.1) | ND (5.3) * | ND (11) *  | 53       | 51     |
| SSB-2  | 06/30/97 | 1              | N           | ---            | ---     | ---    | ---        | ---        | ND (0.05)            | 48.7            | ---    | 7.4    | ---    | ---         | ---        | 7.9    | ---      | ---        | ---        | ---      | 27.3   |
|  | 06/30/97 | 3              | N           | ---            | ---     | ---    | ---        | ---        | ND (0.05)            | 7.6             | ---    | 6.8    | ---    | ---         | ---        | 5.7    | ---      | ---        | ---        | ---      | 20.4   |
|  | 06/30/97 | 6              | N           | ---            | ---     | ---    | ---        | ---        | ND (0.05)            | 10.1            | ---    | 9.4    | ---    | ---         | ---        | 7.9    | ---      | ---        | ---        | ---      | 27     |
|  | 06/30/97 | 10             | N           | ---            | ---     | 46.4   | ---        | ---        | ND (0.05)            | 9.7             | ---    | 11     | 3.1    | ---         | ND (0.2)   | 11.7   | ---      | ---        | ---        | 20.2     | 27.3   |
| SSB-3  | 06/30/97 | 1              | N           | ---            | ---     | ---    | ---        | ---        | ND (0.05)            | 8.2             | ---    | 4.3    | ---    | ---         | ---        | 6      | ---      | ---        | ---        | ---      | 13.7   |
|  | 06/30/97 | 3              | N           | ---            | ---     | ---    | ---        | ---        | ND (0.05)            | 13.2            | ---    | 9.5    | ---    | ---         | ---        | 10.4   | ---      | ---        | ---        | ---      | 21.4   |
|  | 06/30/97 | 6              | N           | ---            | ---     | ---    | ---        | ---        | ND (0.05)            | 23.5            | ---    | 13.7   | ---    | ---         | ---        | 16.4   | ---      | ---        | ---        | ---      | 27.1   |
|  | 06/30/97 | 10             | N           | ---            | ---     | 70     | ---        | ---        | ND (0.05)            | 7.1             | ---    | 13.4   | 2.3    | ---         | ND (0.2)   | 7.7    | ---      | ---        | ---        | 15.5     | 19.2   |
| SSB-4  | 06/30/97 | 1              | N           | ---            | ---     | ---    | ---        | ---        | ND (0.05)            | 10.1            | ---    | 3      | ---    | ---         | ---        | 3.9    | ---      | ---        | ---        | ---      | 11.9   |
|  | 06/30/97 | 3              | N           | ---            | ---     | ---    | ---        | ---        | ND (0.05)            | 1,520           | ---    | 10.3   | ---    | ---         | ---        | 5.4    | ---      | ---        | ---        | ---      | 141    |
|  | 06/30/97 | 6              | N           | ---            | ---     | ---    | ---        | ---        | ND (0.05)            | 297             | ---    | 12.4   | ---    | ---         | ---        | 6.9    | ---      | ---        | ---        | ---      | 130    |
|  | 06/30/97 | 10             | N           | ---            | ---     | 93.9   | ---        | ---        | ND (0.05)            | 201             | ---    | 11.9   | 2.1    | ---         | ND (0.2)   | 7.4    | ---      | ---        | ---        | 19.3     | 188    |
| SSB-5  | 06/30/97 | 1              | N           | ---            | ---     | ---    | ---        | ---        | 0.06                 | 521             | ---    | 13.5   | ---    | ---         | ---        | 7.8    | ---      | ---        | ---        | ---      | 39.6   |
|  | 06/30/97 | 3              | N           | ---            | ---     | ---    | ---        | ---        | ND (0.05)            | 1,440           | ---    | 16     | ---    | ---         | ---        | 4.2    | ---      | ---        | ---        | ---      | 128    |
|  | 06/30/97 | 6              | N           | ---            | ---     | ---    | ---        | ---        | ND (0.05)            | 617             | ---    | 14.9   | ---    | ---         | ---        | 6.4    | ---      | ---        | ---        | ---      | 115    |
|  | 06/30/97 | 10             | N           | ---            | ---     | 89.6   | ---        | ---        | ND (0.05)            | 31.6            | ---    | 7      | 1.75   | ---         | ND (0.2)   | 7.7    | ---      | ---        | ---        | 18.7     | 107    |
| WP-1   | 06/30/97 | 0              | N           | ---            | ---     | ---    | ---        | ---        | 47.5                 | 2,090           | ---    | 3.9    | ---    | ---         | ---        | 3.6    | ---      | ---        | ---        | ---      | 44.5   |
| WP-2   | 09/18/97 | 0              | N           | ---            | ---     | ---    | ---        | ---        | ND (0.5)             | 25.9            | ---    | 22.8   | ---    | ---         | ---        | 9.9    | ---      | ---        | ---        | ---      | 80.1   |
| WP-3   | 09/18/97 | 0.5            | N           | ---            | ---     | ---    | ---        | ---        | 11.8                 | 1,290           | ---    | 13.2   | ---    | ---         | ---        | 5.6    | ---      | ---        | ---        | ---      | 50.3   |
|  | 09/18/97 | 2              | N           | ---            | ---     | ---    | ---        | ---        | 0.41                 | 273             | ---    | 18.6   | ---    | ---         | ---        | 18.3   | ---      | ---        | ---        | ---      | 50     |
| WP-4   | 09/18/97 | 0              | N           | ---            | ---     | ---    | ---        | ---        | 1.14                 | 120             | ---    | 10.8   | ---    | ---         | ---        | 4      | ---      | ---        | ---        | ---      | 65.6   |
| WP-5   | 09/18/97 | 0              | N           | ---            | ---     | ---    | ---        | ---        | 3.51                 | 511             | ---    | 16.8   | ---    | ---         | ---        | 13.2   | ---      | ---        | ---        | ---      | 50.4   |
|  | 09/18/97 | 1              | N           | ---            | ---     | ---    | ---        | ---        | 6.66                 | 711             | ---    | 15.4   | ---    | ---         | ---        | 10.2   | ---      | ---        | ---        | ---      | 61.5   |
|  | 09/18/97 | 2              | N           | ---            | ---     | ---    | ---        | ---        | 8.97                 | 421             | ---    | 15.8   | ---    | ---         | ---        | 12.9   | ---      | ---        | ---        | ---      | 51.9   |
|  | 09/18/97 | 3              | N           | ---            | ---     | ---    | ---        | ---        | 6.1                  | 158             | ---    | 10.1   | ---    | ---         | ---        | 4.5    | ---      | ---        | ---        | ---      | 22.9   |
|  | 09/18/97 | 4              | N           | ---            | ---     | ---    | ---        | ---        | 10.2                 | 113             | ---    | 24.4   | ---    | ---         | ---        | 20.6   | ---      | ---        | ---        | ---      | 41.9   |
| WP-6   | 09/18/97 | 0              | N           | ---            | ---     | ---    | ---        | ---        | 1.64                 | 712             | ---    | 21.6   | ---    | ---         | ---        | 12.4   | ---      | ---        | ---        | ---      | 57.9   |
|  | 09/18/97 | 1              | N           | ---            | ---     | ---    | ---        | ---        | 9.46                 | 1,030           | ---    | 18.2   | ---    | ---         | ---        | 5.8    | ---      | ---        | ---        | ---      | 46.5   |
|  | 09/18/97 | 2              | N           | ---            | ---     | ---    | ---        | ---        | 2.29                 | 401             | ---    | 11.9   | ---    | ---         | ---        | 10.5   | ---      | ---        | ---        | ---      | 210    |
| WP-Bank1   | 11/23/98 | 0              | N           | ---            | ---     | ---    | ---        | ---        | 5.5                  | 261             | ---    | 10.3   | ---    | ---         | ---        | 3.8    | ---      | ---        | ---        | ---      | 23.4   |
| WP-Bank2   | 11/23/98 | 0              | N           | ---            | ---     | ---    | ---        | ---        | 14                   | 909             | ---    | 27.2   | ---    | ---         | ---        | 7.9    | ---      | ---        | ---        | ---      | 61.8   |
| BANK-WP  | 11/13/98 | Unknown        | N           | ---            | ---     | ---    | ---        | ---        | ND (0.51)            | 34.4            | ---    | 16.3   | ---    | ---         | ---        | 24.7   | ---      | ---        | ---        | ---      | 41.3   |

TABLE B-1a  
Sample Results: Metals  
SWMU 1 – Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |           |         |                      |                 |        |        |        |         |            |        |          |        |          |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|-----------|---------|----------------------|-----------------|--------|--------|--------|---------|------------|--------|----------|--------|----------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672     | 1.1     | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125  | 1.37       | 27.3   | 1.47     | 5.15   | 0.78     | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160       | 71      | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11      | 390        | 1,500  | 390      | 390    | 0.78     | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15        | 5.2     | NE                   | 36,000          | NE     | NE     | 80     | 1       | NE         | 490    | NE       | 390    | NE       | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3      | 0.0151  | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125  | 2.25       | 0.607  | 0.177    | 5.15   | 2.32     | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672     | 1.1     | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE      | 1.37       | 27.3   | 1.47     | NE     | NE       | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium | Cadmium | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury | Molybdenum | Nickel | Selenium | Silver | Thallium | Vanadium | Zinc   |
| WP-Floor   | 11/23/98 | Unknown        | N           | ---            | ---     | ---    | ---       | ---     | 3.3                  | 317             | ---    | 13.9   | ---    | ---     | ---        | 1.4 J  | ---      | ---    | ---      | ---      | 15.9 J |
| Bank - b   | 11/13/98 | Unknown        | N           | ---            | ---     | ---    | ---       | ---     | 0.7                  | 20.1            | ---    | 15     | ---    | ---     | ---        | 18.2   | ---      | ---    | ---      | ---      | 38.2   |
| T-1  | 11/13/98 | Unknown        | N           | ---            | ---     | ---    | ---       | ---     | ND (0.53)            | 15.9            | ---    | 13.1   | ---    | ---     | ---        | 13.2   | ---      | ---    | ---      | ---      | 38.6   |
|  | 11/13/98 | Unknown        | N           | ---            | ---     | ---    | ---       | ---     | 2.1                  | 38.8            | ---    | 28     | ---    | ---     | ---        | 21.6   | ---      | ---    | ---      | ---      | 164    |
| T-2  | 11/13/98 | Unknown        | N           | ---            | ---     | ---    | ---       | ---     | ND (0.53)            | 21.2            | ---    | 12.4   | ---    | ---     | ---        | 16.2   | ---      | ---    | ---      | ---      | 44.7   |
|  | 11/13/98 | Unknown        | N           | ---            | ---     | ---    | ---       | ---     | 0.6                  | 44.4            | ---    | 14.2   | ---    | ---     | ---        | 13.1   | ---      | ---    | ---      | ---      | 43     |
| T-3-B  | 11/13/98 | 0              | N           | ---            | ---     | ---    | ---       | ---     | 3.1                  | 619             | ---    | 19.6   | ---    | ---     | ---        | 7.9    | ---      | ---    | ---      | ---      | 673    |
| P-1  | 11/13/98 | Unknown        | N           | ---            | ---     | ---    | ---       | ---     | ND (0.52)            | 12              | ---    | 12.7   | ---    | ---     | ---        | 9.2    | ---      | ---    | ---      | ---      | 29.4   |
|  | 11/13/98 | Unknown        | N           | ---            | ---     | ---    | ---       | ---     | ND (0.53)            | 17.9            | ---    | 16.1   | ---    | ---     | ---        | 13.1   | ---      | ---    | ---      | ---      | 40.4   |
| P-2Soil  | 11/13/98 | - 3.5          | N           | ---            | ---     | ---    | ---       | ---     | ND (0.76)            | 33.2            | ---    | 6      | ---    | ---     | ---        | 5.6    | ---      | ---    | ---      | ---      | 6.4    |
|  | 11/13/98 | Unknown        | N           | ---            | ---     | ---    | ---       | ---     | ND (0.52)            | 15              | ---    | 9.7    | ---    | ---     | ---        | 8.1    | ---      | ---    | ---      | ---      | 36.1   |
| Category 3   |          |                |             |                |         |        |           |         |                      |                 |        |        |        |         |            |        |          |        |          |          |        |
| PB-1   | 06/24/88 | 0 - 3          | N           | ---            | ---     | ---    | ---       | ---     | ND (0.5)             | 45              | ---    | ---    | ---    | ---     | ---        | ---    | ---      | ---    | ---      | ---      | ---    |
| PB-2   | 06/24/88 | 0 - 3          | N           | ---            | ---     | ---    | ---       | ---     | ND (0.5)             | 38              | ---    | ---    | ---    | ---     | ---        | ---    | ---      | ---    | ---      | ---      | ---    |
|  | 06/24/88 | 0 - 3          | FD          | ---            | ---     | ---    | ---       | ---     | ND (0.5)             | 37              | ---    | ---    | ---    | ---     | ---        | ---    | ---      | ---    | ---      | ---      | ---    |
| PB-3   | 06/24/88 | 0 - 3          | N           | ---            | ---     | ---    | ---       | ---     | 7.1                  | 270             | ---    | ---    | ---    | ---     | ---        | ---    | ---      | ---    | ---      | ---      |        |
| PB-4   | 06/24/88 | 0 - 3          | N           | ---            | ---     | ---    | ---       | ---     | ND (0.5)             | 25              | ---    | ---    | ---    | ---     | ---        | ---    | ---      | ---    | ---      | ---      | ---    |

**Notes:**  
Category 1: Validated data suitable for all uses, including risk assessment and remedial action decisions.  
Category 2: Validated data suitable for use in characterization of the chemicals of potential concern at the facility and to help define the nature and extent of contamination.  
Category 3: Validated data suitable only for use in qualitative characterization of the nature and extent of contamination.  
Results greater than or equal to the interim screening level are circled; however, if the interim screening level is equal to the background value, only results greater than the interim screening level are circled.

- ⊖
- white powder sample.
- \*
- Reporting limits greater than or equal to the interim screening level.
- 
- not analyzed
- ft bgs
- feet below ground surface
- mg/kg
- milligrams per kilogram
- DTSC
- California Department of Toxic Substances Control
- DTSC-SL
- DTSC Screening Levels
- FD
- field duplicate
- J
- concentration or reporting limit estimated by laboratory or data validation
- N
- primary sample
- ND
- not detected at the listed reporting limit
- NE
- not established
- USEPA
- United States Environmental Protection Agency

<sup>1</sup> Interim screening level is background value. If background value is not available then the interim screening value is the lower of the Ecological Comparison Value , residential DTSC-SL, or USEPA residential regional screening value.  
<sup>2</sup> United States Environmental Protection Agency (USEPA). 2017. Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites. November.  
<sup>3</sup> California Department of Toxic Substances Control (DTSC). 2018. Human Health Risk Assessment (HHRA) Note Number 3. January.  
<sup>4</sup> ARCADIS. 2008. "Technical Memorandum 3: Ecological Comparison Values for Metals and Polycyclic Aromatic Hydrocarbons in Soil." May 28.  
<sup>5</sup> CH2M HILL. 2009. "Final Soil Background Technical Memorandum at Pacific Gas and Electric Company Topock Compressor Station, Needles, California." May.



TABLE B-1b  
Sample Results: Dioxins and Furans  
SWMU 1 – Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |           |           |           |           |             |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|-----------|-----------|-----------|-----------|-------------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE        | NE        | 16        | 50        | 5.58        |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE        | NE        | NE        | 4.8       | NE          |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE        | NE        | NE        | 50        | NE          |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE        | NE        | NE        | 16        | NE          |
| Background <sup>5</sup> :                            |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE        | NE        | NE        | 5.98      | 5.58        |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD      | OCDF      | TEQ Avian | TEQ Human | TEQ Mammals |
| Category 1   |          |                |             |                       |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |           |           |           |           |             |
| SWMU1-18   | 01/07/16 | 0 - 1          | N           | 3,300                 | 310                 | 33                  | 13                | ND (0.53)         | 91                | 26                | 27                | ND (0.61)         | ND (2.4)        | ND (0.37)       | ND (1,500)        | 2.7 J           | ND (0.44)    | ND (0.13)    | 47,000    | 980       | 98        | 140       | 140         |
|  | 01/07/16 | 2 - 3          | N           | 4.7 J                 | ND (0.2)            | ND (0.049)          | ND (0.092)        | ND (0.093)        | ND (0.091)        | ND (0.086)        | ND (0.086)        | ND (0.11)         | ND (0.085)      | ND (0.14)       | ND (3.3)          | ND (0.15)       | ND (0.062)   | ND (0.24)    | 49        | 0.97 J    | 0.47      | 0.37      | 0.37        |
|  | 01/07/16 | 5 - 6          | N           | 3.5 J                 | ND (0.13)           | ND (0.16)           | ND (0.09)         | ND (0.12)         | ND (0.089)        | ND (0.11)         | ND (0.084)        | ND (0.5)          | ND (0.041)      | ND (0.048)      | ND (0.57)         | ND (0.052)      | ND (0.079)   | ND (0.24)    | 13 J      | 0.39 J    | 0.29      | 0.2       | 0.2         |
|  | 01/07/16 | 9 - 10         | N           | 3.5 J                 | ND (0.2)            | ND (0.25)           | ND (0.073)        | ND (0.31)         | ND (0.079)        | ND (0.29)         | ND (0.075)        | ND (0.36)         | ND (0.063)      | ND (0.044)      | ND (0.87)         | ND (0.047)      | ND (0.075)   | ND (0.14)    | 23 J      | ND (0.12) | 0.27      | 0.23      | 0.23        |
| SWMU1-19   | 01/09/16 | 0 - 1          | N           | 80                    | 4.5 J               | ND (0.23)           | ND (0.82)         | ND (0.35)         | 3.3 J             | ND (0.33)         | ND (1.5)          | ND (0.41)         | ND (0.41)       | ND (0.27)       | ND (41)           | ND (0.29)       | ND (0.1)     | ND (0.31)    | 450       | 11 J      | 3         | 3.9       | 3.9         |
|  | 01/09/16 | 2 - 3          | N           | 14,000                | 2,200               | ND (41)             | 130               | 320               | 770               | ND (24)           | 350               | ND (30)           | 63              | ND (2.7)        | ND (12,000)       | 36              | 3.1 J        | ND (0.91)    | 240,000   | 6,500     | 850       | 1,100     | 1,100       |
|  | 01/09/16 | 5 - 6          | N           | 1,100                 | 79                  | ND (3.7)            | 4.3 J             | ND (2.1)          | 31                | ND (1.9)          | 10 J              | ND (2.4)          | ND (1.5)        | ND (0.8)        | ND (360)          | ND (0.86)       | ND (0.13)    | ND (0.58)    | 16,000    | 230       | 25        | 41        | 41          |
|  | 01/09/16 | 9 - 10         | N           | 3,300                 | 170                 | 25                  | 17                | ND (15)           | 120               | ND (14)           | 45                | ND (18)           | 7.8 J           | 3 J             | ND (2,600)        | 17              | ND (0.97)    | ND (0.59)    | 43,000    | 300       | 170       | 210       | 210         |
|  | 01/09/16 | 14 - 15        | N           | 1,100 J               | 100 J               | 9.1 J               | ND (6.4) J        | ND (6.2) J        | 40 J              | ND (9.1) J        | 12 J              | ND (7.1) J        | 3 J             | ND (1.9) J      | ND (700) J        | 5.6 J           | ND (0.48) J  | 0.9 J        | 15,000 J  | 120 J     | 51        | 63        | 63          |
|  | 01/09/16 | 19 - 20        | N           | 25 J                  | ND (2.4) J          | ND (2.8) J          | ND (0.11) J       | ND (0.11) J       | ND (0.12) J       | ND (0.24) J       | ND (0.27) J       | ND (0.13) J       | ND (0.079) J    | ND (0.087) J    | ND (29) J         | ND (0.13) J     | ND (0.07) J  | ND (0.046) J | 340 J     | 1.7 J     | 1.7       | 2         | 2           |
| SWMU1-20   | 01/13/16 | 1 - 1.5        | N           | 170                   | 10 J                | ND (0.9)            | ND (1.1)          | ND (0.44)         | 7 J               | ND (0.6)          | ND (2.6)          | ND (0.51)         | ND (0.87)       | ND (0.31)       | ND (33)           | ND (0.33)       | ND (0.44)    | ND (0.44)    | 1,100     | 25        | 3.4       | 5.5       | 5.5         |
|  | 01/13/16 | 2 - 3          | N           | 63                    | 3.1 J               | ND (0.5)            | ND (1.7)          | ND (0.62)         | 3.7 J             | ND (0.81)         | 3.9 J             | ND (0.19)         | ND (1.5)        | ND (0.33)       | ND (20)           | ND (0.36)       | ND (0.18)    | ND (0.15)    | 670       | 9.3 J     | 2.8       | 3.7       | 3.7         |
|  | 01/13/16 | 5 - 6          | N           | 2,200                 | 220                 | 16                  | 23                | ND (16)           | 100               | ND (15)           | 69                | ND (19)           | 20              | 8 J             | ND (690)          | ND (3.5)        | 1.2 J        | ND (2.6)     | 24,000    | 380       | 78        | 110       | 110         |
|  | 01/13/16 | 9 - 10         | N           | 13,000                | 1,500               | 150                 | 75                | 350               | 730               | 59                | 170               | 36                | 31              | ND (2.5)        | ND (11,000)       | 75              | 4.6 J        | ND (0.5)     | 160,000   | 5,700     | 780       | 950       | 950         |
|  | 01/13/16 | 14 - 15        | N           | 1,900                 | 160                 | ND (7.6)            | 11 J              | ND (140)          | 67                | ND (130)          | 21                | ND (160)          | ND (2.5)        | ND (0.8)        | ND (1,300)        | 12 J            | ND (0.46)    | ND (0.39)    | 46,000    | 200       | 110       | 140       | 140         |
|  | 01/13/16 | 19 - 20        | N           | 4.8 J                 | ND (0.16)           | ND (0.19)           | ND (0.079)        | ND (0.21)         | ND (0.068)        | ND (0.18)         | ND (0.069)        | ND (0.24)         | ND (0.047)      | ND (0.069)      | ND (2.7)          | ND (0.069)      | ND (0.034)   | ND (0.066)   | ND (71)   | ND (0.57) | 0.29      | 0.29      | 0.29        |
| SWMU1-21   | 01/26/16 | 0 - 1          | N           | 10,000                | 1,100               | 49 J                | ND (12)           | 28                | 130 J             | ND (9.3)          | ND (12)           | ND (12)           | ND (2.6)        | ND (7.9)        | ND (220)          | 7.9 J           | 0.69 J       | ND (1.3)     | 140,000   | 13,000    | 65        | 190       | 190         |
|  | 01/26/16 | 2 - 3          | N           | 19,000                | ND (320)            | ND (410)            | 160               | 89                | 1,000             | 150               | 350               | ND (38)           | 92              | ND (61)         | ND (6,500)        | ND (66)         | 3.5 J        | ND (6.8)     | 200,000   | 10,000    | 580       | 870       | 870         |
|  | 01/26/16 | 5 - 6          | N           | 1,600                 | 21                  | ND (10)             | 27                | ND (1.9)          | 30                | ND (1.8)          | 8.4 J             | ND (2.2)          | ND (0.67)       | ND (5.2)        | ND (260)          | ND (5.6)        | ND (0.28)    | ND (0.26)    | 12,000    | 44        | 23        | 41        | 41          |
|  | 01/26/16 | 9 - 10         | N           | 130                   | ND (0.95)           | ND (0.39)           | ND (0.64)         | ND (0.21)         | ND (2.6)          | ND (0.19)         | ND (1.2)          | ND (0.24)         | ND (0.082)      | ND (0.21)       | ND (0.21)         | ND (0.22)       | ND (0.062)   | ND (0.11)    | 500       | ND (1.3)  | 0.57      | 1.8       | 1.8         |
|  | 01/26/16 | 14 - 15        | N           | 31                    | ND (0.2)            | ND (0.23)           | ND (0.18)         | ND (0.17)         | ND (0.15)         | ND (0.15)         | ND (0.16)         | ND (0.2)          | ND (0.077)      | ND (0.091)      | ND (3.7)          | ND (0.21)       | ND (0.05)    | ND (0.084)   | 110       | 1.1 J     | 0.48      | 0.68      | 0.68        |
|  | 01/26/16 | 19 - 20        | N           | 12 J                  | ND (0.087)          | ND (0.34)           | ND (0.11)         | ND (0.074)        | ND (0.47)         | ND (0.15)         | ND (0.092)        | ND (0.084)        | ND (0.13)       | ND (0.066)      | ND (1.6)          | ND (0.077)      | ND (0.058)   | ND (0.066)   | 110       | ND (1.3)  | 0.3       | 0.39      | 0.39        |
| SWMU1-22   | 12/17/15 | 0 - 1          | N           | 240 J                 | 17 J                | ND (1.1) J          | ND (1.9) J        | ND (2.7) J        | 6.1 J             | ND (2.3) J        | ND (2.8) J        | ND (3.2) J        | ND (0.36) J     | ND (0.99) J     | ND (24) J         | ND (0.64) J     | ND (0.26) J  | ND (1.5) J   | 2,100 J   | 31 J      | 3.9       | 6.2       | 6.2         |
| SWMU1-23   | 12/17/15 | 0 - 1          | N           | 480 J                 | 39 J                | 2.6 J               | 3 J               | 3.9 J             | 13 J              | 2.7 J             | 5.8 J             | ND (1.1) J        | 2.2 J           | 1.5 J           | ND (71) J         | ND (1.1) J      | ND (0.38) J  | ND (1.1) J   | 5,200 J   | 94 J      | 10        | 16        | 16          |
| SWMU1-24   | 12/17/15 | 0 - 1          | N           | 47,000 J              | 5,500 J             | ND (71) J           | ND (540) J        | 150 J             | 1,600 J           | 260 J             | ND (470) J        | ND (38) J         | 150 J           | ND (80) J       | ND (4,000) J      | ND (81) J       | 18 J         | 7.4 J        | 360,000 J | 5,000 J   | 650       | 1,300     | 1,300       |
| SWMU1-25   | 01/26/16 | 0 - 1          | N           | 140,000               | ND (1,100)          | ND (1,400)          | 1,900             | ND (400)          | 14,000            | 1,600             | 2,900             | ND (470)          | 910             | ND (92)         | ND (140,000)      | 1,600           | 67           | 89           | 540,000   | 160,000   | 11,000    | 12,000    | 12,000      |
|  | 01/26/16 | 2 - 3          | N           | 340                   | 13                  | ND (1.8)            | 1.9 J             | ND (0.89)         | 7.8 J             | ND (0.82)         | ND (2.5)          | ND (1)            | ND (0.21)       | ND (0.35)       | ND (71)           | ND (0.38)       | ND (0.16)    | ND (0.22)    | 4,400     | 35        | 5.4       | 9.9       | 9.9         |
|  | 01/26/16 | 5 - 6          | N           | 210                   | ND (5.6)            | ND (1.3)            | 2.5 J             | ND (0.85)         | 6.1 J             | ND (0.79)         | 1.9 J             | ND (1)            | ND (0.17)       | ND (0.53)       | ND (37)           | ND (0.57)       | ND (0.58)    | 0.65 J       | 2,200     | 13 J      | 4.2       | 6.4       | 6.4         |
|  | 01/26/16 | 9 - 10         | N           | 59                    | 5.4 J               | ND (0.42)           | ND (0.39)         | ND (0.85)         | 1.7 J             | ND (1.1)          | ND (0.49)         | ND (0.4)          | ND (0.19)       | ND (0.16)       | ND (24)           | ND (0.18)       | ND (0.097)   | ND (0.14)    | 670       | 12 J      | 1.9       | 2.6       | 2.6         |

TABLE B-1b  
Sample Results: Dioxins and Furans  
SWMU 1 – Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |          |           |           |           |             |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|----------|-----------|-----------|-----------|-------------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE       | NE        | 16        | 50        | 5.58        |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE       | NE        | NE        | 4.8       | NE          |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | 50        | NE          |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | 16        | 1.6         |
| Background <sup>5</sup> :                            |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | 5.98      | 5.58        |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD     | OCDF      | TEQ Avian | TEQ Human | TEQ Mammals |
| SWMU1-26   | 01/08/17 | 0 - 0.5        | N           | 450 J                 | 37                  | ND (9.4)            | ND (0.39)         | ND (2)            | 12 J              | ND (1.8)          | 2.9 J             | ND (2.3)          | ND (0.25)       | ND (0.98)       | ND (93)           | ND (0.79)       | ND (0.14)    | ND (0.62)    | 5,100 J  | 75        | 7.7       | 13        | 13          |
|  | 01/08/17 | 0 - 0.5        | FD          | 1,200 J               | 70                  | 5.7 J               | 2.1 J             | ND (3.4)          | 21                | ND (3.1)          | 4 J               | ND (4)            | ND (0.39)       | ND (0.38)       | ND (140)          | ND (1)          | ND (0.11)    | ND (0.71)    | 8,000 J  | 150       | 12        | 26        | 26          |
|  | 01/08/17 | 2 - 3          | N           | 46                    | ND (3.4)            | ND (0.6)            | ND (0.25)         | ND (0.13)         | ND (0.25)         | ND (0.12)         | ND (0.61)         | ND (0.15)         | ND (0.16)       | ND (0.16)       | ND (10)           | ND (0.51)       | ND (0.27)    | ND (1.2)     | 390      | 8.7 J     | 1.7       | 1.5       | 1.5         |
|  | 01/08/17 | 5 - 6          | N           | 410                   | 61                  | 8.3 J               | ND (1.4)          | ND (1.4)          | 14                | 5.6 J             | ND (2.6)          | ND (1.7)          | ND (0.68)       | ND (3.2)        | ND (420)          | ND (3.3)        | ND (0.12)    | 0.77 J       | 7,100    | 120       | 27        | 31        | 31          |
|  | 01/08/17 | 9 - 10         | N           | 11 J                  | ND (2.8)            | ND (2)              | ND (0.57)         | 0.66 J            | ND (0.48)         | ND (0.49)         | 0.99 J            | ND (1.2)          | 0.33 J          | 0.47 J          | ND (1.7)          | ND (0.17)       | ND (0.11)    | 0.74 J       | 80       | ND (4.2)  | 1.7       | 1         | 1           |
|  | 01/08/17 | 14 - 15        | N           | 1.9 J                 | ND (0.64)           | ND (0.45)           | ND (0.11)         | ND (0.11)         | ND (0.1)          | ND (0.096)        | ND (0.14)         | ND (0.19)         | ND (0.1)        | ND (0.11)       | ND (0.5)          | ND (0.11)       | ND (0.084)   | ND (0.31)    | 20 J     | ND (0.26) | 0.37      | 0.22      | 0.22        |
|  | 01/08/17 | 19 - 20        | N           | ND (0.19)             | ND (0.37)           | ND (0.12)           | ND (0.13)         | ND (0.086)        | ND (0.13)         | ND (0.078)        | ND (0.15)         | ND (0.5)          | ND (0.12)       | ND (0.12)       | ND (0.68)         | ND (0.12)       | ND (0.12)    | ND (0.45)    | 11 J     | ND (1)    | 0.49      | 0.26      | 0.26        |
| SWMU1-27   | 01/07/17 | 0 - 0.5        | N           | 210                   | 22                  | ND (4.4)            | ND (1.1)          | ND (0.42)         | ND (0.37)         | ND (2.3)          | 3 J               | ND (1.2)          | ND (0.53)       | ND (2.1)        | ND (78)           | ND (0.4)        | ND (0.13)    | ND (0.28)    | 2,100    | 56        | 5.9       | 7.9       | 7.9         |
|  | 01/07/17 | 2 - 3          | N           | 34                    | ND (2.7)            | ND (0.23)           | ND (0.42)         | ND (0.42)         | 1.1 J             | ND (0.1)          | 0.74 J            | ND (0.13)         | ND (0.13)       | ND (0.18)       | ND (5.9)          | ND (0.18)       | ND (0.12)    | ND (0.6)     | 250      | ND (4.6)  | 1         | 1.1       | 1.1         |
|  | 01/07/17 | 5 - 6          | N           | 150                   | 17                  | ND (2.6)            | ND (0.63)         | ND (1.8)          | 4.2 J             | ND (1.6)          | 2 J               | ND (2.1)          | ND (0.92)       | ND (0.53)       | ND (44)           | ND (0.51)       | ND (0.11)    | ND (0.59)    | 1,600    | 35        | 4.3       | 5.9       | 5.9         |
|  | 01/07/17 | 9 - 10         | N           | ND (1.8)              | ND (0.36)           | ND (0.064)          | ND (0.081)        | ND (0.071)        | ND (0.08)         | ND (0.065)        | ND (0.26)         | ND (0.17)         | ND (0.11)       | ND (0.093)      | ND (0.69)         | ND (0.098)      | ND (0.11)    | 0.27 J       | ND (22)  | ND (0.78) | 0.5       | 0.24      | 0.24        |
|  | 01/07/17 | 14 - 15        | N           | ND (0.28)             | ND (0.14)           | ND (0.62)           | 0.21 J            | ND (0.24)         | ND (0.27)         | ND (0.057)        | ND (0.078)        | ND (0.42)         | ND (0.08)       | ND (0.072)      | ND (0.2)          | ND (0.075)      | ND (0.17)    | ND (0.69)    | ND (9.9) | ND (1.3)  | 0.58      | 0.26      | 0.26        |
|  | 01/07/17 | 19 - 20        | N           | ND (1.1)              | ND (0.45)           | ND (0.37)           | ND (0.048)        | ND (0.093)        | ND (0.047)        | ND (0.085)        | ND (0.075)        | ND (0.11)         | ND (0.092)      | ND (0.033)      | ND (0.096)        | ND (0.15)       | ND (0.09)    | ND (0.29)    | ND (12)  | ND (0.76) | ND (0.34) | ND (0.17) | ND (0.17)   |
| SWMU1-28   | 02/14/17 | 0 - 0.5        | N           | 150                   | 14                  | ND (1.9)            | ND (0.55)         | ND (0.2)          | ND (2.6)          | ND (1.1)          | ND (1.7)          | ND (0.3)          | ND (0.27)       | ND (0.2)        | ND (25)           | ND (0.21)       | ND (0.073)   | ND (0.22)    | 1,000    | 57        | 2.2       | 3.8       | 3.8         |
|  | 02/14/17 | 0 - 0.5        | FD          | 120                   | 15                  | ND (1.9)            | ND (0.43)         | ND (0.56)         | 3.5 J             | ND (0.46)         | ND (0.42)         | ND (0.51)         | ND (0.13)       | ND (0.41)       | ND (26)           | ND (0.43)       | ND (0.071)   | ND (0.1)     | 1,000    | 59        | 2.2       | 3.6       | 3.6         |
|  | 02/14/17 | 2 - 3          | N           | 33                    | 6.4 J               | ND (0.7)            | ND (0.27)         | ND (0.35)         | 1.3 J             | ND (0.18)         | 0.87 J            | ND (0.22)         | ND (0.32)       | ND (0.3)        | ND (8.7)          | ND (0.56)       | ND (0.061)   | ND (0.17)    | 230      | ND (11)   | 1.3       | 1.5       | 1.5         |
| SWMU1-29   | 02/16/17 | 0 - 0.5        | N           | 240 J                 | 21                  | ND (1.7)            | ND (1.2)          | 1.6 J             | 8.1 J             | ND (0.92)         | 2.8 J             | ND (0.34)         | ND (0.62)       | ND (0.93)       | ND (49)           | ND (1.1)        | ND (0.15)    | ND (0.57)    | 2,400    | 56 J      | 5         | 7.8       | 7.8         |
|  | 02/16/17 | 2 - 3          | N           | 4,700                 | 250                 | 25                  | 61                | 20                | 240               | 18                | ND (110)          | 4.6 J             | 39              | 7.4 J           | ND (3,400)        | 7.1 J           | ND (0.16)    | 2 J          | 48,000 J | 320       | 250       | 320       | 320         |
|  | 02/16/17 | 5 - 6          | N           | 400                   | 29                  | 2.7 J               | 3.2 J             | ND (2.9)          | 14                | ND (1.6)          | 7 J               | ND (0.27)         | ND (1.8)        | ND (0.68)       | ND (190)          | 1.3 J           | ND (0.11)    | 0.59 J       | 4,700    | 48        | 15        | 19        | 19          |
|  | 02/16/17 | 9 - 10         | N           | 380                   | 23                  | 2.3 J               | ND (1.6)          | 2.4 J             | 9.2 J             | ND (0.64)         | ND (3.8)          | ND (0.4)          | ND (0.94)       | ND (0.16)       | ND (130)          | ND (0.45)       | ND (0.13)    | ND (0.39)    | 6,200    | 43        | 9.3       | 15        | 15          |

Notes:

Category 1: Validated data suitable for all uses, including risk assessment and remedial action decisions.

Category 2: Validated data suitable for use in characterization of the chemicals of potential concern at the facility and to help define the nature and extent of contamination.

Category 3: Validated data suitable only for use in qualitative characterization of the nature and extent of contamination.

Results greater than or equal to the Interim Screening Level are circled.

- not analyzed
- ft bgs feet below ground surface
- ng/kg nanograms per kilogram
- DTSC-SL DTSC Screening Levels
- DTSC California Department of Toxic Substances Control
- FD Field Dupliicate
- J concentration or reporting limit estimated by laboratory or data validation
- JR estimated value, one or more input values is “R” qualified.
- N Primary Sample
- NA NA = not applicable
- NE not established

TABLE B-1b  
Sample Results: Dioxins and Furans  
SWMU 1 – Former Percolation Bed  
*Soil Engineering Evaluation/Cost Analysis*  
*PG&E Topock Compressor Station, Needles, California*

|       |   |
|-------|---|
| ND    | not detected at the listed reporting limit  |
| R     | The result has been rejected; identification and/or quantitation could not be verified because critical QC specifications were not met (e.g., a non-detect result obtained for an archive sample following a hold time of greater than one year). |
| USEPA | USEPA = United States Environmental Protection Agency   |

- 1 For individual dioxins and furans, selected value is the lower of the ECV, residential DTSC-SL, or USEPA residential regional screening value, unless the background value is higher. For TEQ values, selected value is the DTSC-SL.
- 2 United States Environmental Protection Agency (USEPA). 2017. Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites. November.
- 3 California Department of Toxic Substances Control (DTSC). 2018. Human Health Risk Assessment (HHRA) Note Number 3. JanuaryCalifornia Department of Toxic Substances Control (DTSC). 2017. Human Health Risk Assessment (HHRA) Note 2, Soil Remedial Goals for Dioxins and Dioxin-like Compounds for Consideration at California Hazardous Waste Sites. April.
- 4 ARCADIS. 2008. "Technical Memorandum 3: Ecological Comparison Values for Metals and Polycyclic Aromatic Hydrocarbons in Soil." May 28. ARCADIS. 2009. "Topock Compression Station - Final Technical Memorandum 4: Ecological Comparison Values for Additional Decteded Chemicals in Soil." July 1.
- 5 CH2M. 2017. Revised Ambient Study of Dioxins and Furans at the Pacific Gas and Electric Company, Topock Compressor Station, Needles, California. October.

Calculations:  
TEQ = Sum of Result xToxic equivalency factor (TEF), 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.  
TEQ Avian = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.  
TEQMammals = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.  
Teq Humans = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.





TABLE B-2a  
Sample Results: Metals in Soil  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |            |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |          |        |              |            |        |            |          |            |          |        |
|--|------------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|----------|--------|--------------|------------|--------|------------|----------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |            |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8     | 8.39   | 0.0125       | 1.37       | 27.3   | 1.47       | 5.15     | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |            |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100    | 400    | 11           | 390        | 1,500  | 390        | 390      | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |            |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE       | 80     | 1            | NE         | 490    | NE         | 390      | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |            |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6     | 0.0166 | 0.0125       | 2.25       | 0.607  | 0.177      | 5.15     | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |            |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8     | 8.39   | NE           | 1.37       | 27.3   | 1.47       | NE       | NE         | 52.2     | 58     |
| Location   | Date       | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper   | Lead   | Mercury      | Molybdenum | Nickel | Selenium   | Silver   | Thallium   | Vanadium | Zinc   |
| Category 1   |            |                |             |                |         |        |            |            |                      |                 |        |          |        |              |            |        |            |          |            |          |        |
| AOC1-BCW1  | 09/20/08   | 0 - 0.5        | N           | ND (2) *       | 4.3     | 160    | ND (1) *   | ND (1)     | ND (0.401)           | 23              | 6.4    | 11       | 7.5    | ND (0.1) *   | ND (1)     | 11     | ND (1)     | ND (1)   | ND (2) *   | 26       | 44     |
|  | 09/20/08   | 2 - 3          | N           | ND (2) *       | 8.4     | 160    | ND (1) *   | ND (1)     | ND (0.404)           | 25              | 9.4    | 15       | 2      | ND (0.1) *   | ND (1)     | 19     | ND (1)     | ND (1)   | ND (2) *   | 40       | 28     |
| AOC1-BCW2  | 10/04/08   | 0 - 0.5        | N           | ND (2) *       | 3.4     | 96     | ND (1) *   | ND (1)     | ND (0.403)           | 21              | 6      | 7.6      | 3.7    | ND (0.1) *   | ND (1)     | 10     | ND (1)     | ND (1)   | ND (2) *   | 23       | 40     |
|  | 10/04/08   | 2 - 3          | N           | ND (2) *       | 3.1     | 110    | ND (1) *   | ND (1)     | ND (0.407)           | 34              | 7.1    | 9.2      | 18     | ND (0.1) *   | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2) *   | 30       | 39     |
|  | 10/04/08   | 5 - 6          | N           | ND (2) *       | 3.1     | 100    | ND (1) *   | ND (1)     | ND (0.404)           | 35              | 7.1    | 8.8      | 4.4    | ND (0.1) *   | 1.5        | 12     | ND (1)     | ND (1)   | ND (2) *   | 28       | 41     |
|  | 10/04/08   | 9 - 10         | N           | ND (2.1) *     | 3.8     | 120    | ND (1.1) * | ND (1.1) * | ND (0.426)           | 20              | 8.7    | 8.1      | 3.8    | ND (0.1) *   | ND (1.1)   | 14     | ND (1.1)   | ND (1.1) | ND (2.1) * | 38       | 39     |
| AOC1-BCW3  | 10/04/08   | 0 - 0.5        | N           | ND (2) *       | 4.4     | 140    | ND (1) *   | ND (1)     | 0.416                | 25              | 6.4    | 11       | 7.3    | ND (0.1) *   | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2) *   | 27       | 51     |
|  | 10/04/08   | 2 - 3          | N           | ND (2) *       | 3.2     | 99     | ND (1) *   | ND (1)     | ND (0.404)           | 25              | 7.5    | 9.8      | 4      | ND (0.1) *   | ND (1)     | 13     | ND (1)     | ND (1)   | ND (2) *   | 30       | 38     |
|  | 10/04/08   | 5 - 6          | N           | ND (2.1) *     | 4.2     | 170    | ND (2.1) * | ND (1)     | ND (0.415)           | 23              | 11     | 9.6      | 2.2    | ND (0.1) *   | ND (2.1) * | 14     | ND (1)     | ND (2.1) | ND (4.1) * | 36       | 43     |
|  | 10/04/08   | 9 - 10         | N           | ND (2.1) *     | 4       | 120    | ND (1.1) * | ND (1.1) * | ND (0.421)           | 21              | 9      | 8.5      | 2.2    | ND (0.11) *  | ND (1.1)   | 13     | ND (1.1)   | ND (1.1) | ND (2.1) * | 36       | 38     |
|  | 10/04/08   | 9 - 10         | FD          | ND (2.1) *     | 4.2     | 130    | ND (1.1) * | ND (1.1) * | ND (0.424)           | 22              | 9.3    | 8.8      | 2.3    | ND (0.11) *  | ND (1.1)   | 14     | ND (1.1)   | ND (1.1) | ND (2.1) * | 37       | 41     |
| AOC1-BCW4  | 10/04/08   | 0 - 0.5        | N           | ND (2) *       | 4.4     | 180    | ND (1) *   | ND (1)     | 1.3                  | 36              | 8.3    | 13       | 9.4    | ND (0.1) *   | ND (1)     | 16     | ND (1)     | ND (1)   | ND (2) *   | 33       | 61     |
|  | 10/04/08   | 2 - 3          | N           | ND (2) *       | 2.9     | 76     | ND (1) *   | ND (1)     | ND (0.407)           | 24              | 5.8    | 8.3      | 3.6    | ND (0.1) *   | ND (1)     | 9.5    | ND (1)     | ND (1)   | ND (2) *   | 23       | 33     |
|  | 10/04/08   | 5 - 6          | N           | ND (2.1) *     | 4       | 60     | ND (1) *   | ND (1)     | ND (0.416)           | 23              | 9.4    | 8.4      | 2.7    | ND (0.1) *   | ND (1)     | 14     | ND (1)     | ND (1)   | ND (2.1) * | 37       | 45     |
|  | 10/04/08   | 9 - 10         | N           | ND (2.1) *     | 5.1     | 81     | ND (2.1) * | ND (1.1) * | ND (0.426)           | 22              | 9.7    | 7.6      | 2.3    | ND (0.11) *  | ND (2.1) * | 15     | ND (1.1)   | ND (2.1) | ND (4.3) * | 35       | 42     |
| AOC1-BCW5  | 10/04/08   | 0 - 0.5        | N           | ND (2) *       | 3.7     | 160    | ND (1) *   | ND (1)     | 0.445                | 35              | 8.7    | 12       | 6      | ND (0.099) * | ND (1)     | 15     | ND (1)     | ND (1)   | ND (2) *   | 34       | 46     |
|  | 10/04/08   | 2 - 3          | N           | ND (2) *       | 3.5     | 130    | ND (1) *   | ND (1)     | ND (0.407)           | 31              | 7.4    | 9.6      | 7      | ND (0.1) *   | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2) *   | 30       | 42     |
|  | 10/04/08   | 5 - 6          | N           | ND (2.1) *     | 3.9     | 120    | ND (1) *   | ND (1)     | ND (0.42)            | 26              | 9.9    | 8.4      | 2.7    | ND (0.1) *   | ND (1)     | 15     | ND (1)     | ND (1)   | ND (2.1) * | 41       | 44     |
|  | 10/04/08   | 9 - 10         | N           | ND (2.1) *     | 4.7     | 110    | ND (2.1) * | ND (1)     | ND (0.425)           | 22              | 9.2    | ND (7.4) | 3.2    | ND (0.11) *  | ND (2.1) * | 15     | ND (1)     | ND (2.1) | ND (4.2) * | 35       | 40     |
|  | 10/04/08   | 9 - 10         | FD          | ND (2.1) *     | 4.7     | 110    | ND (2.1) * | ND (1.1) * | ND (0.427)           | 24              | 9      | ND (7.3) | 3      | ND (0.11) *  | ND (2.1) * | 15     | ND (1.1)   | ND (2.1) | ND (4.2) * | 34       | 40     |
| AOC1-BCW6  | 08/22/08 ‡ | 0 - 0.5        | N           | ND (5.7) *     | 13      | 320    | ND (2.8) * | ND (2.8) * | 2.63                 | 71              | 7.7    | 22       | 23     | ND (0.14) *  | ND (2.8) * | 18     | ND (2.8) * | ND (2.8) | ND (5.7) * | 37       | 81     |
|  | 08/22/08 ‡ | 2 - 3          | N           | ND (5.8) *     | 9.3     | 230    | ND (2.9) * | ND (2.9) * | ND (0.608)           | 21              | 6.3    | 14       | 8.7    | ND (0.14) *  | ND (2.9) * | 13     | ND (2.9) * | ND (2.9) | ND (5.8) * | 31       | 50     |
| AOC1-T1a   | 10/16/08   | 0 - 0.5        | N           | ND (2) *       | 6.5     | 100    | ND (2) *   | ND (1)     | ND (0.406)           | 19              | 7.3    | 11       | 4.9    | ND (0.1) *   | ND (2) *   | 14     | ND (1)     | ND (2)   | ND (4) *   | 30       | 38     |
|  | 10/16/08   | 2 - 3          | N           | ND (2) *       | 3.2     | 120    | ND (1) *   | ND (1)     | ND (0.404)           | 27              | 7.7    | 8.6      | 3.8    | ND (0.1) *   | 2          | 13     | ND (1)     | ND (1)   | ND (2) *   | 29       | 37     |
|  | 10/16/08   | 5 - 6          | N           | ND (2) *       | 3.5     | 110    | ND (1) *   | ND (1)     | ND (0.405)           | 26              | 7.2    | 9.5      | 3.4    | ND (0.1) *   | 2          | 12     | ND (1)     | ND (1)   | ND (2) *   | 29       | 34     |
|  | 10/16/08   | 9 - 10         | N           | ND (2) *       | 2.4     | 88     | ND (1) *   | ND (1)     | ND (0.404)           | 14              | 7.3    | 7.5      | 1.4    | ND (0.1) *   | ND (1)     | 9.5    | ND (1)     | ND (1)   | ND (2) *   | 29       | 32     |
| AOC1-T1b   | 10/16/08   | 0 - 0.5        | N           | ND (2) *       | 2.9     | 88     | ND (1) *   | ND (1)     | ND (0.405)           | 43 J            | 8.4    | 9        | 3.1    | ND (0.1) *   | ND (1)     | 14     | ND (1)     | ND (1)   | ND (2) *   | 36       | 31     |
|  | 10/16/08   | 0 - 0.5        | FD          | ND (2) *       | 2.8     | 86     | ND (1) *   | ND (1)     | ND (0.405)           | 33 J            | 8.2    | 10       | 3.2    | ND (0.1) *   | ND (1)     | 16     | ND (1)     | ND (1)   | ND (2) *   | 35       | 32     |
|  | 10/16/08   | 2 - 3          | N           | ND (2.1) *     | 2.9     | 210    | ND (1) *   | ND (1)     | ND (1.94) *          | 98              | 7.5    | 12       | 3.9    | ND (0.1) *   | ND (1)     | 16     | ND (1)     | ND (1)   | ND (2.1) * | 33       | 67     |
|  | 10/16/08   | 5 - 6          | N           | ND (2) *       | 3       | 99     | ND (1) *   | ND (1)     | 0.402                | 28              | 7.2    | 9        | 3.2    | ND (0.1) *   | 1.7        | 12     | ND (1)     | ND (1)   | ND (2) *   | 31       | 31     |
|  | 10/16/08   | 9 - 10         | N           | ND (2) *       | 2.6     | 120    | ND (1) *   | ND (1)     | ND (0.402)           | 42              | 8      | 11       | 2.6    | ND (0.1) *   | 5          | 14     | ND (1)     | ND (1)   | ND (2) *   | 30       | 32     |
| AOC1-T1c   | 10/16/08   | 0 - 0.5        | N           | ND (2) *       | 3.2     | 120    | ND (1) *   | ND (1)     | 0.601                | 44              | 7.4    | 13       | 7.5    | ND (0.1) *   | 1.9        | 11     | ND (1)     | ND (1)   | ND (2) *   | 33       | 53     |
|  | 10/16/08   | 2 - 3          | N           | ND (2.1) *     | 2.6     | 150    | ND (1) *   | ND (1)     | 4.77 J               | 140             | 8      | 26       | 20 J   | ND (0.1) *   | 2.5        | 11 J   | ND (1)     | ND (1)   | ND (2.1) * | 33       | 82 J   |
|  | 10/16/08   | 2 - 3          | FD          | ND (2.1) *     | 3       | 170    | ND (1) *   | ND (1)     | 3.58 J               | 150             | 8.2    | 29       | 32 J   | ND (0.1) *   | 2.2        | 14 J   | ND (1)     | ND (1)   | ND (2.1) * | 29       | 110 J  |
|  | 10/16/08   | 5 - 6          | N           | ND (2) *       | 3.1     | 97     | ND (1) *   | ND (1)     | 0.446                | 46              | 7.2    | 15       | 5      | ND (0.1) *   | 3          | 12     | ND (1)     | ND (1)   | ND (2) *   | 27       | 44     |
|  | 10/16/08   | 9 - 10         | N           | ND (2.1) *     | 2.8     | 120    | ND (1) *   | ND (1)     | ND (0.418)           | 20              | 8.6    | 11       | 1.9    | ND (0.1) *   | ND (1)     | 13     | ND (1)     | ND (1)   | ND (2.1) * | 33       | 38     |

TABLE B-2a  
Sample Results: Metals in Soil  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |         |        |             |            |        |          |            |            |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|---------|--------|-------------|------------|--------|----------|------------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8    | 8.39   | 0.0125      | 1.37       | 27.3   | 1.47     | 5.15       | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100   | 400    | 11          | 390        | 1,500  | 390      | 390        | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE      | 80     | 1           | NE         | 490    | NE       | 390        | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6    | 0.0166 | 0.0125      | 2.25       | 0.607  | 0.177    | 5.15       | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8    | 8.39   | NE          | 1.37       | 27.3   | 1.47     | NE         | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper  | Lead   | Mercury     | Molybdenum | Nickel | Selenium | Silver     | Thallium   | Vanadium | Zinc   |
| AOC1-T2a   | 10/05/08 | 0 - 0.5        | N           | ND (2) *       | 4       | 110    | ND (1) *   | ND (1)     | ND (0.403)           | 26              | 7.1    | 10      | 4.8    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2) *   | 30       | 38     |
|  | 10/16/08 | 2 - 3          | N           | ND (2) *       | 6       | 120    | ND (2) *   | ND (1)     | ND (0.407)           | 28              | 8.7    | 10      | 4      | ND (0.1) *  | ND (2) *   | 15     | ND (1)   | ND (2)     | ND (4) *   | 32       | 42     |
|  | 10/16/08 | 5 - 6          | N           | ND (2) *       | 2.7     | 110    | ND (1) *   | ND (1)     | ND (0.405)           | 19              | 8.1    | 8.3     | 2.4    | ND (0.1) *  | 1.1        | 11     | ND (1)   | ND (1)     | ND (2) *   | 28       | 35     |
|  | 10/16/08 | 9 - 10         | N           | ND (2.1) *     | 2.9     | 110    | ND (1) *   | ND (1)     | ND (0.416)           | 15              | 7.4    | 7.1     | 2.1    | ND (0.1) *  | ND (1)     | 11     | ND (1)   | ND (1)     | ND (2.1) * | 27       | 36     |
| AOC1-T2b   | 10/16/08 | 0 - 0.5        | N           | ND (2) J*      | 3.6     | 120    | ND (1) *   | ND (1)     | ND (0.408)           | 26              | 7.3    | 9.3     | 3.2    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2) *   | 28       | 39     |
|  | 10/16/08 | 2 - 3          | N           | ND (2.1) *     | 3       | 93     | ND (1) *   | ND (1)     | ND (0.414)           | 26              | 6.9    | 10      | 3      | ND (0.1) *  | 2.4        | 11     | ND (1)   | ND (1)     | ND (2.1) * | 23       | 33     |
|  | 10/16/08 | 5 - 6          | N           | ND (2) *       | 3       | 89     | ND (1) *   | ND (1)     | ND (0.407)           | 53              | 6.7    | 8.7     | 2.4    | ND (0.1) *  | 5.5        | 12     | ND (1)   | ND (1)     | ND (2) *   | 25       | 32     |
|  | 10/16/08 | 9 - 10         | N           | ND (2.1) *     | 2.4     | 99     | ND (1) *   | ND (1)     | ND (0.415)           | 18              | 8.4    | 8.5     | 1.8    | ND (0.1) *  | 1.3        | 12     | ND (1)   | ND (1)     | ND (2.1) * | 27       | 33     |
|  | 10/16/08 | 9 - 10         | FD          | ND (2.1) *     | 2.3     | 110    | ND (1) *   | ND (1)     | ND (0.413)           | 18              | 8.2    | 9.6     | 1.6    | ND (0.1) *  | 1.2        | 13     | ND (1)   | ND (1)     | ND (2.1) * | 29       | 35     |
| AOC1-T2c   | 10/08/08 | 0 - 0.5        | N           | ND (2) J*      | 3.7     | 88     | ND (1) *   | ND (1)     | 1.26                 | 60              | 6.3    | 10      | 5.1    | ND (0.1) *  | ND (1)     | 11     | ND (1)   | ND (1)     | ND (2) *   | 26       | 44     |
|  | 10/08/08 | 2 - 3          | N           | ND (2) *       | 3.1     | 130    | ND (1) *   | ND (1)     | ND (0.416)           | 42              | 8.4    | 11      | 3.3    | ND (0.1) *  | ND (1)     | 15     | ND (1)   | ND (1)     | ND (2) *   | 34       | 33     |
|  | 10/08/08 | 5 - 6          | N           | ND (2) *       | 2.3     | 81     | ND (1) *   | ND (1)     | ND (0.412)           | 22              | 7.2    | 9.1     | 1.8    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)     | ND (2) *   | 31       | 28     |
|  | 10/08/08 | 9 - 10         | N           | ND (2.1) *     | 3.7     | 40     | ND (1) *   | ND (1)     | ND (0.419)           | 24              | 9.3    | 9.7     | 2.6    | ND (0.1) *  | ND (1)     | 15     | ND (1)   | ND (1)     | ND (2.1) * | 35       | 40     |
| AOC1-T2d   | 10/07/08 | 0 - 0.5        | N           | ND (2) *       | 3       | 100    | ND (1) *   | ND (1)     | ND (0.408)           | 46              | 8.2    | 10      | 2.9    | ND (0.1) *  | 2.9        | 14     | ND (1)   | ND (1)     | ND (2) *   | 36       | 36     |
|  | 10/07/08 | 2 - 3          | N           | ND (2.1) *     | ND (1)  | 120    | ND (1) *   | ND (1)     | 5.73                 | 970             | 7.5    | 13      | 4.7    | ND (0.1) *  | 1.5        | 11     | ND (1)   | ND (1)     | ND (2.1) * | 34       | 98     |
|  | 10/07/08 | 5 - 6          | N           | ND (2.1) *     | ND (1)  | 84     | ND (1) *   | ND (1)     | 4.34                 | 370             | 6.9    | 11      | 3.9    | ND (0.1) *  | 1.1        | 11     | ND (1)   | ND (1)     | ND (2.1) * | 26       | 130    |
|  | 10/07/08 | 9 - 10         | N           | ND (2.1) *     | 4.5     | 86     | ND (2.1) * | ND (1)     | 2.92                 | 140             | 10     | 14      | 3.1    | ND (0.1) *  | ND (2.1) * | 15     | ND (1)   | ND (2.1)   | ND (4.2) * | 33       | 68     |
|  | 10/07/08 | 19 - 20        | N           | ND (2.1) *     | 5.8     | 56     | ND (2.1) * | ND (1.1) * | ND (0.423)           | 26              | 10     | 9.2     | 3      | ND (0.11) * | ND (2.1) * | 16     | ND (1.1) | ND (2.1)   | ND (4.2) * | 38       | 45     |
|  | 10/07/08 | 29 - 30        | N           | ND (2.1) *     | 6.2     | 38     | ND (2.1) * | ND (1)     | ND (0.424)           | 21              | 8.5    | 8.9     | 2.7    | ND (0.1) *  | ND (2.1) * | 14     | ND (1)   | ND (2.1)   | ND (4.2) * | 31       | 37     |
|  | 10/07/08 | 29 - 30        | FD          | ND (2.1) *     | 9.7     | 40     | ND (5.3) * | ND (1.1) * | ND (0.423)           | 24              | 8.7    | ND (11) | 2.2    | ND (0.11) * | ND (5.3) * | 16     | ND (1.1) | ND (5.3) * | ND (11) *  | 34       | 36     |
|  | 10/07/08 | 39 - 40        | N           | ND (2.1) *     | 6.4     | 79     | ND (2.1) * | ND (1.1) * | ND (0.431)           | 22              | 8.9    | 11      | 3.6    | ND (0.11) * | ND (2.1) * | 16     | ND (1.1) | ND (2.1)   | ND (4.3) * | 34       | 42     |
|  | 10/07/08 | 49 - 50        | N           | ND (2.1) *     | 4.1     | 62     | ND (1.1) * | ND (1.1) * | ND (0.425)           | 28              | 9.3    | 10      | 2.1    | ND (0.11) * | ND (1.1)   | 17     | ND (1.1) | ND (1.1)   | ND (2.1) * | 36       | 38     |
|  | 10/08/08 | 59 - 60        | N           | ND (2) *       | 5.3     | 36     | ND (2) *   | ND (1)     | ND (0.406)           | 39              | 9      | 9.8     | 2.2    | ND (0.1) *  | 4.7        | 13     | ND (1)   | ND (2)     | ND (4) *   | 33       | 32     |
|  | 10/08/08 | 69 - 70        | N           | ND (2.2) *     | 4.4     | 41     | ND (1.1) * | ND (1.1) * | ND (0.435)           | 18              | 9.1    | 9.8     | 2.8    | ND (0.11) * | 2.2        | 13     | ND (1.1) | ND (1.1)   | ND (2.2) * | 31       | 31     |
| AOC1-T2e   | 10/16/08 | 0 - 0.5        | N           | ND (2) *       | 2.9     | 98     | ND (1) *   | ND (1)     | ND (0.405)           | 34              | 7.5    | 9.3     | 3.4    | ND (0.1) *  | 2.2        | 13     | ND (1)   | ND (1)     | ND (2) *   | 29       | 36     |
|  | 10/16/08 | 2 - 3          | N           | ND (2) *       | 2.9     | 87     | ND (1) *   | ND (1)     | ND (0.408)           | 30              | 6.9    | 8.4     | 3.2    | ND (0.1) *  | 1.4        | 12     | ND (1)   | ND (1)     | ND (2) *   | 27       | 30     |
|  | 10/16/08 | 2 - 3          | FD          | ND (2) *       | 3.1     | 90     | ND (1) *   | ND (1)     | ND (0.408)           | 32              | 7.1    | 8       | 3.2    | ND (0.1) *  | 1.3        | 12     | ND (1)   | ND (1)     | ND (2) *   | 27       | 33     |
|  | 10/16/08 | 5 - 6          | N           | ND (2) *       | 2.6     | 98     | ND (1) *   | ND (1)     | ND (0.402)           | 44              | 7      | 8.4     | 2.3    | ND (0.1) *  | 5.4        | 12     | ND (1)   | ND (1)     | ND (2) *   | 26       | 32     |
|  | 10/16/08 | 9 - 10         | N           | ND (2.1) *     | 2.5     | 100    | ND (1) *   | ND (1)     | ND (0.415)           | 20              | 6.4    | 4.9     | 1.1    | ND (0.1) *  | 1.1        | 9      | ND (1)   | ND (1)     | ND (2.1) * | 24       | 27     |
| AOC1-T3a   | 10/05/08 | 0 - 0.5        | N           | ND (2) *       | 4.1     | 150    | ND (1) *   | ND (1)     | ND (0.403)           | 24              | 7.8    | 11      | 8.4    | ND (0.1) *  | ND (1)     | 14     | ND (1)   | ND (1)     | ND (2) *   | 33       | 47     |
|  | 10/17/08 | 2 - 3          | N           | ND (2) *       | 4.4     | 110    | ND (1) *   | ND (1)     | ND (0.407)           | 19              | 7.1    | 9       | 4.2    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)     | ND (2) *   | 29       | 37     |
|  | 10/17/08 | 5 - 6          | N           | ND (2) *       | 4.2     | 110    | ND (1) *   | ND (1)     | ND (0.405)           | 23              | 7      | 12      | 14     | ND (0.1) *  | 1.7        | 12     | ND (1)   | ND (1)     | ND (2) *   | 28       | 39     |
|  | 10/17/08 | 9 - 10         | N           | ND (2) *       | 2.9     | 99     | ND (1) *   | ND (1)     | ND (0.406)           | 15              | 7.2    | 10      | 1.9    | ND (0.1) *  | ND (1)     | 9.8    | ND (1)   | ND (1)     | ND (2) *   | 26       | 33     |
| AOC1-T3b   | 10/05/08 | 0 - 0.5        | N           | ND (2) *       | 2.6     | 78     | ND (1) *   | ND (1)     | ND (0.402)           | 23              | 7      | 8       | 3.1    | ND (0.1) *  | ND (1)     | 11     | ND (1)   | ND (1)     | ND (2) *   | 35       | 29     |
|  | 10/17/08 | 2 - 3          | N           | ND (2.1) *     | 3.1     | 120    | ND (1) *   | ND (1)     | 2.77                 | 170             | 6.5    | 13      | 9.1    | ND (0.11) * | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2.1) * | 26       | 120    |
|  | 10/17/08 | 5 - 6          | N           | ND (2) *       | 2.3     | 92     | ND (1) *   | ND (1)     | ND (0.405)           | 46              | 7      | 8.6     | 2.3    | ND (0.1) *  | 4.6        | 12     | ND (1)   | ND (1)     | ND (2) *   | 25       | 34     |
|  | 10/17/08 | 9 - 10         | N           | ND (2) *       | 2.7     | 110    | ND (1) *   | ND (1)     | ND (0.41)            | 17              | 7.3    | 7.7     | 1.7    | ND (0.1) *  | 1.1        | 9.4    | ND (1)   | ND (1)     | ND (2) *   | 28       | 31     |
|  | 10/17/08 | 9 - 10         | FD          | ND (2.1) *     | 2.5     | 110    | ND (1) *   | ND (1)     | ND (0.412)           | 16              | 7.2    | 6.5     | 1.9    | ND (0.1) *  | 1.1        | 9.5    | ND (1)   | ND (1)     | ND (2.1) * | 29       | 32     |

TABLE B-2a  
Sample Results: Metals in Soil  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |           |         |                      |                 |        |        |        |              |            |        |          |        |            |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|-----------|---------|----------------------|-----------------|--------|--------|--------|--------------|------------|--------|----------|--------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672     | 1.1     | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125       | 1.37       | 27.3   | 1.47     | 5.15   | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160       | 71      | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11           | 390        | 1,500  | 390      | 390    | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15        | 5.2     | NE                   | 36,000          | NE     | NE     | 80     | 1            | NE         | 490    | NE       | 390    | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3      | 0.0151  | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125       | 2.25       | 0.607  | 0.177    | 5.15   | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672     | 1.1     | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE           | 1.37       | 27.3   | 1.47     | NE     | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium | Cadmium | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury      | Molybdenum | Nickel | Selenium | Silver | Thallium   | Vanadium | Zinc   |
| AOC1-T3c   | 10/05/08 | 0 - 0.5        | N           | ND (2) *       | 4.6     | 130    | ND (1) *  | ND (1)  | 0.42                 | 27              | 6.5    | 11     | 7      | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1) | ND (2) *   | 29       | 46     |
|  | 10/05/08 | 2 - 3          | N           | ND (2) *       | 3.5     | 98     | ND (1) *  | ND (1)  | ND (0.41)            | 30              | 8.9    | 9.7    | 3.4    | ND (0.1) *   | ND (1)     | 14     | ND (1)   | ND (1) | ND (2) *   | 33       | 39     |
|  | 10/05/08 | 5 - 6          | N           | ND (2) *       | 3.7     | 130    | ND (1) *  | ND (1)  | 1.65                 | 89              | 8.8    | 12     | 5.8    | ND (0.1) *   | 1.4        | 14     | ND (1)   | ND (1) | ND (2) *   | 34       | 65     |
|  | 10/05/08 | 9 - 10         | N           | ND (2) *       | 2.7     | 94     | ND (1) *  | ND (1)  | ND (0.403)           | 19              | 8.2    | 10     | 2.4    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1) | ND (2) *   | 32       | 36     |
| AOC1-T4a   | 10/03/08 | 0 - 0.5        | N           | ND (2) *       | 4.2     | 120    | ND (1) *  | ND (1)  | ND (0.402)           | 28              | 7.3    | 11     | 5.5    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1) | ND (2) *   | 26       | 51     |
|  | 10/03/08 | 2 - 3          | N           | ND (2) *       | 3.9     | 99     | ND (1) *  | ND (1)  | ND (0.407)           | 26              | 7.7    | 10     | 4      | ND (0.1) *   | ND (1)     | 14     | ND (1)   | ND (1) | ND (2) *   | 31       | 40     |
|  | 10/03/08 | 5 - 6          | N           | ND (2) *       | 4       | 89     | ND (1) *  | ND (1)  | ND (0.409)           | 25              | 8.3    | 11     | 3.3    | ND (0.1) *   | ND (1)     | 14     | ND (1)   | ND (1) | ND (2) *   | 34       | 40     |
|  | 10/03/08 | 9 - 10         | N           | ND (2) *       | 3.7     | 160    | ND (1) *  | ND (1)  | 0.525                | 26              | 6.9    | 9.6    | 4.3    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1) | ND (2) *   | 28       | 36     |
| AOC1-T4b   | 10/02/08 | 0 - 0.5        | N           | ND (2) *       | 2.9     | 83     | ND (1) *  | ND (1)  | 1.26                 | 21              | 6.3    | 7.5    | 2.6    | ND (0.1) *   | ND (1)     | 10     | ND (1)   | ND (1) | ND (2) *   | 22       | 29     |
|  | 10/02/08 | 2 - 3          | N           | ND (2) *       | 3.7     | 120    | ND (1) *  | ND (1)  | ND (0.412)           | 29              | 7.6    | 12     | 8.8 J  | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1) | ND (2) *   | 33       | 46     |
|  | 10/02/08 | 2 - 3          | FD          | ND (2) *       | 3.5     | 110    | ND (1) *  | ND (1)  | ND (0.408)           | 28              | 7.2    | 11     | 7 J    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1) | ND (2) *   | 31       | 50     |
|  | 10/02/08 | 5 - 6          | N           | ND (2.1) *     | 3.6     | 110    | ND (1) *  | ND (1)  | ND (0.419)           | 24              | 9.9    | 9.6    | 3.2    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1) | ND (2.1) * | 33       | 39     |
|  | 10/02/08 | 9 - 10         | N           | ND (2.1) *     | 3.2     | 100    | ND (1) *  | ND (1)  | ND (0.415)           | 19              | 7.7    | 8.8    | 2.4    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1) | ND (2.1) * | 31       | 37     |
| AOC1-T4c   | 10/04/08 | 0 - 0.5        | N           | ND (2) J*      | 4.2     | 100    | ND (1) *  | ND (1)  | ND (0.403)           | 19              | 5.5    | 22     | 5.9    | ND (0.1) *   | ND (1)     | 9.4    | ND (1)   | ND (1) | ND (2) *   | 25       | 33     |
|  | 10/04/08 | 2 - 3          | N           | ND (2) *       | 3.8     | 130    | ND (1) *  | ND (1)  | 0.816                | 27              | 8.9    | 19     | 14     | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1) | ND (2) *   | 38       | 67     |
|  | 10/04/08 | 5 - 6          | N           | ND (2) *       | 3.3     | 150    | ND (1) *  | ND (1)  | 0.868                | 28              | 9.2    | 21     | 19     | ND (0.1) *   | 1.3        | 13     | ND (1)   | ND (1) | ND (2) *   | 36       | 71     |
|  | 10/04/08 | 9 - 10         | N           | ND (2.1) *     | 3.1     | 120    | ND (1) *  | ND (1)  | ND (0.413)           | 27              | 8.3    | 13     | 5.8    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1) | ND (2.1) * | 35       | 47     |
| AOC1-T5a   | 10/04/08 | 0 - 0.5        | N           | ND (2) *       | 3.1     | 150    | ND (1) *  | ND (1)  | ND (0.402)           | 21              | 7.8    | 13     | 4      | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1) | ND (2) *   | 33       | 41     |
|  | 10/04/08 | 2 - 3          | N           | ND (2) *       | 2.8     | 95     | ND (1) *  | ND (1)  | ND (0.403)           | 39              | 9      | 10     | 3.2    | ND (0.099) * | ND (1)     | 13     | ND (1)   | ND (1) | ND (2) *   | 32       | 38     |
|  | 10/04/08 | 5 - 6          | N           | ND (2) *       | 3.8     | 99     | ND (1) *  | ND (1)  | ND (0.405)           | 35              | 9      | 24     | 3.4    | ND (0.1) *   | 2.2        | 17     | ND (1)   | ND (1) | ND (2) *   | 32       | 38     |
|  | 10/04/08 | 9 - 10         | N           | ND (2) *       | 2.6     | 110    | ND (1) *  | ND (1)  | ND (0.411)           | 24              | 7.4    | 11     | 3.6    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1) | ND (2) *   | 30       | 38     |
|  | 10/04/08 | 9 - 10         | FD          | ND (2) *       | 2.4     | 110    | ND (1) *  | ND (1)  | ND (0.409)           | 27              | 7.8    | 11     | 3.1    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1) | ND (2) *   | 30       | 38     |
| AOC1-T5b   | 10/04/08 | 0 - 0.5        | N           | ND (2) J*      | 2.4     | 73     | ND (1) *  | ND (1)  | ND (0.402)           | 26              | 6.8    | 11     | 4.9    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1) | ND (2) *   | 28       | 33     |
|  | 10/04/08 | 2 - 3          | N           | ND (2) *       | 3.3     | 110    | ND (1) *  | ND (1)  | 0.452                | 41              | 7.2    | 9.5    | 4.4    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1) | ND (2) *   | 32       | 38     |
|  | 10/04/08 | 5 - 6          | N           | ND (2) *       | 3.4     | 120    | ND (1) *  | ND (1)  | 0.596                | 61              | 7.9    | 9.8    | 4.8    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1) | ND (2) *   | 31       | 41     |
|  | 10/04/08 | 9 - 10         | N           | ND (2) *       | 3.5     | 120    | ND (1) *  | ND (1)  | ND (0.409)           | 23              | 9.6    | 13     | 3.4    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1) | ND (2) *   | 39       | 41     |
| AOC1-T5c   | 10/04/08 | 0 - 0.5        | N           | ND (2) *       | 3.7     | 140    | ND (1) *  | ND (1)  | ND (0.403)           | 15              | 6.7    | 8.8    | 5.8    | ND (0.1) *   | ND (1)     | 8.7    | ND (1)   | ND (1) | ND (2) *   | 27       | 37     |
|  | 10/04/08 | 2 - 3          | N           | ND (2) *       | 3.3     | 150    | ND (1) *  | ND (1)  | 0.875                | 31              | 8.6    | 12     | 7.5    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1) | ND (2) *   | 35       | 53     |
|  | 10/04/08 | 5 - 6          | N           | ND (2) *       | 3.1     | 130    | ND (1) *  | ND (1)  | 0.641                | 36              | 7.2    | 12     | 11     | ND (0.099) * | ND (1)     | 11     | ND (1)   | ND (1) | ND (2) *   | 31       | 49     |
|  | 10/04/08 | 9 - 10         | N           | ND (2) *       | 3.5     | 130    | ND (1) *  | ND (1)  | 0.478                | 21              | 7.7    | 9.8    | 3.9    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1) | ND (2) *   | 32       | 39     |
| AOC1-T6a   | 09/30/08 | 0 - 0.5        | N           | ND (2) *       | 3.2     | 96     | ND (1) *  | ND (1)  | ND (0.402)           | 20              | 6.3    | 11     | 5.6    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1) | ND (2) *   | 28       | 47     |
|  | 09/30/08 | 2.5 - 3        | N           | ND (2) *       | 3.2     | 110    | ND (1) *  | ND (1)  | ND (0.408)           | 20              | 6.9    | 8.9    | 5.6    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1) | ND (2) *   | 29       | 36     |
|  | 09/30/08 | 2.5 - 3        | FD          | ND (2) *       | 3.1     | 100    | ND (1) *  | ND (1)  | ND (0.407)           | 21              | 6.6    | 8.8    | 5.4    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1) | ND (2) *   | 31       | 40     |
|  | 09/30/08 | 5.5 - 6        | N           | ND (2) *       | 2.3     | 94     | ND (1) *  | ND (1)  | ND (0.408)           | 16              | 7.2    | 7.9    | 3.9    | ND (0.1) *   | ND (1)     | 10     | ND (1)   | ND (1) | ND (2) *   | 33       | 34     |
|  | 09/30/08 | 9.5 - 10       | N           | ND (2) *       | 3.2     | 110    | ND (1) *  | ND (1)  | ND (0.41)            | 20              | 7      | 8.7    | 12     | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1) | ND (2) *   | 32       | 40     |
| AOC1-T6b   | 09/30/08 | 0 - 0.5        | N           | ND (2) *       | 3       | 110    | ND (1) *  | ND (1)  | ND (0.401)           | 26              | 6.3    | 9      | 5.5    | ND (0.1) *   | ND (1)     | 10     | ND (1)   | ND (1) | ND (2) *   | 31       | 41     |
|  | 09/30/08 | 2.5 - 3        | N           | ND (2) *       | 3.4     | 130    | ND (1) *  | ND (1)  | ND (0.404)           | 18              | 5.7    | 7.1    | 4.4    | ND (0.1) *   | ND (1)     | 8.5    | ND (1)   | ND (1) | ND (2) *   | 25       | 29     |
|  | 09/30/08 | 5.5 - 6        | N           | ND (2) *       | 2.9     | 100    | ND (1) *  | ND (1)  | ND (0.404)           | 22              | 7.3    | 10     | 3.2    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1) | ND (2) *   | 30       | 36     |
|  | 09/30/08 | 9.5 - 10       | N           | ND (2) *       | 2.8     | 94     | ND (1) *  | ND (1)  | ND (0.405)           | 25              | 7      | 9.3    | 3.1 J  | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1) | ND (2) *   | 30       | 37     |
|  | 09/30/08 | 9.5 - 10       | FD          | ND (2) *       | 3       | 110    | ND (1) *  | ND (1)  | ND (0.404)           | 27              | 7.9    | 10     | 8.5 J  | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1) | ND (2) *   | 33       | 39     |

TABLE B-2a  
Sample Results: Metals in Soil  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |        |             |            |        |          |          |            |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|-------------|------------|--------|----------|----------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125      | 1.37       | 27.3   | 1.47     | 5.15     | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11          | 390        | 1,500  | 390      | 390      | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1           | NE         | 490    | NE       | 390      | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125      | 2.25       | 0.607  | 0.177    | 5.15     | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE          | 1.37       | 27.3   | 1.47     | NE       | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury     | Molybdenum | Nickel | Selenium | Silver   | Thallium   | Vanadium | Zinc   |
| AOC1-T6c   | 09/30/08 | 0 - 0.5        | N           | ND (2) *       | 2.9     | 81     | ND (1) *   | ND (1)     | ND (0.401)           | 18              | 6.4    | 8.7    | 3.2    | ND (0.1) *  | ND (1)     | 10     | ND (1)   | ND (1)   | ND (2) *   | 25       | 39     |
|  | 09/30/08 | 2.5 - 3        | N           | ND (2) *       | 5.1     | 94     | ND (1) *   | ND (1)     | ND (0.407)           | 26              | 6.6    | 9.7    | 5.1    | ND (0.1) *  | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2) *   | 29       | 37     |
|  | 09/30/08 | 5.5 - 6        | N           | ND (2) *       | 2.4     | 110    | ND (1) *   | ND (1)     | ND (0.406)           | 21              | 9      | 9.4    | 2.9    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2) *   | 32       | 37     |
| AOC4-1   | 10/14/08 | 0 - 0.5        | N           | ND (2) J*      | 3.7     | 440 J  | ND (1) *   | ND (1)     | 0.49                 | 47              | 6.7    | 16     | 8.5    | ND (0.1) *  | ND (1)     | 19     | ND (1)   | ND (1)   | ND (2) *   | 23       | 48     |
|  | 10/14/08 | 0.5 - 1        | N           | ND (2) *       | 4       | 120    | ND (1) *   | ND (1)     | ND (0.404)           | 32              | 9.6    | 13     | 10     | ND (0.1) *  | ND (1)     | 17     | ND (1)   | ND (1)   | ND (2) *   | 32       | 47     |
|  | 10/14/08 | 2 - 3          | N           | ND (2) *       | 3.6     | 120    | ND (1) *   | ND (1)     | ND (0.405)           | 20              | 7.4    | 12     | 17     | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2) *   | 30       | 39     |
| AOC1-1   | 01/23/16 | 0 - 0.5        | N           | ND (2.1) *     | 3.5     | 93     | ND (1) *   | ND (1)     | 12                   | 410             | 6.8    | 14     | 5.4    | ND (0.1) *  | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2.1) * | 31       | 74     |
|  | 01/23/16 | 2 - 3          | N           | ND (2) *       | 2.5     | 120    | ND (1) *   | ND (1)     | 4.1                  | 290             | 7.6    | 14     | 4.5    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2) *   | 35       | 74     |
|  | 01/23/16 | 5 - 6          | N           | ND (2) *       | 2.3     | 130    | ND (1) *   | ND (1)     | ND (0.2)             | 15              | 7      | 9      | 2.6    | ND (0.1) *  | ND (1)     | 10     | ND (1)   | ND (1)   | ND (2) *   | 31       | 34     |
|  | 01/23/16 | 9 - 10         | N           | ND (2) *       | 1.5     | 99     | ND (1) *   | ND (1)     | ND (0.2)             | 17              | 7.7    | 9.6    | 2.1    | ND (0.1) *  | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2) *   | 36       | 35     |
|  | 01/23/16 | 14 - 15        | N           | ND (2) *       | 1.8     | 130    | ND (1) *   | ND (1)     | ND (0.2)             | 18              | 9      | 11     | 1.8    | ND (0.1) *  | ND (1)     | 15 J   | ND (1)   | ND (1)   | ND (2) *   | 32       | 36     |
|  | 01/23/16 | 14 - 15        | FD          | ND (2) *       | 1.5     | 130    | ND (1) *   | ND (1)     | ND (0.2)             | 19              | 8.5    | 12     | 1.9    | ND (0.1) *  | ND (1)     | 12 J   | ND (1)   | ND (1)   | ND (2) *   | 35       | 36     |
|  | 01/24/16 | 19 - 20        | N           | ND (2) *       | 1.1     | 100    | ND (1) *   | ND (1)     | ND (0.2)             | 18              | 8.7    | 9      | 1.3    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2) *   | 36       | 39     |
|  | 01/24/16 | 29 - 30        | N           | ND (2.1) *     | 1.5     | 100    | ND (1) *   | ND (1)     | ND (0.21)            | 16              | 9.5    | 12     | 2.3    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2.1) * | 36       | 41     |
| AOC1-2   | 01/23/16 | 0 - 0.5        | N           | ND (2.1) *     | 2.2     | 110    | ND (1) *   | ND (1)     | ND (0.21)            | 20              | 7.9    | 9.1    | 4.2    | ND (0.1) *  | ND (1)     | 15     | ND (1)   | ND (1)   | ND (2.1) * | 35       | 38     |
|  | 01/23/16 | 2 - 3          | N           | ND (2) J*      | 1.7     | 180    | ND (1) *   | ND (1)     | ND (0.2)             | 18 J            | 8      | 9.1    | 1.9    | ND (0.1) *  | ND (1)     | 12     | ND (1) J | ND (1)   | ND (2) *   | 31       | 36     |
|  | 01/23/16 | 5 - 6          | N           | ND (2) *       | 1.7     | 130    | ND (1) *   | ND (1)     | ND (0.2)             | 19              | 8.7    | 11     | 1.8    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2) *   | 32       | 36     |
|  | 01/23/16 | 9 - 10         | N           | ND (2) *       | ND (1)  | 74     | ND (1) *   | ND (1)     | ND (0.2)             | 18              | 6.7    | 6.3    | 1      | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2) *   | 25       | 28     |
|  | 01/23/16 | 14 - 15        | N           | ND (2) *       | ND (1)  | 92     | ND (1) *   | ND (1)     | ND (0.2)             | 13              | 7.9    | 8.1    | 1      | ND (0.1) *  | ND (1)     | 8.5    | ND (1)   | ND (1)   | ND (2) *   | 35       | 34     |
|  | 01/23/16 | 19 - 20        | N           | ND (2) *       | 1.5     | 73     | ND (1) *   | ND (1)     | ND (0.2)             | 16 J            | 7.8    | 7.7    | 1.5    | ND (0.1) *  | ND (1)     | 12 J   | ND (1)   | ND (1)   | ND (2) *   | 30       | 35     |
|  | 01/23/16 | 20 - 30        | FD          | ND (2) *       | 1.4     | 84     | ND (1) *   | ND (1)     | ND (0.2)             | 13 J            | 7.6    | 8      | 1.3    | ND (0.1) *  | ND (1)     | 9.4 J  | ND (1)   | ND (1)   | ND (2) *   | 33       | 36     |
|  | 01/23/16 | 29 - 30        | N           | ND (2) *       | 1.1     | 94     | ND (1) *   | ND (1)     | ND (0.2)             | 15              | 7.8    | 7.6    | 1.2    | ND (0.1) *  | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2) *   | 31       | 31     |
| AOC1-3   | 01/25/16 | 0 - 0.5        | N           | ND (2.1) *     | 3       | 100    | ND (1) *   | ND (1)     | 14                   | 410             | 7.9    | 13     | 3.7    | ND (0.1) *  | ND (1)     | 14     | ND (1)   | ND (1)   | ND (2.1) * | 37       | 90     |
|  | 01/25/16 | 2 - 3          | N           | ND (2) *       | 2.4     | 110    | ND (1) *   | ND (1)     | 3.7                  | 210             | 8.6    | 11     | 3.3    | ND (0.1) *  | ND (1)     | 14     | ND (1)   | ND (1)   | ND (2) *   | 36       | 60     |
|  | 01/25/16 | 5 - 6          | N           | ND (2) *       | 1.2     | 130    | ND (1) *   | ND (1)     | ND (0.2)             | 24              | 8.6    | 14     | 1.5    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2) *   | 37       | 39     |
|  | 01/25/16 | 9 - 10         | N           | ND (2) *       | 1.3     | 97     | ND (1) *   | ND (1)     | ND (0.2)             | 13              | 7.5    | 7.7    | 1.4    | ND (0.1) *  | ND (1)     | 8.9    | ND (1)   | ND (1)   | ND (2) *   | 33       | 32     |
|  | 01/25/16 | 14 - 15        | N           | ND (2) *       | 1.8     | 110    | ND (1) *   | ND (1)     | ND (0.2)             | 17              | 8.1    | 10     | 1.4    | ND (0.1) *  | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2) *   | 38       | 40     |
|  | 01/25/16 | 14 - 15        | FD          | ND (2) *       | 1.4     | 110    | ND (1) *   | ND (1)     | ND (0.2)             | 19              | 8.3    | 9.8    | 1.3    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2) *   | 37       | 43     |
|  | 01/25/16 | 19 - 20        | N           | ND (2) *       | 1.5     | 120    | ND (1) *   | ND (1)     | ND (0.2)             | 19              | 9.5    | 11     | 1.6    | ND (0.1) *  | ND (1)     | 14     | ND (1)   | ND (1)   | ND (2) *   | 42       | 38     |
|  | 01/25/16 | 29 - 30        | N           | ND (2) *       | 1.3     | 66     | ND (1) *   | ND (1)     | ND (0.2)             | 15              | 7.5    | 11     | 2.2    | ND (0.1) *  | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2) *   | 34       | 34     |
|  | 01/25/16 | 39 - 40        | N           | ND (2.2) *     | 2.7     | 40     | ND (1.1) * | ND (1.1) * | ND (0.22)            | 22              | 9.7    | 10     | 1.7    | ND (0.11) * | ND (1.1)   | 18     | ND (1.1) | ND (1.1) | ND (2.2) * | 35       | 39     |
|  | 01/25/16 | 49 - 50        | N           | ND (2.1) *     | 2.8     | 42     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 23              | 11     | 14     | 2.3    | ND (0.11) * | ND (1.1)   | 19     | ND (1.1) | ND (1.1) | ND (2.1) * | 45       | 42     |
|  | 01/25/16 | 59 - 60        | N           | ND (2.1) *     | 4       | 42     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 39              | 10     | 14     | 2.2    | ND (0.11) * | ND (1.1)   | 23     | ND (1.1) | ND (1.1) | ND (2.1) * | 45       | 42     |
|  | 01/26/16 | 69 - 70        | N           | ND (2.1) *     | 2.2     | 64     | ND (1) *   | ND (1)     | ND (0.21)            | 20              | 8.9    | 19     | 1.5    | ND (0.1) *  | ND (1)     | 15     | ND (1)   | ND (1)   | ND (2.1) * | 35       | 38     |
|  | 01/26/16 | 79 - 80        | N           | ND (2.1) *     | 2.4     | 86     | ND (1) *   | ND (1)     | ND (0.21)            | 17              | 7.1    | 13     | 1.3    | ND (0.11) * | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2.1) * | 29       | 31     |

TABLE B-2a  
Sample Results: Metals in Soil  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |          |             |            |        |            |          |             |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|----------|-------------|------------|--------|------------|----------|-------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39     | 0.0125      | 1.37       | 27.3   | 1.47       | 5.15     | 0.78        | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400      | 11          | 390        | 1,500  | 390        | 390      | 0.78        | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80       | 1           | NE         | 490    | NE         | 390      | NE          | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166   | 0.0125      | 2.25       | 0.607  | 0.177      | 5.15     | 2.32        | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39     | NE          | 1.37       | 27.3   | 1.47       | NE       | NE          | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead     | Mercury     | Molybdenum | Nickel | Selenium   | Silver   | Thallium    | Vanadium | Zinc   |
| AOC1-4   | 01/23/16 | 0 - 0.5        | N           | ND (2) *       | 1.9     | 82     | ND (1) *   | ND (1)     | ND (0.2)             | 13              | 6.7    | 7      | 1.9      | ND (0.1) *  | ND (1)     | 9      | ND (1)     | ND (1)   | ND (2) *    | 26       | 35     |
|  | 01/23/16 | 2 - 3          | N           | ND (2) *       | 2       | 110    | ND (1) *   | ND (1)     | ND (0.2)             | 19              | 7.7    | 8.7    | 3        | ND (0.1) *  | ND (1)     | 13     | ND (1)     | ND (1)   | ND (2) *    | 32       | 30     |
|  | 01/23/16 | 5 - 6          | N           | ND (2) *       | 1.8     | 84     | ND (1) *   | ND (1)     | ND (0.2)             | 14              | 6.8    | 10     | 2.9      | ND (0.1) *  | ND (1)     | 9.5    | ND (1)     | ND (1)   | ND (2) *    | 30       | 31     |
|  | 01/23/16 | 9 - 10         | N           | ND (2) *       | 1.8     | 90     | ND (1) *   | ND (1)     | ND (0.2)             | 14              | 7      | 9.3    | 2.2      | ND (0.1) *  | ND (1)     | 11     | ND (1)     | ND (1)   | ND (2) *    | 31       | 33     |
|  | 01/23/16 | 14 - 15        | N           | ND (2) *       | 1.8     | 95     | ND (1) *   | ND (1)     | ND (0.2)             | 35              | 7.6    | 9.1    | 2        | ND (0.1) *  | ND (1)     | 14     | ND (1)     | ND (1)   | ND (2) *    | 33       | 35     |
|  | 01/23/16 | 19 - 20        | N           | ND (2) *       | 1.6     | 99     | ND (1) *   | ND (1)     | ND (0.2)             | 16              | 8.4    | 8.4    | 1.2      | ND (0.1) J* | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2) *    | 33       | 37     |
|  | 01/23/16 | 19 - 20        | FD          | ND (2) J*      | 1.6     | 110 J  | ND (1) *   | ND (1)     | ND (0.2)             | 21              | 9.9    | 11     | 1.3      | ND (0.1) *  | ND (1)     | 15     | ND (1) J   | ND (1)   | ND (2) *    | 39       | 43 J   |
|  | 01/23/16 | 29 - 30        | N           | ND (2.1) *     | 2.5     | 1,400  | ND (1.1) * | ND (1.1) * | ND (0.21)            | 16              | 8.1    | 7.9    | 2.2      | ND (0.1) *  | ND (1.1)   | 14     | ND (1.1)   | ND (1.1) | ND (2.1) *  | 32       | 39     |
| AOC1-5   | 01/09/17 | 0 - 0.5        | N           | ND (2.1) *     | 1.3     | 65     | ND (1) *   | ND (1)     | ND (0.21)            | 14              | 7.2    | 7.3    | 1.5      | ND (0.1) *  | ND (1)     | 9.7    | ND (1) J   | ND (1)   | ND (2.1) *  | 28       | 26     |
|  | 01/09/17 | 2 - 3          | N           | ND (2.1) *     | 1.6     | 76     | ND (1) *   | ND (1)     | ND (0.21)            | 24              | 8.8    | 8.7    | ND (1)   | ND (0.1) *  | ND (1)     | 12     | ND (1) J   | ND (1)   | ND (2.1) *  | 42       | 32     |
|  | 01/09/17 | 5 - 6          | N           | ND (2.1) *     | 1.4     | 77     | ND (1) *   | ND (1)     | ND (0.21)            | 19              | 7.6    | 7.9    | 2.1      | ND (0.1) *  | ND (1)     | 10     | ND (1) J   | ND (1)   | ND (2.1) *  | 27       | 45     |
|  | 01/09/17 | 9 - 10         | N           | ND (2.1) *     | ND (1)  | 110    | ND (1) *   | ND (1)     | ND (0.21)            | 13              | 7.2    | 9.5    | ND (1)   | ND (0.1) *  | ND (1)     | 8.6    | ND (1) J   | ND (1)   | ND (2.1) *  | 29       | 28     |
|  | 01/09/17 | 14 - 15        | N           | ND (2.1) *     | 1.7     | 51     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 18              | 8.4    | 8.3    | 1.9      | ND (0.11) * | ND (1.1)   | 13     | ND (1.1) J | ND (1.1) | ND (2.1) *  | 29       | 34     |
| AOC1-6   | 01/09/17 | 0 - 0.5        | N           | ND (2.1) *     | 1.8     | 69     | ND (1) *   | ND (1)     | 0.22                 | 23              | 8.4    | 11     | 2.9      | ND (0.1) *  | ND (1)     | 11     | ND (1) J   | ND (1)   | ND (2.1) *  | 30       | 34     |
|  | 01/09/17 | 2 - 3          | N           | ND (2.1) *     | 1.1     | 60     | ND (1) *   | ND (1)     | ND (0.21)            | 17              | 7.1    | 6.7    | 1.2      | ND (0.1) *  | ND (1)     | 9.4    | ND (1) J   | ND (1)   | ND (2.1) *  | 25       | 27     |
|  | 01/09/17 | 5 - 6          | N           | ND (2.1) *     | 1.3     | 92     | ND (1) *   | ND (1)     | ND (0.21)            | 14              | 8.3    | 8.8    | ND (1)   | ND (0.1) *  | ND (1)     | 9.4    | ND (1) J   | ND (1)   | ND (2.1) *  | 29       | 30     |
|  | 01/09/17 | 9 - 10         | N           | ND (2.1) *     | 2.1     | 50     | ND (1) *   | ND (1)     | ND (0.21)            | 21              | 9.9    | 8.3    | 1.5      | ND (0.1) *  | ND (1)     | 13     | ND (1) J   | ND (1)   | ND (2.1) *  | 36       | 35     |
|  | 01/09/17 | 14 - 15        | N           | ND (2.1) *     | 2.8     | 52     | ND (1) *   | ND (1)     | ND (0.21)            | 23              | 9.4    | 7.3    | 1.6      | ND (0.1) *  | ND (1)     | 17     | ND (1) J   | ND (1)   | ND (2.1) *  | 32       | 38     |
| AOC16-5  | 02/20/17 | 0 - 0.5        | N           | ND (2.1) *     | 1.5     | 130    | ND (1) *   | 1.4        | 0.56                 | 28 J            | 5.7 J  | 18 J   | 29 J     | ---         | ND (1)     | 9.8 J  | ND (1) J   | ND (1)   | ND (2.1) J* | 20 J     | 46 J   |
|  | 02/20/17 | 0 - 0.5        | FD          | ND (2.1) *     | 1.7     | 130    | ND (1) *   | 1.3        | 0.61                 | 22 J            | 8.1 J  | 11 J   | 3.9 J    | 0.12        | ND (1)     | 14 J   | ND (1) J   | ND (1)   | ND (2.1) J* | 25 J     | 36 J   |
|  | 02/20/17 | 2 - 3          | N           | ND (2.1) *     | 1.3     | 84     | ND (1) *   | 1.1        | ND (0.21)            | 13              | 7.6    | 28     | 1.3      | ND (0.1) *  | ND (1)     | 12     | ND (1) J   | ND (1)   | ND (2.1) J* | 22       | 25     |
| AOC1-7   | 01/09/17 | 0 - 0.5        | N           | ND (2.1) *     | 1.6 J   | 56     | ND (1) *   | ND (1)     | ND (0.21)            | 14              | 6.4    | 9.4    | 1.6      | ND (0.1) *  | ND (1)     | 9.3 J  | ND (1) J   | ND (1)   | ND (2.1) *  | 21       | 28 J   |
|  | 01/09/17 | 2 - 3          | N           | ND (2.1) *     | 1.7     | 62     | ND (1) *   | ND (1)     | ND (0.21)            | 20              | 9.5    | 9      | 1.9      | ND (0.1) *  | ND (1)     | 13     | ND (1)     | ND (1)   | ND (2.1) *  | 34       | 35     |
|  | 01/09/17 | 2 - 3          | FD          | ND (2.1) *     | 1.6     | 56     | ND (1) *   | ND (1)     | ND (0.21)            | 18              | 8.6    | 7.1    | 1.4      | ND (0.1) *  | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2.1) *  | 30       | 33     |
|  | 01/09/17 | 5 - 6          | N           | ND (2.1) *     | 1.6     | 51     | ND (1) *   | ND (1)     | ND (0.21)            | 18              | 9.3    | 6.3    | 1.1      | ND (0.1) *  | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2.1) *  | 33       | 35     |
|  | 01/09/17 | 9 - 10         | N           | ND (2.1) *     | 1.9     | 86     | ND (1) *   | ND (1)     | ND (0.21)            | 25              | 11     | 8.8    | 1.6      | ND (0.1) *  | ND (1)     | 16     | ND (1)     | ND (1)   | ND (2.1) *  | 38       | 42     |
|  | 01/09/17 | 14 - 15        | N           | ND (2.1) *     | 1.9     | 61     | ND (1) *   | ND (1)     | ND (0.21)            | 22              | 10     | 9.2    | 1.3      | ND (0.1) *  | ND (1)     | 15     | ND (1)     | ND (1)   | ND (2.1) *  | 36       | 38     |
| AOC1-8   | 01/05/17 | 0 - 0.5        | N           | ND (2.1) *     | 2.2     | 110    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 26              | 6.1    | 12     | 4.1      | ND (0.11) * | ND (1.1)   | 9.9    | ND (1.1) J | ND (1.1) | ND (2.1) J* | 22       | 41     |
|  | 01/05/17 | 2 - 3          | N           | ND (2.4) *     | 2.4     | 130    | ND (1.2) * | ND (1.2) * | 0.24                 | 16              | 5.8    | 10     | 12       | ND (0.12) * | ND (1.2)   | 7.3    | ND (1.2) J | ND (1.2) | ND (2.4) J* | 24       | 40     |
| AOC1-BCW10   | 02/04/16 | 0 - 0.5        | N           | ND (2.1) *     | 3.6     | 190    | ND (1) *   | ND (1)     | ND (0.21)            | 52              | 8.5    | 16     | 11       | ND (0.1) *  | ND (1)     | 14     | ND (1)     | ND (1)   | ND (2.1) *  | 33       | 65     |
|  | 02/04/16 | 2 - 3          | N           | ND (2.1) *     | 3.4     | 190    | ND (1) *   | ND (1)     | 0.42                 | 66              | 8.8    | 15     | 11       | ND (0.1) *  | ND (1)     | 14     | ND (1)     | ND (1)   | ND (2.1) *  | 32       | 63     |
|  | 02/04/16 | 5 - 6          | N           | ND (2) *       | 1.7     | 100    | ND (1) *   | ND (1)     | ND (0.2)             | 17              | 7.8    | 9.5    | 1.1      | ND (0.1) *  | ND (1)     | 11     | ND (1)     | ND (1)   | ND (2) *    | 30       | 35     |
|  | 02/04/16 | 9 - 10         | N           | ND (2.1) *     | 2.6     | 150    | ND (1) *   | ND (1)     | ND (0.21)            | 25 J            | 11     | 7.9    | 1.8      | ND (0.11) * | ND (1)     | 16     | ND (1)     | ND (1)   | ND (2.1) *  | 40       | 49     |
|  | 02/04/16 | 9 - 10         | FD          | ND (2.1) *     | 2.5     | 160    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 19 J            | 11     | 8.2    | 1.9      | ND (0.11) * | ND (1.1)   | 14     | ND (1.1)   | ND (1.1) | ND (2.1) *  | 41       | 44     |
| AOC1-BCW11   | 02/04/16 | 0 - 0.5        | N           | ND (2.1) *     | 4.4     | 180    | ND (1.1) * | ND (1.1) * | ND (0.21) J          | 19              | 6.6    | 14     | 8.5      | ND (0.11) * | ND (1.1)   | 12     | ND (1.1)   | ND (1.1) | ND (2.1) *  | 25       | 54     |
|  | 02/04/16 | 2 - 3          | N           | ND (2) *       | 2.5     | 180    | ND (1) *   | ND (1)     | 0.36                 | 38              | 11     | 15     | 6.3      | ND (0.1) *  | ND (1)     | 17     | ND (1)     | ND (1)   | ND (2) *    | 41       | 54     |
|  | 02/04/16 | 5 - 6          | N           | ND (2.1) *     | 3.3     | 210    | ND (1) *   | ND (1)     | 0.5                  | 54              | 10     | 16     | 7.3      | ND (0.1) *  | ND (1)     | 18     | ND (1)     | ND (1)   | ND (2.1) *  | 38       | 62     |
|  | 02/04/16 | 9 - 10         | N           | ND (2.2) *     | 2.1     | 91     | ND (1.1) * | ND (1.1) * | ND (0.22)            | 11              | 6.5    | 6      | ND (1.1) | ND (0.11) * | ND (1.1)   | 7.3    | ND (1.1)   | ND (1.1) | ND (2.2) *  | 22       | 27     |



TABLE B-2a  
Sample Results: Metals in Soil  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |          |        |            |            |                      |                 |        |        |          |             |            |        |            |          |            |          |        |
|--|----------|----------------|-------------|----------------|----------|--------|------------|------------|----------------------|-----------------|--------|--------|----------|-------------|------------|--------|------------|----------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11       | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39     | 0.0125      | 1.37       | 27.3   | 1.47       | 5.15     | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68     | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400      | 11          | 390        | 1,500  | 390        | 390      | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11     | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80       | 1           | NE         | 490    | NE         | 390      | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4     | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166   | 0.0125      | 2.25       | 0.607  | 0.177      | 5.15     | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11       | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39     | NE          | 1.37       | 27.3   | 1.47       | NE       | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic  | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead     | Mercury     | Molybdenum | Nickel | Selenium   | Silver   | Thallium   | Vanadium | Zinc   |
| AOC1-BCW12   | 02/04/16 | 0 - 0.5        | N           | ND (2.2) *     | 4.3      | 200    | ND (1.1) * | ND (1.1) * | ND (0.23)            | 29              | 7.5    | 15     | 9.8      | ND (0.11) * | ND (1.1)   | 13     | ND (1.1)   | ND (1.1) | ND (2.2) * | 30       | 74     |
|  | 02/04/16 | 2 - 3          | N           | ND (2.3) *     | 4        | 190    | ND (1.1) * | ND (1.1) * | 0.8                  | 48              | 7.7    | 17     | 10       | ND (0.11) * | ND (1.1)   | 13     | ND (1.1)   | ND (1.1) | ND (2.3) * | 31       | 58     |
|  | 02/04/16 | 5 - 6          | N           | ND (2.1) *     | 2.5      | 110    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 12              | 6.2    | 6.9    | 2        | ND (0.11) * | ND (1.1)   | 8.3    | ND (1.1)   | ND (1.1) | ND (2.1) * | 24       | 30     |
|  | 02/04/16 | 9 - 10         | N           | ND (2.1) *     | 2.1      | 92     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 13              | 7.3    | 6.5    | 1.3      | ND (0.11) * | ND (1.1)   | 8.2    | ND (1.1)   | ND (1.1) | ND (2.1) * | 26       | 29     |
| AOC1-BCW13   | 02/04/16 | 0 - 0.5        | N           | ND (2.1) *     | 3.7      | 190    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 29              | 8      | 16     | 8.7      | ND (0.11) * | ND (1.1)   | 14     | ND (1.1)   | ND (1.1) | ND (2.1) * | 31       | 62     |
|  | 02/04/16 | 2 - 3          | N           | ND (2.1) *     | 2.4      | 190    | ND (1.1) * | ND (1.1) * | 0.22                 | 22              | 10     | 17     | 1.5      | ND (0.11) * | ND (1.1)   | 14     | ND (1.1)   | ND (1.1) | ND (2.1) * | 39       | 44     |
|  | 02/04/16 | 5 - 6          | N           | ND (2.2) *     | 3.4      | 73     | ND (1.1) * | ND (1.1) * | ND (0.22)            | 17              | 9.3    | 11     | 2        | ND (0.11) * | ND (1.1)   | 14     | ND (1.1)   | ND (1.1) | ND (2.2) * | 34       | 39     |
|  | 02/04/16 | 9 - 10         | N           | ND (2.2) *     | 2.5      | 140    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 16              | 8.6    | 6.5    | 1.5      | ND (0.11) * | ND (1.1)   | 11     | ND (1.1)   | ND (1.1) | ND (2.2) * | 30       | 35     |
| AOC1-BCW14   | 02/04/16 | 0 - 0.5        | N           | ND (2.1) *     | 2.5      | 150    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 28              | 9.5    | 12     | 4.7      | ND (0.11) * | ND (1.1)   | 14     | ND (1.1)   | ND (1.1) | ND (2.1) * | 39       | 49     |
|  | 02/04/16 | 2 - 3          | N           | ND (2.1) *     | 2.5      | 110    | ND (1) *   | ND (1)     | 0.23                 | 15              | 7.7    | 10     | 3.6      | ND (0.1) *  | ND (1)     | 11     | ND (1)     | ND (1)   | ND (2.1) * | 32       | 34     |
|  | 02/04/16 | 5 - 6          | N           | ND (2.1) J*    | ND (1)   | 88 J   | ND (1) *   | ND (1)     | ND (0.21)            | 14              | 8      | 8.8    | 1.3      | ND (0.1) *  | ND (1)     | 9.6    | ND (1) J   | ND (1)   | ND (2.1) * | 29       | 34     |
|  | 02/04/16 | 9 - 10         | N           | ND (2.1) *     | 4.5      | 280    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 19              | 11     | 22     | 1.2      | ND (0.11) * | ND (1.1)   | 18     | ND (1.1)   | ND (1.1) | ND (2.1) * | 37       | 29     |
| AOC1-BCW15   | 02/04/16 | 0 - 0.5        | N           | ND (2.3) *     | 4.7      | 180    | ND (1.2) * | ND (1.2) * | ND (0.23)            | 21              | 6.6    | 15     | 9.2      | ND (0.12) * | ND (1.2)   | 12     | ND (1.2)   | ND (1.2) | ND (2.3) * | 27       | 52     |
|  | 02/04/16 | 2 - 3          | N           | ND (2.5) *     | 2.5      | 140    | ND (1.2) * | ND (1.2) * | 0.54                 | 43              | 7      | 17     | 9.9      | ND (0.13) * | ND (1.2)   | 12     | ND (1.2)   | ND (1.2) | ND (2.5) * | 29       | 49     |
|  | 02/04/16 | 5 - 6          | N           | ND (2.2) *     | ND (1.1) | 95     | ND (1.1) * | ND (1.1) * | ND (0.22)            | 14              | 8.5    | 6.6    | 1.4      | ND (0.11) * | ND (1.1)   | 9.9    | ND (1.1)   | ND (1.1) | ND (2.2) * | 32       | 39     |
|  | 02/04/16 | 9 - 10         | N           | ND (2.2) *     | ND (1.1) | 140    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 16              | 7.5    | 6.9    | ND (1.1) | ND (0.11) * | ND (1.1)   | 12     | ND (1.1)   | ND (1.1) | ND (2.2) * | 29       | 37     |
| AOC1-BCW16   | 02/04/16 | 0 - 0.5        | N           | ND (2.2) *     | 2.4      | 150    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 30              | 8.9    | 13     | 5.8      | ND (0.11) * | ND (1.1)   | 14     | ND (1.1)   | ND (1.1) | ND (2.2) * | 38       | 46     |
|  | 02/04/16 | 2 - 3          | N           | ND (2.4) *     | 4.2      | 200    | ND (1.2) * | ND (1.2) * | 0.36                 | 50              | 7.4    | 18     | 12       | ND (0.12) * | ND (1.2)   | 12     | ND (1.2)   | ND (1.2) | ND (2.4) * | 31       | 51     |
|  | 02/04/16 | 5 - 6          | N           | ND (2.1) *     | 2.2      | 78     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 15              | 6.3    | 8.1    | 1.3      | ND (0.11) * | ND (1.1)   | 8.8    | ND (1.1)   | ND (1.1) | ND (2.1) * | 27       | 28     |
|  | 02/04/16 | 9 - 10         | N           | ND (2.1) *     | 1.8      | 40     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 10              | 5.5    | 6.2    | ND (1.1) | ND (0.11) * | ND (1.1)   | 7.7    | ND (1.1)   | ND (1.1) | ND (2.1) * | 24       | 22     |
| AOC1-BCW17   | 02/04/16 | 0 - 0.5        | N           | ND (2.3) *     | 2.7      | 140    | ND (1.1) * | ND (1.1) * | ND (0.23)            | 15              | 6.9    | 13     | 5.1      | ND (0.11) * | ND (1.1)   | 10     | ND (1.1)   | ND (1.1) | ND (2.3) * | 28       | 36     |
|  | 02/04/16 | 2 - 3          | N           | ND (2.1) *     | ND (1.1) | 110    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 23              | 9.1    | 18     | 1.4      | ND (0.11) * | ND (1.1)   | 12     | ND (1.1)   | ND (1.1) | ND (2.1) * | 36       | 41     |
|  | 02/04/16 | 5 - 6          | N           | ND (2.1) *     | ND (1.1) | 120    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 18              | 8.5    | 18     | 2        | ND (0.11) * | ND (1.1)   | 11     | ND (1.1)   | ND (1.1) | ND (2.1) * | 34       | 38     |
|  | 02/04/16 | 9 - 10         | N           | ND (2.1) *     | ND (1.1) | 250    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 19              | 8.3    | 15     | 1.7      | ND (0.11) * | ND (1.1)   | 11     | ND (1.1)   | ND (1.1) | ND (2.1) * | 34       | 39     |
| AOC1-BCW18   | 02/05/16 | 0 - 0.5        | N           | ND (2.6) *     | 3.7      | 250    | ND (1.3) * | ND (1.3) * | ND (0.26)            | 46              | 9.4    | 19     | 13       | ND (0.13) * | ND (1.3)   | 18     | ND (1.3)   | ND (1.3) | ND (2.6) * | 39       | 68     |
|  | 02/05/16 | 2 - 3          | N           | ND (2.5) *     | 2.9      | 180    | ND (1.2) * | ND (1.2) * | ND (0.25)            | 10              | 5.5    | 7      | 3.5      | ND (0.12) * | ND (1.2)   | 7.6    | ND (1.2)   | ND (1.2) | ND (2.5) * | 23       | 30     |
|  | 02/05/16 | 5 - 6          | N           | ND (2.2) *     | 1.7      | 110    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 9.6             | 5.8    | 6.9    | ND (1.1) | ND (0.11) * | ND (1.1)   | 7.6    | ND (1.1)   | ND (1.1) | ND (2.2) * | 22       | 28     |
|  | 02/05/16 | 9 - 10         | N           | ND (2.2) *     | 2.4      | 180    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 17              | 8.4    | 6      | 1.5      | ND (0.11) * | ND (1.1)   | 11     | ND (1.1)   | ND (1.1) | ND (2.2) * | 33       | 35     |
| AOC1-BCW19   | 02/05/16 | 0 - 0.5        | N           | ND (2.3) J*    | 3.3      | 190    | ND (1.2) * | ND (1.2) * | 1.4                  | 58              | 8.5    | 15     | 11       | ND (0.12) * | ND (1.2)   | 15     | ND (1.2) J | ND (1.2) | ND (2.3) * | 34       | 60     |
|  | 02/05/16 | 2 - 3          | N           | ND (2.1) *     | 1.4      | 60     | ND (1) *   | ND (1)     | ND (0.21)            | 12              | 7.1    | 6.9    | 1.4      | ND (0.1) *  | ND (1)     | 8.2    | ND (1)     | ND (1)   | ND (2.1) * | 26       | 27     |
|  | 02/05/16 | 5 - 6          | N           | ND (2.1) *     | ND (1)   | 62     | ND (1) *   | ND (1)     | ND (0.21)            | 15              | 8.2    | 6.9    | 1        | ND (0.1) *  | ND (1)     | 11     | ND (1)     | ND (1)   | ND (2.1) * | 32       | 34     |
|  | 02/05/16 | 9 - 10         | N           | ND (2.2) *     | 1.9      | 59     | ND (1.1) * | ND (1.1) * | ND (0.22)            | 12              | 7.1    | 7.7    | ND (1.1) | ND (0.11) * | ND (1.1)   | 8.6    | ND (1.1)   | ND (1.1) | ND (2.2) * | 31       | 31     |
| AOC1-BCW20   | 02/05/16 | 0 - 0.5        | N           | ND (2.1) *     | ND (1)   | 75     | ND (1) *   | ND (1)     | ND (0.21)            | 20              | 8.7    | 8.2    | 2.2      | ND (0.1) *  | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2.1) * | 35       | 38     |
|  | 02/05/16 | 2 - 3          | N           | ND (2.1) *     | 1.8      | 67     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 14              | 7.3    | 7.4    | 1.6      | ND (0.11) * | ND (1.1)   | 9.9    | ND (1.1)   | ND (1.1) | ND (2.1) * | 34       | 31     |
|  | 02/05/16 | 5 - 6          | N           | ND (2.3) *     | 1.6      | 71     | ND (1.1) * | ND (1.1) * | ND (0.22)            | 12              | 7.1    | 8.7    | 1.4      | ND (0.11) * | ND (1.1)   | 8.9    | ND (1.1)   | ND (1.1) | ND (2.3) * | 29       | 29     |
|  | 02/05/16 | 9 - 10         | N           | ND (2.3) *     | 2.4      | 70     | ND (1.1) * | ND (1.1) * | ND (0.23)            | 22              | 11     | 17     | 2.9      | ND (0.11) * | ND (1.1)   | 15     | ND (1.1)   | ND (1.1) | ND (2.3) * | 43       | 48     |
| AOC1-BCW21   | 02/05/16 | 0 - 0.5        | N           | ND (2.3) *     | 3.3      | 190    | ND (1.1) * | ND (1.1) * | ND (0.23)            | 42              | 8.6    | 17     | 13       | ND (0.11) * | ND (1.1)   | 15     | ND (1.1)   | ND (1.1) | ND (2.3) * | 36       | 64     |
|  | 02/05/16 | 2 - 3          | N           | ND (2.2) *     | 2.9      | 110    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 22              | 10     | 9.7    | 3.2      | ND (0.11) * | ND (1.1)   | 12     | ND (1.1)   | ND (1.1) | ND (2.2) * | 38       | 40     |
|  | 02/05/16 | 5 - 6          | N           | ND (2.2) *     | 2        | 420    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 15              | 7.2    | 13     | 1.6      | ND (0.11) * | ND (1.1)   | 11     | ND (1.1)   | ND (1.1) | ND (2.2) * | 29       | 33     |
|  | 02/05/16 | 9 - 10         | N           | ND (2.2) *     | 2        | 140    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 19              | 9.1    | 14     | 2        | ND (0.11) * | ND (1.1)   | 11     | ND (1.1)   | ND (1.1) | ND (2.2) * | 41       | 40     |

TABLE B-2a  
Sample Results: Metals in Soil  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |          |             |            |        |            |          |             |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|----------|-------------|------------|--------|------------|----------|-------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39     | 0.0125      | 1.37       | 27.3   | 1.47       | 5.15     | 0.78        | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400      | 11          | 390        | 1,500  | 390        | 390      | 0.78        | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80       | 1           | NE         | 490    | NE         | 390      | NE          | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166   | 0.0125      | 2.25       | 0.607  | 0.177      | 5.15     | 2.32        | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39     | NE          | 1.37       | 27.3   | 1.47       | NE       | NE          | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead     | Mercury     | Molybdenum | Nickel | Selenium   | Silver   | Thallium    | Vanadium | Zinc   |
| AOC1-BCW22   | 02/05/16 | 0 - 0.5        | N           | ND (2.1) *     | 3.9     | 72     | ND (1) *   | ND (1)     | ND (0.21)            | 12              | 4.6    | 7      | 6.1      | ND (0.1) *  | ND (1)     | 6.8    | ND (1)     | ND (1)   | ND (2.1) *  | 23       | 26     |
|  | 02/05/16 | 2 - 3          | N           | ND (2.1) *     | 3.9     | 120    | ND (1) *   | ND (1)     | ND (0.21)            | 20              | 6.6    | 10     | 16       | ND (0.11) * | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2.1) *  | 30       | 43     |
|  | 02/05/16 | 5 - 6          | N           | ND (2.1) *     | 2.9     | 90     | ND (1) *   | ND (1)     | ND (0.21)            | 16              | 7.6    | 7.7    | 4.2      | ND (0.1) *  | ND (1)     | 9.1    | ND (1)     | ND (1)   | ND (2.1) *  | 36       | 36     |
|  | 02/05/16 | 9 - 10         | N           | ND (2.2) *     | 2.2     | 66     | ND (1.1) * | ND (1.1) * | ND (0.22)            | 15              | 7.2    | 8.8    | ND (1.1) | ND (0.11) * | ND (1.1)   | 9.6    | ND (1.1)   | ND (1.1) | ND (2.2) *  | 29       | 33     |
| AOC1-BCW23   | 02/05/16 | 0 - 0.5        | N           | ND (2.6) *     | 6.9     | 270    | ND (1.3) * | ND (1.3) * | ND (0.26)            | 38              | 9.6    | 22     | 16       | ND (0.13) * | ND (1.3)   | 18     | ND (1.3)   | ND (1.3) | ND (2.6) *  | 42       | 84     |
|  | 02/05/16 | 2 - 3          | N           | ND (2.4) *     | 3.3     | 180    | ND (1.2) * | ND (1.2) * | ND (0.24)            | 17              | 7.6    | 12     | 6.9      | ND (0.12) * | ND (1.2)   | 12     | ND (1.2)   | ND (1.2) | ND (2.4) *  | 33       | 47     |
|  | 02/05/16 | 5 - 6          | N           | ND (2.2) *     | 2.3     | 55     | ND (1.1) * | ND (1.1) * | ND (0.22)            | 11              | 5.9    | 5.7    | 1.7      | ND (0.11) * | ND (1.1)   | 6.9    | ND (1.1)   | ND (1.1) | ND (2.2) *  | 28       | 24     |
|  | 02/05/16 | 9 - 10         | N           | ND (2.2) *     | 2       | 120    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 13              | 7.3    | 7.6    | 1.5      | ND (0.11) * | ND (1.1)   | 8.7    | ND (1.1)   | ND (1.1) | ND (2.2) *  | 29       | 33     |
| AOC1-BCW24   | 02/05/16 | 0 - 0.5        | N           | ND (2.4) J*    | 3.4     | 170    | ND (1.2) * | ND (1.2) * | ND (0.24)            | 30              | 9.2    | 14     | 7.4      | ND (0.12) * | ND (1.2)   | 15     | ND (1.2) J | ND (1.2) | ND (2.4) *  | 40       | 56     |
|  | 02/05/16 | 2 - 3          | N           | ND (2.4) *     | 2.7     | 170    | ND (1.2) * | ND (1.2) * | 0.28                 | 29              | 6.7    | 15     | 8.8      | ND (0.12) * | ND (1.2)   | 11     | ND (1.2)   | ND (1.2) | ND (2.4) *  | 29       | 49     |
|  | 02/05/16 | 5 - 6          | N           | ND (2.2) *     | 1.9     | 55     | ND (1.1) * | ND (1.1) * | ND (0.22)            | 11              | 7.3    | 7.7    | 1.1      | ND (0.11) * | ND (1.1)   | 8      | ND (1.1)   | ND (1.1) | ND (2.2) *  | 28       | 27     |
|  | 02/05/16 | 9 - 10         | N           | ND (2.2) *     | 1.9     | 43     | ND (1.1) * | ND (1.1) * | ND (0.22)            | 7.9             | 4.5    | 4.9    | 1.3      | ND (0.11) * | ND (1.1)   | 5.6    | ND (1.1)   | ND (1.1) | ND (2.2) *  | 19       | 21     |
| AOC1-BCW25   | 02/05/16 | 0 - 0.5        | N           | ND (2.6) *     | 5.1     | 230    | ND (1.3) * | ND (1.3) * | ND (0.26)            | 39              | 9.4    | 18     | 11       | ND (0.13) * | ND (1.3)   | 16     | ND (1.3)   | ND (1.3) | ND (2.6) *  | 41       | 69     |
|  | 02/05/16 | 2 - 3          | N           | ND (2.6) *     | 3.6     | 180    | ND (1.3) * | ND (1.3) * | ND (0.26)            | 21              | 9.2    | 14     | 3.8      | ND (0.13) * | ND (1.3)   | 12     | ND (1.3)   | ND (1.3) | ND (2.6) *  | 38       | 42     |
|  | 02/05/16 | 5 - 6          | N           | ND (2.2) *     | 2.2     | 110    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 13              | 7.5    | 7.9    | 2.6      | ND (0.11) * | ND (1.1)   | 8.8    | ND (1.1)   | ND (1.1) | ND (2.2) *  | 31       | 37     |
|  | 02/05/16 | 9 - 10         | N           | ND (2.2) *     | 2       | 120    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 16              | 9.1    | 14     | 2        | ND (0.11) * | ND (1.1)   | 11     | ND (1.1)   | ND (1.1) | ND (2.2) *  | 38       | 42     |
| AOC1-BCW26   | 02/04/16 | 0 - 0.5        | N           | ND (2.2) *     | 5       | 170    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 35              | 9      | 15     | 8.9      | ND (0.11) * | ND (1.1)   | 15     | ND (1.1)   | ND (1.1) | ND (2.2) *  | 35       | 59     |
|  | 02/04/16 | 2 - 3          | N           | ND (2.5) *     | 7.1     | 190    | ND (1.3) * | ND (1.3) * | ND (0.25)            | 12              | 6.3    | 10     | 8.2      | ND (0.13) * | ND (1.3)   | 9.8    | ND (1.3)   | ND (1.3) | ND (2.5) *  | 23       | 43     |
|  | 02/04/16 | 5 - 6          | N           | ND (2.1) *     | 3.3     | 74     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 13              | 6.8    | 11     | 3.6      | ND (0.11) * | ND (1.1)   | 9.2    | ND (1.1)   | ND (1.1) | ND (2.1) *  | 24       | 33     |
|  | 02/04/16 | 9 - 10         | N           | ND (2.4) *     | 3.3     | 42     | ND (1.2) * | 1.3        | ND (0.24)            | 19              | 9      | 25     | 3.1      | ND (0.12) * | ND (1.2)   | 14     | ND (1.2)   | ND (1.2) | ND (2.4) *  | 35       | 40     |
| AOC1-BCW27   | 02/05/16 | 0 - 0.5        | N           | ND (2.4) *     | 5.2     | 210    | ND (1.2) * | ND (1.2) * | ND (0.24)            | 33              | 8.1    | 17     | 17       | ND (0.12) * | ND (1.2)   | 15     | ND (1.2)   | ND (1.2) | ND (2.4) *  | 35       | 59     |
|  | 02/05/16 | 2 - 3          | N           | ND (2.3) *     | 1.7     | 65     | ND (1.1) * | ND (1.1) * | ND (0.23)            | 12              | 8      | 8.6    | 2        | ND (0.11) * | ND (1.1)   | 9.2    | ND (1.1)   | ND (1.1) | ND (2.3) *  | 36       | 33     |
|  | 02/05/16 | 5 - 6          | N           | ND (2.1) *     | 1.4     | 53     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 9.7             | 6.3    | 9      | 1.3      | ND (0.11) * | ND (1.1)   | 7      | ND (1.1)   | ND (1.1) | ND (2.1) *  | 26       | 29     |
|  | 02/05/16 | 9 - 10         | N           | ND (2.3) *     | 1.9     | 78     | ND (1.1) * | ND (1.1) * | ND (0.23)            | 15              | 7.4    | 7.4    | 2.2      | ND (0.11) * | ND (1.1)   | 12     | ND (1.1)   | ND (1.1) | ND (2.3) *  | 30       | 31     |
| AOC1-BCW28   | 02/05/16 | 0 - 0.5        | N           | ND (2.4) *     | 5.1     | 270    | ND (1.2) * | ND (1.2) * | 0.3                  | 49              | 9.2    | 19     | 14       | ND (0.12) * | ND (1.2)   | 17     | ND (1.2)   | ND (1.2) | ND (2.4) *  | 39       | 73     |
|  | 02/05/16 | 2 - 3          | N           | ND (2.3) *     | 4.6     | 150    | ND (1.2) * | ND (1.2) * | ND (0.23)            | 18              | 6.8    | 10     | 4.2      | ND (0.11) * | ND (1.2)   | 9.9    | ND (1.2)   | ND (1.2) | ND (2.3) *  | 32       | 38     |
|  | 02/05/16 | 5 - 6          | N           | ND (2.2) *     | 1.3     | 96     | ND (1.1) * | 1.1        | ND (0.22)            | 18              | 7.8    | 8.3    | 1.4      | ND (0.11) * | ND (1.1)   | 12     | ND (1.1)   | ND (1.1) | ND (2.2) *  | 29       | 33     |
|  | 02/05/16 | 9 - 10         | N           | ND (2.2) *     | 1.8     | 110    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 18              | 8.9    | 11     | 2.1      | ND (0.11) * | ND (1.1)   | 11     | ND (1.1)   | ND (1.1) | ND (2.2) *  | 36       | 39     |
| AOC1-BCW29   | 02/04/16 | 0 - 0.5        | N           | ND (2.6) *     | 4.3     | 160    | ND (1.3) * | ND (1.3) * | ND (0.26)            | 33              | 8.7    | 15     | 8.3      | ND (0.13) * | ND (1.3)   | 14     | ND (1.3)   | ND (1.3) | ND (2.6) *  | 38       | 56     |
|  | 02/04/16 | 2 - 3          | N           | ND (2.7) *     | 4.2     | 210    | ND (1.4) * | ND (1.4) * | ND (0.27)            | 17              | 8.7    | 13     | 5.2      | ND (0.14) * | ND (1.4) * | 13     | ND (1.4)   | ND (1.4) | ND (2.7) *  | 31       | 49     |
|  | 02/04/16 | 5 - 6          | N           | ND (3.1) *     | 5.4     | 350    | ND (1.5) * | ND (1.5) * | ND (0.31)            | 27              | 14     | 23     | 7.6      | ND (0.15) * | ND (1.5) * | 19     | ND (1.5) * | ND (1.5) | ND (3.1) *  | 46       | 66     |
|  | 02/04/16 | 9 - 10         | N           | ND (2.4) *     | 2.7     | 74     | ND (1.2) * | ND (1.2) * | ND (0.24) J          | 11              | 7.3    | 7.1    | ND (1.2) | ND (0.12) * | ND (1.2)   | 9.6    | ND (1.2)   | ND (1.2) | ND (2.4) *  | 32       | 29     |
| AOC1-BCW30   | 02/04/16 | 0 - 0.5        | N           | ND (2.4) J*    | 5.5     | 220    | ND (1.2) * | ND (1.2) * | ND (0.24)            | 42              | 7.3    | 18     | 17 J     | ND (0.12) * | ND (1.2) J | 14     | ND (1.2) J | ND (1.2) | ND (2.4) J* | 28       | 61     |
|  | 02/04/16 | 2 - 3          | N           | ND (2.4) *     | 3.4     | 140    | ND (1.2) * | ND (1.2) * | 0.26                 | 14              | 6      | 8.7    | 2.7      | ND (0.12) * | ND (1.2)   | 11     | ND (1.2)   | ND (1.2) | ND (2.4) *  | 22       | 28     |
|  | 02/04/16 | 5 - 6          | N           | ND (2.3) *     | 3.7     | 210    | ND (1.2) * | ND (1.2) * | ND (0.23)            | 12              | 6      | 8.4    | 2.9      | ND (0.12) * | ND (1.2)   | 9.6    | ND (1.2)   | ND (1.2) | ND (2.3) *  | 23       | 29     |
|  | 02/04/16 | 9 - 10         | N           | ND (2.3) *     | 2.7     | 49     | ND (1.2) * | ND (1.2) * | ND (0.23)            | 8.8             | 5.8    | 7.8    | ND (1.2) | ND (0.12) * | ND (1.2)   | 6.3    | ND (1.2)   | ND (1.2) | ND (2.3) *  | 19       | 27     |

TABLE B-2a  
Sample Results: Metals in Soil  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |          |             |            |        |            |          |             |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|----------|-------------|------------|--------|------------|----------|-------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39     | 0.0125      | 1.37       | 27.3   | 1.47       | 5.15     | 0.78        | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400      | 11          | 390        | 1,500  | 390        | 390      | 0.78        | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80       | 1           | NE         | 490    | NE         | 390      | NE          | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166   | 0.0125      | 2.25       | 0.607  | 0.177      | 5.15     | 2.32        | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39     | NE          | 1.37       | 27.3   | 1.47       | NE       | NE          | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead     | Mercury     | Molybdenum | Nickel | Selenium   | Silver   | Thallium    | Vanadium | Zinc   |
| AOC1-BCW7  | 02/05/16 | 0 - 0.5        | N           | ND (2) *       | 2.2     | 74     | ND (1) *   | ND (1)     | 0.29                 | 18              | 6.3    | 18     | 8        | ND (0.1) *  | ND (1)     | 9.6    | ND (1)     | ND (1)   | ND (2) *    | 24       | 34     |
|  | 02/05/16 | 2 - 3          | N           | ND (2.1) *     | 3.5     | 80     | ND (1) *   | ND (1)     | 0.36                 | 20              | 7      | 8.4    | 1.7      | ND (0.1) *  | ND (1)     | 10     | ND (1)     | ND (1)   | ND (2.1) *  | 25       | 29     |
|  | 02/05/16 | 2 - 3          | FD          | ND (2.1) *     | 4.3     | 91     | ND (1) *   | ND (1)     | 0.28                 | 23              | 6.3    | 7.5    | 1.7      | ND (0.1) *  | ND (1)     | 10     | ND (1)     | ND (1)   | ND (2.1) *  | 25       | 27     |
|  | 02/05/16 | 5 - 6          | N           | ND (2.1) *     | 6.7     | 150    | ND (1) *   | ND (1)     | ND (0.21)            | 15              | 3.3    | 6.2    | 2.2      | ND (0.1) *  | ND (1)     | 7.5    | ND (1)     | ND (1)   | ND (2.1) *  | 15       | 15     |
|  | 02/05/16 | 9 - 10         | N           | ND (2.1) *     | 7.1     | 540    | ND (1.1) * | ND (1.1) * | 0.36                 | 24              | 10     | 23     | 1.4      | ND (0.1) *  | ND (1.1)   | 18     | ND (1.1)   | ND (1.1) | ND (2.1) *  | 41       | 26     |
|  | 02/05/16 | 14 - 15        | N           | ND (2.1) *     | 3       | 210    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 19              | 10     | 8.4    | 2.4      | ND (0.1) *  | ND (1.1)   | 16     | ND (1.1)   | ND (1.1) | ND (2.1) *  | 33       | 39     |
|  | 02/05/16 | 19 - 20        | N           | ND (2.1) *     | 3.9     | 460 J  | ND (1) *   | ND (1)     | ND (0.21)            | 20              | 9.1    | 7.2    | 1.8      | ND (0.11) * | ND (1)     | 14     | ND (1)     | ND (1)   | ND (2.1) *  | 34       | 38     |
|  | 02/05/16 | 19 - 20        | FD          | ND (2.1) *     | 3.5     | 210 J  | ND (1.1) * | ND (1.1) * | ND (0.21)            | 19              | 9.1    | 8.7    | 1.8      | ND (0.1) *  | ND (1.1)   | 13     | ND (1.1)   | ND (1.1) | ND (2.1) *  | 34       | 38     |
| AOC1-BCW8  | 02/04/16 | 0 - 0.5        | N           | ND (2.2) *     | 3.8     | 180    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 21              | 7.1    | 14     | 8.3      | ND (0.11) * | ND (1.1)   | 13     | ND (1.1)   | ND (1.1) | ND (2.2) *  | 32       | 53     |
|  | 02/04/16 | 2 - 3          | N           | ND (2) *       | 2.5     | 110    | ND (1) *   | ND (1)     | 0.44                 | 28              | 9.3    | 10     | 4.5      | ND (0.1) *  | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2) *    | 37       | 45     |
|  | 02/04/16 | 5 - 6          | N           | ND (2) *       | 1.4     | 82     | ND (1) *   | ND (1)     | 0.24                 | 18              | 9.6    | 8.4    | 3.2      | ND (0.1) *  | ND (1)     | 10     | ND (1)     | ND (1)   | ND (2) *    | 32       | 35     |
|  | 02/04/16 | 9 - 10         | N           | ND (2.1) *     | 1.1     | 92     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 15 J            | 8      | 9.3    | 1.1      | ND (0.11) * | ND (1.1)   | 10     | ND (1.1) J | ND (1.1) | ND (2.1) *  | 32       | 35     |
|  | 02/04/16 | 9 - 10         | FD          | ND (2.1) *     | 2.2     | 110    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 11 J            | 8.7    | 11     | ND (1.1) | ND (0.11) * | ND (1.1)   | 9.5    | ND (1.1)   | ND (1.1) | ND (2.1) *  | 30       | 37     |
| AOC1-BCW9  | 02/04/16 | 0 - 0.5        | N           | ND (2.2) *     | 4       | 200    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 35              | 8.3    | 17     | 9.3      | ND (0.11) * | ND (1.1)   | 15     | ND (1.1)   | ND (1.1) | ND (2.2) *  | 33       | 61     |
|  | 02/04/16 | 2 - 3          | N           | ND (2.2) *     | 3.5     | 190    | ND (1.1) * | ND (1.1) * | 1.2                  | 66              | 8.1    | 16     | 11       | ND (0.11) * | ND (1.1)   | 14     | ND (1.1)   | ND (1.1) | ND (2.2) *  | 33       | 57     |
|  | 02/04/16 | 5 - 6          | N           | ND (2.1) *     | 2.4     | 110    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 17              | 8.5    | 9.5    | 3        | ND (0.1) *  | ND (1.1)   | 11     | ND (1.1)   | ND (1.1) | ND (2.1) *  | 37       | 37     |
|  | 02/04/16 | 9 - 10         | N           | ND (2.1) *     | 2.4     | 100    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 13              | 7.9    | 10     | ND (1.1) | ND (0.1) *  | ND (1.1)   | 10     | ND (1.1)   | ND (1.1) | ND (2.1) *  | 28       | 32     |
| AOC1-T1e   | 01/11/16 | 0 - 1          | N           | ND (2.1) *     | 2.7     | 37     | ND (1) *   | ND (1)     | ND (0.21)            | 26              | 7.5    | 13     | 3.3      | ---         | ND (1)     | 16     | ND (1)     | ND (1)   | ND (2.1) *  | 23       | 37     |
|  | 01/11/16 | 2 - 3          | N           | ND (2.1) *     | 2.7     | 32     | ND (1) *   | ND (1)     | ND (0.21)            | 18              | 9.8    | 10     | 2        | ND (0.1) *  | ND (1)     | 15     | ND (1)     | ND (1)   | ND (2.1) *  | 30       | 40     |
|  | 01/11/16 | 5 - 6          | N           | ND (2.1) *     | 1.9     | 22     | ND (1) *   | ND (1)     | ND (0.21)            | 16              | 6.6    | 7.5    | 1.1      | ND (0.1) *  | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2.1) *  | 23       | 30     |
|  | 01/11/16 | 9 - 10         | N           | ND (2.1) *     | 1.9     | 40     | ND (1) *   | ND (1)     | ND (0.2)             | 20              | 8.1    | 11     | 1.3      | ND (0.1) *  | ND (1)     | 14     | ND (1)     | ND (1)   | ND (2.1) *  | 27       | 32     |
|  | 01/11/16 | 9 - 10         | FD          | ND (2.1) *     | 2.4     | 43     | ND (1) *   | ND (1)     | ND (0.21)            | 17              | 8.1    | 13     | 1.5      | 0.18        | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2.1) *  | 27       | 32     |
|  | 01/11/16 | 14 - 15        | N           | ND (2.2) *     | 2.1     | 42     | ND (1.1) * | ND (1.1) * | ND (0.22)            | 17              | 6.8    | 11     | 1.3      | 0.16        | ND (1.1)   | 13     | ND (1.1)   | ND (1.1) | ND (2.2) *  | 24       | 28     |
| AOC1-T1f   | 01/12/16 | 0 - 1          | N           | ND (2.1) *     | 2.5     | 73     | ND (1) *   | ND (1)     | 0.71                 | 49              | 6.6    | 13     | 5.5      | 0.13        | ND (1)     | 13     | ND (1)     | ND (1)   | ND (2.1) *  | 23       | 41     |
|  | 01/12/16 | 2 - 3          | N           | ND (2.1) *     | 2.3     | 37     | ND (1) *   | ND (1)     | ND (0.21)            | 20              | 7.6    | 7.2    | 1.5      | 0.13        | ND (1)     | 19     | ND (1)     | ND (1)   | ND (2.1) *  | 25       | 32     |
|  | 01/12/16 | 5 - 6          | N           | ND (2.1) *     | 3.1     | 32     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 24              | 8.9    | 11     | 2        | 0.11        | ND (1.1)   | 18     | ND (1.1)   | ND (1.1) | ND (2.1) *  | 27       | 40     |
|  | 01/12/16 | 9 - 10         | N           | ND (2.1) *     | 2.7     | 72     | ND (1) *   | ND (1)     | ND (0.21)            | 18 J            | 11 J   | 9.1    | 1.9      | 0.11        | ND (1)     | 14     | ND (1)     | ND (1)   | ND (2.1) *  | 36 J     | 46 J   |
|  | 01/12/16 | 9 - 10         | FD          | ND (2) *       | 3.1     | 71     | ND (1) *   | ND (1)     | ND (0.21)            | 30 J            | 8.2 J  | 11     | 2.6      | ND (0.1) *  | ND (1)     | 14     | ND (1)     | ND (1)   | ND (2) *    | 28 J     | 35 J   |
|  | 01/12/16 | 14 - 15        | N           | ND (2) *       | 2.2     | 55     | ND (1) *   | ND (1)     | 0.68                 | 29              | 7.6    | 9.2    | 2        | ND (0.1) *  | ND (1)     | 13     | ND (1)     | ND (1)   | ND (2) *    | 25       | 34     |
| AOC1-T1g   | 02/17/17 | 0 - 0.5        | N           | ND (2) *       | 1.4     | 97     | ND (1) *   | 1.4        | ND (0.2)             | 26              | 8.2    | 12     | 4.1      | ND (0.1) *  | ND (1)     | 15     | ND (1) J   | ND (1) J | ND (2) J*   | 30       | 33     |
|  | 02/17/17 | 0 - 0.5        | FD          | ND (2) *       | ND (1)  | 100    | ND (1) *   | 1.4        | ND (0.2)             | 24              | 9.9    | 14     | 1.6      | ND (0.1) *  | ND (1)     | 15     | ND (1) J   | ND (1) J | ND (2) J*   | 31       | 36     |
|  | 02/17/17 | 2 - 3          | N           | ND (2.1) *     | ND (1)  | 80     | ND (1) *   | 1.3        | ND (0.21)            | 30              | 9.4    | 13     | ND (1)   | ND (0.1) *  | ND (1)     | 17     | ND (1) J   | ND (1) J | ND (2.1) J* | 31       | 32     |
|  | 02/17/17 | 5 - 6          | N           | ND (2.1) *     | ND (1)  | 81     | ND (1) *   | 1.1        | 0.63                 | 23              | 7.1    | 9.2    | 1.1      | ND (0.1) *  | ND (1)     | 9.9    | ND (1) J   | ND (1) J | ND (2.1) J* | 27       | 30     |
|  | 02/17/17 | 9 - 10         | N           | ND (2.1) *     | ND (1)  | 69     | ND (1) *   | 1.1        | ND (0.21)            | 14              | 6.7    | 9.2    | ND (1)   | ND (0.1) *  | ND (1)     | 8.8    | ND (1) J   | ND (1) J | ND (2.1) J* | 26       | 29     |
| AOC1-T2f   | 12/17/15 | 0 - 1          | N           | ND (2) *       | 7.6     | 96     | ND (1) *   | ND (1)     | 0.22                 | 14              | 5.3    | 12     | 7.9      | ND (0.1) *  | 3.2        | 11     | ND (1)     | ND (1)   | ND (2) *    | 25       | 39     |
|  | 12/17/15 | 2 - 3          | N           | ND (2) *       | 4.4     | 55     | ND (1) *   | ND (1)     | 0.25                 | 17              | 7.5    | 11     | 3.1      | ND (0.1) *  | 8.2        | 12     | ND (1)     | ND (1)   | ND (2) *    | 37       | 40     |

TABLE B-2a  
Sample Results: Metals in Soil  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |          |        |            |            |                      |                 |        |        |        |              |            |        |          |          |            |          |        |
|--|----------|----------------|-------------|----------------|----------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|--------------|------------|--------|----------|----------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11       | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125       | 1.37       | 27.3   | 1.47     | 5.15     | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68     | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11           | 390        | 1,500  | 390      | 390      | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11     | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1            | NE         | 490    | NE       | 390      | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4     | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125       | 2.25       | 0.607  | 0.177    | 5.15     | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11       | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE           | 1.37       | 27.3   | 1.47     | NE       | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic  | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury      | Molybdenum | Nickel | Selenium | Silver   | Thallium   | Vanadium | Zinc   |
| AOC1-T2g   | 03/03/16 | 9 - 10         | N           | 4.5            | 3.6      | 90     | ND (1.1) * | ND (1.1) * | 30                   | 2,100           | 8      | 11     | 5.2    | 0.26         | 8.4        | 10     | ND (1.1) | ND (1.1) | ND (2.2) * | 26       | 140    |
|  | 03/03/16 | 14 - 15        | N           | ND (2.1) *     | 2.3      | 52     | ND (1.1) * | ND (1.1) * | 0.77                 | 28              | 8.6    | 8.9    | 2      | 0.16         | ND (1.1)   | 14     | ND (1.1) | ND (1.1) | ND (2.1) * | 33       | 75     |
|  | 03/03/16 | 19 - 20        | N           | ND (2.1) *     | 1.8      | 43     | ND (1.1) * | ND (1.1) * | 0.58                 | 27              | 8.7    | 9.2    | 2      | 0.16         | ND (1.1)   | 17     | ND (1.1) | ND (1.1) | ND (2.1) * | 30       | 53     |
|  | 03/03/16 | 29 - 30        | N           | ND (2.1) *     | 2.1      | 50     | ND (1.1) * | ND (1.1) * | 0.25                 | 21              | 10     | 9.9    | 2.1    | 0.15         | ND (1.1)   | 14     | ND (1.1) | ND (1.1) | ND (2.1) * | 36       | 50     |
|  | 03/03/16 | 39 - 40        | N           | ND (2.1) *     | 2.2      | 94     | ND (1.1) * | ND (1.1) * | 0.23                 | 19              | 8.9    | 9.2    | 1.8    | 0.14         | ND (1.1)   | 13     | ND (1.1) | ND (1.1) | ND (2.1) * | 36       | 39     |
|  | 03/03/16 | 39 - 40        | FD          | ND (2.1) *     | 2        | 79     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 19              | 9      | 9.8    | 1.8    | 0.13         | ND (1.1)   | 13     | ND (1.1) | ND (1.1) | ND (2.1) * | 36       | 39     |
|  | 03/03/16 | 49 - 50        | N           | ND (2.1) *     | 2.8      | 22     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 18              | 8.9    | 15     | 1.9    | 0.12         | ND (1.1)   | 15     | ND (1.1) | ND (1.1) | ND (2.1) * | 36       | 37     |
|  | 03/03/16 | 59 - 60        | N           | ND (2.1) *     | 2.3      | 69     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 18              | 9.6    | 13     | 2.1    | 0.15         | ND (1.1)   | 14     | ND (1.1) | ND (1.1) | ND (2.1) * | 37       | 44     |
|  | 03/03/16 | 69 - 70        | N           | ND (2.1) *     | 2.1      | 67     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 15              | 7.5    | 8.4    | 1.4    | 0.11         | ND (1.1)   | 13     | ND (1.1) | ND (1.1) | ND (2.1) * | 29       | 36     |
| AOC1-T2h   | 03/04/16 | 0 - 1          | N           | ND (2.1) J*    | 1.4      | 120    | ND (1) *   | ND (1)     | 2.5                  | 100 J           | 9      | 9.2 J  | 2.2    | ND (0.1) *   | ND (1)     | 17     | ND (1) J | ND (1)   | ND (2.1) * | 32       | 39     |
|  | 03/04/16 | 2 - 3          | N           | ND (2.1) *     | 2.1      | 72     | ND (1.1) * | ND (1.1) * | 0.42                 | 24              | 11     | 9.9    | 2.2    | ND (0.11) *  | ND (1.1)   | 16     | ND (1.1) | ND (1.1) | ND (2.1) * | 34       | 45     |
|  | 03/04/16 | 5 - 6          | N           | ND (2.1) *     | ND (1)   | 130    | ND (1) *   | ND (1)     | 6.8                  | 200             | 9.4    | 9.8    | 3.4    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2.1) * | 32       | 85     |
|  | 03/04/16 | 9 - 10         | N           | ND (2.1) *     | ND (1)   | 100    | ND (1) *   | ND (1)     | 0.94                 | 28              | 8.7    | 16     | 1.4    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2.1) * | 31       | 44     |
|  | 03/04/16 | 14 - 15        | N           | ND (2.1) *     | 1.7      | 42     | ND (1) *   | ND (1)     | 0.29                 | 19              | 7.1    | 9      | 1.1    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2.1) * | 26       | 33     |
|  | 03/04/16 | 19 - 20        | N           | ND (2.1) *     | 1.5      | 58     | ND (1.1) * | ND (1.1) * | 0.23                 | 18              | 9.1    | 12     | 1.3    | ND (0.1) *   | ND (1.1)   | 12     | ND (1.1) | ND (1.1) | ND (2.1) * | 31       | 41     |
|  | 03/04/16 | 29 - 30        | N           | ND (2.1) *     | 1.9      | 40     | ND (1) *   | ND (1)     | ND (0.21)            | 18              | 8.9    | 8.9    | 1.2    | ND (0.1) *   | ND (1)     | 14     | ND (1)   | ND (1)   | ND (2.1) * | 31       | 34     |
|  | 03/04/16 | 39 - 40        | N           | ND (2.1) *     | 2.2      | 44     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 17              | 7.9    | 8      | 1.6    | ND (0.1) *   | ND (1.1)   | 13     | ND (1.1) | ND (1.1) | ND (2.1) * | 30       | 35     |
| AOC1-T2i   | 03/05/16 | 0 - 1          | N           | ND (2.1) *     | 1.8      | 92     | ND (1) *   | ND (1)     | 0.61                 | 28              | 7.8    | 10     | 2.6    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2.1) * | 31       | 36     |
|  | 03/05/16 | 2 - 3          | N           | ND (2.1) *     | 1.3      | 89     | ND (1) *   | ND (1)     | 0.55                 | 25              | 7.8    | 9.2    | 2.5    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2.1) * | 27       | 34     |
|  | 03/05/16 | 5 - 6          | N           | ND (2.1) *     | ND (1)   | 89     | ND (1) *   | ND (1)     | 0.29                 | 16              | 7.8    | 10     | 3.5    | 0.12         | ND (1)     | 10     | ND (1)   | ND (1)   | ND (2.1) * | 27       | 40     |
|  | 03/05/16 | 9 - 10         | N           | ND (2) *       | 1.2      | 110    | ND (1) *   | ND (1)     | 0.31                 | 40              | 7.9    | 12     | 4.8    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2) *   | 28       | 40     |
|  | 03/05/16 | 14 - 15        | N           | ND (2.1) *     | ND (1)   | 100    | ND (1) *   | ND (1)     | 0.28                 | 17              | 9      | 9.5    | 1.4    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2.1) * | 35       | 38     |
|  | 03/05/16 | 19 - 20        | N           | ND (2) *       | 1.2      | 130    | ND (1) *   | ND (1)     | 0.27                 | 18              | 8.7    | 14     | 1.3    | ND (0.1) *   | ND (1)     | 15     | ND (1)   | ND (1)   | ND (2) *   | 31       | 39     |
| AOC1-T2j   | 03/05/16 | 0 - 1          | N           | ND (2.1) *     | ND (1)   | 93     | ND (1) *   | ND (1)     | 0.6                  | 31              | 11     | 8.8    | 1.9    | ND (0.1) *   | ND (1)     | 15     | ND (1)   | ND (1)   | ND (2.1) * | 48       | 40     |
|  | 03/05/16 | 2 - 3          | N           | ND (2.1) *     | ND (1)   | 80 J   | ND (1) *   | ND (1)     | 0.38                 | 21              | 8.3 J  | 9.3    | 2.4    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2.1) * | 35       | 32     |
|  | 03/05/16 | 2 - 3          | FD          | ND (2.1) *     | ND (1)   | 65 J   | ND (1) *   | ND (1)     | 0.39                 | 18              | 6.5 J  | 10     | 1.7    | ND (0.1) *   | ND (1)     | 9.1    | ND (1)   | ND (1)   | ND (2.1) * | 29       | 29     |
|  | 03/05/16 | 5 - 6          | N           | ND (2.1) *     | 1.7      | 64     | ND (1) *   | ND (1)     | ND (0.21)            | 18              | 8.7    | 9.2    | 1.4    | 0.11         | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2.1) * | 33       | 31     |
|  | 03/05/16 | 9 - 10         | N           | ND (2.1) *     | ND (1)   | 81     | ND (1) *   | ND (1)     | 0.37                 | 16              | 7.4    | 6.4    | 1.3    | ND (0.1) *   | ND (1)     | 10     | ND (1)   | ND (1)   | ND (2.1) * | 41       | 33     |
|  | 03/05/16 | 14 - 15        | N           | ND (2.1) *     | 1.5      | 64     | ND (1.1) * | ND (1.1) * | 0.26                 | 26              | 10     | 12     | 2.1    | ND (0.11) *  | ND (1.1)   | 14     | ND (1.1) | ND (1.1) | ND (2.1) * | 42       | 44     |
|  | 03/05/16 | 19 - 20        | N           | ND (2.1) *     | 1.6      | 53     | ND (1.1) * | ND (1.1) * | 0.7                  | 22 J            | 9.8    | 8.8    | 1.7    | ND (0.11) *  | ND (1.1)   | 11 J   | ND (1.1) | ND (1.1) | ND (2.1) * | 39       | 46     |
|  | 03/05/16 | 19 - 20        | FD          | ND (2.1) *     | 1.6      | 57     | ND (1.1) * | ND (1.1) * | 0.64                 | 30 J            | 11     | 9.3    | 2      | ND (0.11) *  | ND (1.1)   | 14 J   | ND (1.1) | ND (1.1) | ND (2.1) * | 40       | 45     |
| AOC1-T5D   | 01/12/16 | 0 - 1          | N           | ND (2) *       | 1.3      | 84     | ND (1) *   | ND (1)     | ND (0.2)             | 23              | 7.5    | 8.3    | 6.2    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2) *   | 26       | 33     |
|  | 01/12/16 | 2 - 3          | N           | ND (2.1) *     | 5.3      | 230    | ND (1.1) * | ND (1.1) * | 2.7                  | 120 J           | 6.6    | 17     | 18     | ND (0.11) *  | ND (1.1)   | 12     | ND (1.1) | ND (1.1) | ND (2.1) * | 28       | 100 J  |
|  | 01/12/16 | 2 - 3          | FD          | ND (2.1) *     | 4.2      | 210    | ND (1) *   | ND (1)     | 2.6                  | 69 J            | 6.4    | 14     | 16     | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2.1) * | 25       | 72 J   |
|  | 01/12/16 | 5 - 6          | N           | ND (2) *       | 2.3      | 120    | ND (1) *   | ND (1)     | 2.4                  | 80              | 7.9    | 9.7    | 3.7    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2) *   | 32       | 42     |
|  | 01/12/16 | 9 - 10         | N           | ND (2) *       | 1.9      | 97     | ND (1) *   | ND (1)     | 0.33                 | 23              | 8.2    | 8.3    | 4.8    | ND (0.1) *   | ND (1)     | 14     | ND (1)   | ND (1)   | ND (2) *   | 31       | 40     |
|  | 01/12/16 | 14 - 15        | N           | ND (2) *       | 1.8      | 110    | ND (1) *   | ND (1)     | 0.92                 | 36              | 7.3    | 8.8    | 4.1    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2) *   | 27       | 36     |
|  | 01/12/16 | 19 - 20        | N           | ND (2) *       | ND (1)   | 120 J  | ND (1) *   | ND (1)     | 0.51                 | 23              | 9.5    | 8.8    | 1.8    | ND (0.099) * | ND (1)     | 14     | ND (1)   | ND (1)   | ND (2) *   | 33       | 48     |
|  | 01/12/16 | 19 - 20        | FD          | ND (2.1) *     | ND (1.1) | 91 J   | ND (1.1) * | ND (1.1) * | 0.72                 | 22              | 9.3    | 8.8    | 1.8    | ND (0.11) *  | ND (1.1)   | 13     | ND (1.1) | ND (1.1) | ND (2.1) * | 32       | 52     |

TABLE B-2a  
Sample Results: Metals in Soil  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |          |        |            |            |                      |                 |        |        |          |             |            |        |            |          |             |          |        |
|--|----------|----------------|-------------|----------------|----------|--------|------------|------------|----------------------|-----------------|--------|--------|----------|-------------|------------|--------|------------|----------|-------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11       | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39     | 0.0125      | 1.37       | 27.3   | 1.47       | 5.15     | 0.78        | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68     | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400      | 11          | 390        | 1,500  | 390        | 390      | 0.78        | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11     | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80       | 1           | NE         | 490    | NE         | 390      | NE          | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4     | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166   | 0.0125      | 2.25       | 0.607  | 0.177      | 5.15     | 2.32        | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11       | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39     | NE          | 1.37       | 27.3   | 1.47       | NE       | NE          | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic  | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead     | Mercury     | Molybdenum | Nickel | Selenium   | Silver   | Thallium    | Vanadium | Zinc   |
| AOC1-T6D   | 02/09/16 | 0 - 0.5        | N           | ND (2) *       | 3.7      | 110 J  | ND (1) *   | ND (1)     | ND (0.2) J           | 19              | 6.7    | 7.6    | 2.4      | ND (0.1) *  | ND (1)     | 9.9    | ND (1)     | ND (1)   | 2.4         | 28       | 100    |
|  | 02/09/16 | 2 - 3          | N           | ND (2.1) *     | 2.6      | 96     | ND (1) *   | ND (1)     | 0.32 J               | 19              | 8.4    | 11     | 1.3      | ND (0.1) *  | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2.1) *  | 31       | 38     |
|  | 02/09/16 | 5 - 6          | N           | ND (2.1) *     | 1.3      | 110    | ND (1) *   | ND (1)     | 0.24 J               | 19              | 9.1    | 11     | 1.7      | ND (0.1) *  | ND (1)     | 13     | ND (1)     | ND (1)   | 2.3         | 33       | 43     |
|  | 02/09/16 | 9 - 10         | N           | ND (2.1) *     | 3.4      | 39     | ND (1) *   | ND (1)     | ND (0.21) J          | 16              | 7.6    | 8.8    | 1.4      | ND (0.1) *  | ND (1)     | 12     | ND (1)     | ND (1)   | 2.6         | 27       | 35     |
|  | 02/09/16 | 9 - 10         | FD          | ND (2.1) *     | 3.9      | 40     | ND (1) *   | ND (1)     | ND (0.21) J          | 16              | 7.6    | 9.5    | 1.7      | ND (0.1) *  | ND (1)     | 12     | ND (1)     | ND (1)   | 2.1         | 29       | 36     |
|  | 02/09/16 | 14 - 15        | N           | ND (2.1) *     | 3.1      | 72 J   | ND (1) *   | ND (1)     | ND (0.21) J          | 16              | 8.3    | 8.3    | 1.2      | ND (0.1) *  | ND (1)     | 13     | ND (1)     | ND (1)   | 2.4         | 31       | 36     |
|  | 02/09/16 | 14 - 15        | FD          | ND (2) *       | 2        | 91 J   | ND (1) *   | ND (1)     | ND (0.2) J           | 19              | 9.5    | 9.9    | 1.7      | ND (0.1) *  | ND (1)     | 14     | ND (1)     | ND (1)   | ND (2) *    | 35       | 41     |
|  | 02/09/16 | 19 - 20        | N           | ND (2) *       | 2.6      | 65     | ND (1) *   | ND (1)     | ND (0.2) J           | 24              | 9.7    | 10     | 1.2      | ND (0.1) *  | ND (1)     | 15     | ND (1)     | ND (1)   | 2.2         | 37       | 41     |
| AOC1-T7  | 02/19/17 | 0 - 0.5        | N           | ND (2.1) *     | 1.1      | 84     | ND (1.1) * | 1.3        | ND (0.21)            | 23              | 8.2    | 13     | ND (1.1) | ND (0.1) *  | ND (1.1)   | 13     | ND (1.1) J | ND (1.1) | ND (2.1) J* | 26       | 32     |
|  | 02/19/17 | 2 - 3          | N           | ND (2) *       | ND (1)   | 58     | ND (1) *   | 1.1        | 0.33                 | 27              | 6.4    | 8.9    | 1.1      | ND (0.1) *  | ND (1)     | 10     | ND (1) J   | ND (1)   | ND (2) J*   | 24       | 35     |
|  | 02/19/17 | 5 - 6          | N           | ND (2) *       | ND (1)   | 72     | ND (1) *   | 1.1        | 0.43                 | 18              | 6.5    | 8.9    | 7.1      | ND (0.1) *  | ND (1)     | 8.5    | ND (1) J   | ND (1)   | ND (2) J*   | 23       | 30     |
|  | 02/19/17 | 9 - 10         | N           | ND (2.1) *     | 1.2      | 78     | ND (1) *   | 1.3        | ND (0.21)            | 17              | 7.3    | 10     | ND (1)   | ND (0.1) *  | ND (1)     | 9.5    | ND (1) J   | ND (1)   | ND (2.1) J* | 27       | 30     |
| AOC1-T8  | 02/18/17 | 0 - 0.5        | N           | ND (2.1) *     | ND (1)   | 57     | ND (1) *   | 1.2        | 0.23                 | 43              | 7.8    | 11     | 1.1      | ND (0.1) *  | ND (1)     | 16     | ND (1) J   | ND (1)   | ND (2.1) J* | 22       | 34     |
|  | 02/18/17 | 2 - 3          | N           | ND (2.1) *     | ND (1)   | 60     | ND (1) *   | 1          | ND (0.21)            | 18              | 6.1    | 17     | 1.1      | ND (0.1) *  | ND (1)     | 8.8    | ND (1) J   | ND (1)   | ND (2.1) J* | 20       | 28     |
|  | 02/18/17 | 5 - 6          | N           | ND (2.1) *     | 1.5      | 47     | ND (1.1) * | 1.2        | ND (0.21)            | 14              | 7.3    | 8.6    | ND (1.1) | ND (0.11) * | ND (1.1)   | 9.9    | ND (1.1) J | ND (1.1) | ND (2.1) J* | 23       | 36     |
|  | 02/18/17 | 9 - 10         | N           | ND (2.1) *     | ND (1)   | 62     | ND (1) *   | 1.1        | 0.22                 | 13 J            | 6      | 10     | ND (1)   | ND (0.1) *  | ND (1)     | 7.9 J  | ND (1) J   | ND (1)   | ND (2.1) J* | 20       | 31     |
|  | 02/18/17 | 9 - 10         | FD          | ND (2) *       | ND (1)   | 63     | ND (1) *   | 1.1        | ND (0.21)            | 17 J            | 6.8    | 9.2    | ND (1)   | ND (0.1) *  | ND (1)     | 11 J   | ND (1) J   | ND (1)   | ND (2) J*   | 21       | 27     |
| AOC4-GB10  | 02/10/10 | 0 - 0.5        | N           | ND (2.2) *     | ND (1.1) | 160 J  | ND (1.1) * | ND (1.1) * | ND (0.44)            | 35 J            | 8.5    | 16     | 14       | ND (0.11) * | ND (1.1)   | 20     | ND (1.1)   | ND (1.1) | ND (2.2) *  | 40 J     | 71 J   |
| AOC4-GB11  | 02/10/10 | 0 - 0.5        | N           | ND (2.2) *     | ND (1.1) | 170    | ND (1.1) * | ND (1.1) * | ND (0.43)            | 31              | 9.1    | 13     | 7.2 J    | ND (0.11) * | ND (1.1)   | 17     | ND (1.1)   | ND (1.1) | ND (2.2) *  | 38       | 46     |
|  | 02/10/10 | 0 - 0.5        | FD          | ND (2.2) *     | ND (1.1) | 160    | ND (1.1) * | ND (1.1) * | 0.57                 | 29              | 8.1    | 14     | 16 J     | ND (0.11) * | ND (1.1)   | 16     | ND (1.1)   | ND (1.1) | ND (2.2) *  | 38       | 47     |
| AOC4-GB12  | 02/10/10 | 0 - 0.5        | N           | ND (2.2) *     | ND (1.1) | 160    | ND (1.1) * | ND (1.1) * | ND (0.44)            | 35              | 9.1    | 15     | 5.5      | ND (0.11) * | ND (1.1)   | 24     | ND (1.1)   | ND (1.1) | ND (2.2) *  | 42       | 43     |
| MW-10  | 06/27/97 | 1              | N           | ---            | ---      | ---    | ---        | ---        | ND (0.05)            | 14.2            | ---    | 14.1   | ---      | ---         | ---        | 8.8    | ---        | ---      | ---         | ---      | 20.9   |
|  | 06/27/97 | 3              | N           | ---            | ---      | ---    | ---        | ---        | ND (0.05)            | 13.4            | ---    | 8.3    | ---      | ---         | ---        | 9      | ---        | ---      | ---         | ---      | 26.6   |
|  | 06/27/97 | 6              | N           | ---            | ---      | ---    | ---        | ---        | ND (0.05)            | 19              | ---    | 8.4    | ---      | ---         | ---        | 10.7   | ---        | ---      | ---         | ---      | 23.3   |
|  | 06/27/97 | 10             | N           | ---            | ---      | 95.3   | ---        | ---        | ND (0.05)            | 26.7            | ---    | 9.6    | 2.8      | ---         | 0.62       | 14.1   | ---        | ---      | ---         | 26.9     | 30.4   |
|  | 06/27/97 | 20             | N           | ---            | ---      | ---    | ---        | ---        | ND (0.05)            | 14.7            | ---    | 7.7    | ---      | ---         | ---        | 10.2   | ---        | ---      | ---         | ---      | 27.1   |
|  | 06/27/97 | 25             | N           | ---            | ---      | ---    | ---        | ---        | ND (0.05)            | 16.1            | ---    | 10.6   | ---      | ---         | ---        | 13.4   | ---        | ---      | ---         | ---      | 34.1   |
|  | 06/27/97 | 30             | N           | ---            | ---      | ---    | ---        | ---        | ND (0.05)            | 13.8            | ---    | 9.4    | ---      | ---         | ---        | 11.5   | ---        | ---      | ---         | ---      | 31.5   |
|  | 06/27/97 | 35             | N           | ---            | ---      | 87     | ---        | ---        | ---                  | ---             | ---    | ---    | 3.6      | ---         | ND (0.2)   | ---    | ---        | ---      | ---         | 29.9     | ---    |
|  | 06/27/97 | 40             | N           | ---            | ---      | ---    | ---        | ---        | ND (0.05)            | 14.5            | ---    | 9.2    | ---      | ---         | ---        | 12.6   | ---        | ---      | ---         | ---      | 29.4   |
|  | 06/28/97 | 50             | N           | ---            | ---      | ---    | ---        | ---        | ND (0.05)            | 14.3            | ---    | 8.5    | ---      | ---         | ---        | 12.2   | ---        | ---      | ---         | ---      | 31.2   |
|  | 06/27/97 | 60             | N           | ---            | ---      | ---    | ---        | ---        | ND (0.05)            | 9.1             | ---    | 6      | ---      | ---         | ---        | 6.6    | ---        | ---      | ---         | ---      | 16.3   |
|  | 06/27/97 | 70             | N           | ---            | ---      | 110    | ---        | ---        | ND (0.05)            | 11.7            | ---    | 8.8    | 2.2      | ---         | ND (0.2)   | 9.4    | ---        | ---      | ---         | 20.1     | 24.2   |
|  | 06/27/97 | 75             | N           | ---            | ---      | ---    | ---        | ---        | ND (0.05)            | 11.5            | ---    | 6.4    | ---      | ---         | ---        | 8.2    | ---        | ---      | ---         | ---      | 24.9   |
|  | 06/27/97 | 75             | FD          | ---            | ---      | ---    | ---        | ---        | 0.1                  | 9.6             | ---    | 6.97   | ---      | ---         | ---        | 8.1    | ---        | ---      | ---         | ---      | 21.6   |
|  | 06/27/97 | 82             | N           | ---            | ---      | 115    | ---        | ---        | ND (0.05)            | 9.9             | ---    | 6.3    | 2.3      | ---         | ND (0.2)   | 8.7    | ---        | ---      | ---         | 21.5     | 26.6   |



TABLE B-2a  
Sample Results: Metals in Soil  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |             |             |                      |                 |        |        |        |             |            |        |          |            |            |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|-------------|-------------|----------------------|-----------------|--------|--------|--------|-------------|------------|--------|----------|------------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672       | 1.1         | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125      | 1.37       | 27.3   | 1.47     | 5.15       | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160         | 71          | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11          | 390        | 1,500  | 390      | 390        | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15          | 5.2         | NE                   | 36,000          | NE     | NE     | 80     | 1           | NE         | 490    | NE       | 390        | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3        | 0.0151      | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125      | 2.25       | 0.607  | 0.177    | 5.15       | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672       | 1.1         | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE          | 1.37       | 27.3   | 1.47     | NE         | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium   | Cadmium     | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury     | Molybdenum | Nickel | Selenium | Silver     | Thallium   | Vanadium | Zinc   |
| MW-11  | 06/29/97 | 1              | N           | ---            | ---     | ---    | ---         | ---         | ND (0.05)            | 12.2            | ---    | 7.5    | ---    | ---         | ---        | 8.4    | ---      | ---        | ---        | ---      | 24.8   |
|  | 06/29/97 | 3              | N           | ---            | ---     | ---    | ---         | ---         | ND (0.05)            | 31.1            | ---    | 6.6    | ---    | ---         | ---        | 7.3    | ---      | ---        | ---        | ---      | 29.5   |
|  | 06/29/97 | 6              | N           | ---            | ---     | ---    | ---         | ---         | ND (0.05)            | 26.9            | ---    | 5.3    | ---    | ---         | ---        | 5.6    | ---      | ---        | ---        | ---      | 23.2   |
|  | 06/29/97 | 10             | N           | ---            | ---     | 101    | ---         | ---         | ND (0.05)            | 13.5            | ---    | 8.3    | 6.3    | ---         | 0.32       | 7.7    | ---      | ---        | ---        | 18.9     | 38.5   |
|  | 06/29/97 | 20             | N           | ---            | ---     | ---    | ---         | ---         | ND (0.05)            | 5.9             | ---    | 6      | ---    | ---         | ---        | 4.9    | ---      | ---        | ---        | ---      | 19.9   |
|  | 06/29/97 | 30             | N           | ---            | ---     | 91.4   | ---         | ---         | ND (0.05)            | 12.6            | ---    | 6.9    | 1.8    | ---         | 0.8        | 8.2    | ---      | ---        | ---        | 22       | 28.4   |
|  | 06/29/97 | 40             | N           | ---            | ---     | ---    | ---         | ---         | ND (0.05)            | 9.8             | ---    | 9.8    | ---    | ---         | ---        | 8.6    | ---      | ---        | ---        | ---      | 28.4   |
|  | 06/29/97 | 50             | N           | ---            | ---     | ---    | ---         | ---         | ND (0.05)            | 13.6            | ---    | 6.9    | ---    | ---         | ---        | 10.1   | ---      | ---        | ---        | ---      | 29.8   |
|  | 06/29/97 | 60             | N           | ---            | ---     | 27.4   | ---         | ---         | ND (0.05)            | 9.6             | ---    | 5.8    | 3      | ---         | 0.088 J    | 8.3    | ---      | ---        | ---        | 18.1     | 26.2   |
|  | 06/29/97 | 60             | FD          | ---            | ---     | ---    | ---         | ---         | ND (0.05)            | 10              | ---    | 5.74   | ---    | ---         | ---        | 8.6    | ---      | ---        | ---        | ---      | 19.8   |
| 06/29/97   | 69       | N              | ---         | ---            | 370     | ---    | ---         | ND (0.05)   | 16.9                 | ---             | 13.8   | 5      | ---    | ND (0.2)    | 11.3       | ---    | ---      | ---        | 23.2       | 35.7     |        |
| MW-13  | 07/09/97 | 10             | N           | ---            | ---     | ---    | ---         | ---         | ND (0.05)            | 10.8            | ---    | 9.3    | ---    | ---         | ---        | 8.1    | ---      | ---        | ---        | ---      | 27.2   |
|  | 07/09/97 | 20             | N           | ---            | ---     | 94.2   | ---         | ---         | ND (0.05)            | 10.5            | ---    | 7.1    | 2.4    | ---         | 0.14 J     | 8.9    | ---      | ---        | ---        | 21.1     | 28.3   |
|  | 07/09/97 | 25             | N           | ---            | ---     | 124    | ---         | ---         | ---                  | ---             | ---    | ---    | 2.8    | ---         | ND (0.2)   | ---    | ---      | ---        | ---        | 26.4     | ---    |
|  | 07/09/97 | 30             | N           | ---            | ---     | ---    | ---         | ---         | ND (0.05)            | 12.2            | ---    | 8.6    | ---    | ---         | ---        | 8.2    | ---      | ---        | ---        | ---      | 33.3   |
|  | 07/09/97 | 40             | N           | ---            | ---     | ---    | ---         | ---         | ND (0.05)            | 10.7            | ---    | 8.1    | ---    | ---         | ---        | 9.4    | ---      | ---        | ---        | ---      | 30.4   |
|  | 07/09/97 | 40             | FD          | ---            | ---     | ---    | ---         | ---         | ND (0.05)            | 6.4             | ---    | 5.6    | ---    | ---         | ---        | 5.6    | ---      | ---        | ---        | ---      | 17.7   |
| Old Well-BCW-1                                       | 09/11/13 | 7 - 8          | N           | ND (2.2) J*    | 4.8     | 130    | ND (1.1) J* | ND (1.1) J* | 80                   | 4,200           | 7      | 14     | 12 J   | ND (0.11) * | 18         | 11     | 2.1      | ND (1.1) J | ND (2.2) * | 37 J     | 190    |
| Old Well-BCW-2                                       | 09/11/13 | 4 - 5          | N           | ND (2.1) *     | 19      | 130    | ND (1) *    | ND (1)      | 73                   | 4,400           | 7.2    | 23     | 10     | ND (0.11) * | 6.7        | 12     | ND (1)   | ND (1)     | ND (2.1) * | 61       | 150    |
| PA-01  | 11/09/15 | 0 - 1          | N           | ND (2) J*      | 3.4     | 85 J   | ND (1) *    | ND (1)      | 0.65                 | 20              | 3.7    | 8.5    | 9.3    | ND (0.1) *  | ND (1)     | 6.9    | ND (1)   | ND (1)     | ND (2) *   | 18       | 80     |
| PA-03  | 11/09/15 | 0 - 1          | N           | ND (2) *       | 3.8     | 140    | ND (1) *    | ND (1)      | 0.65                 | 26              | 7.1    | 15     | 13     | ND (0.1) *  | ND (1)     | 15     | ND (1)   | ND (1)     | ND (2) *   | 25       | 200    |
| PA-04  | 11/09/15 | 0 - 1          | N           | ND (2) *       | 3.9     | 170    | ND (1) *    | ND (1)      | 0.69                 | 36              | 7.1    | 14     | 25     | ND (0.1) *  | ND (1)     | 20     | ND (1)   | ND (1)     | ND (2) *   | 33       | 56     |
| PA-14  | 01/27/16 | 0 - 1          | N           | ND (2.1) *     | 4.5     | 180    | ND (1) *    | ND (1)      | ND (0.21)            | 20              | 5.5    | 22     | 10     | ND (0.1) *  | ND (1)     | 8.7    | ND (1)   | ND (1)     | ND (2.1) * | 23       | 270    |
| PA-15  | 01/27/16 | 0 - 1          | N           | ND (2.1) *     | 4.7     | 120    | ND (1) *    | ND (1)      | 1.1                  | 170             | 6.6    | 26     | 20     | ND (0.1) *  | ND (1)     | 14     | ND (1)   | ND (1)     | ND (2.1) * | 25       | 120    |
| PA-16  | 01/27/16 | 0 - 1          | N           | ND (2.1) *     | 4.1     | 150    | ND (1) *    | ND (1)      | 1.3                  | 47              | 6.4    | 26     | 8.5    | ND (0.1) *  | 1.2        | 35     | ND (1)   | ND (1)     | ND (2.1) * | 25       | 64     |
| SD-14  | 01/11/16 | 0 - 1          | N           | ND (2.1) *     | 3.7     | 87     | ND (1) *    | ND (1)      | 0.72                 | 29              | 5.6    | 14     | 13     | ND (0.1) *  | ND (1)     | 10     | ND (1)   | ND (1)     | ND (2.1) * | 20       | 37     |
|  | 01/11/16 | 2 - 3          | N           | ND (2.1) *     | 2.6     | 94     | ND (1) *    | ND (1)      | 0.63                 | 32              | 5      | 7.6    | 16     | ND (0.1) *  | ND (1)     | 9.1    | ND (1)   | ND (1)     | ND (2.1) * | 19       | 47     |
|  | 01/11/16 | 5 - 6          | N           | ND (2.3) *     | 6.7     | 140    | ND (1.1) *  | ND (1.1) *  | 3.1                  | 42              | 4.5    | 64     | 120    | ND (0.11) * | 5          | 11     | ND (1.1) | ND (1.1)   | ND (2.3) * | 18       | 660    |
|  | 01/11/16 | 9 - 10         | N           | ND (2.1) *     | 1.6     | 64     | ND (1) *    | ND (1)      | 1.1                  | 35              | 7.6    | 7.8    | 1.9    | ND (0.1) *  | ND (1)     | 11     | ND (1)   | ND (1)     | ND (2.1) * | 28       | 36     |
| SD-15  | 01/12/16 | 0 - 0.5        | N           | ND (2.1) *     | 1.8     | 220    | ND (1.1) *  | ND (1.1) *  | 0.77                 | 19              | 6.3    | 13     | 2.7    | ND (0.11) * | ND (1.1)   | 9.6    | ND (1.1) | ND (1.1)   | ND (2.1) * | 24       | 32     |
|  | 01/12/16 | 2 - 3          | N           | ND (2.1) *     | 2.1     | 36     | ND (1.1) *  | ND (1.1) *  | ND (0.21)            | 25              | 7.7    | 12     | 1.8    | ND (0.11) * | ND (1.1)   | 13     | ND (1.1) | ND (1.1)   | ND (2.1) * | 27       | 32     |
|  | 01/12/16 | 5 - 6          | N           | ND (2.1) *     | 1.6     | 72     | ND (1.1) *  | ND (1.1) *  | ND (0.21)            | 21              | 7.2    | 11     | 1.5    | ND (0.11) * | ND (1.1)   | 12     | ND (1.1) | ND (1.1)   | ND (2.1) * | 28       | 32     |
|  | 01/12/16 | 9 - 10         | N           | ND (2.1) *     | 2       | 49     | ND (1.1) *  | ND (1.1) *  | ND (0.21)            | 20              | 9.4    | 9.3    | 2.1    | ND (0.11) * | ND (1.1)   | 13     | ND (1.1) | ND (1.1)   | ND (2.1) * | 35       | 37     |
| SD-16  | 01/12/16 | 0 - 0.5        | N           | ND (2.1) *     | 1.3     | 100    | ND (1.1) *  | ND (1.1) *  | ND (0.21)            | 16              | 7.3    | 10     | 1.8    | ND (0.1) *  | ND (1.1)   | 10     | ND (1.1) | ND (1.1)   | ND (2.1) * | 28       | 32     |
|  | 01/12/16 | 2 - 3          | N           | ND (2.1) *     | 1.9     | 230    | ND (1.1) *  | ND (1.1) *  | ND (0.21)            | 19              | 7.6    | 11     | 2.2    | ND (0.1) *  | ND (1.1)   | 13     | ND (1.1) | ND (1.1)   | ND (2.1) * | 34       | 28     |
|  | 01/12/16 | 5 - 6          | N           | ND (2.1) *     | 2.3     | 46     | ND (1) *    | ND (1)      | ND (0.21)            | 24              | 10     | 9.3    | 2.4    | ND (0.11) * | ND (1)     | 16     | ND (1)   | ND (1)     | ND (2.1) * | 37       | 40     |
|  | 01/12/16 | 9 - 10         | N           | ND (2.1) *     | 1.4     | 69     | ND (1) *    | ND (1)      | ND (0.21)            | 13              | 9.4    | 6.1    | 1.9    | ND (0.1) *  | ND (1)     | 9.3    | ND (1)   | ND (1)     | ND (2.1) * | 28       | 33     |
| SD-17  | 12/17/15 | 0 - 0.5        | N           | ND (2.1) *     | 5.1     | 190    | ND (1) *    | ND (1)      | ND (0.2)             | 17              | 6.6    | 15     | 15     | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)     | ND (2.1) * | 27       | 60     |
|  | 12/17/15 | 2 - 3          | N           | ND (2) *       | 5.5     | 180    | ND (1) *    | ND (1)      | 0.25                 | 18              | 7.6    | 16     | 19     | ND (0.1) *  | ND (1)     | 15     | ND (1)   | ND (1)     | ND (2) *   | 30       | 65     |

TABLE B-2a  
Sample Results: Metals in Soil  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |            |                |             | Metals (mg/kg) |         |        |             |            |                      |                 |        |        |        |             |            |        |            |          |             |          |        |
|--|------------|----------------|-------------|----------------|---------|--------|-------------|------------|----------------------|-----------------|--------|--------|--------|-------------|------------|--------|------------|----------|-------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |            |                |             | 0.285          | 11      | 410    | 0.672       | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125      | 1.37       | 27.3   | 1.47       | 5.15     | 0.78        | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |            |                |             | 31             | 0.68    | 15,000 | 160         | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11          | 390        | 1,500  | 390        | 390      | 0.78        | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |            |                |             | NE             | 0.11    | NE     | 15          | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1           | NE         | 490    | NE         | 390      | NE          | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |            |                |             | 0.285          | 11.4    | 330    | 23.3        | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125      | 2.25       | 0.607  | 0.177      | 5.15     | 2.32        | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |            |                |             | NE             | 11      | 410    | 0.672       | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE          | 1.37       | 27.3   | 1.47       | NE       | NE          | 52.2     | 58     |
| Location   | Date       | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium   | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury     | Molybdenum | Nickel | Selenium   | Silver   | Thallium    | Vanadium | Zinc   |
| SD-18  | 12/17/15   | 0 - 0.5        | N           | ND (2.1) *     | 2.9     | 63     | ND (1.1) *  | ND (1.1) * | ND (0.21)            | 32              | 11     | 17     | 3.4    | ND (0.11) * | ND (1.1)   | 22     | ND (1.1)   | ND (1.1) | ND (2.1) *  | 41       | 310    |
| SD-19  | 01/13/16   | 0 - 0.5        | N           | ND (2.1) *     | 2.3     | 150 J  | ND (1) *    | ND (1)     | ND (0.21)            | 30              | 9.8    | 15 J   | 2      | ND (0.1) *  | ND (1)     | 24     | ND (1)     | ND (1)   | ND (2.1) *  | 31       | 33     |
|  | 01/13/16   | 0 - 0.5        | FD          | ND (2.1) *     | 2.3     | 120 J  | ND (1) *    | ND (1)     | ND (0.21)            | 28              | 9.8    | 11 J   | 2.1    | ND (0.11) * | 1.3        | 22     | ND (1)     | ND (1)   | ND (2.1) *  | 31       | 33     |
|  | 01/13/16   | 2 - 3          | N           | ND (2) *       | 2.8     | 150    | ND (1) *    | ND (1)     | ND (0.2)             | 24              | 8.3    | 10     | 2.8    | ND (0.1) *  | ND (1)     | 17     | ND (1)     | ND (1)   | ND (2) *    | 32       | 33     |
|  | 01/13/16   | 5 - 6          | N           | ND (2) *       | 1.2     | 75     | ND (1) *    | ND (1)     | ND (0.2)             | 14              | 6.6    | 7.9    | 1.5    | ND (0.1) *  | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2) *    | 23       | 30     |
|  | 01/13/16   | 8 - 8.5        | N           | ND (2) *       | 1.9     | 94     | ND (1) *    | ND (1)     | ND (0.2)             | 15              | 6.5    | 7.8    | 1.8    | 0.12        | ND (1)     | 11     | ND (1)     | ND (1)   | ND (2) *    | 24       | 35     |
| SD-25  | 03/10/16   | 0 - 1          | N           | ND (2.1) *     | 2.2     | 89     | ND (1) *    | ND (1)     | ND (0.21)            | 23              | 8.6    | 15     | 3.1    | 0.1         | ND (1)     | 20     | ND (1)     | ND (1)   | ND (2.1) *  | 32       | 39     |
| SD-26  | 03/10/16   | 0 - 1          | N           | ND (2) *       | 4.8     | 130    | ND (1) *    | 1.1        | 0.32                 | 24              | 5.6    | 21     | 16     | ND (0.1) *  | ND (1)     | 17     | ND (1)     | ND (1)   | ND (2) *    | 22       | 220    |
| SD-OS33  | 12/20/16   | 1.5 - 2        | N           | ND (2.1) J*    | 4.7     | 120    | ND (1) *    | ND (1)     | 0.36                 | 29              | 8      | 12     | 5.2    | ND (0.1) *  | ND (1)     | 15     | ND (1) J   | ND (1)   | ND (2.1) *  | 34       | 47     |
| TCS-4  | 03/25/14   | 59 - 60        | N           | ND (2) J*      | 2.1     | 80     | ND (1) *    | ND (1) J   | 2.2                  | 61 J            | 6.3    | 18 J   | 32 J   | ND (0.1) *  | ND (1)     | 16 J   | 1.6        | ND (1) J | ND (2) J*   | 29       | 30     |
|  | 03/25/14   | 113            | N           | ND (2) *       | 20      | 51     | ND (1) *    | ND (1)     | ND (0.4)             | 1,700           | 31     | 580    | 17     | ND (0.1) *  | 35         | 300    | 42         | ND (1)   | ND (2) *    | 5.7      | 55     |
| TCS4-E   | 03/01/16   | 4 - 5          | N           | 8.3 J          | 19 J    | 140    | ND (1) J*   | ND (1)     | 29 J                 | 3,100           | 6.5    | 16 J   | 6.2    | ND (0.1) *  | 9.6 J      | 10 J   | ND (1) J   | ND (1)   | ND (2.1) J* | 67 J     | 190 J  |
|  | 03/01/16   | 4 - 5          | FD          | 16 J           | 18 J    | 120    | ND (1.1) J* | ND (1.1) * | 50 J                 | 3,400           | 5.9    | 12 J   | 5      | ND (0.11) * | 9.1 J      | 7.1 J  | ND (1.1) J | ND (1.1) | ND (2.1) J* | 60 J     | 120 J  |
|  | 03/01/16   | 5 - 6          | N           | ND (2.1) *     | ND (1)  | 58     | ND (1) *    | ND (1)     | 0.99                 | 13              | 8      | 8      | ND (1) | ND (0.1) *  | ND (1)     | 7.6    | ND (1)     | ND (1)   | ND (2.1) *  | 32       | 31     |
| TCS4-N   | 03/01/16   | 4 - 5          | N           | 8.6            | 14      | 100    | ND (1.1) *  | ND (1.1) * | 33                   | 3,400           | 6.9    | 8.7    | 6.9    | ND (0.1) *  | 4.9        | 13     | ND (1.1)   | ND (1.1) | ND (2.1) *  | 70       | 82     |
|  | 03/01/16   | 5 - 6          | N           | 6.9            | 3.8     | 130    | ND (1.1) *  | ND (1.1) * | 39                   | 3,300           | 7.5    | 14     | 6.2    | ND (0.11) * | 15         | 12     | ND (1.1)   | ND (1.1) | ND (2.2) *  | 33       | 130    |
| TCS4-S   | 03/01/16   | 4 - 5          | N           | ND (2.1) *     | 1.9     | 74     | ND (1.1) *  | ND (1.1) * | 30                   | 840             | 7.4    | 9      | 4.5    | ND (0.11) * | ND (1.1)   | 9.5    | ND (1.1)   | ND (1.1) | ND (2.1) *  | 33       | 120    |
|  | 03/01/16   | 5 - 6          | N           | 5              | 2.7     | 100    | ND (1.1) *  | ND (1.1) * | 21                   | 2,200           | 7.3    | 11     | 3.1    | ND (0.11) * | 3.4        | 9      | ND (1.1)   | ND (1.1) | ND (2.2) *  | 30       | 150    |
| SS-1   | 06/29/97 ‡ | 0.5            | N           | ---            | ---     | ---    | ---         | ---        | ND (0.05)            | 38.2            | ---    | 16.5   | ---    | ---         | ---        | 17.9   | ---        | ---      | ---         | ---      | 55     |
|  | 06/29/97 ‡ | 1.5            | N           | ---            | ---     | ---    | ---         | ---        | ND (0.05)            | 25.3            | ---    | 13.6   | ---    | ---         | ---        | 12.5   | ---        | ---      | ---         | ---      | 43.4   |
| SS-2   | 06/29/97   | 0.5            | N           | ---            | ---     | ---    | ---         | ---        | ND (0.05)            | 18.9            | ---    | 14.1   | ---    | ---         | ---        | 13.2   | ---        | ---      | ---         | ---      | 48.3   |
|  | 06/29/97   | 1.5            | N           | ---            | ---     | ---    | ---         | ---        | ND (0.05)            | 10.2            | ---    | 12.9   | ---    | ---         | ---        | 9.4    | ---        | ---      | ---         | ---      | 42.2   |
| SS-3   | 06/29/97   | 0.5            | N           | ---            | ---     | ---    | ---         | ---        | ND (0.05)            | ---             | ---    | ---    | ---    | ---         | ---        | ---    | ---        | ---      | ---         | ---      | ---    |
| SS-4   | 06/29/97   | 0.5            | N           | ---            | ---     | ---    | ---         | ---        | ND (0.05)            | ---             | ---    | ---    | ---    | ---         | ---        | ---    | ---        | ---      | ---         | ---      | ---    |
| SS-5   | 06/29/97   | 0.5            | N           | ---            | ---     | ---    | ---         | ---        | ND (0.05)            | ---             | ---    | ---    | ---    | ---         | ---        | ---    | ---        | ---      | ---         | ---      | ---    |
| SS-6   | 06/29/97   | 0.5            | N           | ---            | ---     | ---    | ---         | ---        | ND (0.05)            | ---             | ---    | ---    | ---    | ---         | ---        | ---    | ---        | ---      | ---         | ---      | ---    |
| SS-7   | 06/29/97   | 0.5            | N           | ---            | ---     | ---    | ---         | ---        | ND (0.05)            | ---             | ---    | ---    | ---    | ---         | ---        | ---    | ---        | ---      | ---         | ---      | ---    |
| SS-8   | 06/29/97   | 0.5            | N           | ---            | ---     | ---    | ---         | ---        | ND (0.05)            | ---             | ---    | ---    | ---    | ---         | ---        | ---    | ---        | ---      | ---         | ---      | ---    |
| SSB-1  | 06/25/97   | 1              | N           | ---            | ---     | ---    | ---         | ---        | ND (0.05)            | 13.7            | ---    | 14.9   | ---    | ---         | ---        | 11.6   | ---        | ---      | ---         | ---      | 35.7   |
|  | 06/25/97   | 3              | N           | ---            | ---     | ---    | ---         | ---        | ND (0.05)            | 13.6            | ---    | 11     | ---    | ---         | ---        | 12     | ---        | ---      | ---         | ---      | 29.6   |
|  | 06/25/97   | 6              | N           | ---            | ---     | ---    | ---         | ---        | ND (0.05)            | 16.7            | ---    | 16.9   | ---    | ---         | ---        | 12.2   | ---        | ---      | ---         | ---      | 34.5   |
|  | 06/25/97   | 10             | N           | ---            | ---     | 97.3   | ---         | ---        | ND (0.05)            | 16.5            | ---    | 8.2    | 1.3    | ---         | ND (0.2)   | 12.9   | ---        | ---      | ---         | 24.6     | 31.9   |
| SSB-6  | 06/30/97   | 1              | N           | ---            | ---     | ---    | ---         | ---        | ND (0.05)            | 13.7            | ---    | 8.6    | ---    | ---         | ---        | 8.9    | ---        | ---      | ---         | ---      | 29.1   |
|  | 06/30/97   | 3              | N           | ---            | ---     | ---    | ---         | ---        | ND (0.05)            | 27.5            | ---    | 6.6    | ---    | ---         | ---        | 8.2    | ---        | ---      | ---         | ---      | 24.8   |
|  | 06/30/97   | 6              | N           | ---            | ---     | ---    | ---         | ---        | 0.06                 | 467             | ---    | 33.8   | ---    | ---         | ---        | 5.5    | ---        | ---      | ---         | ---      | 132    |
|  | 06/30/97   | 10             | N           | ---            | ---     | 100    | ---         | ---        | ND (0.05)            | 14.8            | ---    | 9.6    | 3.1    | ---         | 0.79       | 10.3   | ---        | ---      | ---         | 22.7     | 33.4   |

TABLE B-2a  
Sample Results: Metals in Soil  
AOC 1 – Area around Former Percolation Bed  
*Soil Engineering Evaluation/Cost Analysis*  
*PG&E Topock Compressor Station, Needles, California*

|  |          |                |             | Metals (mg/kg) |         |        |           |         |                      |                 |        |        |        |         |            |        |          |        |          |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|-----------|---------|----------------------|-----------------|--------|--------|--------|---------|------------|--------|----------|--------|----------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672     | 1.1     | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125  | 1.37       | 27.3   | 1.47     | 5.15   | 0.78     | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160       | 71      | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11      | 390        | 1,500  | 390      | 390    | 0.78     | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15        | 5.2     | NE                   | 36,000          | NE     | NE     | 80     | 1       | NE         | 490    | NE       | 390    | NE       | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3      | 0.0151  | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125  | 2.25       | 0.607  | 0.177    | 5.15   | 2.32     | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672     | 1.1     | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE      | 1.37       | 27.3   | 1.47     | NE     | NE       | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium | Cadmium | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury | Molybdenum | Nickel | Selenium | Silver | Thallium | Vanadium | Zinc   |
| SSB-7  | 06/30/97 | 1              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.05)            | 19.8            | ---    | 7.7    | ---    | ---     | ---        | 8.4    | ---      | ---    | ---      | ---      | 28.1   |
|  | 06/30/97 | 3              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.05)            | 24.9            | ---    | 6.5    | ---    | ---     | ---        | 7      | ---      | ---    | ---      | ---      | 29.4   |
|  | 06/30/97 | 6              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.05)            | 8.6             | ---    | 14.7   | ---    | ---     | ---        | 6.3    | ---      | ---    | ---      | ---      | 23     |
|  | 06/30/97 | 10             | N           | ---            | ---     | 77.5   | ---       | ---     | ND (0.05)            | 8.1             | ---    | 5.8    | 1.8    | ---     | ND (0.2)   | 6.5    | ---      | ---    | ---      | 16.2     | 23.4   |
| SSB-8  | 07/10/97 | 1              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.05)            | 53.1            | ---    | 15.1   | ---    | ---     | ---        | 15.3   | ---      | ---    | ---      | ---      | 38.3   |
|  | 07/10/97 | 3              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.05)            | 13.6            | ---    | 14.1   | ---    | ---     | ---        | 10.6   | ---      | ---    | ---      | ---      | 35.3   |
|  | 07/10/97 | 6              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.05)            | 15.3            | ---    | 7.3    | ---    | ---     | ---        | 10     | ---      | ---    | ---      | ---      | 33.5   |
|  | 07/10/97 | 10             | N           | ---            | ---     | 43.9   | ---       | ---     | ND (0.05)            | 17.1            | ---    | 10.7   | 2.8    | ---     | 0.071 J    | 13.9   | ---      | ---    | ---      | 26.8     | 35.8   |
|  | 07/10/97 | 10             | FD          | ---            | ---     | ---    | ---       | ---     | ND (0.05)            | 13.7            | ---    | 8      | ---    | ---     | ---        | 11.1   | ---      | ---    | ---      | ---      | 30     |
| SSB-9  | 07/10/97 | 1              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.05)            | 17.3            | ---    | 8.6    | ---    | ---     | ---        | 10.1   | ---      | ---    | ---      | ---      | 35.5   |
|  | 07/10/97 | 3              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.05)            | 11              | ---    | 6.1    | ---    | ---     | ---        | 7      | ---      | ---    | ---      | ---      | 31.8   |
|  | 07/10/97 | 6              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.05)            | 9.6             | ---    | 6.4    | ---    | ---     | ---        | 7.8    | ---      | ---    | ---      | ---      | 25.3   |
|  | 07/10/97 | 10             | N           | ---            | ---     | 102    | ---       | ---     | ND (0.05)            | 15.7            | ---    | 7.7    | 3      | ---     | 0.096 J    | 11.4   | ---      | ---    | ---      | 25.7     | 33.1   |
| XMW-9  | 06/25/97 | 3              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.05)            | 18.4            | ---    | 12     | ---    | ---     | ---        | 9      | ---      | ---    | ---      | ---      | 25.8   |
|  | 06/25/97 | 10             | N           | ---            | ---     | 257    | ---       | ---     | ND (0.05)            | 45.7            | ---    | 19.7   | 5.7    | ---     | 0.075 J    | 35.2   | ---      | ---    | ---      | 44.5     | 44.2   |
|  | 06/25/97 | 10             | FD          | ---            | ---     | ---    | ---       | ---     | ND (0.05)            | 31.1            | ---    | 16.7   | ---    | ---     | ---        | 27     | ---      | ---    | ---      | ---      | 38.7   |
|  | 06/25/97 | 30             | N           | ---            | ---     | 88.1   | ---       | ---     | ND (0.05)            | 35.6            | ---    | 17.2   | 7.2    | ---     | 0.11 J     | 32.1   | ---      | ---    | ---      | 42.9     | 50.3   |
|  | 06/25/97 | 50             | N           | ---            | ---     | 57.4   | ---       | ---     | ND (0.05)            | 36.3            | ---    | 15.6   | 4.5    | ---     | ND (0.2)   | 28.5   | ---      | ---    | ---      | 37.7     | 54.2   |
|  | 06/25/97 | 70             | N           | ---            | ---     | 1,580  | ---       | ---     | ND (0.05)            | 6.7             | ---    | 170    | 6.1    | ---     | 1.8        | 7.4    | ---      | ---    | ---      | 19.7     | 54.6   |
| Category 2   |          |                |             |                |         |        |           |         |                      |                 |        |        |        |         |            |        |          |        |          |          |        |
| Spill04162006_Sam                                    | 04/26/06 | 0              | N           | 5              | 2.3     | 140    | 0.5       | 0.5     | ---                  | 35              | 5.3    | 10     | 18     | 0.14    | 2.7        | 15     | 1        | 0.5    | 5        | 24       | 78     |
| Spill04162006_Sam                                    | 04/26/06 | 0              | N           | 10             | 4.6     | 210    | 1         | 1       | ---                  | 20              | 7      | 11     | 6.2    | 0.16    | 5          | 15     | 1        | 1      | 10       | 34       | 42     |
| Category 3   |          |                |             |                |         |        |           |         |                      |                 |        |        |        |         |            |        |          |        |          |          |        |
| DS-1   | 06/24/88 | 1 - 3          | N           | ---            | ---     | ---    | ---       | ---     | 6.8                  | 80              | ---    | ---    | ---    | ---     | ---        | ---    | ---      | ---    | ---      | ---      | ---    |
| DS-2   | 06/24/88 | 0 - 3          | N           | ---            | ---     | ---    | ---       | ---     | 0.7                  | 43              | ---    | ---    | ---    | ---     | ---        | ---    | ---      | ---    | ---      | ---      | ---    |
| DS-3   | 06/24/88 | 0 - 3          | N           | ---            | ---     | ---    | ---       | ---     | ND (0.5)             | 25              | ---    | ---    | ---    | ---     | ---        | ---    | ---      | ---    | ---      | ---      | ---    |
| DS-4   | 06/24/88 | 0 - 3          | N           | ---            | ---     | ---    | ---       | ---     | ND (0.5)             | 28              | ---    | ---    | ---    | ---     | ---        | ---    | ---      | ---    | ---      | ---      | ---    |

Notes:

Category 1: Validated data suitable for all uses, including risk assessment and remedial action decisions.  
Category 2: Validated data suitable for use in characterization of the chemicals of potential concern at the facility and to help define the nature and extent of contamination.  
Category 3: Validated data suitable only for use in qualitative characterization of the nature and extent of contamination.  
Results greater than or equal to the interim screening level are circled; however, if the interim screening level is equal to the background value, only results greater than the interim screening level are circled.

|         |   |
|---------|---|
| ‡       | This location is in an area where soil is transitioning into sediment.      |
| Δ       | sediment sample   |
| *       | Reporting limits greater than or equal to the interim screening level.      |
| ---     | not analyzed  |
| ft bgs  | feet below ground surface   |
| mg/kg   | milligrams per kilogram   |
| DTSC    | California Department of Toxic Substances Control                           |
| DTSC-SL | DTSC Screening Levels   |
| FD      | field duplicate   |
| J       | concentration or reporting limit estimated by laboratory or data validation |
| N       | primary sample  |
| ND      | not detected at the listed reporting limit                                  |
| NE      | not established   |
| USEPA   | United States Environmental Protection Agency                               |

- 1 Interim screening level is background value. If background value is not available then the interim screening value is the lower of the Ecological Comparison Value , residential DTSC-SL, or USEPA residential regional screening value.
- 2 United States Environmental Protection Agency (USEPA). 2017. Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites. November.
- 3 California Department of Toxic Substances Control (DTSC). 2018. Human Health Risk Assessment (HHRA) Note Number 3. January.
- 4 ARCADIS. 2008. "Technical Memorandum 3: Ecological Comparison Values for Metals and Polycyclic Aromatic Hydrocarbons in Soil." May 28.
- 5 CH2M HILL. 2009. "Final Soil Background Technical Memorandum at Pacific Gas and Electric Company Topock Compressor Station, Needles, California." May.

TABLE B-2b  
Sample Results: Dioxins and Furans  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |          |           |           |           |             |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|----------|-----------|-----------|-----------|-------------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE       | NE        | 16        | 50        | 5.58        |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE       | NE        | NE        | 4.8       | NE          |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | 50        | NE          |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | 16        | NE          |
| Background <sup>5</sup> :                            |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | 5.98      | 5.58        |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD     | OCDF      | TEQ Avian | TEQ Human | TEQ Mammals |
| Category 1   |          |                |             |                       |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |          |           |           |           |             |
| AOC1-BCW6  | 08/22/08 | 0 - 0.5        | N           | 2,100 J               | 210 J               | ND (8.4) J          | 14 J              | 14 J              | 75 J              | 14 J              | 25 J              | ND (5.5) J        | ND (5.3) J*     | ND (4) J        | ND (350) J        | ND (5.5) J      | ND (0.31) J  | ND (2) J     | 16,000 J | 510 J     | 37        | 64        | 64          |
|  | 08/22/08 | 2 - 3          | N           | 570 J                 | 85 J                | ND (6.7) J          | 3.1 J             | ND (2) J          | ND (0.79) J       | ND (5.2) J        | 7.9 J             | ND (2.3) J        | ND (0.37) J     | ND (1.5) J      | ND (2.5) J        | ND (1.5) J      | ND (0.1) J   | ND (0.2) J   | 8,000 J  | 200 J     | 5         | 11        | 11          |
| AOC1-1   | 01/23/16 | 0 - 0.5        | N           | 5,600 J               | 410 J               | 31 J                | 43 J              | 44 J              | 180 J             | 20 J              | 100 J             | ND (8) J          | 23 J            | 6.4 J           | ND (2,900) J      | 13 J            | 1.1 J        | ND (0.18) J  | 87,000 J | 700 J     | 220       | 300       | 300         |
|  | 01/23/16 | 2 - 3          | N           | 3,700 J               | 370 J               | 28 J                | 20 J              | 23 J              | 120 J             | 13 J              | 49 J              | 5.7 J             | 11 J            | 3.8 J           | ND (1,900) J      | 7.1 J           | ND (0.12) J  | ND (1.2) J   | 66,000 J | 810 J     | 140       | 190       | 190         |
| AOC1-2   | 01/23/16 | 0 - 0.5        | N           | 41                    | 4.2 J               | ND (0.68)           | ND (0.66)         | ND (0.41)         | 1.5 J             | ND (0.45)         | 1.1 J             | ND (0.23)         | ND (1.4)        | ND (0.4)        | ND (5.3)          | ND (0.16)       | ND (0.08)    | ND (0.14)    | 300      | 8.1 J     | 1.5       | 1.9       | 1.9         |
|  | 01/23/16 | 2 - 3          | N           | ND (1.3)              | ND (0.32)           | ND (0.093)          | ND (0.17)         | ND (0.11)         | ND (0.15)         | ND (0.095)        | ND (0.15)         | 0.29 J            | ND (0.064)      | ND (0.057)      | ND (0.11)         | ND (0.057)      | ND (0.046)   | ND (0.053)   | 21 J     | ND (0.83) | 0.17      | 0.15      | 0.15        |
| AOC1-3   | 01/25/16 | 0 - 0.5        | N           | 6,200 J               | 670 J               | ND (35)             | 62 J              | ND (40)           | 230 J             | ND (35)           | 140 J             | ND (47)           | 37 J            | ND (3.4)        | ND (3,100)        | 15 J            | ND (0.47)    | ND (3.4)     | 45,000 J | 730 J     | 250       | 330       | 330         |
|  | 01/25/16 | 2 - 3          | N           | 3,600                 | 300                 | ND (15)             | 31                | ND (18)           | 120               | 26                | 76                | ND (3.3)          | 15              | ND (10)         | ND (1,700)        | ND (11)         | ND (0.33)    | ND (0.95)    | 33,000 J | 480       | 130       | 180       | 180         |
|  | 01/25/16 | 5 - 6          | N           | 13 J                  | 1.3 J               | ND (0.32) J         | ND (0.25) J       | ND (0.39) J       | ND (0.23) J       | ND (0.18) J       | ND (0.23) J       | ND (0.29) J       | ND (0.27) J     | ND (0.21) J     | ND (5.4) J        | ND (0.22) J     | ND (0.14) J  | ND (0.073) J | 200 J    | ND (3.6)  | 0.74      | 0.8       | 0.8         |
|  | 01/25/16 | 9 - 10         | N           | 5.2 J                 | ND (0.82) J         | ND (0.36) J         | ND (0.19) J       | ND (0.13) J       | ND (0.098) J      | ND (0.24) J       | 0.5 J             | ND (0.15) J       | ND (0.29) J     | ND (0.1) J      | ND (1.3) J        | ND (0.11) J     | ND (0.22) J  | ND (0.2) J   | 72 J     | ND (2.1)  | 0.58      | 0.52      | 0.52        |
| AOC1-4   | 01/23/16 | 0 - 0.5        | N           | 24 J                  | ND (2.4) J          | ND (0.6) J          | ND (0.9) J        | ND (0.59) J       | ND (0.46) J       | ND (0.55) J       | ND (0.47) J       | ND (0.71) J       | ND (0.27) J     | ND (0.14) J     | ND (3.8) J        | ND (0.15) J     | ND (0.1) J   | ND (0.15) J  | 240 J    | ND (5)    | 0.74      | 0.92      | 0.92        |
|  | 01/23/16 | 2 - 3          | N           | 18 J                  | 2 J                 | ND (2.4) J          | ND (0.23) J       | ND (0.31) J       | ND (0.22) J       | ND (0.29) J       | ND (0.22) J       | ND (0.37) J       | ND (0.16) J     | ND (0.091) J    | ND (2.7) J        | ND (0.096) J    | ND (0.081) J | ND (0.084) J | 310 J    | ND (5.6)  | 0.5       | 0.66      | 0.66        |
| AOC1-5   | 01/09/17 | 0 - 0.5        | N           | 120                   | ND (9.5)            | ND (1.4)            | ND (0.37)         | ND (0.44)         | ND (0.47)         | ND (0.58)         | ND (1.6)          | ND (0.25)         | ND (0.47)       | ND (0.11)       | ND (6)            | ND (0.12)       | ND (0.087)   | ND (0.098)   | 1,300    | 28        | 1.2       | 2.4       | 2.4         |
|  | 01/09/17 | 2 - 3          | N           | 6.5 J                 | ND (0.2)            | ND (0.24)           | ND (0.11)         | ND (0.053)        | ND (0.17)         | ND (0.048)        | ND (0.16)         | ND (0.063)        | ND (0.07)       | ND (0.064)      | ND (0.2)          | ND (0.067)      | ND (0.071)   | ND (0.1)     | ND (44)  | ND (1.3)  | 0.2       | 0.2       | 0.2         |
|  | 01/09/17 | 5 - 6          | N           | 280                   | 45                  | ND (2.5)            | 1.3 J             | ND (1.2)          | ND (0.22)         | ND (1.7)          | ND (2.2)          | ND (0.52)         | ND (0.49)       | ND (0.24)       | ND (53)           | ND (0.25)       | ND (0.077)   | ND (0.12)    | 4,200    | 280       | 4.7       | 8         | 8           |
|  | 01/09/17 | 9 - 10         | N           | 8.1 J                 | ND (1.6)            | ND (1.1)            | ND (0.29)         | ND (0.14)         | ND (0.19)         | ND (0.13)         | ND (1.1)          | ND (0.56)         | ND (0.14)       | ND (0.11)       | 0.77 J            | ND (0.11)       | ND (0.071)   | ND (0.27)    | 83       | ND (4.4)  | 0.51      | 0.45      | 0.45        |
|  | 01/09/17 | 14 - 15        | N           | 1.8 J                 | ND (0.13)           | ND (0.39)           | ND (0.3)          | ND (0.067)        | ND (0.09)         | ND (0.061)        | 0.27 J            | ND (0.079)        | ND (0.064)      | ND (0.043)      | ND (0.069)        | ND (0.046)      | ND (0.12)    | ND (0.18)    | ND (9.2) | ND (0.73) | 0.26      | 0.19      | 0.19        |
| AOC1-6   | 01/09/17 | 0 - 0.5        | N           | 440                   | 42                  | ND (4.5)            | ND (1.6)          | ND (1.3)          | 12 J              | ND (2.8)          | 5.1 J             | ND (1.6)          | ND (1)          | ND (0.52)       | ND (110)          | ND (0.55)       | ND (0.18)    | ND (0.25)    | 4,500    | 94        | 8.8       | 14        | 14          |
|  | 01/09/17 | 2 - 3          | N           | 77                    | ND (10)             | ND (0.72)           | ND (0.49)         | ND (0.51)         | 2.4 J             | ND (0.46)         | ND (0.79)         | ND (0.6)          | ND (0.19)       | ND (0.39)       | ND (20)           | ND (0.41)       | ND (0.092)   | ND (0.13)    | 750      | 26        | 1.8       | 2.7       | 2.7         |
|  | 01/09/17 | 5 - 6          | N           | ND (8.9)              | ND (1.1)            | ND (0.24)           | ND (0.12)         | ND (0.13)         | ND (0.14)         | ND (0.32)         | ND (0.28)         | ND (0.15)         | ND (0.06)       | ND (0.051)      | 1.2 J             | ND (0.053)      | ND (0.044)   | ND (0.039)   | ND (75)  | ND (1.5)  | 0.28      | 0.3       | 0.3         |
|  | 01/09/17 | 9 - 10         | N           | ND (3.5)              | ND (0.37)           | ND (0.38)           | ND (0.052)        | ND (0.092)        | ND (0.051)        | ND (0.084)        | ND (0.05)         | ND (0.11)         | ND (0.098)      | ND (0.11)       | ND (0.095)        | ND (0.11)       | ND (0.069)   | ND (0.063)   | ND (41)  | ND (1.5)  | ND (0.21) | ND (0.16) | ND (0.16)   |
|  | 01/09/17 | 14 - 15        | N           | 3.5 J                 | ND (0.34)           | ND (0.13)           | ND (0.11)         | ND (0.14)         | ND (0.11)         | ND (0.097)        | ND (0.11)         | ND (0.13)         | ND (0.21)       | ND (0.047)      | ND (0.31)         | ND (0.049)      | ND (0.067)   | ND (0.048)   | ND (30)  | ND (1.6)  | 0.24      | 0.24      | 0.24        |
| AOC16-5  | 02/20/17 | 0 - 0.5        | N           | 820 J                 | 54                  | 5.9 J               | 3.8 J             | 9 J               | 26                | ND (3.1)          | 8.4 J             | ND (1.6)          | ND (2.4)        | ND (0.23)       | ND (370)          | ND (2.8)        | ND (0.095)   | ND (0.16)    | 6,800 J  | 100       | 26        | 36        | 36          |
|  | 02/20/17 | 0 - 0.5        | FD          | 440 J                 | 28                  | 3.1 J               | 2.1 J             | 5.3 J             | 15                | ND (4.1)          | 4.9 J             | 1.3 J             | ND (1.3)        | ND (0.27)       | ND (260)          | ND (2.1)        | ND (0.075)   | ND (0.68)    | 3,700 J  | 45        | 18        | 23        | 23          |
|  | 02/20/17 | 2 - 3          | N           | ND (7.9)              | ND (0.57)           | ND (0.18)           | ND (0.069)        | ND (0.081)        | ND (0.34)         | ND (0.078)        | ND (0.11)         | ND (0.094)        | ND (0.065)      | ND (0.047)      | ND (5.9)          | ND (0.049)      | ND (0.031)   | ND (0.036)   | ND (66)  | ND (0.91) | ND (0.42) | ND (0.44) | ND (0.44)   |
| AOC1-7   | 01/09/17 | 0 - 0.5        | N           | 480                   | 38 J                | ND (0.85)           | 1.4 J             | 1.8 J             | 7.7 J             | ND (1.8)          | ND (0.29)         | ND (0.8)          | ND (0.8)        | ND (0.13)       | ND (61)           | ND (0.65)       | ND (0.33)    | 0.38 J       | 5,100    | 130 J     | 6.2       | 12        | 12          |
|  | 01/09/17 | 2 - 3          | N           | 190 J                 | 19                  | ND (1.3)            | ND (0.8)          | ND (1.1)          | 5 J               | ND (0.95)         | ND (1.8)          | ND (0.43)         | ND (0.28)       | ND (0.33)       | ND (41)           | ND (0.35)       | ND (0.075)   | ND (0.11)    | 2,200 J  | 69        | 3.4       | 5.8       | 5.8         |
|  | 01/09/17 | 2 - 3          | FD          | 97 J                  | 9.8 J               | ND (0.79)           | ND (0.64)         | ND (0.45)         | 2.8 J             | ND (0.41)         | 1.6 J             | ND (0.53)         | ND (0.57)       | ND (0.14)       | ND (30)           | ND (0.14)       | ND (0.073)   | ND (0.12)    | 980 J    | 24 J      | 2.5       | 3.8       | 3.8         |
|  | 01/09/17 | 5 - 6          | N           | 4 J                   | ND (1.3)            | 1.2 J               | ND (0.32)         | ND (0.11)         | ND (0.061)        | ND (0.099)        | ND (0.63)         | ND (0.41)         | ND (0.36)       | ND (0.2)        | 0.84 J            | ND (0.16)       | ND (0.068)   | ND (0.24)    | 51       | 2.5 J     | 0.61      | 0.49      | 0.49        |
|  | 01/09/17 | 9 - 10         | N           | ND (0.27)             | ND (0.42)           | ND (0.59)           | ND (0.19)         | ND (0.28)         | ND (0.083)        | ND (0.07)         | ND (0.24)         | ND (0.53)         | ND (0.048)      | ND (0.1)        | ND (0.079)        | ND (0.056)      | ND (0.055)   | ND (0.077)   | 17 J     | ND (1.2)  | 0.2       | 0.15      | 0.15        |
|  | 01/09/17 | 14 - 15        | N           | 1.1 J                 | ND (0.11)           | ND (0.33)           | ND (0.068)        | ND (0.032)        | ND (0.067)        | ND (0.03)         | ND (0.066)        | ND (0.038)        | ND (0.079)      | ND (0.059)      | ND (0.26)         | ND (0.062)      | ND (0.096)   | ND (0.12)    | 12 J     | ND (0.66) | 0.21      | 0.15      | 0.15        |



Sample Results: Dioxins and Furans  
AOC 1 – Area around Former Percolation Bed  
*Soil Engineering Evaluation/Cost Analysis*  
*PG&E Topock Compressor Station, Needles, California*

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Print Date: 5/7/2018

TABLE B-2b  
Sample Results: Dioxins and Furans  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |          |             |           |            |             |    |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|----------|-------------|-----------|------------|-------------|----|
| Interim Screening Level <sup>1</sup> :   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE       | NE          | 16        | 50         | 5.58        |    |
| Residential Regional Screening Levels <sup>2</sup> :<br>Residential DTSC-SL <sup>3</sup> :<br>Ecological Comparison Values <sup>4</sup> :<br>Background <sup>5</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE       | NE          | NE        | 4.8        | NE          |    |
|  |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE          | NE        | NE         | NE          | NE |
|  |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE          | NE        | NE         | NE          | NE |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD     | OCDF        | TEQ Avian | TEQ Human  | TEQ Mammals |    |
| AOC1-BCW20   | 02/05/16 | 0 - 0.5        | N           | 160                   | ND (0.2)            | 1.2 J               | 1.3 J             | ND (0.24)         | 6.1 J             | ND (3.1)          | 2.7 J             | ND (0.28)         | ND (0.26)       | ND (0.32)       | ND (42)           | ND (0.34)       | ND (0.068)   | ND (0.064)   | 1,600    | 35          | 3.4       | 5.6        | 5.6         |    |
|  | 02/05/16 | 2 - 3          | N           | 4.4 J                 | ND (0.13)           | ND (0.16)           | ND (0.17)         | ND (0.056)        | ND (0.039)        | ND (0.052)        | ND (0.037)        | ND (0.065)        | ND (0.074)      | ND (0.086)      | ND (1.5)          | ND (0.1)        | ND (0.041)   | ND (0.11)    | ND (21)  | ND (0.41)   | 0.26      | 0.22       | 0.22        |    |
|  | 02/05/16 | 5 - 6          | N           | ND (3.1)              | ND (0.088)          | ND (0.068)          | ND (0.17)         | ND (0.075)        | ND (0.069)        | ND (0.069)        | ND (0.14)         | ND (0.087)        | ND (0.054)      | ND (0.1)        | ND (1.1)          | ND (0.11)       | ND (0.06)    | 0.15 J       | ND (13)  | 0.31 J      | 0.35      | 0.19       | 0.19        |    |
|  | 02/05/16 | 9 - 10         | N           | ND (0.61)             | ND (0.084)          | ND (0.038)          | ND (0.04)         | ND (0.064)        | ND (0.05)         | ND (0.059)        | ND (0.047)        | ND (0.075)        | ND (0.097)      | ND (0.085)      | ND (0.2)          | ND (0.091)      | ND (0.041)   | ND (0.14)    | ND (2)   | ND (0.031)  | ND (0.21) | ND (0.12)  | ND (0.12)   |    |
| AOC1-BCW21   | 02/05/16 | 0 - 0.5        | N           | 2,000                 | ND (9.8)            | ND (12)             | 5.2 J             | 14                | 44                | ND (23)           | 16                | 3.8 J             | 4.6 J           | ND (0.2)        | 5.5 J             | 3.5 J           | ND (0.29)    | ND (0.48)    | 20,000   | 440         | 18        | 42         | 42          |    |
|  | 02/05/16 | 2 - 3          | N           | 12 J                  | ND (0.086)          | ND (0.11)           | ND (0.13)         | ND (0.12)         | ND (0.13)         | ND (0.11)         | ND (0.12)         | ND (0.14)         | ND (0.12)       | ND (0.075)      | ND (0.12)         | ND (0.081)      | ND (0.053)   | ND (0.14)    | 110      | 3.1 J       | 0.26      | 0.31       | 0.31        |    |
|  | 02/05/16 | 5 - 6          | N           | ND (1)                | ND (0.04)           | ND (0.05)           | ND (0.047)        | ND (0.067)        | ND (0.046)        | ND (0.057)        | ND (0.044)        | ND (0.078)        | ND (0.073)      | ND (0.08)       | ND (0.43)         | ND (0.086)      | ND (0.047)   | ND (0.1)     | ND (5.6) | ND (0.17)   | ND (0.19) | ND (0.12)  | ND (0.12)   |    |
|  | 02/05/16 | 9 - 10         | N           | ND (0.73)             | ND (0.069)          | ND (0.087)          | ND (0.03)         | ND (0.05)         | ND (0.062)        | ND (0.12)         | ND (0.034)        | ND (0.058)        | ND (0.074)      | ND (0.052)      | ND (0.39)         | ND (0.056)      | ND (0.055)   | ND (0.04)    | ND (3.4) | ND (0.19)   | ND (0.15) | ND (0.12)  | ND (0.12)   |    |
| AOC1-BCW22   | 02/05/16 | 0 - 0.5        | N           | 190 J                 | 22 J                | 2.3 J               | ND (0.63) J       | ND (1.2) J        | 5.5 J             | ND (0.99) J       | 2.1 J             | ND (0.77) J       | ND (0.87) J     | ND (0.4) J      | ND (49) J         | ND (0.88) J     | ND (0.15) J  | ND (0.097) J | 2,500 J  | 63 J        | 4.6       | 7          | 7           |    |
| AOC1-BCW23   | 02/05/16 | 0 - 0.5        | N           | 540                   | 63                  | 5.2 J               | ND (4)            | ND (3.4)          | 16                | ND (4.5)          | ND (4.9)          | ND (1.5)          | ND (2.3)        | 5.7 J           | ND (170)          | ND (2.3)        | ND (0.34)    | 3.1 J        | 5,900    | 180         | 17        | 21         | 21          |    |
|  | 02/05/16 | 2 - 3          | N           | 16                    | 1.9 J               | ND (0.57)           | ND (0.22)         | ND (0.13)         | ND (0.5)          | ND (0.11)         | ND (0.5)          | 0.67 J            | ND (0.16)       | ND (0.23)       | ND (1.7)          | ND (0.23)       | ND (0.16)    | ND (0.17)    | 120      | 2.3 J       | 0.62      | 0.65       | 0.65        |    |
| AOC1-BCW24   | 02/05/16 | 0 - 0.5        | N           | 830                   | 58                  | ND (15)             | 4.9 J             | ND (4.7)          | 20                | ND (4.1)          | 12 J              | ND (5.3)          | 1.7 J           | ND (2)          | ND (160)          | ND (2)          | ND (0.15)    | ND (0.93)    | 10,000   | 150         | 16        | 27         | 27          |    |
|  | 02/05/16 | 2 - 3          | N           | 510                   | 110                 | ND (28)             | ND (1.5)          | ND (8.3)          | 23                | 5.4 J             | ND (5.7)          | ND (1.7)          | 1.5 J           | ND (3.5)        | ND (250)          | ND (3.5)        | ND (0.068)   | ND (0.2)     | 5,500    | 310         | 20        | 26         | 26          |    |
|  | 02/05/16 | 5 - 6          | N           | ND (1.6) J            | ND (0.079) J        | ND (0.12) J         | ND (0.11) J       | ND (0.061) J      | ND (0.1) J        | ND (0.057) J      | ND (0.1) J        | ND (0.073) J      | ND (0.11) J     | ND (0.073) J    | ND (0.55) J       | ND (0.078) J    | ND (0.086) J | ND (0.046) J | ND (8.3) | ND (0.13) J | ND (0.21) | ND (0.18)  | ND (0.18)   |    |
| AOC1-BCW25   | 02/05/16 | 0 - 0.5        | N           | 1,700                 | 110 J               | 12 J                | 7.8 J             | ND (1.7)          | 50 J              | ND (29)           | 16                | ND (2)            | 4.7 J           | ND (1)          | ND (400)          | ND (1.1)        | ND (0.16)    | 1.4 J        | 17,000   | 620 J       | 36        | 58         | 58          |    |
|  | 02/05/16 | 2 - 3          | N           | 38                    | 3.4 J               | ND (0.32)           | 1.4 J             | ND (0.16)         | ND (0.3)          | ND (1.6)          | ND (0.56)         | ND (0.18)         | ND (0.2)        | ND (0.15)       | ND (17)           | ND (0.16)       | ND (0.056)   | ND (0.12)    | 510      | 17 J        | 1.4       | 1.9        | 1.9         |    |
|  | 02/05/16 | 5 - 6          | N           | 7.2 J                 | ND (0.69)           | ND (0.33)           | ND (0.13)         | ND (0.18)         | ND (0.13)         | ND (0.17)         | ND (0.12)         | ND (0.21)         | ND (0.084)      | ND (0.78)       | ND (4.5)          | ND (0.84)       | ND (0.03)    | ND (0.26)    | 73       | 6.6 J       | 0.93      | 0.58       | 0.58        |    |
|  | 02/05/16 | 9 - 10         | N           | ND (0.36)             | ND (0.032)          | ND (0.04)           | ND (0.03)         | ND (0.057)        | ND (0.03)         | ND (0.053)        | ND (0.055)        | ND (0.066)        | ND (0.042)      | ND (0.036)      | ND (0.15)         | ND (0.039)      | ND (0.023)   | ND (0.076)   | ND (1.8) | ND (0.037)  | ND (0.11) | ND (0.067) | ND (0.067)  |    |
| AOC1-BCW26   | 02/04/16 | 0 - 0.5        | N           | 4,100                 | 250                 | ND (18)             | 16                | 18                | 95                | 15                | 30                | ND (13)           | ND (1.7)        | ND (3.1)        | ND (540)          | 7.8 J           | ND (0.5)     | 2.6 J        | 39,000   | 710         | 58        | 100        | 100         |    |
|  | 02/04/16 | 2 - 3          | N           | ND (19)               | 3 J                 | ND (1.7)            | ND (0.76)         | ND (0.21)         | ND (1.2)          | ND (0.4)          | ND (1.7)          | ND (0.76)         | ND (0.37)       | 0.26 J          | ND (1.4)          | ND (0.24)       | ND (0.083)   | ND (0.2)     | ND (120) | ND (3.4)    | 0.78      | 0.75       | 0.75        |    |
| AOC1-BCW27   | 02/05/16 | 0 - 0.5        | N           | 91                    | ND (0.57)           | ND (0.73)           | ND (0.68)         | ND (0.14)         | 3.5 J             | ND (2.9)          | 1.3 J             | ND (0.25)         | ND (0.82)       | ND (0.18)       | ND (25)           | ND (2)          | ND (0.19)    | 0.7 J        | 660      | 21 J        | 4         | 3.9        | 3.9         |    |
|  | 02/05/16 | 2 - 3          | N           | ND (0.2)              | ND (0.095)          | ND (0.035)          | ND (0.055)        | ND (0.041)        | ND (0.054)        | ND (0.038)        | ND (0.052)        | ND (0.048)        | ND (0.071)      | ND (0.084)      | ND (0.066)        | ND (0.091)      | ND (0.052)   | 0.24 J       | ND (1.2) | ND (0.095)  | 0.37      | 0.12       | 0.12        |    |
|  | 02/05/16 | 5 - 6          | N           | 0.6 J                 | ND (0.068)          | ND (0.086)          | ND (0.055)        | ND (0.058)        | ND (0.055)        | ND (0.15)         | ND (0.052)        | ND (0.068)        | ND (0.089)      | ND (0.058)      | ND (0.34)         | ND (0.063)      | ND (0.04)    | ND (0.069)   | 4.4 J    | ND (0.56)   | 0.17      | 0.13       | 0.13        |    |
|  | 02/05/16 | 9 - 10         | N           | 0.27 J                | ND (0.028)          | ND (0.035)          | ND (0.08)         | ND (0.022)        | ND (0.029)        | ND (0.02)         | ND (0.027)        | ND (0.026)        | ND (0.037)      | ND (0.032)      | ND (0.29)         | ND (0.035)      | ND (0.053)   | ND (0.19)    | ND (1.5) | ND (0.076)  | 0.18      | 0.088      | 0.088       |    |
| AOC1-BCW28   | 02/05/16 | 0 - 0.5        | N           | 5,700                 | ND (28)             | ND (35)             | 23                | ND (74)           | 180               | ND (68)           | 53                | ND (86)           | 14              | 8.9 J           | ND (1,000)        | 15              | ND (1)       | 2.7 J        | 47,000   | 1,500       | 110       | 180        | 180         |    |
|  | 02/05/16 | 2 - 3          | N           | 16                    | ND (0.16)           | ND (0.2)            | ND (0.19)         | ND (0.21)         | ND (0.19)         | ND (1.2)          | ND (0.27)         | ND (0.24)         | ND (0.094)      | ND (0.13)       | ND (8.2)          | ND (0.14)       | ND (0.056)   | ND (0.11)    | 130      | 4.7 J       | 0.75      | 0.83       | 0.83        |    |
|  | 02/05/16 | 5 - 6          | N           | 8 J                   | ND (0.71)           | ND (0.14)           | ND (0.2)          | ND (0.19)         | ND (0.19)         | ND (0.33)         | ND (0.18)         | ND (0.22)         | ND (0.097)      | ND (0.12)       | ND (4.8)          | ND (0.13)       | ND (0.19)    | 0.23 J       | 82       | 4 J         | 0.76      | 0.6        | 0.6         |    |
|  | 02/05/16 | 9 - 10         | N           | ND (0.65)             | ND (0.076)          | ND (0.097)          | ND (0.034)        | ND (0.044)        | ND (0.033)        | ND (0.041)        | ND (0.032)        | ND (0.051)        | ND (0.072)      | ND (0.064)      | ND (0.15)         | ND (0.069)      | ND (0.066)   | ND (0.15)    | ND (1.8) | ND (0.23)   | ND (0.2)  | ND (0.11)  | ND (0.11)   |    |
| AOC1-BCW29   | 02/04/16 | 0 - 0.5        | N           | 2,900                 | 280                 | ND (5)              | ND (13)           | ND (12)           | 68                | ND (12)           | ND (12)           | ND (14)           | ND (2.4)        | 10 J            | ND (600)          | ND (4.1)        | ND (0.39)    | ND (1.2)     | 30,000   | 1,300       | 47        | 84         | 84          |    |
|  | 02/04/16 | 2 - 3          | N           | 2.8 J                 | ND (0.12)           | ND (0.14)           | 0.74 J            | ND (0.13)         | ND (0.14)         | ND (0.13)         | ND (0.13)         | ND (0.27)         | ND (0.095)      | ND (0.15)       | ND (2.5)          | ND (0.16)       | ND (0.084)   | ND (1.1)     | 24 J     | ND (0.8)    | 0.93      | 0.45       | 0.45        |    |
|  | 02/04/16 | 5 - 6          | N           | 2.7 J                 | 0.69 J              | ND (0.29)           | ND (0.2)          | 0.3 J             | ND (0.072)        | ND (0.36)         | ND (0.18)         | ND (0.26)         | ND (0.2)        | ND (0.14)       | ND (1)            | ND (0.15)       | ND (0.27)    | 1.2 J        | 29       | ND (1.1)    | 1.7       | 0.56       | 0.56        |    |
|  | 02/04/16 | 9 - 10         | N           | 17                    | ND (0.75)           | ND (0.11)           | ND (0.15)         | ND (0.072)        | ND (0.23)         | ND (0.14)         | ND (0.15)         | ND (0.084)        | ND (0.09)       | ND (0.092)      | ND (1.3)          | ND (0.17)       | ND (0.12)    | ND (0.61)    | 370      | 2.4 J       | 0.65      | 0.55       | 0.55        |    |

TABLE B-2b  
Sample Results: Dioxins and Furans  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |          |           |           |            |             |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|----------|-----------|-----------|------------|-------------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | 4.8               | NE              | NE           | NE           | NE       | NE        | NE        | NE         | NE          |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | 4.8               | NE              | NE           | NE           | NE       | NE        | NE        | NE         | NE          |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | NE         | NE          |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | NE         | NE          |
| Background <sup>5</sup> :                            |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | NE         | NE          |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD     | OCDF      | TEQ Avian | TEQ Human  | TEQ Mammals |
| AOC1-BCW30   | 02/04/16 | 0 - 0.5        | N           | 5,200                 | 460                 | 24                  | 22                | 34                | ND (5.8)          | 32                | 49                | ND (9.1)          | 12 J            | ND (8.8)        | ND (890)          | 13              | 0.5 J        | 7            | 14,000   | 980       | 100       | 140        | 140         |
|  | 02/04/16 | 2 - 3          | N           | ND (0.77)             | 2.4 J               | ND (0.22)           | ND (0.46)         | ND (0.63)         | ND (0.32)         | ND (0.49)         | ND (0.64)         | ND (0.93)         | 0.87 J          | ND (0.23)       | ND (7.8)          | ND (0.46)       | ND (1.1)     | 0.65 J       | 98       | 3.6 J     | 2.9       | 2.2        | 2.2         |
| AOC1-BCW31   | 02/20/17 | 0 - 0.5        | N           | 9.3 J                 | 1.1 J               | ND (0.13)           | ND (0.11)         | ND (0.19)         | 0.43 J            | ND (0.18)         | ND (0.33)         | ND (0.22)         | ND (0.11)       | ND (0.092)      | ND (3)            | ND (0.095)      | ND (0.11)    | ND (0.27)    | ND (88)  | ND (1.3)  | 0.53      | 0.5        | 0.5         |
|  | 02/20/17 | 2 - 3          | N           | ND (0.46)             | ND (0.049)          | ND (0.058)          | ND (0.039)        | ND (0.042)        | ND (0.04)         | ND (0.04)         | ND (0.053)        | ND (0.048)        | ND (0.054)      | ND (0.037)      | ND (0.21)         | ND (0.039)      | ND (0.03)    | ND (0.034)   | ND (7.4) | ND (0.16) | ND (0.1)  | ND (0.078) | ND (0.078)  |
| AOC1-BCW32   | 02/20/17 | 0 - 0.5        | N           | 20                    | 2.9 J               | 0.32 J              | ND (0.11)         | ND (0.12)         | 1.2 J             | ND (0.2)          | ND (0.43)         | ND (0.14)         | ND (0.064)      | 0.27 J          | 14                | ND (0.056)      | ND (0.035)   | ND (0.087)   | 190      | 5.5 J     | 1.7       | 1.9        | 1.9         |
|  | 02/20/17 | 2 - 3          | N           | ND (2.9)              | ND (0.38)           | ND (0.083)          | ND (0.076)        | ND (0.054)        | ND (0.076)        | ND (0.098)        | ND (0.12)         | ND (0.062)        | ND (0.06)       | ND (0.043)      | ND (0.58)         | ND (0.045)      | ND (0.035)   | ND (0.023)   | ND (40)  | 0.93 J    | 0.14      | 0.13       | 0.13        |
| AOC1-BCW7  | 02/05/16 | 0 - 0.5        | N           | 200                   | 16                  | 2.1 J               | 0.87 J            | 1.8 J             | 5.6 J             | ND (3.2)          | ND (2)            | 0.59 J            | ND (0.35)       | ND (0.19)       | ND (37)           | ND (0.39)       | 0.17 J       | 0.26 J       | 2,600    | 74        | 3.9       | 6.4        | 6.4         |
|  | 02/05/16 | 2 - 3          | N           | 100                   | 8.2 J               | 1.1 J               | 0.85 J            | 0.94 J            | 2.9 J             | ND (0.27)         | 1.2 J             | ND (0.26)         | ND (0.21)       | ND (0.24)       | ND (18)           | ND (0.26)       | ND (0.051)   | 0.19 J       | 1,100    | 32        | 2         | 3.1        | 3.1         |
|  | 02/05/16 | 2 - 3          | FD          | 90                    | ND (0.15)           | ND (0.68)           | 0.54 J            | ND (0.24)         | ND (2.5)          | ND (0.88)         | 1.3 J             | ND (0.28)         | ND (0.15)       | ND (0.12)       | ND (17)           | ND (0.13)       | ND (0.052)   | ND (0.074)   | 870      | 30        | 1.5       | 2.5        | 2.5         |
|  | 02/05/16 | 5 - 6          | N           | ND (2.7)              | ND (0.094)          | ND (0.12)           | 0.24 J            | ND (0.081)        | ND (0.074)        | ND (0.075)        | ND (0.071)        | ND (0.094)        | ND (0.095)      | ND (0.038)      | ND (0.28)         | ND (0.041)      | ND (0.068)   | ND (0.052)   | ND (23)  | ND (0.6)  | 0.18      | 0.17       | 0.17        |
|  | 02/05/16 | 9 - 10         | N           | 5 J                   | ND (0.36)           | ND (0.15)           | ND (0.075)        | ND (0.084)        | ND (0.074)        | ND (0.078)        | ND (0.07)         | ND (0.098)        | ND (0.085)      | ND (0.12)       | ND (1)            | ND (0.13)       | ND (0.05)    | ND (0.037)   | 54       | 1.5 J     | 0.24      | 0.23       | 0.23        |
| AOC1-BCW8  | 02/04/16 | 0 - 0.5        | N           | 730                   | 55                  | ND (2.8)            | ND (3.2)          | ND (4.9)          | 15                | ND (4.3)          | 5.9 J             | ND (5.6)          | ND (1.5)        | ND (0.73)       | ND (120)          | ND (0.63)       | ND (0.18)    | ND (0.66)    | 9,900    | 170       | 11        | 21         | 21          |
|  | 02/04/16 | 2 - 3          | N           | 1,400                 | 110                 | 7.6 J               | 6.9 J             | 6.4 J             | 30                | 6 J               | 14                | 2.5 J             | ND (1.8)        | ND (2.9)        | ND (180)          | ND (3.7)        | ND (0.33)    | 3 J          | 18,000   | 270       | 23        | 38         | 38          |
|  | 02/04/16 | 5 - 6          | N           | 240 J                 | 53 J                | 8.8 J               | ND (0.5) J        | ND (0.55) J       | 6.7 J             | ND (0.51) J       | ND (1.2) J        | ND (0.66) J       | ND (0.23) J     | ND (0.26) J     | ND (81) J         | ND (0.64) J     | ND (0.072) J | ND (0.08) J  | 2,600 J  | 170 J     | 5.9       | 9          | 9           |
| AOC1-BCW9  | 02/04/16 | 0 - 0.5        | N           | 920                   | 78                  | ND (6.7)            | 3.7 J             | ND (11)           | 22                | ND (9.7)          | 7.7 J             | ND (1.8)          | ND (0.23)       | ND (1.2)        | ND (220)          | ND (1.9)        | ND (0.13)    | 1.5 J        | 10,000   | 220       | 19        | 29         | 29          |
|  | 02/04/16 | 2 - 3          | N           | 17                    | ND (1.8)            | ND (0.19)           | ND (0.33)         | ND (0.41)         | ND (0.71)         | ND (0.36)         | ND (0.29)         | ND (0.47)         | ND (0.13)       | ND (0.15)       | ND (3.9)          | ND (0.15)       | ND (0.067)   | ND (0.096)   | 150      | 5.1 J     | 0.55      | 0.68       | 0.68        |
| AOC1-T1e   | 01/11/16 | 0 - 1          | N           | 670                   | 68                  | ND (4.3)            | 4 J               | ND (3)            | 15                | 4 J               | 8.9 J             | ND (3.5)          | 2.1 J           | ND (0.8)        | ND (84)           | ND (0.31)       | 0.23 J       | ND (0.12)    | 6,300    | 120       | 11        | 19         | 19          |
|  | 01/11/16 | 2 - 3          | N           | 29                    | ND (3)              | ND (0.52)           | ND (0.65)         | ND (0.85)         | ND (0.58)         | ND (0.72)         | ND (0.62)         | ND (31)           | ND (0.25)       | ND (0.4)        | 2.7 J             | ND (0.28)       | ND (0.13)    | ND (0.14)    | 190      | ND (2.2)  | 2.4       | 2.6        | 2.6         |
|  | 01/11/16 | 5 - 6          | N           | 4.5 J                 | ND (0.79)           | ND (0.14)           | ND (0.26)         | ND (0.18)         | ND (0.3)          | ND (0.16)         | ND (0.31)         | ND (0.21)         | ND (0.16)       | ND (0.095)      | ND (0.18)         | ND (0.074)      | ND (0.062)   | ND (0.1)     | 51       | ND (1.2)  | 0.28      | 0.27       | 0.27        |
|  | 01/11/16 | 9 - 10         | N           | 28                    | ND (3.6)            | ND (2)              | ND (0.38)         | ND (0.34)         | ND (0.34)         | ND (0.29)         | ND (0.8)          | ND (0.4)          | ND (0.16)       | ND (0.17)       | ND (3.6)          | ND (0.18)       | ND (0.12)    | ND (0.14)    | 240      | ND (4.9)  | 0.67      | 0.86       | 0.86        |
| AOC1-T1f   | 01/12/16 | 0 - 1          | N           | 550                   | 74                  | ND (5.5)            | 3.6 J             | ND (11)           | 13                | ND (9.1)          | ND (0.54)         | ND (12)           | ND (0.76)       | ND (0.66)       | ND (140)          | ND (0.69)       | ND (0.11)    | ND (0.51)    | 6,800    | 230       | 12        | 19         | 19          |
|  | 01/12/16 | 2 - 3          | N           | 2.5 J                 | ND (0.27)           | ND (0.071)          | ND (0.037)        | ND (0.055)        | ND (0.032)        | ND (0.048)        | ND (0.032)        | ND (0.099)        | ND (0.024)      | ND (0.059)      | ND (0.055)        | ND (0.059)      | ND (0.03)    | ND (0.034)   | 29       | ND (0.43) | 0.099     | 0.092      | 0.092       |
|  | 01/12/16 | 5 - 6          | N           | 7.7 J                 | ND (0.12)           | ND (0.15)           | ND (0.25)         | ND (0.4)          | ND (0.22)         | ND (0.29)         | ND (0.17)         | ND (0.2)          | ND (0.19)       | ND (0.14)       | ND (0.17)         | ND (0.15)       | ND (0.2)     | ND (0.76)    | 22 J     | ND (0.5)  | 0.74      | 0.43       | 0.43        |
|  | 01/12/16 | 9 - 10         | N           | 9.6 J                 | ND (0.56)           | 0.74 J              | ND (0.33)         | ND (0.16)         | ND (0.3)          | ND (0.15)         | ND (0.32)         | ND (0.43)         | ND (0.27)       | ND (0.14)       | ND (0.24)         | ND (0.15)       | ND (0.1)     | ND (0.17)    | 30       | ND (0.29) | 0.45      | 0.43       | 0.43        |
| AOC1-T1g   | 02/17/17 | 0 - 0.5        | N           | 260 J                 | 17                  | 1.5 J               | 1.4 J             | 1.1 J             | ND (6.1)          | 0.79 J            | 2.3 J             | ND (0.38)         | ND (0.56)       | 0.34 J          | ND (36)           | ND (0.5)        | ND (0.067)   | ND (0.06)    | 2,000 J  | 35        | 3.6       | 6.5        | 6.5         |
|  | 02/17/17 | 0 - 0.5        | FD          | 650 J                 | 21                  | 1.5 J               | ND (1)            | 1.2 J             | 7.7 J             | 0.73 J            | 2.7 J             | ND (0.31)         | ND (0.55)       | ND (0.46)       | ND (28)           | ND (0.57)       | ND (0.066)   | ND (0.34)    | 6,900 J  | 34        | 4.3       | 12         | 12          |
|  | 02/17/17 | 2 - 3          | N           | 590                   | 78                  | 6 J                 | 2.7 J             | 3.6 J             | 16                | 2.7 J             | 5.6 J             | 1.1 J             | 1.5 J           | ND (1.3)        | ND (110)          | ND (0.66)       | ND (0.12)    | ND (0.2)     | 7,300    | 250       | 11        | 19         | 19          |
|  | 02/17/17 | 5 - 6          | N           | 160                   | 34                  | 2.3 J               | ND (0.37)         | ND (0.7)          | 5.7 J             | ND (0.37)         | ND (1.4)          | ND (0.58)         | 0.45 J          | ND (0.29)       | ND (44)           | ND (0.42)       | ND (0.05)    | ND (0.045)   | 1,600    | 95        | 3.8       | 6          | 6           |
|  | 02/17/17 | 9 - 10         | N           | 91                    | 9.1 J               | ND (0.7)            | ND (0.34)         | ND (0.27)         | 2.7 J             | ND (0.26)         | 0.78 J            | ND (0.31)         | ND (0.14)       | ND (0.082)      | ND (14)           | ND (0.085)      | ND (0.027)   | ND (0.032)   | 610      | 25        | 1.3       | 2.4        | 2.4         |
| AOC1-T2g   | 03/03/16 | 9 - 10         | N           | 3,100 J               | 820 J               | ND (31)             | 12 J              | ND (21)           | 85                | ND (89) J         | 16                | ND (25)           | 3.6 J           | ND (0.62)       | ND (1,200)        | ND (0.65)       | ND (0.13)    | ND (0.2)     | 35,000   | 4,200     | 89        | 130        | 130         |
|  | 03/03/16 | 14 - 15        | N           | 310                   | ND (0.22)           | 6.5 J               | ND (0.91)         | ND (0.46)         | 12 J              | ND (17)           | 2.1 J             | ND (0.53)         | ND (0.42)       | ND (0.73)       | ND (220)          | ND (0.76)       | ND (0.22)    | ND (0.16)    | 3,300    | 170       | 14        | 18         | 18          |
|  | 03/03/16 | 19 - 20        | N           | 59                    | 11 J                | ND (1.2)            | ND (0.23)         | ND (0.39)         | 2.1 J             | ND (3.8)          | ND (0.22)         | ND (0.46)         | ND (0.039)      | ND (0.11)       | ND (44)           | ND (0.12)       | ND (0.037)   | 0.14 J       | 640      | 43        | 3         | 3.6        | 3.6         |

TABLE B-2b  
Sample Results: Dioxins and Furans  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |          |           |           |           |             |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|----------|-----------|-----------|-----------|-------------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | 16        | 50        | 5.58        |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | 4.8       | NE          |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | NE        | NE          |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | NE        | NE          |
| Background <sup>5</sup> :                            |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | NE        | NE          |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD     | OCDF      | TEQ Avian | TEQ Human | TEQ Mammals |
| AOC1-T2h   | 03/04/16 | 0 - 1          | N           | 930                   | 150                 | ND (4.3)            | 3.4 J             | ND (1.1)          | 23                | ND (27)           | 5.9 J             | ND (1.3)          | ND (0.86)       | ND (0.66)       | ND (290) J        | ND (0.59)       | ND (0.13)    | ND (0.18)    | 11,000   | 720 J     | 21        | 34        | 34          |
|  | 03/04/16 | 2 - 3          | N           | 570                   | 56                  | 5.3 J               | 2.8 J             | ND (0.22)         | 14                | 1.6 J             | 5.8 J             | ND (0.91)         | ND (1.3)        | ND (0.81)       | ND (130)          | 1.1 J           | 0.2 J        | ND (0.38)    | 6,700    | 200       | 12        | 19        | 19          |
|  | 03/04/16 | 5 - 6          | N           | 69                    | 5.7 J               | ND (0.19)           | 0.97 J            | ND (0.12)         | ND (1.9)          | ND (0.26)         | 0.9 J             | ND (0.14)         | ND (0.23)       | ND (0.18)       | ND (11)           | ND (0.19)       | ND (0.035)   | ND (0.17)    | 420      | 10 J      | 1.2       | 1.9       | 1.9         |
|  | 03/04/16 | 9 - 10         | N           | 460                   | 44                  | 6.4 J               | ND (2.3)          | ND (0.23)         | 13                | ND (0.67)         | 4.7 J             | ND (0.68)         | ND (0.75)       | ND (0.24)       | ND (240)          | 0.86 J          | ND (0.13)    | 0.23 J       | 5,400    | 250       | 16        | 21        | 21          |
| AOC1-T2i   | 03/05/16 | 0 - 1          | N           | 670                   | 88                  | 10 J                | 1.7 J             | ND (0.62)         | 14                | ND (20)           | ND (2.6)          | ND (0.72)         | ND (0.12)       | ND (0.42)       | ND (220)          | ND (0.13)       | ND (0.044)   | ND (0.22)    | 9,800    | 610       | 15        | 25        | 25          |
|  | 03/05/16 | 2 - 3          | N           | 420                   | 37                  | 3.4 J               | 2.8 J             | 4.1 J             | 13                | 1.1 J             | 4.5 J             | ND (0.81)         | ND (1.2)        | ND (0.34)       | ND (80)           | ND (0.79)       | ND (0.12)    | ND (0.18)    | 5,800    | 150       | 7.9       | 14        | 14          |
|  | 03/05/16 | 5 - 6          | N           | 16                    | ND (1.6)            | ND (0.3)            | ND (0.15)         | 0.72 J            | 0.88 J            | 0.87 J            | ND (0.36)         | ND (0.72)         | ND (0.08)       | ND (0.091)      | ND (6)            | ND (0.096)      | ND (0.029)   | ND (0.14)    | 170      | 9.4 J     | 0.75      | 0.91      | 0.91        |
|  | 03/05/16 | 9 - 10         | N           | 910                   | 110                 | ND (12)             | ND (1.8)          | ND (0.27)         | 21                | 1.1 J             | 4.7 J             | 1.3 J             | 1.2 J           | ND (0.92)       | ND (280)          | ND (0.47)       | ND (0.039)   | 0.28 J       | 10,000   | 730       | 20        | 32        | 32          |
| AOC1-T2j   | 03/05/16 | 0 - 1          | N           | 190                   | 8.7 J               | ND (1.5)            | 0.93 J            | ND (0.31)         | 4.6 J             | ND (0.3)          | ND (1.4)          | ND (0.36)         | ND (0.25)       | ND (0.098)      | ND (21)           | ND (0.26)       | ND (0.052)   | ND (0.1)     | 2,900    | 21 J      | 2.2       | 4.8       | 4.8         |
|  | 03/05/16 | 2 - 3          | N           | 380 J                 | 37                  | 3.6 J               | 2.4 J             | ND (0.16)         | 11 J              | 1.9 J             | 4.7 J             | ND (0.86)         | 1.5 J           | ND (0.15)       | ND (78)           | ND (1.3)        | 0.28 J       | ND (0.31)    | 4,000 J  | 120       | 8.6       | 13        | 13          |
|  | 03/05/16 | 2 - 3          | FD          | 170 J                 | 16                  | ND (0.58)           | 1.1 J             | 2.4 J             | 6.4 J             | 1.2 J             | 2.6 J             | 0.79 J            | ND (0.82)       | ND (0.23)       | ND (41)           | 0.68 J          | ND (0.09)    | ND (0.19)    | 1,400 J  | 33        | 4.6       | 6.5       | 6.5         |
|  | 03/05/16 | 5 - 6          | N           | 120                   | 19                  | 1.8 J               | ND (0.38)         | ND (0.6)          | 3.5 J             | ND (0.59)         | 1.2 J             | ND (0.7)          | ND (0.12)       | ND (0.097)      | ND (42)           | ND (0.22)       | ND (0.11)    | 0.55 J       | 1,700    | 99        | 3.6       | 4.8       | 4.8         |
|  | 03/05/16 | 9 - 10         | N           | 17                    | 1.9 J               | ND (0.37)           | ND (0.16)         | ND (0.12)         | 0.56 J            | ND (0.4)          | ND (0.25)         | ND (0.14)         | ND (0.045)      | ND (0.092)      | ND (5.2)          | ND (0.097)      | ND (0.065)   | ND (0.33)    | 190      | 10 J      | 0.65      | 0.71      | 0.71        |
| AOC1-T5D   | 01/12/16 | 0 - 1          | N           | 280                   | 30                  | ND (2.2)            | ND (1.4)          | ND (1.2)          | ND (9.1)          | ND (1.1)          | 3.7 J             | ND (1.4)          | ND (0.19)       | ND (0.6)        | ND (96)           | ND (1.3)        | ND (0.1)     | ND (0.54)    | 2,700    | 94        | 7.4       | 10        | 10          |
|  | 01/12/16 | 2 - 3          | N           | 21,000 J              | 2,800               | 130 J               | 79                | 360               | 880               | ND (66)           | 190               | ND (83)           | ND (40) *       | ND (22)         | ND (6,300)        | ND (24)         | 4.9 J        | 12           | 270,000  | 11,000 J  | 520       | 830       | 830         |
|  | 01/12/16 | 2 - 3          | FD          | 44,000 J              | 3,700               | ND (250) J          | ND (96)           | 360               | 1,200             | 89                | 260               | ND (52)           | ND (23) *       | ND (2.9)        | ND (5,900)        | 68              | 6.2          | 14           | 340,000  | 18,000 J  | 600       | 1,100     | 1,100       |
|  | 01/12/16 | 5 - 6          | N           | 2,500                 | 420                 | 39                  | 5.9 J             | ND (9.8)          | 57                | ND (9.1)          | ND (13)           | ND (11)           | ND (2.1)        | ND (0.41)       | ND (860)          | ND (1)          | 0.59 J       | ND (0.34)    | 28,000   | 2,200     | 58        | 92        | 92          |
|  | 01/12/16 | 9 - 10         | N           | 500                   | 86                  | ND (4.3)            | ND (2.8)          | ND (0.66)         | 15                | ND (0.61)         | ND (3.6)          | ND (0.77)         | ND (0.77)       | ND (0.28)       | ND (230)          | ND (0.3)        | ND (0.11)    | ND (0.22)    | 5,000    | 290       | 15        | 21        | 21          |
|  | 01/12/16 | 14 - 15        | N           | 1,700                 | 120                 | 10 J                | 7.7 J             | 13                | 38                | ND (2.6)          | 15                | ND (2.3)          | 3.2 J           | ND (1.3)        | ND (340)          | ND (1.4)        | ND (0.52)    | 0.73 J       | 22,000   | 380       | 31        | 53        | 53          |
|  | 01/12/16 | 19 - 20        | N           | 590                   | 130                 | 20                  | 4 J               | ND (7.1)          | 22                | ND (6.6)          | 7.1 J             | ND (8.2)          | ND (0.27)       | ND (0.3)        | ND (370)          | ND (0.32)       | ND (0.083)   | ND (0.12)    | 5,300    | 410       | 24        | 32        | 32          |
|  | 01/12/16 | 19 - 20        | FD          | 620                   | 120                 | 18                  | ND (3.5)          | ND (5.7)          | 24                | ND (5.3)          | 7 J               | ND (6.6)          | ND (0.45)       | ND (0.15)       | ND (380)          | ND (0.45)       | ND (0.087)   | ND (0.067)   | 5,400    | 400       | 24        | 33        | 33          |
| AOC1-T6D   | 02/09/16 | 0 - 0.5        | N           | 240                   | 13                  | 1.4 J               | ND (0.84)         | ND (0.051)        | 3.8 J             | ND (0.34)         | 1.7 J             | 0.34 J            | ND (0.49)       | ND (0.23)       | ND (58)           | ND (0.27)       | ND (0.4)     | 0.31 J       | 2,100    | 48        | 4.7       | 7.3       | 7.3         |
|  | 02/09/16 | 2 - 3          | N           | 17                    | 0.66 J              | ND (0.25)           | ND (0.18)         | ND (0.089)        | 0.49 J            | ND (0.087)        | ND (0.11)         | ND (0.1)          | ND (0.17)       | ND (0.076)      | ND (1.7)          | ND (0.14)       | ND (3.5)     | ND (0.2)     | 100      | 1.5 J     | 2.2       | 2.2       | 2.2         |
|  | 02/09/16 | 5 - 6          | N           | 5.1 J                 | ND (0.24)           | ND (0.08)           | ND (0.046)        | ND (0.059)        | ND (0.15)         | ND (0.048)        | ND (0.14)         | ND (0.069)        | ND (0.04)       | ND (0.062)      | ND (0.49)         | ND (0.056)      | ND (2.6)     | ND (0.14)    | 41       | ND (0.32) | 1.5       | 1.5       | 1.5         |
|  | 02/09/16 | 9 - 10         | N           | ND (0.74)             | ND (0.093)          | 0.11 J              | ND (0.071)        | ND (0.066)        | ND (0.023)        | ND (0.051)        | ND (0.022)        | ND (0.061)        | ND (0.063)      | ND (0.029)      | ND (0.18)         | ND (0.03)       | ND (0.94)    | 0.17 J       | ND (4.5) | ND (0.13) | 0.71      | 0.55      | 0.55        |
|  | 02/09/16 | 9 - 10         | FD          | ND (1.1)              | ND (0.32)           | 0.27 J              | ND (0.087)        | ND (0.092)        | ND (0.064)        | ND (0.09)         | ND (0.12)         | ND (0.37)         | ND (0.067)      | ND (0.14)       | ND (0.096)        | ND (0.15)       | ND (2.4)     | ND (0.25)    | ND (4.6) | ND (0.18) | 1.5       | 1.3       | 1.3         |
| AOC1-T7  | 02/19/17 | 0 - 0.5        | N           | 210 J                 | 21                  | ND (1.5)            | 0.65 J            | 0.81 J            | 4 J               | ND (0.44)         | ND (0.66)         | ND (0.43)         | ND (0.32)       | ND (0.088)      | ND (37)           | ND (0.069)      | ND (0.13)    | ND (0.038)   | 2,100 J  | 68 J      | 3         | 5.7       | 5.7         |
|  | 02/19/17 | 2 - 3          | N           | 310                   | 34                  | 2.5 J               | 1.9 J             | 2.2 J             | 10 J              | ND (1.6)          | 4.1 J             | ND (0.63)         | ND (0.65)       | 0.6 J           | ND (56)           | ND (0.64)       | ND (0.15)    | ND (0.094)   | 3,600    | 65        | 5.6       | 9.8       | 9.8         |
|  | 02/19/17 | 5 - 6          | N           | 690                   | 150                 | 8.6 J               | 1.1 J             | ND (1.4)          | 19                | ND (0.64)         | 2.5 J             | ND (0.93)         | ND (0.22)       | ND (0.16)       | ND (190)          | ND (0.17)       | ND (0.051)   | ND (0.1)     | 7,600    | 610       | 14        | 23        | 23          |
|  | 02/19/17 | 9 - 10         | N           | 93                    | 15                  | ND (1)              | ND (0.15)         | 0.38 J            | 3.1 J             | ND (0.26)         | ND (0.63)         | ND (0.11)         | ND (0.099)      | ND (0.078)      | ND (26)           | ND (0.081)      | ND (0.041)   | ND (0.045)   | 1,000    | 51        | 1.9       | 3.2       | 3.2         |

TABLE B-2b  
Sample Results: Dioxins and Furans  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |          |            |           |           |             |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|----------|------------|-----------|-----------|-------------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE       | NE         | 16        | 50        | 5.58        |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE       | NE         | NE        | 4.8       | NE          |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE         | NE        | 50        | NE          |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE         | NE        | 16        | 1.6         |
| Background <sup>5</sup> :                            |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE         | NE        | 5.98      | 5.58        |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD     | OCDF       | TEQ Avian | TEQ Human | TEQ Mammals |
| AOC1-T8  | 02/18/17 | 0 - 0.5        | N           | 360                   | 48                  | 3.4 J               | 2.2 J             | 2.2 J             | 11 J              | ND (1.2)          | 4.9 J             | 0.69 J            | ND (1.2)        | 1 J             | ND (110)          | ND (0.64)       | ND (0.17)    | 0.25 J       | 4,000    | 130        | 9.2       | 14        | 14          |
|  | 02/18/17 | 2 - 3          | N           | 330                   | 46                  | 3.4 J               | 2.4 J             | 2.8 J             | 12 J              | ND (1.1)          | 4.7 J             | 0.75 J            | ND (1.4)        | ND (0.79)       | ND (100)          | ND (0.86)       | ND (0.072)   | ND (0.25)    | 3,100    | 110        | 8.6       | 13        | 13          |
|  | 02/18/17 | 5 - 6          | N           | 80                    | 4.3 J               | 0.83 J              | ND (0.26)         | ND (0.18)         | 1.5 J             | ND (0.33)         | ND (0.13)         | 0.36 J            | ND (0.2)        | ND (0.19)       | ND (7.8)          | ND (0.047)      | ND (0.025)   | ND (0.036)   | 470      | 14 J       | 0.82      | 1.7       | 1.7         |
|  | 02/18/17 | 9 - 10         | N           | 49                    | 5.8 J               | 0.69 J              | ND (0.15)         | ND (0.11)         | 1.3 J             | ND (0.069)        | ND (0.4)          | ND (0.12)         | ND (0.18)       | ND (0.082)      | ND (14)           | ND (0.085)      | ND (0.046)   | ND (0.042)   | 590      | 18 J       | 1.1       | 1.7       | 1.7         |
|  | 02/18/17 | 9 - 10         | FD          | 110                   | 14                  | ND (0.86)           | ND (0.2)          | ND (0.34)         | 3.1 J             | ND (0.45)         | 0.92 J            | ND (0.13)         | 0.17 J          | ND (0.089)      | ND (33)           | ND (0.093)      | ND (0.029)   | ND (0.024)   | 1,300    | 39         | 2.5       | 4         | 4           |
| AOC4-GB10  | 02/10/10 | 0 - 0.5        | N           | 4,200                 | 140                 | 14                  | 16                | ND (21)           | 88                | ND (13)           | 29                | ND (12.5)         | ND (12.5) *     | ND (12.5)       | ND (12.5)         | 6.5 J           | ND (5) *     | ND (5)       | 52,000   | 260        | 37        | 87        | 87          |
| AOC4-GB11  | 02/10/10 | 0 - 0.5        | N           | 4,700                 | 180                 | ND (12.5)           | ND (13)           | ND (28)           | 110               | ND (17)           | 34                | ND (12.5)         | ND (12.5) *     | 3.7 J           | ND (14)           | 6.7 J           | 1.2 J        | ND (5)       | 33,000   | 610        | 35        | 87        | 87          |
|  | 02/10/10 | 0 - 0.5        | FD          | 5,300                 | 230                 | ND (12.5)           | 21                | ND (43)           | 160               | ND (23)           | 39                | ND (12.5)         | ND (12.5) *     | ND (12.5)       | 22                | 14              | 1.7 J        | ND (5)       | 30,000   | 440        | 48        | 110       | 110         |
| AOC4-GB12  | 02/10/10 | 0 - 0.5        | N           | 490                   | 26                  | ND (12.5)           | 5.5 J             | ND (12.5)         | 14                | ND (12.5)         | ND (12.5)         | ND (12.5)         | ND (12.5) *     | ND (12.5)       | ND (12.5)         | 1.4 J           | ND (5) *     | ND (5)       | 4,400    | 66         | 18        | 21        | 21          |
| Old Well-BCW-1                                       | 09/11/13 | 7 - 8          | N           | 7,000                 | ND (1.2)            | 170                 | 21                | 64                | 200               | ND (280)          | 40                | ND (2)            | 8.8 J           | ND (0.42)       | ND (4,000)        | ND (4.8)        | ND (0.17)    | 0.46 J       | 53,000   | 8,400      | 250       | 350       | 350         |
| Old Well-BCW-2                                       | 09/11/13 | 4 - 5          | N           | 8,300                 | ND (1.9)            | 170                 | 50                | 110               | 380               | ND (450)          | 97                | ND (5.6)          | 18              | ND (2.4)        | 63                | ND (10)         | ND (0.23)    | 1.6          | 100,000  | 11,000     | 100       | 230       | 230         |
| PA-14  | 01/27/16 | 0 - 1          | N           | 660 J                 | 49 J                | 4.1 J               | 7.1 J             | ND (3.2) J        | 20 J              | 4.3 J             | 14 J              | ND (0.51) J       | 4.9 J           | ND (1.4) J      | ND (64) J         | 2.1 J           | ND (0.53) J  | 3.2 J        | 5,300 J  | 92 J       | 18        | 23        | 23          |
| PA-15  | 01/27/16 | 0 - 1          | N           | 2,600 J               | 320 J               | 15 J                | 21 J              | 19 J              | 85 J              | 25 J              | 43 J              | 4.5 J             | 10 J            | 4 J             | ND (340) J        | 6.7 J           | ND (0.93) J  | 4.2 J        | 22,000 J | 370 J      | 58        | 86        | 86          |
| PA-16  | 01/27/16 | 0 - 1          | N           | 880 J                 | 74 J                | 5.1 J               | 7.2 J             | 6 J               | 24 J              | 7.1 J             | 12 J              | 1.6 J             | ND (0.95) J     | 2.1 J           | ND (110) J        | 2.3 J           | ND (0.63) J  | ND (1.2) J   | 7,300 J  | 140 J      | 15        | 25        | 25          |
| SD-14  | 01/11/16 | 0 - 1          | N           | 5,500                 | 340                 | 45                  | 49                | ND (1.4)          | 170               | 15                | 85                | 9 J               | 24              | ND (1.4)        | ND (1,200)        | 9.1 J           | 3.1 J        | 2.7 J        | 40,000   | 1,100      | 130       | 190       | 190         |
|  | 01/11/16 | 2 - 3          | N           | 3,100                 | 240                 | ND (9.4)            | 14                | ND (1.9)          | 71                | ND (5.2)          | 29                | ND (2.3)          | ND (5.8) *      | ND (0.91)       | ND (490)          | 4.2 J           | ND (1.4)     | ND (1.4)     | 25,000   | 1,100      | 46        | 83        | 83          |
|  | 01/11/16 | 5 - 6          | N           | 1,500                 | ND (27)             | ND (34)             | ND (3.8)          | ND (7)            | 35                | ND (8.8)          | 12 J              | ND (4.6)          | ND (4.5)        | ND (0.76)       | ND (190)          | ND (1.7)        | ND (1.2)     | ND (0.68)    | 20,000   | 400        | 20        | 40        | 40          |
|  | 01/11/16 | 9 - 10         | N           | 6.3 J                 | ND (0.59)           | ND (0.3)            | ND (0.19)         | ND (0.16)         | ND (0.18)         | ND (0.15)         | ND (0.17)         | ND (0.19)         | ND (0.14)       | ND (0.045)      | ND (0.81)         | ND (0.049)      | ND (0.094)   | ND (0.32)    | 55       | ND (1.3)   | 0.4       | 0.32      | 0.32        |
| SD-15  | 01/12/16 | 0 - 0.5        | N           | 1,300                 | 120                 | 11 J                | 7.1 J             | ND (0.71)         | 36                | 2.9 J             | 14                | ND (0.83)         | 3.6 J           | ND (0.9)        | ND (240)          | 2.5 J           | ND (0.56)    | ND (1)       | 13,000   | 390        | 25        | 41        | 41          |
|  | 01/12/16 | 2 - 3          | N           | 50                    | 5.1 J               | ND (0.38)           | ND (0.26)         | 0.61 J            | ND (1.4)          | ND (1.6)          | ND (0.43)         | ND (0.15)         | ND (0.065)      | ND (0.091)      | ND (18)           | ND (0.098)      | ND (0.099)   | ND (0.2)     | 450      | 13 J       | 1.5       | 2         | 2           |
|  | 01/12/16 | 5 - 6          | N           | 51                    | 3.7 J               | ND (0.5)            | ND (0.34)         | ND (0.28)         | ND (1.4)          | ND (1.2)          | ND (0.22)         | ND (0.33)         | ND (0.11)       | ND (0.071)      | ND (12)           | ND (0.12)       | ND (0.043)   | ND (0.085)   | 430      | 7.2 J      | 1         | 1.6       | 1.6         |
|  | 01/12/16 | 9 - 10         | N           | 8.4 J                 | ND (0.59)           | ND (0.29)           | ND (0.15)         | ND (0.14)         | ND (0.23)         | ND (0.13)         | ND (0.38)         | ND (0.17)         | ND (0.11)       | ND (0.076)      | ND (0.76)         | ND (0.041)      | ND (0.04)    | ND (0.38)    | 36       | 0.67 J     | 0.39      | 0.3       | 0.3         |
| SD-16  | 01/12/16 | 0 - 0.5        | N           | 6.2 J                 | ND (0.52)           | ND (0.19)           | ND (0.1)          | ND (0.11)         | ND (0.3)          | ND (0.098)        | ND (0.097)        | ND (0.12)         | ND (0.069)      | ND (0.052)      | 1.1 J             | ND (0.056)      | ND (0.041)   | ND (0.3)     | 44       | 1.2 J      | 0.39      | 0.31      | 0.31        |
|  | 01/12/16 | 2 - 3          | N           | 1.6 J                 | ND (0.2)            | ND (0.071)          | ND (0.097)        | ND (0.04)         | ND (0.096)        | ND (0.037)        | ND (0.091)        | ND (0.047)        | ND (0.065)      | ND (0.073)      | 0.26 J            | ND (0.078)      | ND (0.024)   | ND (0.18)    | 7.5 J    | ND (0.21)  | 0.22      | 0.13      | 0.13        |
|  | 01/12/16 | 5 - 6          | N           | 0.57 J                | ND (0.12)           | ND (0.075)          | ND (0.04)         | ND (0.07)         | ND (0.04)         | ND (0.065)        | ND (0.038)        | ND (0.092)        | ND (0.051)      | ND (0.059)      | ND (0.11)         | ND (0.064)      | ND (0.059)   | 0.27 J       | 2.5 J    | 0.15 J     | 0.38      | 0.12      | 0.12        |
|  | 01/12/16 | 9 - 10         | N           | 0.32 J                | ND (0.11)           | ND (0.15)           | ND (0.039)        | ND (0.035)        | ND (0.038)        | ND (0.043)        | ND (0.011)        | ND (0.037)        | ND (0.029)      | ND (0.063)      | ND (0.22)         | ND (0.068)      | ND (0.036)   | ND (0.095)   | ND (1.5) | ND (0.092) | 0.14      | 0.074     | 0.074       |
| SD-25  | 03/10/16 | 0 - 1          | N           | 140 J                 | 9.5 J               | 0.82 J              | ND (0.61) J       | ND (1.4) J        | 3.5 J             | 1.7 J             | 2 J               | ND (0.28) J       | ND (0.24) J     | ND (0.97) J     | ND (9.4) J        | 2.4 J           | ND (0.099) J | 1.7 J        | 990 J    | 13 J       | 5.6       | 4.2       | 4.2         |
| SD-26  | 03/10/16 | 0 - 1          | N           | 1,400 J               | 99 J                | 6.9 J               | 14 J              | 8.3 J             | 36 J              | 8.2 J             | 21 J              | 2.6 J             | 6.2 J           | 2.2 J           | ND (93) J         | 4.2 J           | ND (0.68) J  | ND (2.4) J   | 13,000 J | 170 J      | 26        | 41        | 41          |
| TCS-4  | 03/25/14 | 59 - 60        | N           | 4,200                 | 740                 | 53                  | 8.1 J             | ND (21)           | 79                | ND (19)           | 16                | ND (25)           | 2.3 J           | ND (1.5)        | ND (1,400)        | ND (1.6)        | ND (0.09)    | ND (0.15)    | 46,000   | 3,800      | 96        | 150       | 150         |
|  | 03/25/14 | 113            | N           | 1,000                 | 200                 | 20                  | ND (4.5)          | ND (5.7)          | 26                | ND (5.3)          | 10 J              | ND (6.7)          | ND (1.2)        | ND (0.87)       | ND (490)          | 18              | ND (0.45)    | ND (0.3)     | 11,000   | 920        | 50        | 51        | 51          |



TABLE B-2b  
Sample Results: Dioxins and Furans  
AOC 1 – Area around Former Percolation Bed  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |           |        |           |           |             |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|-----------|--------|-----------|-----------|-------------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | 4.8             | NE                | NE              | NE           | NE           | NE        | NE     | NE        | NE        | NE          |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | 4.8             | NE                | NE              | NE           | NE           | NE        | NE     | NE        | NE        | NE          |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE        | NE     | NE        | NE        | NE          |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE        | NE     | NE        | NE        | NE          |
| Background <sup>5</sup> :                            |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE        | NE     | NE        | NE        | NE          |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD      | OCDF   | TEQ Avian | TEQ Human | TEQ Mammals |
| TCS4-E   | 03/01/16 | 4 - 5          | N           | 10,000 J              | ND (550)            | ND (650) J          | 54 J              | 230               | 630               | ND (770)          | 110               | ND (16)           | 26              | ND (1.1)        | ND (9,100)        | ND (5.2)        | 3.2 J        | 1.9 J        | 140,000 J | 19,000 | 600       | 780       | 780         |
|  | 03/01/16 | 4 - 5          | FD          | 19,000 J              | ND (2.5)            | 430 J               | ND (170) J        | 250               | 680               | ND (810)          | ND (160)          | ND (17)           | 19              | ND (1.1)        | ND (8,600)        | ND (4.6)        | 2.4 J        | 1.3 J        | 220,000 J | 18,000 | 590       | 870       | 870         |
|  | 03/01/16 | 5 - 6          | N           | 150                   | ND (0.24)           | ND (1.1)            | ND (0.3)          | 1.2 J             | ND (3.2)          | ND (3.3)          | ND (1.1)          | ND (0.41)         | ND (0.13)       | ND (0.22)       | ND (38)           | ND (0.23)       | 0.23 J       | ND (0.065)   | 1,000     | 35     | 3         | 4.6       | 4.6         |
| TCS4-N   | 03/01/16 | 4 - 5          | N           | 2,600                 | ND (0.45)           | 36                  | 9.5 J             | 20                | 70                | ND (90)           | 15                | ND (5.6)          | 3.1 J           | ND (0.81)       | ND (1,100)        | ND (0.86)       | ND (0.32)    | 0.46 J       | 26,000    | 1,800  | 74        | 110       | 110         |
|  | 03/01/16 | 5 - 6          | N           | 4,200                 | ND (750)            | 96                  | 9.6 J             | ND (12)           | 140               | ND (180)          | 23                | ND (14)           | 3.6 J           | ND (0.58)       | ND (2,300)        | ND (2.9)        | 0.34 J       | ND (0.49)    | 48,000    | 4,300  | 150       | 210       | 210         |
| TCS4-S   | 03/01/16 | 4 - 5          | N           | 3,300                 | ND (0.47)           | 77                  | 18                | 41                | 120               | ND (160)          | 36                | ND (2.8)          | 9 J             | ND (0.88)       | ND (1,800)        | ND (1.5)        | ND (0.37)    | 0.48 J       | 39,000    | 3,300  | 130       | 180       | 180         |
|  | 03/01/16 | 5 - 6          | N           | 940                   | 130                 | 21                  | 1.8 J             | ND (0.32)         | 23                | ND (37)           | 4.3 J             | ND (0.38)         | 0.8 J           | ND (1.2)        | ND (530)          | ND (1.3)        | ND (0.23)    | ND (0.066)   | 10,000    | 1,100  | 34        | 47        | 47          |

Notes:

Category 1: Validated data suitable for all uses, including risk assessment and remedial action decisions.  
Category 2: Validated data suitable for use in characterization of the chemicals of potential concern at the facility and to help define the nature and extent of contamination.  
Category 3: Validated data suitable only for use in qualitative characterization of the nature and extent of contamination.  
Results greater than or equal to the Interim Screening Level are circled.

|         |   |
|---------|---|
| ‡       | This location is in an area where soil is transitioning into sediment.  |
| --      | not analyzed  |
| ft bgs  | feet below ground surface   |
| ng/kg   | nanograms per kilogram  |
| DTSC-SL | DTSC Screening Levels   |
| DTSC    | California Department of Toxic Substances Control   |
| FD      | Field Dupliicate  |
| J       | concentration or reporting limit estimated by laboratory or data validation   |
| JR      | estimated value, one or more input values is "R" qualified.   |
| N       | Primary Sample  |
| NA      | NA = not applicable   |
| NE      | not established   |
| ND      | not detected at the listed reporting limit  |
| R       | The result has been rejected; identification and/or quantitation could not be verified because critical QC specifications were not met (e.g., a non-detect result obtained for an archive sample following a hold time of greater than one year). |
| USEPA   | USEPA = United States Environmental Protection Agency   |

- 1 For individual dioxins and furans, selected value is the lower of the ECV, residential DTSC-SL, or USEPA residential regional screening value, unless the background value is higher. For TEQ values, selected value is the DTSC-SL.
- 2 United States Environmental Protection Agency (USEPA). 2017. Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites. November.
- 3 California Department of Toxic Substances Control (DTSC). 2018. Human Health Risk Assessment (HHRA) Note Number 3. JanuaryCalifornia Department of Toxic Substances Control (DTSC). 2017. Human Health Risk Assessment (HHRA) Note 2, Soil Remedial Goals for Dioxins and Dioxin-like Compounds for Consideration at California Hazardous Waste Sites. April.
- 4 ARCADIS. 2008. "Technical Memorandum 3: Ecological Comparison Values for Metals and Polycyclic Aromatic Hydrocarbons in Soil." May 28. ARCADIS. 2009. "Topock Compression Station - Final Technical Memorandum 4: Ecological Comparison Values for Additional Dected Chemicals in Soil." July 1.
- 5 CH2M. 2017. Revised Ambient Study of Dioxins and Furans at the Pacific Gas and Electric Company, Topock Compressor Station, Needles, California. October.

Calculations:  
TEQ = Sum of Result xToxic equivalency factor (TEF), 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.  
TEQ Avian = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.  
TEQMammals = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.

TABLE B-2b  
Sample Results: Dioxins and Furans  
AOC 1 – Area around Former Percolation Bed  
*Soil Engineering Evaluation/Cost Analysis*  
*PG&E Topock Compressor Station, Needles, California*

Teq Humans = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.

TABLE B-3a  
Sample Results: Metals  
AOC 9 – Southeast Fence Line  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |                       |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |          |        |        |              |            |        |          |            |            |          |        |
|--|-----------------------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|----------|--------|--------|--------------|------------|--------|----------|------------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |                       |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7     | 16.8   | 8.39   | 0.0125       | 1.37       | 27.3   | 1.47     | 5.15       | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |                       |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23       | 3,100  | 400    | 11           | 390        | 1,500  | 390      | 390        | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |                       |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE       | NE     | 80     | 1            | NE         | 490    | NE       | 390        | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |                       |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13       | 20.6   | 0.0166 | 0.0125       | 2.25       | 0.607  | 0.177    | 5.15       | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |                       |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7     | 16.8   | 8.39   | NE           | 1.37       | 27.3   | 1.47     | NE         | NE         | 52.2     | 58     |
| Location   | Date                  | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt   | Copper | Lead   | Mercury      | Molybdenum | Nickel | Selenium | Silver     | Thallium   | Vanadium | Zinc   |
| Category 1   |                       |                |             |                |         |        |            |            |                      |                 |          |        |        |              |            |        |          |            |            |          |        |
| AOC9-1   | 10/01/08              | 0 - 0.5        | N           | ND (2) *       | 6.2     | 93     | ND (1) *   | ND (1)     | 1.03                 | 23              | 5.4      | 9.1    | 19     | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1)     | ND (2) *   | 26       | 46     |
|  | 10/01/08              | 2 - 3          | N           | ND (2) *       | 4.1     | 89     | ND (1) *   | ND (1)     | ND (0.478)           | 9.7             | 4.3      | 5      | 4.5    | ND (0.1) *   | ND (1)     | 7.4    | ND (1)   | ND (1)     | ND (2) *   | 17       | 17     |
| AOC9-2   | 09/18/08              | 0 - 0.5        | N           | ND (2) *       | 3.2     | 120    | ND (2) *   | ND (1)     | ND (0.401)           | 16              | 4.7      | 11     | 9.6    | ND (0.099) * | ND (2) *   | 11     | ND (1)   | ND (2)     | ND (4) *   | 25       | 33     |
|  | 09/18/08              | 2 - 3          | N           | ND (2) *       | 3.3     | 150    | ND (2) *   | ND (1)     | ND (0.406)           | 11              | 3        | 5.9    | 4.9    | ND (0.1) *   | ND (2) *   | 6.9    | ND (1)   | ND (2)     | ND (4) *   | 20       | 20     |
| AOC9-3   | 09/18/08              | 0 - 0.5        | N           | ND (2) *       | 3.2     | 110    | ND (2) *   | ND (1)     | ND (0.402)           | 25              | 4.1      | 17     | 9      | ND (0.1) *   | ND (2) *   | 12     | ND (1)   | ND (2)     | ND (4) *   | 24       | 49     |
|  | 09/18/08              | 2 - 3          | N           | ND (2) *       | 3.5     | 130    | ND (2) *   | ND (1)     | ND (0.454)           | 15              | 3.8      | 7.3    | 23     | ND (0.1) *   | ND (2) *   | 10     | ND (1)   | ND (2)     | ND (4.1) * | 23       | 92     |
| AOC9-4   | 09/18/08              | 0 - 0.5        | N           | ND (2) *       | 3.7     | 120    | ND (2) *   | ND (1)     | 1.06                 | 22              | 5        | 12     | 13     | ND (0.1) *   | ND (2) *   | 12     | ND (1)   | ND (2)     | ND (4) *   | 29       | 53     |
|  | 09/18/08              | 2 - 3          | N           | ND (2) *       | 3.9     | 110    | ND (2) *   | ND (1)     | ND (0.402)           | 19              | 4.6      | 11     | 11     | ND (0.1) *   | ND (2) *   | 11     | ND (1)   | ND (2)     | ND (4) *   | 25       | 42     |
| AOC9-5   | 10/01/08              | 0 - 0.5        | N           | ND (2) *       | 4.9     | 90     | ND (1) *   | ND (1)     | 0.726                | 35              | 7.1      | 19     | 28     | ND (0.1) *   | ND (1)     | 17     | ND (1)   | ND (1)     | ND (2) *   | 30       | 100    |
|  | 10/01/08              | 2 - 3          | N           | ND (2) *       | 6       | 130    | ND (2) *   | ND (1)     | 1                    | 38              | 7.6      | 21     | 25     | 0.27         | ND (2) *   | 20     | ND (1)   | ND (2)     | ND (4) *   | 31       | 76     |
|  | 10/01/08              | 2 - 3          | FD          | ND (2) *       | 7       | 120    | ND (2) *   | ND (1)     | 0.791                | 43              | 7.7      | 19     | 24     | 0.23         | ND (2) *   | 19     | ND (1)   | ND (2)     | ND (4) *   | 34       | 85     |
| AOC9-6   | 09/18/08              | 0 - 0.5        | N           | ND (2) *       | 3.8     | 180    | ND (2) *   | ND (1)     | 0.789                | 25              | 5.4      | 12     | 23     | 0.14         | ND (2) *   | 13     | ND (1)   | ND (2)     | ND (4) *   | 31       | 68     |
|  | 09/18/08              | 2 - 3          | N           | ND (2.1) *     | 3.8     | 120    | ND (2.1) * | ND (1)     | ND (0.458)           | 16              | 5        | 9.3    | 5      | ND (0.1) *   | ND (2.1) * | 14     | ND (1)   | ND (2.1)   | ND (4.2) * | 25       | 31     |
| AOC9-7   | 09/18/08              | 0 - 0.5        | N           | ND (2) *       | 2.2     | 94     | ND (2) *   | ND (1)     | 4.37                 | 72              | 4.2      | 14     | 15     | ND (0.1) *   | ND (2) *   | 11     | ND (1)   | ND (2)     | ND (4) *   | 22       | 120    |
|  | 09/18/08              | 2 - 3          | N           | ND (2) *       | 4.3     | 83     | ND (1) *   | ND (1)     | ND (0.411)           | 13              | 2.9      | 6.7    | 20     | ND (0.1) *   | ND (1)     | 6.7    | ND (1)   | ND (1)     | ND (2) *   | 18       | 29     |
| AOC9-8   | 10/01/08              | 0 - 0.5        | N           | ND (2) *       | 3.6     | 100    | ND (1) *   | ND (1)     | 48.6 J               | 230             | 4.4      | 11     | 20     | ND (0.1) *   | 1          | 10     | ND (1)   | ND (1)     | ND (2) *   | 20       | 1,000  |
|  | 10/01/08              | 2.5 - 3        | N           | ND (2.1) *     | 6.3     | 130    | ND (2.1) * | ND (1)     | 2.41                 | 41              | 5.3      | 13     | 59     | ND (0.1) *   | 4.5        | 12     | ND (1)   | ND (2.1)   | 4.1        | 25       | 130    |
|  | 10/01/08              | 5.5 - 6        | N           | ND (2) *       | 4       | 87     | ND (1) *   | ND (1)     | 1.32                 | 13              | 3.7      | 5.5    | 4.4    | ND (0.1) *   | ND (1)     | 8.1    | ND (1)   | ND (1)     | ND (2) *   | 17       | 21     |
| AOC9-9   | 10/01/08              | 0 - 0.5        | N           | ND (2) *       | 5       | 120    | ND (1) *   | ND (1)     | ND (0.404)           | 14              | 3.9      | 8      | 7      | ND (0.1) *   | ND (1)     | 8.1    | ND (1)   | ND (1)     | ND (2) *   | 19       | 34     |
|  | 10/01/08              | 2.5 - 3        | N           | ND (2.1) *     | 4.8     | 91     | ND (1) *   | ND (1)     | ND (0.415)           | 21              | 6.9      | 10     | 3.8    | ND (0.1) *   | ND (1)     | 15     | ND (1)   | ND (1)     | ND (2.1) * | 32       | 41     |
|  | 10/01/08              | 5.5 - 6        | N           | ND (2.1) *     | 4.9     | 97     | ND (1) *   | ND (1)     | 1.53                 | 28              | 7.1      | 11     | 4.9    | ND (0.1) *   | ND (1)     | 15     | ND (1)   | ND (1)     | ND (2.1) * | 31       | 53     |
|  | 10/01/08              | 5.5 - 6        | FD          | ND (2.1) *     | 4.5     | 87     | ND (1) *   | ND (1)     | 1.28                 | 27              | 7.3      | 10     | 4.4    | ND (0.1) *   | ND (1)     | 15     | ND (1)   | ND (1)     | ND (2.1) * | 30       | 50     |
| AOC9-10  | 10/01/08              | 0 - 0.5        | N           | ND (2) *       | 5.1     | 76     | ND (1) *   | ND (1)     | 0.418                | 28              | 6.8      | 11     | 18     | ND (0.1) *   | ND (1)     | 15     | ND (1)   | ND (1)     | ND (2) *   | 30       | 49     |
|  | 10/01/08              | 2 - 3          | N           | ND (2) *       | 7.3     | 110    | ND (2) *   | ND (1)     | 0.494                | 30              | 8.1      | 15     | 15     | 0.11         | ND (2) *   | 19     | ND (1)   | ND (2)     | ND (4) *   | 35       | 110    |
| AOC9-11  | 09/18/08              | 0 - 0.5        | N           | ND (2.1) *     | 3.6     | 130    | ND (2.1) * | ND (1.1) * | ND (0.418)           | 18              | 4.5      | 8.5    | 7.7    | 0.13         | ND (2.1) * | 11     | ND (1.1) | ND (2.1)   | ND (4.3) * | 25       | 35     |
|  | 09/18/08              | 2 - 3          | N           | ND (2) *       | 3.4     | 120    | ND (2) *   | ND (1)     | ND (0.406)           | 20              | 4.3      | 9.7    | 7.1    | ND (0.1) *   | ND (2) *   | 11     | ND (1)   | ND (2)     | ND (4) *   | 24       | 30     |
| AOC9-12  | 10/01/08              | 0 - 0.5        | N           | ND (2) J*      | 7.3     | 190 J  | ND (2) *   | ND (1)     | 0.727                | 34              | 9.4      | 19     | 13     | ND (0.1) *   | ND (2) *   | 24     | ND (1)   | ND (2)     | ND (4.1) * | 38       | 57     |
|  | 10/01/08              | 2 - 3          | N           | ND (2.1) *     | 6.6     | 220    | ND (2.1) * | ND (1)     | ND (0.415)           | 40              | 11       | 17     | 11     | ND (0.1) *   | ND (2.1) * | 29     | ND (1)   | ND (2.1)   | ND (4.1) * | 40       | 50     |
| AOC9-13  | 09/19/08              | 0 - 0.5        | N           | ND (2) J*      | 5.2     | 180    | ND (2) *   | ND (1)     | ND (0.404)           | 18              | 4.7      | 13     | 8.3    | ND (0.099) * | ND (2) *   | 11     | ND (1)   | ND (2)     | ND (4) *   | 27       | 36     |
|  | 09/19/08              | 2 - 3          | N           | ND (2) *       | 3.8     | 130    | ND (2) *   | ND (1)     | ND (0.409)           | 23 J            | 4.7      | 9.8    | 10     | ND (0.1) *   | ND (2) *   | 13     | ND (1)   | ND (2)     | ND (4.1) * | 27       | 35     |
|  | 09/19/08              | 2 - 3          | FD          | ND (2) *       | 3.6     | 110    | ND (2) *   | ND (1)     | ND (0.41)            | 18 J            | 4.5      | 9.6    | 5.6    | ND (0.1) *   | ND (2) *   | 13     | ND (1)   | ND (2)     | ND (4.1) * | 24       | 32     |
| AOC9-14  | 10/02/08 <sup>Θ</sup> | 0 - 0.5        | N           | ND (2.1) *     | 12      | 170    | ND (5.4) * | ND (1.1) * | 1.7                  | 31              | ND (5.4) | 24     | 34     | ND (0.11) *  | ND (5.4) * | 10     | ND (1.1) | ND (5.4) * | ND (11) *  | 19       | 81     |
|  | 10/02/08              | 2 - 3          | N           | ND (2) *       | 7.1     | 160    | ND (2) *   | ND (1)     | ND (0.412)           | 38              | 8.8      | 17     | 13     | ND (0.1) *   | ND (2) *   | 22     | ND (1)   | ND (2)     | ND (4.1) * | 33       | 61     |
| AOC9-15  | 12/06/15              | 0 - 1          | N           | ND (2.2) *     | 2.6 J   | 160    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 24 J            | 5.5 J    | 17 J   | 15 J   | ND (0.11) *  | ND (1.1)   | 13     | ND (1.1) | ND (1.1) J | ND (2.2) * | 25 J     | 52     |
|  | 12/06/15              | 2 - 3          | N           | ND (2.1) *     | 3.1     | 170    | ND (1) *   | ND (1)     | 0.58                 | 25              | 5        | 14     | 23     | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2.1) * | 23       | 46     |

TABLE B-3a  
Sample Results: Metals  
AOC 9 – Southeast Fence Line  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |                       |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |        |             |            |        |            |          |             |          |        |
|--|-----------------------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|-------------|------------|--------|------------|----------|-------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |                       |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125      | 1.37       | 27.3   | 1.47       | 5.15     | 0.78        | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |                       |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11          | 390        | 1,500  | 390        | 390      | 0.78        | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |                       |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1           | NE         | 490    | NE         | 390      | NE          | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |                       |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125      | 2.25       | 0.607  | 0.177      | 5.15     | 2.32        | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |                       |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE          | 1.37       | 27.3   | 1.47       | NE       | NE          | 52.2     | 58     |
| Location   | Date                  | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury     | Molybdenum | Nickel | Selenium   | Silver   | Thallium    | Vanadium | Zinc   |
| AOC9-16  | 01/13/16              | 0 - 0.5        | N           | ND (2.1) *     | 3.3     | 72     | ND (1) *   | ND (1)     | 4.4                  | 48              | 5.6    | 11     | 22     | 0.14        | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2.1) *  | 23       | 69     |
|  | 01/13/16              | 2 - 3          | N           | ND (2) *       | 2.9     | 89     | ND (1) *   | ND (1)     | ND (0.2)             | 17              | 5      | 18     | 6.8    | 0.11        | ND (1)     | 11     | ND (1)     | ND (1)   | ND (2) *    | 22       | 34     |
|  | 01/13/16              | 5 - 6          | N           | ND (2) *       | 3.3     | 91     | ND (1) *   | ND (1)     | ND (0.2)             | 14              | 4.5    | 6.3    | 7.1    | ND (0.11) * | ND (1)     | 9.1    | ND (1)     | ND (1)   | ND (2) *    | 19       | 26     |
|  | 01/13/16              | 9 - 10         | N           | ND (2) *       | 3.3     | 84     | ND (1) *   | ND (1)     | ND (0.2)             | 12              | 4      | 6.2    | 2.9    | ND (0.1) *  | ND (1)     | 8.9    | ND (1)     | ND (1)   | ND (2) *    | 17       | 21     |
| AOC9-17  | 01/10/16              | 9 - 10         | N           | ---            | ---     | ---    | ---        | ---        | 1.2                  | ---             | ---    | ---    | ---    | ---         | ---        | ---    | ---        | ---      | ---         | ---      | ---    |
|  | 01/14/16              | 14 - 15        | N           | ---            | ---     | ---    | ---        | ---        | ND (0.21)            | ---             | ---    | ---    | ---    | ---         | ---        | ---    | ---        | ---      | ---         | ---      | ---    |
| AOC9-18  | 01/10/16              | 5 - 6          | N           | ND (2) *       | 5.9     | 120    | ND (1) *   | ND (1)     | 0.55                 | 25              | 7.4    | 17     | 14     | 0.18        | ND (1)     | 15     | ND (1)     | ND (1)   | ND (2) *    | 31       | 57     |
|  | 01/10/16              | 9 - 10         | N           | ND (2.1) *     | 3.8     | 110    | ND (1) *   | ND (1)     | 0.94                 | 20              | 5.3    | 11     | 28     | 0.75        | ND (1)     | 9.9    | ND (1)     | ND (1)   | ND (2.1) *  | 22       | 53     |
| AOC9-19  | 01/13/16              | 0 - 0.5        | N           | ND (2.1) J*    | 4.2     | 110    | ND (1) *   | ND (1)     | ---                  | 19              | 5.1    | 9.3    | 9.4    | 0.15        | ND (1)     | 12     | ND (1) J   | ND (1)   | ND (2.1) J* | 21       | 42     |
|  | 01/13/16              | 2 - 3          | N           | ND (2) *       | 3.7     | 89     | ND (1) *   | ND (1)     | ---                  | 13              | 4      | 15     | 13     | ND (0.1) *  | ND (1)     | 7.8    | ND (1)     | ND (1)   | ND (2) *    | 17       | 35     |
|  | 01/13/16              | 5 - 6          | N           | ND (2) *       | 4.1     | 73     | ND (1) *   | ND (1)     | ---                  | 13              | 4.5    | 7.6    | 7.4    | 0.12        | ND (1)     | 9.9    | ND (1)     | ND (1)   | ND (2) *    | 17       | 33     |
|  | 01/13/16              | 9 - 10         | N           | ND (2) *       | 3.9     | 98     | ND (1) *   | ND (1)     | ---                  | 17              | 5.5    | 14     | 5.1    | ND (0.1) *  | ND (1)     | 15     | ND (1)     | ND (1)   | ND (2) *    | 21       | 29     |
| AOC9-20  | 01/13/16              | 0 - 0.5        | N           | ---            | ---     | ---    | ---        | ---        | ---                  | ---             | ---    | ---    | 7.1    | 0.11        | ---        | ---    | ---        | ---      | ---         | ---      | ---    |
|  | 01/13/16              | 2 - 3          | N           | ---            | ---     | ---    | ---        | ---        | ---                  | ---             | ---    | ---    | 11     | 0.12        | ---        | ---    | ---        | ---      | ---         | ---      | ---    |
|  | 01/13/16              | 2 - 3          | FD          | ---            | ---     | ---    | ---        | ---        | ---                  | ---             | ---    | ---    | 9.3    | ND (0.1) *  | ---        | ---    | ---        | ---      | ---         | ---      | ---    |
|  | 01/13/16              | 5 - 6          | N           | ---            | ---     | ---    | ---        | ---        | ---                  | ---             | ---    | ---    | 47     | 0.16        | ---        | ---    | ---        | ---      | ---         | ---      | ---    |
|  | 01/13/16              | 9 - 10         | N           | ---            | ---     | ---    | ---        | ---        | ---                  | ---             | ---    | ---    | 2.2    | ND (0.1) *  | ---        | ---    | ---        | ---      | ---         | ---      | ---    |
| AOC9-21  | 01/08/17              | 0 - 0.5        | N           | ND (2.1) *     | 3.4     | 130 J  | ND (1) *   | ND (1)     | ---                  | 34              | 7.2    | 11     | 3.8    | ND (0.1) *  | ND (1)     | 17     | ND (1) J   | ND (1)   | ND (2.1) J* | 30 J     | 47 J   |
|  | 01/08/17              | 0 - 0.5        | FD          | ND (2.1) *     | 3.6     | 170 J  | ND (1.1) * | ND (1.1) * | ---                  | 33              | 8.2    | 13     | 4      | ND (0.1) *  | ND (1.1)   | 18     | ND (1.1) J | ND (1.1) | ND (2.1) J* | 31       | 45 J   |
|  | 01/08/17              | 2 - 3          | N           | ND (2.1) *     | 3.1     | 200    | ND (1) *   | 1.1        | ---                  | 48              | 15     | 23     | 2.7    | ND (0.1) *  | ND (1)     | 38     | ND (1) J   | ND (1)   | ND (2.1) J* | 46       | 44     |
|  | 01/08/17              | 5 - 6          | N           | ND (2.1) *     | 3       | 220    | ND (1) *   | 1.1        | ---                  | 57              | 12     | 22     | 2.4    | ND (0.1) *  | ND (1)     | 38     | ND (1) J   | ND (1)   | ND (2.1) J* | 47       | 42     |
| AOC9-22  | 01/04/17              | 0 - 0.5        | N           | ND (2.4) *     | 4.6     | 190    | ND (1.2) * | ND (1.2) * | ---                  | 30              | 8.2    | 23     | 17     | ND (0.12) * | ND (1.2)   | 18     | ND (1.2) J | ND (1.2) | ND (2.4) J* | 32       | 60     |
|  | 01/04/17              | 2 - 3          | N           | ND (2.1) *     | 5.1     | 140    | ND (1) *   | ND (1)     | ---                  | 62              | 6.8    | 27     | 20     | 0.17        | ND (1)     | 16     | ND (1) J   | ND (1)   | ND (2.1) J* | 28       | 42     |
|  | 01/04/17 <sup>Y</sup> | 2.5 - 2.6      | N           | ND (2.9) *     | 4.6     | 220    | ND (1.4) * | ND (1.4) * | 0.79                 | 64              | 14     | 16     | 5.4    | ND (0.14) * | ND (1.4) * | 39     | ND (1.4) J | ND (1.4) | ND (2.9) J* | 48       | 48     |
|  | 01/04/17              | 4.5 - 5        | N           | ND (2.2) *     | 1.5     | 130    | ND (1.1) * | ND (1.1) * | ---                  | 41              | 2.6    | 13     | 6.4    | ND (0.11) * | ND (1.1)   | 5.9    | ND (1.1) J | ND (1.1) | ND (2.2) J* | 18       | 18     |
| PA-05  | 11/09/15              | 0 - 1          | N           | ND (2) *       | 3.6     | 130    | ND (1) *   | ND (1)     | 0.42                 | 27              | 6.9    | 16     | 7.4    | ND (0.1) *  | ND (1)     | 19     | ND (1)     | ND (1)   | ND (2) *    | 33       | 83     |
| PA-23  | 01/27/16              | 0 - 1          | N           | ND (2.1) *     | 11      | 64     | ND (1.1) * | ND (1.1) * | 0.52                 | 8.9             | 3.3    | 6.7    | 5.1    | ND (0.11) * | ND (1.1)   | 6.3    | ND (1.1)   | ND (1.1) | ND (2.1) *  | 18       | 49     |
| #4   | 04/06/00              | 0 - 3          | N           | ---            | ---     | ---    | ---        | ---        | 4.2                  | 53.2            | ---    | 12.4   | ---    | ---         | ---        | 13.5   | ---        | ---      | ---         | ---      | 343    |
| #5   | 04/06/00              | 0 - 3          | N           | ---            | ---     | ---    | ---        | ---        | 2.7                  | 29              | ---    | 13.8   | ---    | ---         | ---        | 16.3   | ---        | ---      | ---         | ---      | 64     |
| #6   | 04/06/00              | 0 - 3          | N           | ---            | ---     | ---    | ---        | ---        | 2.6                  | 33              | ---    | 12.4   | ---    | ---         | ---        | 13.2   | ---        | ---      | ---         | ---      | 92.7   |
| #7   | 04/06/00              | 0 - 3          | N           | ---            | ---     | ---    | ---        | ---        | 1.3                  | 32.1            | ---    | 15.3   | ---    | ---         | ---        | 16.3   | ---        | ---      | ---         | ---      | 68     |
| #8   | 04/06/00              | 0 - 3          | N           | ---            | ---     | ---    | ---        | ---        | 2.8                  | 28.8            | ---    | 12.9   | ---    | ---         | ---        | 16.4   | ---        | ---      | ---         | ---      | 61.1   |
| #9   | 04/06/00              | 0 - 3          | N           | ---            | ---     | ---    | ---        | ---        | 2.7                  | 92.7            | ---    | 50.4   | ---    | ---         | ---        | 10.1   | ---        | ---      | ---         | ---      | 215    |
| #10  | 04/06/00              | 0 - 3          | N           | ---            | ---     | ---    | ---        | ---        | 114                  | 398             | ---    | 17.9   | ---    | ---         | ---        | 14.8   | ---        | ---      | ---         | ---      | 744    |
| #11  | 04/06/00              | 0 - 3          | N           | ---            | ---     | ---    | ---        | ---        | ---                  | ---             | ---    | ---    | ---    | ---         | ---        | ---    | ---        | ---      | ---         | ---      | 80.3   |
| #12  | 04/06/00              | 0 - 3          | N           | ---            | ---     | ---    | ---        | ---        | 0.8                  | 38.3            | ---    | 35.6   | ---    | ---         | ---        | 21.1   | ---        | ---      | ---         | ---      | ---    |

Notes:

Category 1: Validated data suitable for all uses, including risk assessment and remedial action decisions.  
Category 2: Validated data suitable for use in characterization of the chemicals of potential concern at the facility and to help define the nature and extent of contamination.  
Category 3: Validated data suitable only for use in qualitative characterization of the nature and extent of contamination.  
Results greater than or equal to the interim screening level are circled; however, if the interim screening level is equal to the background value, only results greater than the interim screening level are circled.

|         |   |
|---------|---|
| Ø       | white powder sample.  |
| Y       | debris sample   |
| *       | Reporting limits greater than or equal to the interim screening level.      |
| ---     | not analyzed  |
| ft bgs  | feet below ground surface   |
| mg/kg   | milligrams per kilogram   |
| DTSC    | California Department of Toxic Substances Control                           |
| DTSC-SL | DTSC Screening Levels   |
| FD      | field duplicate   |
| J       | concentration or reporting limit estimated by laboratory or data validation |
| N       | primary sample  |
| ND      | not detected at the listed reporting limit                                  |
| NE      | not established   |
| USEPA   | United States Environmental Protection Agency                               |

- 1 Interim screening level is background value. If background value is not available then the interim screening value is the lower of the Ecological Comparison Value , residential DTSC-SL, or USEPA residential regional screening value.
- 2 United States Environmental Protection Agency (USEPA). 2017. Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites. November.
- 3 California Department of Toxic Substances Control (DTSC). 2018. Human Health Risk Assessment (HHRA) Note Number 3. January.
- 4 ARCADIS. 2008. "Technical Memorandum 3: Ecological Comparison Values for Metals and Polycyclic Aromatic Hydrocarbons in Soil." May 28.
- 5 CH2M HILL. 2009. "Final Soil Background Technical Memorandum at Pacific Gas and Electric Company Topock Compressor Station, Needles, California." May.





TABLE B-3b  
Sample Results: Dioxins and Furans  
AOC 9 – Southeast Fence Line  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |          |          |           |           |             |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|----------|----------|-----------|-----------|-------------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE       | NE       | 16        | 50        | 5.58        |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE       | NE       | NE        | 4.8       | NE          |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE       | NE        | 50        | NE          |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE       | 16        | NE        | 1.6         |
| Background <sup>5</sup> :                            |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE       | 5.98      | 5.58      | 5.58        |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD     | OCDF     | TEQ Avian | TEQ Human | TEQ Mammals |
| Category 1   |          |                |             |                       |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |          |          |           |           |             |
| AOC9-2   | 09/18/08 | 0 - 0.5        | N           | 67 J                  | 5.3 J               | 0.6 J               | ND (0.74) J       | ND (0.29) J       | 1.8 J             | ND (0.65) J       | 1.2 J             | ND (0.35) J       | ND (0.23) J     | ND (0.46) J     | ND (6) J          | ND (0.2) J      | ND (0.081) J | ND (0.31) J  | 610 J    | 12 J     | 1.1       | 1.8       | 1.8         |
|  | 09/18/08 | 2 - 3          | N           | 66 J                  | 4.9 J               | ND (0.27) J         | ND (0.41) J       | ND (0.22) J       | ND (1.4) J        | ND (0.25) J       | ND (0.39) J       | ND (0.33) J       | ND (0.33) J     | ND (0.35) J     | ND (4.5) J        | ND (0.37) J     | ND (0.042) J | ND (0.12) J  | 810 J    | 9.9 J    | 0.95      | 1.6       | 1.6         |
| AOC9-8   | 10/01/08 | 2.5 - 3        | N           | 3,200 J               | 210 J               | 15 J                | 21 J              | 9.3 J             | 59 J              | ND (6) J          | 19 J              | 3.3 J             | 6.1 J           | ND (2.4) J      | ND (350) J        | 3.1 J           | ND (0.44) J  | ND (1.2) J   | 34,000 J | 490 J    | 42        | 81        | 81          |
| AOC9-15  | 12/06/15 | 0 - 1          | N           | 1,700 J               | 130 J               | 10 J                | 18 J              | 7.8 J             | 46 J              | 6.1 J             | 29 J              | ND (2.4) J        | 11 J            | 2.9 J           | ND (220) J        | 4.6 J           | ND (0.09) J  | 3 J          | 18,000 J | 310 J    | 41        | 59        | 59          |
|  | 12/06/15 | 2 - 3          | N           | 5,500 J               | 430 J               | 32 J                | 48 J              | 28 J              | 140 J             | 38 J              | 90 J              | 6.8 J             | 28 J            | 19 J            | ND (350) J        | 12 J            | ND (2) J     | ND (0.73) J  | 41,000 J | 940 J    | 95        | 160       | 160         |
| AOC9-16  | 01/13/16 | 0 - 0.5        | N           | 9,300 J               | 210 J               | ND (17) J           | 110 J             | 20 J              | 150 J             | 12 J              | 60 J              | 5.5 J             | 17 J            | ND (6.3) J      | ND (420) J        | 6.9 J           | ND (2.4) J   | ND (3.5) J   | 51,000 J | 400 J    | 82        | 190       | 190         |
|  | 01/13/16 | 2 - 3          | N           | 290 J                 | 23 J                | ND (1.7) J          | 2.9 J             | ND (2.6) J        | ND (6.1) J        | ND (1.4) J        | 4 J               | ND (0.55) J       | ND (1.2) J      | 3.4 J           | ND (23) J         | ND (1.7) J      | ND (0.22) J  | 1.5 J        | 2,800 J  | 70 J     | 6.2       | 7.6       | 7.6         |
|  | 01/13/16 | 5 - 6          | N           | 600 J                 | 55 J                | ND (3.4) J          | ND (3.7) J        | 2.4 J             | ND (10) J         | ND (2.1) J        | ND (7.3) J        | ND (0.39) J       | ND (2) J        | ND (1.2) J      | ND (34) J         | ND (1.2) J      | ND (0.26) J  | ND (0.27) J  | 7,200 J  | 290 J    | 6.4       | 13        | 13          |
| AOC9-18  | 01/10/16 | 5 - 6          | N           | 2,000 J               | 150 J               | 9.8 J               | 12 J              | 9.7 J             | 46 J              | 6.5 J             | 17 J              | ND (2.6) J        | 5.2 J           | 3.4 J           | ND (240) J        | 3.6 J           | ND (0.14) J  | 2.4 J        | 18,000 J | 300 J    | 34        | 55        | 55          |
| AOC9-19  | 01/13/16 | 0 - 0.5        | N           | 1,000 J               | 70 J                | 6.3 J               | 6.6 J             | 5 J               | ND (20) J         | ND (3.5) J        | 9.6 J             | ND (1.5) J        | ND (1.2) J      | ND (1.6) J      | ND (110) J        | ND (1.8) J      | ND (0.17) J  | 1.2 J        | 9,400 J  | 170 J    | 13        | 24        | 24          |
|  | 01/13/16 | 2 - 3          | N           | 430 J                 | 34 J                | ND (2.3) J          | ND (4.3) J        | ND (1.8) J        | 10 J              | ND (2.1) J        | 6.9 J             | ND (0.67) J       | ND (1.4) J      | ND (2.6) J      | ND (42) J         | ND (0.77) J     | ND (0.13) J  | ND (0.99) J  | 4,000 J  | 90 J     | 6.2       | 11        | 11          |
|  | 01/13/16 | 5 - 6          | N           | 220 J                 | 19 J                | ND (0.88) J         | 1.7 J             | ND (1.1) J        | ND (4.8) J        | ND (0.82) J       | ND (1.6) J        | ND (1) J          | ND (0.97) J     | 1.6 J           | ND (31) J         | ND (0.63) J     | ND (0.15) J  | ND (0.57) J  | 2,000 J  | 46 J     | 3.8       | 5.9       | 5.9         |
| AOC9-20  | 01/13/16 | 0 - 0.5        | N           | 410 J                 | 36 J                | ND (2.3) J          | ND (1.1) J        | ND (1.2) J        | ND (8.6) J        | 2.4 J             | ND (5.1) J        | ND (0.64) J       | ND (1.6) J      | ND (1.2) J      | ND (39) J         | ND (1.2) J      | ND (0.25) J  | ND (0.55) J  | 3,600 J  | 97 J     | 5.6       | 9.8       | 9.8         |
|  | 01/13/16 | 2 - 3          | N           | 540 J                 | 38 J                | 2.7 J               | 4.6 J             | ND (3.4) J        | ND (12) J         | ND (3.8) J        | 6.9 J             | ND (1.2) J        | ND (1.7) J      | 3.2 J           | ND (44) J         | ND (1.3) J      | ND (0.23) J  | 2.8 J        | 3,500 J  | 72 J     | 9.6       | 13        | 13          |
|  | 01/13/16 | 5 - 6          | N           | 1,300 J               | 110 J               | ND (7.6) J          | 11 J              | ND (9.3) J        | 30 J              | ND (7) J          | ND (14) J         | ND (0.91) J       | ND (4.9) J*     | 9.9 J           | ND (130) J        | ND (4.7) J      | ND (0.48) J  | 9.1 J        | 12,000 J | 230 J    | 28        | 35        | 35          |
| AOC9-21  | 01/08/17 | 0 - 0.5        | N           | 3,500                 | 360 J               | 27 J                | 14                | ND (17)           | 77                | ND (15)           | 23                | ND (20)           | ND (2.6)        | ND (5.5)        | ND (940)          | ND (5.6)        | ND (0.49)    | ND (0.51)    | 24,000   | 820      | 68        | 110       | 110         |
|  | 01/08/17 | 0 - 0.5        | FD          | 3,600                 | 380                 | 25                  | ND (9.8)          | ND (15)           | 81                | ND (13)           | 22                | ND (17)           | ND (3.3)        | ND (1)          | ND (900)          | ND (1)          | ND (0.23)    | ND (0.83)    | 34,000 J | 870      | 64        | 110       | 110         |
|  | 01/08/17 | 2 - 3          | N           | ND (18)               | ND (0.3)            | ND (0.8)            | ND (0.19)         | ND (0.22)         | ND (0.26)         | ND (0.17)         | ND (0.17)         | ND (0.25)         | ND (0.17)       | ND (0.39)       | ND (1.5)          | ND (0.19)       | ND (0.12)    | ND (0.098)   | 170      | ND (2.9) | 0.46      | 0.47      | 0.47        |
|  | 01/08/17 | 5 - 6          | N           | ND (5.6)              | ND (0.87)           | ND (0.19)           | ND (0.22)         | ND (0.35)         | ND (0.24)         | ND (0.3)          | ND (0.19)         | ND (0.39)         | ND (0.063)      | ND (0.13)       | ND (0.35)         | ND (0.13)       | ND (0.16)    | ND (0.36)    | ND (94)  | ND (2.2) | ND (0.46) | ND (0.3)  | ND (0.3)    |
| AOC9-22  | 01/04/17 | 0 - 0.5        | N           | 960                   | 49                  | ND (2.6)            | 9.9 J             | ND (1.4)          | 22                | 5.5 J             | 13                | ND (1.6)          | ND (5.2) *      | 11 J            | ND (110)          | ND (2.5)        | ND (0.26)    | 11           | 8,100    | 87       | 27        | 28        | 28          |
|  | 01/04/17 | 2 - 3          | N           | 3,800                 | 200                 | 18                  | 20                | 23                | 63                | ND (32)           | 26                | ND (6.4)          | ND (73) *       | ND (3.8)        | ND (5.6)          | ND (3.8)        | ND (1.4)     | ND (7.7)     | 24,000   | 480      | 60        | 100       | 100         |
|  | 01/04/17 | 4.5 - 5        | N           | 100                   | ND (5.3)            | ND (6.5)            | ND (0.34)         | ND (0.35)         | 3.9 J             | ND (0.75)         | 1.1 J             | ND (0.41)         | ND (0.32)       | ND (1.6)        | ND (44)           | ND (0.15)       | ND (0.1)     | ND (0.19)    | 1,000    | 22 J     | 3.2       | 4.4       | 4.4         |
| PA-23  | 01/27/16 | 0 - 1          | N           | 680 J                 | 67 J                | 5.7 J               | ND (6.3) J        | 19 J              | 19 J              | 8.5 J             | ND (9.5) J        | ND (2.4) J        | ND (1.9) J      | 28 J            | ND (59) J         | ND (11) J       | ND (1.2) J   | 36 J         | 6,700 J  | 96 J     | 55        | 26        | 26          |

Notes:

Category 1: Validated data suitable for all uses, including risk assessment and remedial action decisions.

Category 2: Validated data suitable for use in characterization of the chemicals of potential concern at the facility and to help define the nature and extent of contamination.

Category 3: Validated data suitable only for use in qualitative characterization of the nature and extent of contamination.

Results greater than or equal to the Interim Screening Level are circled.

-- not analyzed

ft bgs feet below ground surface

ng/kg nanograms per kilogram

DTSC-SL DTSC Screening Levels

DTSC California Department of Toxic Substances Control

FD Field Dupliicate

TABLE B-3b  
Sample Results: Dioxins and Furans  
AOC 9 – Southeast Fence Line  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|       |   |
|-------|---|
| J     | concentration or reporting limit estimated by laboratory or data validation   |
| JR    | estimated value, one or more input values is “R” qualified.   |
| N     | Primary Sample  |
| NA    | NA = not applicable   |
| NE    | not established   |
| ND    | not detected at the listed reporting limit  |
| R     | The result has been rejected; identification and/or quantitation could not be verified because critical QC specifications were not met (e.g., a non-detect result obtained for an archive sample following a hold time of greater than one year). |
| USEPA | USEPA = United States Environmental Protection Agency   |

- 1 For individual dioxins and furans, selected value is the lower of the ECV, residential DTSC-SL, or USEPA residential regional screening value, unless the background value is higher. For TEQ values, selected value is the DTSC-SL.
- 2 United States Environmental Protection Agency (USEPA). 2017. Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites. November.
- 3 California Department of Toxic Substances Control (DTSC). 2018. Human Health Risk Assessment (HHRA) Note Number 3. JanuaryCalifornia Department of Toxic Substances Control (DTSC). 2017. Human Health Risk Assessment (HHRA) Note 2, Soil Remedial Goals for Dioxins and Dioxin-like Compounds for Consideration at California Hazardous Waste Sites. April.
- 4 ARCADIS. 2008. "Technical Memorandum 3: Ecological Comparison Values for Metals and Polycyclic Aromatic Hydrocarbons in Soil." May 28. ARCADIS. 2009. "Topock Compression Station - Final Technical Memorandum 4: Ecological Comparison Values for Additional Decteded Chemicals in Soil." July 1.
- 5 CH2M. 2017. Revised Ambient Study of Dioxins and Furans at the Pacific Gas and Electric Company, Topock Compressor Station, Needles, California. October.

Calculations:

TEQ = Sum of Result xToxic equivalency factor (TEF), 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.

TEQ Avian = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.

TEQMammals = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.

Teq Humans = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.

TABLE B-4a  
Sample Results: Metals  
AOC 10 – East Ravine  
*Soil Engineering Evaluation/Cost Analysis*  
*PG&E Topock Compressor Station, Needles, California*

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |        |             |            |        |          |          |             |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|-------------|------------|--------|----------|----------|-------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125      | 1.37       | 27.3   | 1.47     | 5.15     | 0.78        | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11          | 390        | 1,500  | 390      | 390      | 0.78        | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1           | NE         | 490    | NE       | 390      | NE          | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125      | 2.25       | 0.607  | 0.177    | 5.15     | 2.32        | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE          | 1.37       | 27.3   | 1.47     | NE       | NE          | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury     | Molybdenum | Nickel | Selenium | Silver   | Thallium    | Vanadium | Zinc   |
| Category 1   |          |                |             |                |         |        |            |            |                      |                 |        |        |        |             |            |        |          |          |             |          |        |
| AOC10-1  | 10/02/08 | 0 - 0.5        | N           | ND (2) *       | 3.7     | 93     | ND (1) *   | ND (1)     | ND (0.401)           | 6.6             | 2.7    | 4.9    | 9.2    | ND (0.1) *  | ND (1)     | 5.5    | ND (1)   | ND (1)   | ND (2) *    | 13       | 20     |
|  | 10/02/08 | 2 - 3          | N           | ND (2) *       | 4.2     | 81     | ND (1) *   | ND (1)     | ND (0.405)           | 7.4             | 3      | 5.6    | 5.8    | ND (0.1) *  | ND (1)     | 6.3    | ND (1)   | ND (1)   | ND (2) *    | 16       | 21     |
|  | 10/02/08 | 5 - 6          | N           | ND (2) *       | 4.9     | 82     | ND (1) *   | ND (1)     | ND (0.407)           | 7.5             | 3.2    | 5.8    | 5.4    | ND (0.1) *  | ND (1)     | 6.4    | ND (1)   | ND (1)   | ND (2) *    | 17       | 20     |
|  | 10/02/08 | 9 - 10         | N           | ND (2) *       | 4.7     | 110    | ND (1) *   | ND (1)     | ND (0.406)           | 6.8             | 3      | 5.7    | 4.8    | ND (0.1) *  | ND (1)     | 6.2    | ND (1)   | ND (1)   | ND (2) *    | 15       | 21     |
| AOC10-10   | 01/22/16 | 0 - 1          | N           | ND (2.1) *     | 3.1     | 100    | ND (1) *   | ND (1)     | 0.45                 | 36              | 6.2    | 15     | 4.7    | ND (0.1) *  | ND (1)     | 16     | ND (1)   | ND (1)   | ND (2.1) *  | 23       | 63     |
|  | 01/22/16 | 2 - 3          | N           | ND (2.2) *     | 2.6     | 100    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 27              | 9      | 13     | 2      | ND (0.11) * | ND (1.1)   | 22     | ND (1.1) | ND (1.1) | ND (2.2) *  | 38       | 41     |
|  | 01/22/16 | 5 - 6          | N           | ND (2.1) *     | 3.2     | 120    | ND (1.1) * | ND (1.1) * | 0.35                 | 34              | 11     | 13     | 2.1    | ND (0.11) * | ND (1.1)   | 28     | ND (1.1) | ND (1.1) | ND (2.1) *  | 43       | 44     |
|  | 01/22/16 | 9 - 10         | N           | ND (2.2) *     | 3.4     | 100    | ND (1.1) * | ND (1.1) * | 0.35                 | 32              | 9.5    | 11     | 2.6    | ND (0.11) * | ND (1.1)   | 23     | ND (1.1) | ND (1.1) | ND (2.2) *  | 42       | 43     |
|  | 01/22/16 | 9 - 10         | FD          | ND (2.2) *     | 3.1     | 85     | ND (1.1) * | ND (1.1) * | 0.39                 | 31              | 9.2    | 11     | 2.4    | ND (0.11) * | ND (1.1)   | 21     | ND (1.1) | ND (1.1) | ND (2.2) *  | 39       | 42     |
| AOC10-11   | 01/22/16 | 0 - 1          | N           | ND (2.1) *     | 3.3     | 85     | ND (1) *   | ND (1)     | 0.87                 | 31              | 5.8 J  | 9.1    | 2.7    | ND (0.1) *  | ND (1)     | 14 J   | ND (1)   | ND (1)   | ND (2.1) *  | 24 J     | 40     |
|  | 01/22/16 | 0 - 1          | FD          | ND (2.1) *     | 3.4     | 86     | ND (1) *   | ND (1)     | 0.44                 | 27              | 8.6 J  | 14     | 2.4    | ND (0.1) *  | ND (1)     | 18 J   | ND (1)   | ND (1)   | ND (2.1) *  | 31 J     | 45     |
|  | 01/22/16 | 2 - 3          | N           | ND (2.1) J*    | 2.7     | 110    | ND (1) *   | ND (1)     | 0.9                  | 45              | 7.3    | 13     | 2.6    | ND (0.1) *  | ND (1)     | 19     | ND (1) J | ND (1)   | ND (2.1) J* | 30       | 44     |
|  | 01/22/16 | 5 - 6          | N           | ND (2.1) *     | 2.4     | 110    | ND (1) *   | ND (1)     | 1.6                  | 73              | 9.4    | 31     | 2.5    | ND (0.1) *  | ND (1)     | 24     | ND (1)   | ND (1)   | ND (2.1) *  | 35       | 74     |
|  | 01/22/16 | 9 - 10         | N           | ND (2) *       | 2.4     | 190    | ND (1) *   | ND (1)     | 0.72                 | 42              | 10     | 19     | 2.4    | ND (0.1) *  | ND (1)     | 22     | ND (1)   | ND (1)   | ND (2) *    | 36       | 160    |
| AOC10-12   | 01/22/16 | 0 - 0.5        | N           | ND (2.1) *     | 4.3     | 89     | ND (1) *   | ND (1)     | 13                   | 460             | 9.8    | 19     | 12     | ND (0.11) * | ND (1)     | 21     | ND (1)   | ND (1)   | ND (2.1) *  | 36       | 56     |
|  | 01/22/16 | 2 - 3          | N           | ND (2.1) *     | 8.9     | 63     | ND (1.1) * | ND (1.1) * | 0.3                  | 25              | 4.6    | 9      | 3.6    | ND (0.1) *  | 1.4        | 11     | ND (1.1) | ND (1.1) | ND (2.1) *  | 38       | 34     |
|  | 01/22/16 | 5 - 6          | N           | ND (2.1) *     | 3       | 200    | ND (1) *   | ND (1)     | 5                    | 130             | 8.4    | 11     | 6      | ND (0.1) *  | ND (1)     | 18     | ND (1)   | ND (1)   | ND (2.1) *  | 31       | 70     |
|  | 01/22/16 | 9 - 10         | N           | ND (2.1) *     | 4.4     | 120    | ND (1) *   | ND (1)     | 0.66                 | 37              | 9.6    | 16     | 2.5    | ND (0.11) * | ND (1)     | 22     | ND (1)   | ND (1)   | ND (2.1) *  | 34       | 47     |
| AOC10-13   | 12/03/15 | 0 - 1          | N           | ND (2.1) *     | 4.3     | 130    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 14              | 5.3    | 13     | 9.8    | ND (0.11) * | 1.4        | 12     | ND (1.1) | ND (1.1) | ND (2.1) *  | 22       | 39     |
|  | 12/03/15 | 0 - 1          | FD          | ND (2.1) *     | 4.5     | 130    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 16              | 5.7    | 14     | 10     | ND (0.11) * | 1.4        | 14     | 1.1      | ND (1.1) | ND (2.1) *  | 23       | 41     |
| AOC10-14   | 12/03/15 | 0 - 1          | N           | ND (2.1) *     | 6.3     | 380    | ND (1) *   | ND (1)     | ND (0.21)            | 11              | 4.1    | 13     | 5.9    | ND (0.1) *  | 1.3        | 9.1    | 9.1      | ND (1)   | ND (2.1) *  | 21       | 29     |
| AOC10-15   | 12/15/15 | 0 - 1          | N           | ND (2) *       | 5.8     | 150    | ND (1) *   | ND (1)     | 2.6                  | 67              | 6.1    | 23     | 21     | ND (0.1) *  | 14         | 11     | ND (1)   | ND (1)   | ND (2) *    | 24       | 98     |
|  | 12/15/15 | 0 - 1          | FD          | ND (2) *       | 5.4     | 150    | ND (1) *   | ND (1)     | 2.6                  | 70              | 5.9    | 27     | 20     | ND (0.1) *  | 14         | 10     | ND (1)   | ND (1)   | ND (2) *    | 22       | 110    |
|  | 12/15/15 | 2 - 3          | N           | ND (2) *       | 4.7     | 210    | ND (1) *   | ND (1)     | 1.4                  | 41              | 7.2    | 22     | 17 J   | ND (0.1) *  | 8.2        | 14     | ND (1) J | ND (1) J | ND (2) J*   | 26       | 70 J   |
|  | 12/15/15 | 5 - 6          | N           | ND (2.1) *     | 4.4     | 320    | ND (1) *   | ND (1)     | 1.1                  | 33              | 6.3    | 14     | 7.6    | ND (0.1) *  | 4.2        | 15     | ND (1)   | ND (1)   | ND (2.1) *  | 26       | 100    |
|  | 12/15/15 | 9 - 10         | N           | ND (2.1) *     | 4.8     | 78     | ND (1) *   | ND (1)     | ND (0.21)            | 17              | 8.1    | 11     | 1.5    | ND (0.1) *  | ND (1)     | 15     | ND (1)   | ND (1)   | ND (2.1) *  | 30       | 44     |
| AOC10-16   | 12/15/15 | 0 - 1          | N           | ND (2) *       | 3       | 69     | ND (1) *   | ND (1)     | 0.59                 | 21              | 7.3    | 8.9    | 5.9    | ND (0.1) *  | ND (1)     | 16     | ND (1)   | ND (1)   | ND (2) *    | 26       | 40     |
|  | 12/15/15 | 2 - 3          | N           | ND (2.1) *     | 2.8     | 44     | ND (1) *   | ND (1)     | 0.24                 | 21              | 7      | 9.7    | 2.5    | ND (0.1) *  | ND (1)     | 14     | ND (1)   | ND (1)   | ND (2.1) *  | 27       | 44     |
|  | 12/15/15 | 5 - 6          | N           | ND (2.1) *     | 3.1     | 170    | ND (1) *   | ND (1)     | 0.48                 | 21              | 7.2    | 12     | 3.2    | ND (0.1) *  | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2.1) *  | 30       | 40     |
|  | 12/15/15 | 9 - 10         | N           | ND (2) *       | 2.9     | 59     | ND (1) *   | ND (1)     | ND (0.2)             | 14              | 6.6    | 9.4    | 2.4    | ND (0.1) *  | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2) *    | 28       | 38     |
| AOC10-17   | 12/03/15 | 0 - 1          | N           | ND (2.1) *     | 3.8     | 110    | ND (1) *   | ND (1)     | ND (0.21)            | 9.7             | 4.6    | 11     | 9.9    | ND (0.1) *  | 7.8        | 10     | 1.9      | ND (1)   | ND (2.1) *  | 16       | 32     |
| AOC10-18   | 12/06/15 | 0 - 1          | N           | ND (2) *       | 2.3     | 100    | ND (1) *   | ND (1)     | ND (0.2)             | 5.6             | 2.3    | 2.8    | 1.9    | ND (0.1) *  | ND (1)     | 3.6    | ND (1)   | ND (1)   | ND (2) *    | 14       | 13     |
|  | 12/06/15 | 2 - 3          | N           | ND (2) *       | 2.2     | 160    | ND (1) *   | ND (1)     | ND (0.2)             | 5.7             | 2.5    | 4.1    | 1.9    | ND (0.1) *  | ND (1)     | 4.2    | ND (1)   | ND (1)   | ND (2) *    | 15       | 13     |
| AOC10-19   | 02/24/16 | 0 - 1          | N           | ND (2) J*      | 4.2     | 120    | ND (1) *   | ND (1)     | ND (0.2)             | 27              | 8.4    | 14     | 6.7 J  | ND (0.1) *  | ND (1)     | 20     | ND (1)   | ND (1)   | ND (2) *    | 34       | 48     |
|  | 02/24/16 | 2 - 3          | N           | ND (2.1) *     | 5       | 120    | ND (1) *   | ND (1)     | 0.3                  | 34 J            | 10     | 18     | 5.8    | ND (0.1) *  | ND (1)     | 22     | ND (1)   | ND (1)   | ND (2.1) *  | 40       | 55     |
|  | 02/24/16 | 2 - 3          | FD          | ND (2.1) *     | 4.9     | 110    | ND (1) *   | ND (1)     | ND (0.21)            | 27 J            | 9.1    | 17     | 5.8    | ND (0.1) *  | ND (1)     | 19     | ND (1)   | ND (1)   | ND (2.1) *  | 36       | 52     |
|  | 02/24/16 | 5 - 6          | N           | ND (2.1) *     | 5.8     | 130    | ND (1) *   | ND (1)     | ND (0.21)            | 27              | 9.4    | 17     | 3.8    | ND (0.11) * | ND (1)     | 19     | ND (1)   | ND (1)   | ND (2.1) *  | 37       | 47     |

TABLE B-4a  
Sample Results: Metals  
AOC 10 – East Ravine  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |                       |                |             | Metals (mg/kg) |         |        |            |          |                      |                 |        |        |          |              |            |        |            |            |             |          |        |
|--|-----------------------|----------------|-------------|----------------|---------|--------|------------|----------|----------------------|-----------------|--------|--------|----------|--------------|------------|--------|------------|------------|-------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |                       |                |             | 0.285          | 11      | 410    | 0.672      | 1.1      | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39     | 0.0125       | 1.37       | 27.3   | 1.47       | 5.15       | 0.78        | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |                       |                |             | 31             | 0.68    | 15,000 | 160        | 71       | 0.3                  | 120,000         | 23     | 3,100  | 400      | 11           | 390        | 1,500  | 390        | 390        | 0.78        | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |                       |                |             | NE             | 0.11    | NE     | 15         | 5.2      | NE                   | 36,000          | NE     | NE     | 80       | 1            | NE         | 490    | NE         | 390        | NE          | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |                       |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151   | 139.6                | 36.3            | 13     | 20.6   | 0.0166   | 0.0125       | 2.25       | 0.607  | 0.177      | 5.15       | 2.32        | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |                       |                |             | NE             | 11      | 410    | 0.672      | 1.1      | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39     | NE           | 1.37       | 27.3   | 1.47       | NE         | NE          | 52.2     | 58     |
| Location   | Date                  | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium  | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead     | Mercury      | Molybdenum | Nickel | Selenium   | Silver     | Thallium    | Vanadium | Zinc   |
| AOC10-2  | 10/02/08              | 0 - 0.5        | N           | ND (2) *       | 3.4     | 93     | ND (1) *   | ND (1)   | ND (0.402)           | 4.9             | 2.3    | 4.1    | 5.1      | ND (0.1) *   | ND (1)     | 4.3    | ND (1)     | ND (1)     | ND (2) *    | 12       | 14     |
|  | 10/02/08              | 2 - 3          | N           | ND (2.1) *     | 5.5     | 370    | ND (1) *   | ND (1)   | ND (0.417)           | 17              | 6.4    | 9.4    | 3.4      | ND (0.1) *   | ND (1)     | 12     | ND (1)     | ND (1)     | ND (2.1) *  | 33       | 38     |
|  | 10/02/08              | 5 - 6          | N           | ND (2.1) *     | 9.1     | 120    | ND (2.1) * | ND (1)   | ND (0.415)           | 19              | 7.4    | 9.5    | 4.2      | ND (0.1) *   | ND (2.1) * | 14     | ND (1)     | ND (2.1)   | ND (4.1) *  | 36       | 40     |
|  | 10/02/08              | 7 - 8          | N           | ND (2.1) *     | 6       | 110    | ND (1) *   | ND (1)   | ND (0.412)           | 17              | 6.3    | 9      | 3.2      | ND (0.1) *   | ND (1)     | 13     | ND (1)     | ND (1)     | ND (2.1) *  | 30       | 32     |
| AOC10-20   | 02/17/16              | 0 - 0.5        | N           | 15             | 3.5     | 120    | ND (1) *   | ND (1)   | 2,700                | 2,800           | 3.4    | 11     | 6.1      | ND (0.1) *   | ND (1)     | 5.8    | ND (1)     | ND (1)     | ND (2) *    | 14       | 38     |
|  | 02/25/16              | 2 - 3          | N           | ND (2) *       | 3.3     | 100    | ND (1) *   | ND (1)   | 12                   | 28              | 3.2    | 5      | 2.8      | ND (0.1) *   | ND (1)     | 5.8    | ND (1)     | ND (1)     | ND (2) *    | 18       | 16     |
| AOC10-21   | 02/25/16              | 0 - 0.5        | N           | ND (2) *       | 9.7     | 320    | ND (1) *   | 7.4      | 1.4                  | 270             | 8.5    | 3,100  | 920      | 35           | 9.4        | 28     | ND (1)     | ND (1)     | ND (2) *    | 23       | 360    |
|  | 02/25/16              | 2 - 3          | N           | ND (2) *       | 3       | 85     | ND (1) *   | ND (1)   | 0.2                  | 8.1             | 3.2    | 5      | 2.9      | ND (0.099) * | ND (1)     | 5.4    | ND (1)     | ND (1)     | ND (2) *    | 16       | 16     |
| AOC10-22   | 02/17/16              | 0 - 0.5        | N           | ND (2) *       | 4.1     | 140    | ND (1) *   | ND (1)   | ND (0.2)             | 35              | 8.1    | 14     | 12       | ND (0.1) *   | ND (1)     | 20     | ND (1)     | ND (1)     | ND (2) *    | 38       | 50     |
|  | 02/17/16              | 1 - 2          | N           | ND (2.1) *     | 17      | 77     | ND (1.1) * | 4.4      | 0.91                 | 85              | 36     | 200    | 38       | ND (0.11) *  | 2.7        | 51     | ND (1.1)   | ND (1.1)   | ND (2.1) *  | 19       | 39     |
|  | 02/17/16              | 2 - 3          | N           | ND (2) *       | 5.5     | 140    | ND (1) *   | 1.2      | 0.37                 | 35              | 13     | 42     | 17       | ND (0.1) *   | ND (1)     | 25     | ND (1)     | ND (1)     | ND (2) *    | 34       | 35     |
|  | 02/17/16              | 5 - 6          | N           | ND (2) *       | 4.1     | 130    | ND (1) *   | ND (1)   | ND (0.2)             | 8.6             | 3.4    | 5.1    | 3.4      | ND (0.1) *   | ND (1)     | 5.4    | ND (1)     | ND (1)     | ND (2) *    | 19       | 18     |
| AOC10-23   | 02/25/16              | 0 - 1          | N           | ND (2) *       | 11      | 57     | ND (1) *   | 1.8      | 1.8                  | 72              | 27     | 140    | 30       | 0.24         | ND (1)     | 34     | ND (1)     | ND (1)     | ND (2) *    | 12       | 26     |
|  | 02/25/16              | 1 - 2          | N           | ND (2) *       | 5.1     | 59     | ND (1) *   | ND (1)   | 2.6                  | 130             | 5.7    | 22     | 22       | ND (0.1) *   | ND (1)     | 11     | ND (1)     | ND (1)     | ND (2) *    | 16       | 56     |
|  | 02/25/16              | 2 - 3          | N           | ND (2) *       | 3       | 60     | ND (1) *   | ND (1)   | ND (0.2)             | 5.5             | 2.5    | 4.2    | 2.2      | ND (0.1) *   | ND (1)     | 4.4    | ND (1)     | ND (1)     | ND (2) *    | 13       | 11     |
| AOC10-25   | 01/08/17              | 0 - 0.5        | N           | ND (2) *       | 3.1     | 120 J  | ND (1) J*  | ND (1)   | ND (0.2)             | 15              | 5.9 J  | 8      | 7.9 J    | ND (0.1) *   | ND (1)     | 11 J   | ND (1) J   | ND (1)     | ND (2) J*   | 23       | 32     |
|  | 01/08/17              | 0 - 0.5        | FD          | ND (2) *       | 3.7     | 150 J  | ND (1) J*  | ND (1)   | ND (0.2)             | 18              | 7.3 J  | 9.5    | 11 J     | ND (0.1) *   | ND (1)     | 14 J   | ND (1) J   | ND (1)     | ND (2) J*   | 27       | 38     |
|  | 01/08/17              | 2 - 3          | N           | ND (2) *       | 4.1     | 140 J  | ND (1) J*  | ND (1)   | ND (0.2)             | 31              | 9.9    | 11     | 2.1 J    | ND (0.1) *   | 1.4        | 21     | ND (1) J   | ND (1)     | ND (2) J*   | 36 J     | 41     |
|  | 01/08/17              | 5 - 6          | N           | ND (2.1) *     | 4.8     | 160    | ND (1) *   | ND (1)   | ND (0.2)             | 25              | 8.2    | 11     | 1.5      | ND (0.1) *   | ND (1)     | 16     | ND (1) J   | ND (1)     | ND (2.1) *  | 30       | 45     |
|  | 01/08/17              | 9 - 10         | N           | ND (2) *       | 5.6     | 130    | ND (1) *   | ND (1)   | ND (0.2)             | 26              | 10     | 13     | 1.5      | ND (0.1) *   | ND (1)     | 15     | ND (1) J   | ND (1)     | ND (2) *    | 34       | 42     |
| AOC10-26   | 02/21/17 <sup>Θ</sup> | 2.5 - 2.7      | N           | 3.5            | 6.6     | 200    | ND (1.4) * | 1.5      | 9.5                  | 340             | 6.5    | 40     | 18       | 0.15         | ND (1.4) * | 13     | ND (1.4) J | ND (1.4)   | ND (2.8) J* | 31       | 110    |
| AOC10-3  | 09/19/08              | 0 - 0.5        | N           | ND (2) J*      | 3.1     | 160    | ND (2) *   | ND (1)   | 1.91                 | 62              | 4.6    | 14     | 7.8      | ND (0.1) *   | ND (2) *   | 12     | ND (1)     | ND (2)     | ND (4) *    | 23       | 40     |
|  | 09/19/08              | 0 - 0.5        | FD          | ND (2) *       | 2.6     | 150    | ND (2) *   | ND (1)   | 1.7                  | 64              | 4.5    | 13     | 7.7      | ND (0.1) *   | ND (2) *   | 12     | ND (1)     | ND (2)     | ND (4) *    | 22       | 41     |
|  | 09/19/08              | 2 - 3          | N           | ND (2.1) *     | 3.3     | 160    | ND (5.1) * | ND (1)   | ND (0.412)           | 43              | 10     | 14     | ND (5.1) | ND (0.1) *   | ND (5.1) * | 26     | ND (1)     | ND (5.1)   | ND (10) *   | 43       | 47     |
|  | 09/19/08              | 5 - 6          | N           | ND (2.1) *     | 5.4     | 220    | ND (5.1) * | ND (1)   | 0.705                | 37              | 9.9    | 16     | 2.9      | ND (0.1) *   | ND (5.1) * | 25     | ND (1)     | ND (5.1)   | ND (10) *   | 46       | 61     |
|  | 09/19/08              | 9 - 10         | N           | ND (2.1) *     | 7.4     | 110    | ND (1) *   | ND (1)   | ND (0.412)           | 28              | 9      | 12     | 2.8      | ND (0.1) J*  | ND (1)     | 20     | ND (1)     | ND (1)     | ND (2.1) *  | 33       | 50     |
| AOC10-4  | 09/19/08              | 0 - 0.5        | N           | ND (2) *       | 3.5     | 110    | ND (2) *   | ND (1)   | 0.55                 | 33              | 6.5    | 14     | 11       | ND (0.1) *   | ND (2) *   | 15     | ND (1)     | ND (2)     | ND (4) *    | 32       | 52     |
|  | 09/19/08              | 2 - 3          | N           | ND (2) *       | 2.5     | 130    | ND (2) *   | ND (1)   | ND (0.409)           | 26              | 7.1    | 16     | 4.4      | ND (0.1) *   | ND (2) *   | 19     | ND (1)     | ND (2)     | ND (4.1) *  | 33       | 38     |
|  | 09/19/08              | 5 - 6          | N           | ND (2.1) *     | 5.9     | 75     | ND (5.2) * | ND (1)   | ND (0.418)           | 27              | 10     | 16     | 3        | ND (0.11) *  | ND (5.2) * | 20     | ND (1)     | ND (5.2) * | ND (10) *   | 40       | 63     |
|  | 09/19/08              | 9 - 10         | N           | ND (2.1) *     | 7.7     | 48     | ND (1) *   | ND (1)   | ND (0.413)           | 18              | 7.9    | 12     | 2.7      | ND (0.1) J*  | ND (1)     | 14     | ND (1)     | ND (1)     | ND (2.1) *  | 27       | 48     |
| AOC10-5  | 09/19/08              | 0 - 0.5        | N           | ND (2) *       | 9.6     | 500    | ND (5.1) * | ND (1)   | 1.01                 | 39              | 9.6    | 27     | 27       | ND (0.1) *   | ND (5.1) * | 23     | ND (1)     | ND (5.1)   | ND (10) *   | 52       | 97     |
|  | 09/19/08              | 2 - 3          | N           | ND (2.1) *     | 8.2     | 380    | ND (5.1) * | ND (1)   | 0.48                 | 30              | 8.3    | 21     | 34       | ND (0.1) *   | ND (5.1) * | 20     | ND (1)     | ND (5.1)   | ND (10) *   | 43       | 77     |
|  | 09/19/08              | 5 - 6          | N           | ND (4.1) *     | 12      | 1,100  | ND (5.1) * | ND (2) * | ND (0.407)           | 19              | 8.8    | 40     | 6.7      | ND (0.1) *   | ND (5.1) * | 16     | ND (2) *   | ND (5.1)   | ND (10) *   | 36       | 80     |
|  | 09/19/08              | 5 - 6          | FD          | ND (4.1) *     | 12      | 1,300  | ND (5.1) * | ND (2) * | ND (0.407)           | 18              | 8.5    | 41     | 7.3      | ND (0.1) *   | ND (5.1) * | 14     | ND (2) *   | ND (5.1)   | ND (10) *   | 37       | 79     |
| AOC10-6  | 09/20/08              | 0 - 0.5        | N           | ND (2) J*      | 7       | 220 J  | ND (2) *   | ND (1)   | ND (0.402)           | 24              | 7.2    | 11     | 26       | ND (0.1) *   | ND (2) *   | 16     | ND (1)     | ND (2)     | ND (4) *    | 32       | 58     |
|  | 09/20/08              | 2 - 3          | N           | ND (2) *       | 4.2     | 220    | ND (1) *   | ND (1)   | ND (0.404)           | 23              | 7      | 9.5    | 4.1      | ND (0.1) *   | ND (1)     | 16     | ND (1)     | ND (1)     | ND (2) *    | 34       | 45     |
| AOC10-7  | 09/20/08              | 0 - 0.5        | N           | ND (2) *       | 7.6     | 250    | ND (1) *   | ND (1)   | ND (0.414)           | 22              | 6.7    | 12     | 8.6      | ND (0.1) *   | ND (1)     | 14     | ND (1)     | ND (1)     | ND (2) *    | 29       | 54     |
|  | 09/20/08              | 2 - 3          | N           | ND (2) *       | 8       | 210    | ND (1) *   | ND (1)   | ND (0.406)           | 27              | 7.9    | 12     | 8.1      | ND (0.1) *   | 1.1        | 14     | ND (1)     | ND (1)     | ND (2) *    | 33       | 58     |
|  | 09/20/08              | 5 - 6          | N           | ND (2) *       | 9.6     | 270    | ND (2) *   | ND (1)   | ND (0.407)           | 33              | 8.7    | 13     | 4.4      | ND (0.1) *   | ND (2) *   | 20     | ND (1)     | ND (2)     | ND (4.1) *  | 38       | 58     |



TABLE B-4a  
Sample Results: Metals  
AOC 10 – East Ravine  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |        |             |            |        |            |          |             |          |         |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|-------------|------------|--------|------------|----------|-------------|----------|---------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125      | 1.37       | 27.3   | 1.47       | 5.15     | 0.78        | 52.2     | 58      |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11          | 390        | 1,500  | 390        | 390      | 0.78        | 390      | 23,000  |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1           | NE         | 490    | NE         | 390      | NE          | 390      | NE      |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125      | 2.25       | 0.607  | 0.177      | 5.15     | 2.32        | 13.9     | 0.164   |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE          | 1.37       | 27.3   | 1.47       | NE       | NE          | 52.2     | 58      |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury     | Molybdenum | Nickel | Selenium   | Silver   | Thallium    | Vanadium | Zinc    |
| AOC10-8  | 08/22/08 | 0 - 0.5        | N           | ND (4) *       | 8.6     | 210    | ND (2) *   | ND (2) *   | ND (0.402)           | 16              | 6.4    | 12     | 15 J   | ND (0.1) *  | ND (2) *   | 14     | ND (2) *   | ND (2)   | ND (4) *    | 31       | 87      |
|  | 08/22/08 | 0 - 0.5        | FD          | ND (4) *       | 8.2     | 180    | ND (2) *   | ND (2) *   | ND (0.416)           | 18              | 7      | 12     | 12 J   | ND (0.1) *  | ND (2) *   | 14     | ND (2) *   | ND (2)   | ND (4) *    | 33       | 75      |
| AOC10-9  | 12/07/15 | 0 - 1          | N           | ND (2) *       | 9.1     | 82     | ND (1) *   | ND (1)     | ND (0.2)             | 19              | 6.9    | 12     | 3.2    | ND (0.1) *  | ND (1)     | 15     | ND (1)     | ND (1)   | ND (2) *    | 29       | 41      |
|  | 12/07/15 | 2 - 3          | N           | ND (2.1) *     | 4.8     | 140    | ND (1) *   | ND (1)     | ND (0.2)             | 16              | 6.6    | 10     | 2.3    | ND (0.1) *  | ND (1)     | 13     | ND (1)     | ND (1)   | ND (2.1) *  | 26       | 49      |
| AOC10a-1   | 10/17/08 | 0 - 0.5        | N           | ND (2.1) J*    | 8.8     | 140    | ND (1.1) * | ND (1.1) * | 8.25                 | 80              | 5.7    | 270 J  | 200 J  | 0.64        | 19         | 28     | ND (1.1)   | ND (1.1) | ND (2.1) *  | 17       | 1,000 J |
| AOC10a-2   | 01/13/16 | 0 - 1          | N           | ND (2.1) *     | 3.8     | 65     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 13              | 4.2    | 11     | 9.4    | 0.12        | ND (1.1)   | 7.7    | ND (1.1)   | ND (1.1) | ND (2.1) *  | 18       | 36      |
|  | 01/13/16 | 2 - 3          | N           | ND (2.1) *     | 3.1     | 77     | ND (1) *   | ND (1)     | ND (0.21)            | 3.6             | 2.3    | 2.9    | 2.1    | ND (0.1) *  | ND (1)     | 3.4    | ND (1)     | ND (1)   | ND (2.1) *  | 9.6      | 10      |
|  | 01/13/16 | 5 - 6          | N           | ND (2.1) *     | 2.9     | 65     | ND (1) *   | ND (1)     | ND (0.21)            | 3.7             | 1.9    | 2.6    | 1.9    | ND (0.1) *  | ND (1)     | 2.7    | ND (1)     | ND (1)   | ND (2.1) *  | 9.3      | 9.5     |
|  | 01/13/16 | 9 - 10         | N           | ND (2.1) *     | 2.9     | 290    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 4.6             | 2.2    | 3.6    | 2.4    | ND (0.11) * | ND (1.1)   | 3.9    | ND (1.1)   | ND (1.1) | ND (2.1) *  | 9.9      | 12      |
| AOC10a-3   | 01/13/16 | 0 - 1          | N           | ND (2.1) *     | 3.7     | 150    | ND (1) *   | ND (1)     | 5.3                  | 100             | 7.6    | 27     | 4.2    | 0.13        | ND (1)     | 19     | ND (1)     | ND (1)   | ND (2.1) *  | 27       | 35      |
|  | 01/13/16 | 2 - 3          | N           | ND (2.1) *     | 4.7     | 140    | ND (1) *   | ND (1)     | 1.3                  | 68              | 5.7    | 25     | 22     | 0.21        | 1.4        | 16     | ND (1)     | ND (1)   | ND (2.1) *  | 22       | 70      |
|  | 01/13/16 | 5 - 6          | N           | ND (2.1) *     | 3.6     | 82     | ND (1) *   | ND (1)     | ND (0.21)            | 45              | 9      | 12     | 1.7    | 0.19        | ND (1)     | 28     | ND (1)     | ND (1)   | ND (2.1) *  | 40       | 34      |
|  | 01/13/16 | 9 - 10         | N           | ND (2.1) *     | 3.2     | 150    | ND (1) *   | ND (1)     | ND (0.21)            | 39              | 10     | 31     | 2.3    | 0.16        | ND (1)     | 32     | ND (1)     | ND (1)   | ND (2.1) *  | 42       | 38      |
| AOC10a-4   | 01/08/17 | 0 - 0.5        | N           | ND (2.1) *     | 3.6     | 140    | ND (1.1) * | ND (1.1) * | ---                  | 33              | 10     | 30     | 4      | ND (0.11) * | ND (1.1)   | 25     | ND (1.1) J | ND (1.1) | ND (2.1) J* | 34       | 41      |
|  | 01/08/17 | 2 - 3          | N           | ND (2) *       | 3.8     | 130    | ND (1) *   | ND (1)     | ---                  | 11              | 4.1    | 6.3    | 2.6    | ND (0.1) *  | ND (1)     | 7.7    | ND (1) J   | ND (1)   | ND (2) J*   | 19       | 20      |
|  | 01/08/17 | 5 - 6          | N           | ND (2) *       | 3.5     | 130    | ND (1) *   | ND (1)     | ---                  | 11              | 3.9    | 6.9    | 2.5    | ND (0.1) *  | ND (1)     | 7.9    | ND (1) J   | ND (1)   | ND (2) J*   | 17       | 19      |
|  | 01/08/17 | 9 - 10         | N           | ND (2.1) *     | 2.2     | 310    | ND (1) *   | 1.1        | ---                  | 47              | 12     | 14     | 2.1    | ND (0.1) *  | ND (1)     | 35     | ND (1) J   | ND (1)   | ND (2.1) J* | 43       | 41      |
| AOC10b-1   | 09/30/08 | 0 - 0.5        | N           | ND (2) *       | 3.6     | 130    | ND (1) *   | ND (1)     | 0.559                | 24              | 4.8    | 9.8    | 8.6    | ND (0.1) *  | ND (1)     | 10     | ND (1)     | ND (1)   | ND (2) *    | 25       | 38      |
|  | 09/30/08 | 2 - 3          | N           | ND (2) *       | 3.1     | 120    | ND (1) *   | ND (1)     | 1.39                 | 63              | 4.8    | 28     | 8.4 J  | ND (0.1) *  | ND (1)     | 11     | ND (1)     | ND (1)   | ND (2) *    | 20       | 110 J   |
|  | 09/30/08 | 2 - 3          | FD          | ND (2) *       | 2.9     | 100    | ND (1) *   | ND (1)     | 1.39                 | 61              | 4.2    | 27     | 12 J   | ND (0.1) *  | 1.5        | 10     | ND (1)     | ND (1)   | ND (2) *    | 18       | 160 J   |
|  | 09/30/08 | 5 - 6          | N           | ND (2) *       | 3.1     | 110    | ND (1) *   | ND (1)     | 0.425                | 20              | 3.9    | 8      | 4.3    | ND (0.1) *  | ND (1)     | 8.4    | ND (1)     | ND (1)   | ND (2) *    | 16       | 39      |
|  | 09/30/08 | 9 - 10         | N           | ND (2) *       | 4.7     | 120    | ND (2) *   | ND (1)     | ND (0.407)           | 29              | 6.2    | 10     | 3.7    | ND (0.1) *  | ND (2) *   | 16     | ND (1)     | ND (2)   | ND (4) *    | 24       | 29      |
| AOC10b-2   | 09/30/08 | 0 - 0.5        | N           | ND (2) *       | 3       | 89     | ND (1) *   | ND (1)     | 0.434                | 29              | 3.8    | 11     | 8.2    | ND (0.1) *  | 1.1        | 8.9    | ND (1)     | ND (1)   | ND (2) *    | 17       | 40      |
|  | 09/30/08 | 2 - 3          | N           | ND (2) *       | 2.9     | 100    | ND (1) *   | ND (1)     | 1.05                 | 47              | 4.3    | 15     | 5.2    | ND (0.1) *  | 1.1        | 10     | ND (1)     | ND (1)   | ND (2) *    | 17       | 44      |
|  | 09/30/08 | 5 - 6          | N           | ND (2) *       | 4.1     | 100    | ND (1) *   | ND (1)     | 0.453                | 29              | 5.3    | 8.8    | 4.2    | ND (0.1) *  | 1          | 14     | ND (1)     | ND (1)   | ND (2) *    | 22       | 27      |
|  | 09/30/08 | 9 - 10         | N           | ND (2) *       | 5.7     | 120    | ND (2) *   | ND (1)     | 0.759                | 39              | 8.2    | 15     | 3.8    | ND (0.1) *  | ND (2) *   | 22     | ND (1)     | ND (2)   | ND (4) *    | 29       | 38      |
| AOC10b-3   | 09/30/08 | 0 - 0.5        | N           | ND (2) *       | ND (1)  | 120    | ND (1) *   | ND (1)     | 27.7                 | 820             | 3.6    | 90     | 24     | ND (0.1) *  | 1.5        | 9.2    | ND (1)     | ND (1)   | ND (2) *    | 17       | 240     |
|  | 10/01/08 | 2 - 3          | N           | ND (2) *       | 2.9     | 93     | ND (1) *   | ND (1)     | 1.82                 | 90              | 5.8    | 23     | 5      | ND (0.1) *  | ND (1)     | 14     | ND (1)     | ND (1)   | ND (2) *    | 22       | 59      |
|  | 10/01/08 | 5 - 6          | N           | ND (2.1) *     | 5       | 110    | ND (2.1) * | ND (1)     | 0.429                | 38              | 9.2    | 14     | 3.8    | ND (0.1) *  | ND (2.1) * | 24     | ND (1)     | ND (2.1) | ND (4.1) *  | 33       | 40      |
|  | 10/01/08 | 5 - 6          | FD          | ND (2.1) *     | 5       | 110    | ND (2.1) * | ND (1)     | ND (0.417)           | 36              | 10     | 16     | 3.6    | ND (0.1) *  | ND (2.1) * | 25     | ND (1)     | ND (2.1) | ND (4.1) *  | 35       | 39      |
|  | 10/01/08 | 9 - 10         | N           | ND (2.1) *     | 6.2     | 120    | ND (2.1) * | ND (1)     | ND (0.415)           | 36              | 11     | 13     | 3.5    | ND (0.1) *  | ND (2.1) * | 26     | ND (1)     | ND (2.1) | ND (4.1) *  | 38       | 44      |
| AOC10b-4   | 09/30/08 | 0 - 0.5        | N           | ND (2) *       | 3.4     | 76     | ND (1) *   | ND (1)     | ND (0.401)           | 12              | 4      | 5.8    | 41     | ND (0.1) *  | ND (1)     | 9.1    | ND (1)     | ND (1)   | ND (2) *    | 17       | 29      |
|  | 09/30/08 | 2 - 3          | N           | ND (2) *       | 3.6     | 100    | ND (1) *   | ND (1)     | ND (0.403)           | 14              | 4.7    | 6.7    | 10     | ND (0.1) *  | ND (1)     | 9.6    | ND (1)     | ND (1)   | ND (2) *    | 21       | 31      |
|  | 09/30/08 | 5 - 6          | N           | ND (2) *       | 3.8     | 150    | ND (1) *   | ND (1)     | ND (0.407)           | 20              | 6.7    | 8.9    | 3.4    | ND (0.1) *  | ND (1)     | 14     | ND (1)     | ND (1)   | ND (2) *    | 30       | 35      |
|  | 09/30/08 | 9 - 10         | N           | ND (2.1) *     | 4       | 85     | ND (1) *   | ND (1)     | ND (0.415)           | 26              | 7.4    | 11     | 2.8    | ND (0.1) *  | ND (1)     | 18     | ND (1)     | ND (1)   | ND (2.1) *  | 30       | 42      |
| AOC10c-1   | 10/01/08 | 0 - 0.5        | N           | ND (2) J*      | 4.2     | 110    | ND (1) *   | ND (1)     | 1.98                 | 55              | 5.4    | 15     | 7.8    | ND (0.1) *  | ND (1)     | 13     | ND (1)     | ND (1)   | ND (2) *    | 23       | 48      |
|  | 10/01/08 | 2 - 3          | N           | ND (2) *       | 1.2     | 140    | ND (1) *   | ND (1)     | 27.3                 | 490             | 5.6    | 41     | 18     | ND (0.1) *  | 1.2        | 13     | ND (1)     | ND (1)   | ND (2) *    | 21       | 76      |
|  | 10/01/08 | 5 - 6          | N           | ND (2) *       | 3.4     | 110    | ND (2) *   | ND (1)     | 4.78                 | 220             | 8.2    | 17     | 5.4    | ND (0.1) *  | ND (2) *   | 20     | ND (1)     | ND (2)   | ND (4.1) *  | 28       | 42      |
|  | 10/01/08 | 9 - 10         | N           | ND (2) *       | 4       | 180    | ND (1) *   | ND (1)     | 1.37                 | 63              | 9.2    | 14     | 3.4    | ND (0.1) *  | 1          | 23     | ND (1)     | ND (1)   | ND (2) *    | 33       | 39      |

TABLE B-4a  
Sample Results: Metals  
AOC 10 – East Ravine  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |        |             |            |        |            |            |            |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|-------------|------------|--------|------------|------------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125      | 1.37       | 27.3   | 1.47       | 5.15       | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11          | 390        | 1,500  | 390        | 390        | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1           | NE         | 490    | NE         | 390        | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125      | 2.25       | 0.607  | 0.177      | 5.15       | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE          | 1.37       | 27.3   | 1.47       | NE         | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury     | Molybdenum | Nickel | Selenium   | Silver     | Thallium   | Vanadium | Zinc   |
| AOC10c-2   | 10/01/08 | 0 - 0.5        | N           | ND (2) *       | 5.9     | 130    | ND (2) *   | ND (1)     | 1.25                 | 51              | 5.8    | 19     | 12     | ND (0.1) *  | ND (2) *   | 13     | ND (1)     | ND (2)     | ND (4) *   | 24       | 61     |
|  | 10/01/08 | 2 - 3          | N           | ND (2) *       | 4.1     | 150    | ND (1) *   | ND (1)     | 3.77                 | 190             | 5.6    | 37     | 17     | ND (0.1) *  | 2.2        | 13     | ND (1)     | ND (1)     | ND (2) *   | 24       | 78     |
|  | 10/01/08 | 2 - 3          | FD          | ND (2) *       | 4.1     | 150    | ND (1) *   | ND (1)     | 3.8                  | 180             | 5.4    | 34     | 16     | ND (0.1) *  | 1.9        | 13     | ND (1)     | ND (1)     | ND (2) *   | 24       | 75     |
|  | 10/01/08 | 5 - 6          | N           | ND (2) *       | 3.4     | 150    | ND (1) *   | ND (1)     | 1.92                 | 110             | 8.4    | 24     | 7      | ND (0.1) *  | 1.9        | 19     | ND (1)     | ND (1)     | ND (2) *   | 31       | 51     |
|  | 10/01/08 | 9 - 10         | N           | ND (2) *       | 4.5     | 86     | ND (1) *   | ND (1)     | 0.605                | 32              | 11     | 13     | 2.7    | ND (0.1) *  | ND (1)     | 22     | ND (1)     | ND (1)     | ND (2) *   | 44       | 50     |
| AOC10c-3   | 10/02/08 | 0 - 0.5        | N           | ND (2) *       | 9.4     | 270    | ND (2) *   | ND (1)     | 2.56                 | 110             | 8      | 42     | 32     | ND (0.1) *  | ND (2) *   | 19     | ND (1)     | ND (2)     | ND (4.1) * | 36       | 140    |
|  | 10/02/08 | 2 - 3          | N           | ND (2.1) *     | 3.6     | 230    | ND (2.1) * | ND (1)     | 9.27                 | 690             | 7      | 60     | 31     | ND (0.11) * | ND (2.1) * | 16     | ND (1)     | ND (2.1)   | ND (4.1) * | 29       | 140    |
|  | 10/02/08 | 2 - 3          | FD          | ND (2.1) *     | 3.5     | 220    | ND (2.1) * | ND (1)     | 7.97                 | 660             | 6.9    | 60     | 26     | ND (0.1) *  | ND (2.1) * | 16     | ND (1)     | ND (2.1)   | ND (4.1) * | 28       | 140    |
|  | 10/02/08 | 5 - 6          | N           | ND (2) *       | 3.9     | 140    | ND (1) *   | ND (1)     | 0.512                | 29              | 7.8    | 9      | 4.5    | ND (0.1) *  | ND (1)     | 17     | ND (1)     | ND (1)     | ND (2) *   | 28       | 36     |
|  | 10/02/08 | 9 - 10         | N           | ND (2.1) *     | 4.4     | 64     | ND (1) *   | ND (1)     | ND (0.412)           | 22              | 7.8    | 11     | 2.7    | ND (0.1) *  | ND (1)     | 14     | ND (1)     | ND (1)     | ND (2.1) * | 31       | 41     |
| AOC10c-4   | 10/01/08 | 0 - 0.5        | N           | ND (2.1) *     | 11      | 310    | ND (2.1) * | ND (1)     | 2.66                 | 120             | 8.8    | 46     | 36     | ND (0.1) *  | ND (2.1) * | 21     | ND (1)     | ND (2.1)   | ND (4.1) * | 42       | 150    |
|  | 10/01/08 | 2 - 3          | N           | ND (2) *       | 5.9     | 170    | ND (2) *   | ND (1)     | 2.11                 | 90              | 9.9    | 19     | 8.9    | ND (0.1) *  | ND (2) *   | 20     | ND (1)     | ND (2)     | ND (4.1) * | 31       | 52     |
|  | 10/01/08 | 5 - 6          | N           | ND (2) *       | 4.6     | 120    | ND (1) *   | ND (1)     | 2.84                 | 27              | 9.1    | 14     | 2.6    | ND (0.1) *  | ND (1)     | 17     | ND (1)     | ND (1)     | ND (2) *   | 35       | 47     |
|  | 10/01/08 | 9 - 10         | N           | ND (2.1) *     | 7.3     | 200    | ND (2.1) * | ND (1)     | 0.436                | 92              | 5.4    | 25     | 13     | ND (0.1) *  | ND (2.1) * | 13     | ND (1)     | ND (2.1)   | ND (4.1) * | 25       | 74     |
| AOC10c-5   | 10/01/08 | 0 - 0.5        | N           | ND (2) *       | 6.6     | 170    | ND (2) *   | ND (1)     | 2.49                 | 81              | 6.3    | 29     | 15     | ND (0.1) *  | ND (2) *   | 15     | ND (1)     | ND (2)     | ND (4) *   | 27       | 80     |
|  | 10/01/08 | 2 - 3          | N           | ND (2.1) *     | ND (1)  | 230    | ND (2.1) * | ND (1)     | 16.4                 | 1,500           | 6.7    | 110    | 47     | ND (0.1) *  | 2.9        | 16     | ND (1)     | ND (2.1)   | ND (4.1) * | 27       | 170    |
|  | 10/01/08 | 5 - 6          | N           | ND (2.1) *     | 3.7     | 100    | ND (2.1) * | ND (1)     | 1.48                 | 82              | 8.6    | 12     | 4      | ND (0.1) *  | ND (2.1) * | 19     | ND (1)     | ND (2.1)   | ND (4.1) * | 31       | 44     |
|  | 10/01/08 | 9 - 10         | N           | ND (2) *       | 4.5     | 130    | ND (1) *   | ND (1)     | 0.423                | 47              | 9.1    | 15     | 3      | ND (0.1) *  | ND (1)     | 21     | ND (1)     | ND (1)     | ND (2) *   | 34       | 46     |
| AOC10c-6   | 01/21/16 | 14 - 15        | N           | ---            | ---     | ---    | ---        | ---        | 0.54                 | 40              | ---    | ---    | ---    | ---         | ---        | ---    | ---        | ---        | ---        | ---      | ---    |
|  | 01/22/16 | 19 - 20        | N           | ---            | ---     | ---    | ---        | ---        | ND (0.21)            | 31              | ---    | ---    | ---    | ---         | ---        | ---    | ---        | ---        | ---        | ---      | ---    |
|  | 01/22/16 | 29 - 30        | N           | ---            | ---     | ---    | ---        | ---        | ND (0.23)            | 39              | ---    | ---    | ---    | ---         | ---        | ---    | ---        | ---        | ---        | ---      | ---    |
|  | 01/22/16 | 40 - 50        | FD          | ---            | ---     | ---    | ---        | ---        | ND (0.22)            | 32              | ---    | ---    | ---    | ---         | ---        | ---    | ---        | ---        | ---        | ---      | ---    |
|  | 01/22/16 | 49 - 50        | N           | ---            | ---     | ---    | ---        | ---        | ND (0.26)            | 33              | ---    | ---    | ---    | ---         | ---        | ---    | ---        | ---        | ---        | ---      | ---    |
|  | 01/22/16 | 59 - 60        | N           | ---            | ---     | ---    | ---        | ---        | ND (0.21)            | 32              | ---    | ---    | ---    | ---         | ---        | ---    | ---        | ---        | ---        | ---      | ---    |
| AOC10d-1   | 09/18/08 | 0 - 0.5        | N           | ND (2) J*      | 3.4     | 120    | ND (2) *   | ND (1)     | 0.644                | 49              | 6.8    | 16     | 8.8    | ND (0.1) *  | ND (2) *   | 16     | ND (1)     | ND (2)     | ND (4) *   | 31       | 58     |
|  | 09/18/08 | 2 - 3          | N           | ND (2) *       | 3.9     | 120    | ND (2) *   | ND (1)     | 2.86                 | 150             | 7.1    | 31     | 6.8    | ND (0.1) *  | ND (2) *   | 17     | ND (1)     | ND (2)     | ND (4.1) * | 35       | 76     |
|  | 09/18/08 | 5 - 6          | N           | ND (2.1) *     | 6.9     | 200    | ND (5.2) * | ND (1)     | 1.06                 | 66              | 11     | 23     | 5.2    | ND (0.11) * | ND (5.2) * | 27     | ND (1)     | ND (5.2) * | ND (10) *  | 45       | 80     |
|  | 09/18/08 | 5 - 6          | FD          | ND (2.1) *     | 7.1     | 210    | ND (5.2) * | ND (1)     | 0.703                | 64              | 11     | 23     | 5.3    | ND (0.1) *  | ND (5.2) * | 26     | ND (1)     | ND (5.2) * | ND (10) *  | 46       | 74     |
|  | 09/18/08 | 9 - 10         | N           | ND (4.1) *     | 9.8     | 140    | ND (2.1) * | ND (2.1) * | ND (0.414)           | 23              | 9.4    | 12     | 3.5    | ND (0.1) J* | ND (2.1) * | 17     | ND (2.1) * | ND (2.1)   | ND (4.1) * | 31       | 58     |
| AOC10d-2   | 09/17/08 | 0 - 0.5        | N           | ND (2) *       | 4.2     | 180    | ND (2) *   | ND (1)     | ND (0.403)           | 22              | 6.2    | 17     | 21     | ND (0.1) *  | ND (2) *   | 16     | ND (1)     | ND (2)     | ND (4) *   | 32       | 61     |
|  | 09/17/08 | 2 - 3          | N           | ND (2) *       | 3.3     | 180    | ND (2) *   | ND (1)     | 1.16                 | 40              | 5.4    | 14     | 16     | ND (0.1) *  | ND (2) *   | 14     | ND (1)     | ND (2)     | ND (4.1) * | 30       | 54     |
|  | 09/17/08 | 5 - 6          | N           | ND (2) *       | 6.6     | 210    | ND (5.1) * | ND (1)     | 0.597                | 33              | 10     | 16     | 6.2    | ND (0.1) *  | ND (5.1) * | 21     | ND (1)     | ND (5.1)   | ND (10) *  | 45       | 70     |
|  | 09/17/08 | 9 - 10         | N           | ND (2) *       | 7.2     | 150    | ND (5.1) * | ND (1)     | ND (0.406)           | 22              | 8.5    | 16     | 3.2    | ND (0.1) J* | ND (5.1) * | 16     | ND (1)     | ND (5.1)   | ND (10) *  | 38       | 73     |
| AOC10d-3   | 09/17/08 | 0 - 0.5        | N           | ND (2) *       | 3.6     | 120    | ND (2) *   | ND (1)     | ND (0.406)           | 20              | 5.9    | 12     | 22     | ND (0.1) *  | ND (2) *   | 15     | ND (1)     | ND (2)     | ND (4) *   | 29       | 52     |
|  | 09/18/08 | 2 - 3          | N           | ND (2) *       | 3.4     | 270    | ND (2) *   | ND (1)     | 1.91                 | 64              | 6.3    | 18     | 21     | ND (0.1) *  | ND (2) *   | 15     | ND (1)     | ND (2)     | ND (4.1) * | 33       | 61     |
|  | 09/18/08 | 5 - 6          | N           | ND (2) *       | 7.3     | 280    | ND (5.1) * | ND (1)     | ND (0.407)           | 30              | 10     | 18     | 3.3    | ND (0.1) *  | ND (5.1) * | 23     | ND (1)     | ND (5.1)   | ND (10) *  | 43       | 60     |
|  | 09/18/08 | 5 - 6          | FD          | ND (2) *       | 6       | 330    | ND (5.1) * | ND (1)     | ND (0.407)           | 31              | 10     | 18     | 5.1    | ND (0.1) *  | ND (5.1) * | 23     | ND (1)     | ND (5.1)   | ND (10) *  | 42       | 59     |
|  | 09/18/08 | 9 - 10         | N           | ND (4.1) *     | 8.2     | 150    | ND (2) *   | ND (2) *   | ND (0.408)           | 21              | 8.5    | 11     | 3.6    | ND (0.1) J* | ND (2) *   | 15     | ND (2) *   | ND (2)     | ND (4.1) * | 28       | 56     |

TABLE B-4a  
Sample Results: Metals  
AOC 10 – East Ravine  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |                       |                |             | Metals (mg/kg) |          |        |             |             |                      |                 |           |        |        |               |             |           |             |            |             |          |        |
|--|-----------------------|----------------|-------------|----------------|----------|--------|-------------|-------------|----------------------|-----------------|-----------|--------|--------|---------------|-------------|-----------|-------------|------------|-------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |                       |                |             | 0.285          | 11       | 410    | 0.672       | 1.1         | 0.83                 | 39.8            | 12.7      | 16.8   | 8.39   | 0.0125        | 1.37        | 27.3      | 1.47        | 5.15       | 0.78        | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |                       |                |             | 31             | 0.68     | 15,000 | 160         | 71          | 0.3                  | 120,000         | 23        | 3,100  | 400    | 11            | 390         | 1,500     | 390         | 390        | 0.78        | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |                       |                |             | NE             | 0.11     | NE     | 15          | 5.2         | NE                   | 36,000          | NE        | NE     | 80     | 1             | NE          | 490       | NE          | 390        | NE          | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |                       |                |             | 0.285          | 11.4     | 330    | 23.3        | 0.0151      | 139.6                | 36.3            | 13        | 20.6   | 0.0166 | 0.0125        | 2.25        | 0.607     | 0.177       | 5.15       | 2.32        | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |                       |                |             | NE             | 11       | 410    | 0.672       | 1.1         | 0.83                 | 39.8            | 12.7      | 16.8   | 8.39   | NE            | 1.37        | 27.3      | 1.47        | NE         | NE          | 52.2     | 58     |
| Location   | Date                  | Depth (ft bgs) | Sample Type | Antimony       | Arsenic  | Barium | Beryllium   | Cadmium     | Chromium, Hexavalent | Chromium, total | Cobalt    | Copper | Lead   | Mercury       | Molybdenum  | Nickel    | Selenium    | Silver     | Thallium    | Vanadium | Zinc   |
| AOC10d-4   | 09/18/08              | 0 - 0.5        | N           | ND (2.1) *     | 9.2      | 340    | ND (5.2) *  | ND (1)      | 0.92                 | 29              | 8.3       | 25     | 25     | ND (0.1) *    | ND (5.2) *  | 21        | ND (1)      | ND (5.2) * | ND (10) *   | 42       | 85     |
|  | 09/18/08              | 2 - 3          | N           | ND (2.1) *     | 5.4      | 260    | ND (2.1) *  | ND (1.1) *  | 3.93                 | 130             | 6.7       | 27     | 26     | ND (0.11) *   | ND (2.1) *  | 17        | ND (1.1)    | ND (2.1)   | ND (4.2) *  | 35       | 81     |
|  | 09/18/08              | 5 - 6          | N           | ND (2) *       | 3.6      | 220    | ND (2) *    | ND (1)      | ND (0.415)           | 66              | 6.5       | 21     | 17     | ND (0.1) *    | ND (2) *    | 15        | ND (1)      | ND (2)     | ND (4.1) *  | 31       | 64     |
|  | 09/18/08              | 9 - 10         | N           | ND (2) *       | 6.9      | 220    | ND (5.1) *  | ND (1)      | ND (0.41)            | 32              | 11        | 16     | 5.2    | ND (0.1) J*   | ND (5.1) *  | 24        | ND (1)      | ND (5.1)   | ND (10) *   | 43       | 68     |
| AOC10d-9   | 12/15/15              | 0 - 1          | N           | ND (2) *       | 2.8      | 120    | ND (1) *    | ND (1)      | ND (0.2)             | 20              | 7.3       | 8.9    | 20     | ND (0.1) *    | ND (1)      | 16        | ND (1)      | ND (1)     | ND (2) *    | 28       | 44     |
|  | 12/15/15              | 2 - 3          | N           | ND (2.1) *     | 5.3      | 130    | ND (1) *    | ND (1)      | ND (0.21)            | 20              | 8.4       | 13     | 2.4    | ND (0.1) *    | ND (1)      | 16        | ND (1)      | ND (1)     | ND (2.1) *  | 31       | 48     |
|  | 12/15/15              | 5 - 6          | N           | ND (2.1) *     | 5.2      | 190    | ND (1.1) *  | ND (1.1) *  | ND (0.21)            | 27              | 8.8       | 17     | 2.3    | ND (0.1) *    | ND (1.1)    | 18        | ND (1.1)    | ND (1.1)   | ND (2.1) *  | 31       | 49     |
|  | 12/15/15              | 9 - 10         | N           | ND (2.1) *     | 4.9      | 150    | ND (1) *    | ND (1)      | ND (0.21)            | 24              | 9.1       | 17     | 2.6    | ND (0.1) *    | ND (1)      | 20        | ND (1)      | ND (1)     | ND (2.1) *  | 35       | 54     |
| AOC10-OS1  | 04/06/11              | 11 - 11.5      | N           | ---            | ---      | ---    | ---         | ---         | ND (0.4) J           | 43              | ---       | ---    | ---    | ---           | 5.9         | ---       | ---         | ---        | ---         | ---      | ---    |
| AOC10-OS2  | 04/06/11              | 5.5 - 6        | N           | ---            | ---      | ---    | ---         | ---         | 0.78 J               | 44              | ---       | ---    | ---    | ---           | 5.8         | ---       | ---         | ---        | ---         | ---      | ---    |
| AOC10-OS4  | 04/06/11              | 6.5 - 7        | N           | ---            | ---      | ---    | ---         | ---         | ND (0.41) J          | 170             | ---       | ---    | ---    | ---           | 13          | ---       | ---         | ---        | ---         | ---      | ---    |
| AOC10-XRF-01   | 08/25/08              | 0 - 0.5        | N           | ---            | ---      | ---    | ---         | ---         | ND (0.404)           | 9.2             | ---       | ---    | ---    | ---           | ---         | ---       | ---         | ---        | ---         | ---      | ---    |
| AOC10-XRF-02   | 08/25/08              | 0 - 0.5        | N           | ---            | ---      | ---    | ---         | ---         | ND (0.404)           | 11              | ---       | ---    | ---    | ---           | ---         | ---       | ---         | ---        | ---         | ---      | ---    |
| AOC10-XRF-03   | 08/25/08              | 0 - 0.5        | N           | ---            | ---      | ---    | ---         | ---         | ND (0.405)           | 10              | ---       | ---    | ---    | ---           | ---         | ---       | ---         | ---        | ---         | ---      | ---    |
| AOC10-XRF-10   | 09/21/08              | 3 - 4          | N           | ---            | ---      | ---    | ---         | ---         | ND (0.416)           | 26              | ---       | ---    | ---    | ---           | ---         | ---       | ---         | ---        | ---         | ---      | ---    |
| DTSC-AOC10d-1  | 01/18/08 <sup>Θ</sup> | 0              | N           | ND (4.42) *    | 8.28     | 163    | ND (4.41) * | ND (8.83) * | 31.5                 | 652             | ND (4.41) | 137    | 14.3   | ND (0.0193) * | ND (2.5) *  | ND (4.41) | ND (4.42) * | ND (4.42)  | ND (8.83) * | 39.5     | 134    |
| DTSC-AOC10d-2  | 01/18/08 <sup>Θ</sup> | 0              | N           | ND (4.89) *    | 7.36     | 595    | ND (4.89) * | ND (9.78) * | 6.03                 | 243             | ND (4.89) | 66.5   | 13.1   | ND (0.0192) * | ND (4.89) * | ND (4.89) | ND (4.89) * | ND (4.89)  | ND (9.78) * | 36.2     | 147    |
| DTSC-AOC10d-3  | 01/18/08 <sup>Θ</sup> | 0              | N           | ND (4.65) *    | 5.87     | 264    | ND (4.65) * | ND (9.3) *  | 4.38                 | 224             | ND (4.65) | 46.5   | 12     | ND (0.0198) * | ND (4.65) * | ND (4.65) | ND (4.65) * | ND (4.65)  | ND (9.3) *  | 34.5     | 197    |
| MW-57BR  | 01/14/09              | 3 - 4          | N           | ND (2) *       | 9.2      | 270    | ND (2) *    | ND (1)      | ND (0.16)            | 26              | 7.8       | 11     | 6.7    | ND (0.1) *    | ND (2) *    | 17        | ND (1)      | ND (2)     | ND (4.1) *  | 34       | 52     |
|  | 01/14/09              | 8 - 9          | N           | ND (2.1) *     | 8        | 85     | ND (1) *    | ND (1)      | ND (0.17)            | 20              | 7.9       | 11     | 2.7    | ND (0.1) *    | 1.3         | 16        | ND (1)      | ND (1)     | ND (2.1) *  | 28       | 46     |
|  | 01/14/09              | 8 - 9          | FD          | ND (2.1) *     | 8.4      | 85     | ND (1) *    | ND (1)      | ND (0.16)            | 22              | 8         | 11     | 2.9    | ND (0.1) *    | 1.3         | 16        | ND (1)      | ND (1)     | ND (2.1) *  | 27       | 48     |
|  | 01/14/09              | 18 - 19        | N           | ND (4.1) *     | 9.9      | 240    | ND (2.1) *  | ND (2.1) *  | ND (0.16)            | 25              | 10        | 12     | 4.3    | ND (0.1) *    | 3           | 16        | ND (2.1) *  | ND (2.1)   | ND (4.1) *  | 31       | 68     |
| MW-58BR_S  | 01/29/09              | 1.5 - 2        | N           | ND (2.1) J*    | ND (2.1) | 410    | ND (2.1) *  | ND (1.1) *  | 150                  | 4,000           | 8.2       | 300    | 160    | 0.33          | 3.5         | 24        | ND (1.1)    | ND (2.1)   | 6.1         | 23       | 300    |
|  | 01/29/09              | 19 - 20        | N           | ND (2.1) *     | 12       | 240    | ND (2.1) *  | ND (1.1) *  | 0.43                 | 33              | 12        | 24     | 4      | ND (0.11) *   | ND (2.1) *  | 25        | ND (1.1)    | ND (2.1)   | 4.7         | 38       | 63     |
|  | 01/29/09              | 29 - 30        | N           | ND (2.1) *     | 13       | 110    | ND (2.1) *  | ND (1.1) *  | ND (0.17)            | 26              | 11        | 14     | 3.6    | ND (0.11) *   | ND (2.1) *  | 19        | ND (1.1)    | ND (2.1)   | 4.8         | 33       | 64     |
|  | 01/29/09              | 39 - 40        | N           | ND (2.1) *     | 12       | 150    | ND (2.1) *  | ND (1.1) *  | 0.43                 | 35              | 12        | 17     | 4.2    | ND (0.11) *   | ND (2.1) *  | 22        | ND (1.1)    | ND (2.1)   | 4.7         | 34       | 51     |
|  | 01/29/09              | 49 - 50        | N           | ND (2.1) *     | 8.3      | 180    | ND (1.1) *  | ND (1.1) *  | ND (0.17)            | 24              | 8.7       | 17     | 3.7    | ND (0.11) *   | ND (1.1)    | 16        | ND (1.1)    | ND (1.1)   | ND (2.1) *  | 28       | 46     |
|  | 01/29/09              | 59 - 60        | N           | ND (2.2) *     | 8.4      | 37     | ND (1.1) *  | ND (1.1) *  | ND (0.18)            | 27              | 13        | 58     | 3.4    | ND (0.11) *   | ND (1.1)    | 22        | ND (1.1)    | ND (1.1)   | ND (2.2) *  | 28       | 41     |
| PA-06  | 11/09/15              | 0 - 1          | N           | ND (2) *       | 2.4      | 69     | ND (1) *    | ND (1)      | 0.89                 | 30              | 8.1       | 15     | 5.2    | ND (0.1) *    | ND (1)      | 20        | ND (1)      | ND (1)     | ND (2) *    | 23       | 74     |
| PA-18  | 01/27/16              | 0 - 1          | N           | ND (2.1) *     | 5.2      | 130    | ND (1) *    | ND (1)      | 0.28                 | 65              | 7.3       | 64     | 47     | ND (0.1) *    | 1.4         | 22        | ND (1)      | ND (1)     | ND (2.1) *  | 33       | 190    |
| PA-19  | 01/27/16              | 0 - 1          | N           | ND (2.3) *     | 5.8      | 150    | ND (1.1) *  | ND (1.1) *  | ND (0.46)            | 34              | 5.8       | 160    | 30     | ND (0.12) *   | 9.8         | 15        | ND (1.1)    | ND (1.1)   | ND (2.3) *  | 28       | 550    |
| PA-20  | 01/27/16              | 0 - 1          | N           | ND (2.1) *     | 5.2      | 96     | ND (1) *    | ND (1)      | 0.82 J               | 33              | 5.5       | 11     | 23     | ND (0.1) *    | ND (1)      | 11        | ND (1)      | ND (1)     | ND (2.1) *  | 27       | 84     |
| PA-21  | 01/27/16              | 0 - 1          | N           | ND (2) *       | 5.5      | 96     | ND (1) *    | ND (1)      | ND (0.2)             | 49              | 5.8       | 26     | 32     | ND (0.1) *    | 1.2         | 12        | ND (1)      | ND (1)     | ND (2) *    | 28       | 150    |
| SD-01  | 01/13/16              | 0 - 0.5        | N           | ND (2.1) *     | 3        | 78 J   | ND (1.1) *  | ND (1.1) *  | 0.24                 | 14              | 3.9       | 29     | 7.6    | ND (0.1) *    | ND (1.1)    | 7.8       | ND (1.1) J  | ND (1.1)   | ND (2.1) *  | 16       | 190    |
|  | 01/13/16              | 2 - 3          | N           | ND (2.2) *     | 5.2      | 210    | ND (1.1) *  | ND (1.1) *  | ND (0.22)            | 36              | 11        | 14     | 3.2    | ND (0.11) *   | ND (1.1)    | 30        | ND (1.1)    | ND (1.1)   | ND (2.2) *  | 43       | 41     |
|  | 01/13/16              | 5 - 6          | N           | ND (2.2) *     | 4.1      | 100    | ND (1.1) *  | ND (1.1) *  | ND (0.22)            | 49              | 11        | 15     | 2.5    | ND (0.11) *   | ND (1.1)    | 37        | ND (1.1)    | ND (1.1)   | ND (2.2) *  | 44       | 43     |
|  | 01/13/16              | 9 - 10         | N           | ND (2.1) *     | 2.9      | 100    | ND (1.1) *  | ND (1.1) *  | ND (0.21)            | 40              | 11        | 12     | 1.9    | ND (0.11) *   | ND (1.1)    | 34        | ND (1.1)    | ND (1.1)   | ND (2.1) *  | 46       | 40     |
| SD-02  | 11/10/15              | 0 - 1          | N           | ND (2) *       | 3.2      | 100    | ND (1) *    | ND (1)      | 0.66                 | 26              | 5.8       | 16     | 29     | 0.17 J        | ND (1)      | 12        | ND (1)      | ND (1)     | ND (2) *    | 28       | 48     |
|  | 11/10/15              | 2 - 3          | N           | ND (2) *       | 5        | 590    | ND (1) *    | ND (1)      | 11                   | 280             | 5.8       | 590    | 170    | 3.2           | 9.1         | 17        | ND (1)      | ND (1)     | ND (2) *    | 26       | 300    |

TABLE B-4a  
Sample Results: Metals  
AOC 10 – East Ravine  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |           |         |                      |                 |        |        |        |              |            |        |          |        |            |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|-----------|---------|----------------------|-----------------|--------|--------|--------|--------------|------------|--------|----------|--------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672     | 1.1     | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125       | 1.37       | 27.3   | 1.47     | 5.15   | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160       | 71      | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11           | 390        | 1,500  | 390      | 390    | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15        | 5.2     | NE                   | 36,000          | NE     | NE     | 80     | 1            | NE         | 490    | NE       | 390    | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3      | 0.0151  | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125       | 2.25       | 0.607  | 0.177    | 5.15   | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672     | 1.1     | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE           | 1.37       | 27.3   | 1.47     | NE     | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium | Cadmium | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury      | Molybdenum | Nickel | Selenium | Silver | Thallium   | Vanadium | Zinc   |
| SD-03  | 11/10/15 | 0 - 1          | N           | ND (2) *       | 4       | 91     | ND (1) *  | ND (1)  | 0.28                 | 12              | 3.7    | 7.3    | 9.7    | ND (0.099) * | ND (1)     | 8.6    | ND (1)   | ND (1) | ND (2) *   | 17       | 31     |
|  | 11/10/15 | 2 - 3          | N           | ND (2) *       | 2.6     | 52     | ND (1) *  | ND (1)  | ND (0.2)             | 6.4             | 2.3    | 3.4    | 2.5    | ND (0.1) *   | ND (1)     | 4.7    | ND (1)   | ND (1) | ND (2) *   | 11       | 13     |
| SD-04  | 11/10/15 | 0 - 1          | N           | ND (2) J*      | 3       | 90 J   | ND (1) *  | ND (1)  | ND (0.2)             | 10              | 4      | 5.1    | 2.7    | ND (0.1) *   | ND (1)     | 8.3    | ND (1)   | ND (1) | ND (2) *   | 21       | 22     |
|  | 11/10/15 | 2 - 3          | N           | ND (2) *       | 2.9     | 83     | ND (1) *  | ND (1)  | ND (0.2)             | 8               | 3.2    | 4.4    | 2.5    | ND (0.1) *   | ND (1)     | 5.9    | ND (1)   | ND (1) | ND (2) *   | 16       | 19     |
| SD-05  | 11/10/15 | 0 - 1          | N           | ND (2) *       | 3.2     | 100 J  | ND (1) *  | ND (1)  | ND (0.2)             | 13 J            | 3.3    | 9.2    | 13 J   | ND (0.1) *   | 2.5        | 6.3 J  | ND (1)   | ND (1) | ND (2) *   | 17       | 46     |
|  | 11/10/15 | 0 - 1          | FD          | ND (2) *       | 4.5     | 130 J  | ND (1) *  | ND (1)  | ND (0.2)             | 19 J            | 3.9    | 10     | 37 J   | ND (0.1) *   | 1.1        | 9.5 J  | ND (1)   | ND (1) | ND (2) *   | 19       | 42     |
|  | 11/10/15 | 2 - 3          | N           | ND (2.1) *     | 3.8     | 110    | ND (1) *  | ND (1)  | ND (0.21)            | 30              | 7.3    | 12     | 10     | ND (0.1) *   | ND (1)     | 24     | ND (1)   | ND (1) | ND (2.1) * | 33       | 41     |
| SD-06  | 11/10/15 | 0 - 1          | N           | ND (2) *       | 3.3     | 82     | ND (1) *  | ND (1)  | ND (0.2)             | 17              | 6.4    | 9.4    | 3.9    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1) | ND (2) *   | 30       | 39     |
|  | 11/10/15 | 2 - 3          | N           | ND (2.1) *     | 3.6     | 97     | ND (1) *  | ND (1)  | ND (0.2)             | 21              | 7.8    | 10     | 4.2    | ND (0.1) *   | ND (1)     | 16     | ND (1)   | ND (1) | ND (2.1) * | 37       | 40     |
|  | 11/10/15 | 5 - 6          | N           | ND (2.1) *     | 3.1     | 77     | ND (1) *  | ND (1)  | ND (0.21)            | 20              | 7.6    | 9.5    | 2.8    | ND (0.1) *   | ND (1)     | 19     | ND (1)   | ND (1) | ND (2.1) * | 34       | 40     |
| SD-21  | 03/10/16 | 0 - 1          | N           | ND (2) *       | 3.2     | 71     | ND (1) *  | ND (1)  | ND (0.2)             | 21              | 7      | 8.7    | 2.4    | ND (0.1) *   | ND (1)     | 14     | ND (1)   | ND (1) | ND (2) *   | 32       | 44     |
|  | 03/10/16 | 2 - 3          | N           | ND (2.1) *     | 5.4     | 79     | ND (1) *  | ND (1)  | 0.81                 | 31              | 6.4    | 10     | 4.5    | ND (0.1) *   | ND (1)     | 14     | ND (1)   | ND (1) | ND (2.1) * | 34       | 60     |
| SD-22  | 03/09/16 | 0 - 1          | N           | ND (2.1) *     | 3.3     | 100    | ND (1) *  | ND (1)  | ND (0.21)            | 22              | 6.4    | 13     | 10     | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1) | ND (2.1) * | 30       | 61     |
|  | 03/09/16 | 2 - 3          | N           | ND (2.1) *     | 3.2     | 110    | ND (1) *  | ND (1)  | ND (0.21)            | 27              | 7.4    | 10     | 4.7    | ND (0.1) *   | ND (1)     | 17     | ND (1)   | ND (1) | ND (2.1) * | 32       | 49     |
| Bank 1   | 03/07/03 | 0              | N           | ---            | ---     | ---    | ---       | ---     | ND (4) *             | 21.5            | ---    | 13.7   | ---    | ---          | ---        | 14.3   | ---      | ---    | ---        | ---      | 55     |
| L-1  | 02/20/03 | 0              | N           | ---            | ---     | ---    | ---       | ---     | ND (4.1) *           | 88.4            | ---    | 34.8   | ---    | ---          | ---        | 17     | ---      | ---    | ---        | ---      | 99.7   |
|  | 02/20/03 | 2              | N           | ---            | ---     | ---    | ---       | ---     | 2.5                  | 217             | ---    | 69.6   | ---    | ---          | ---        | 10.8   | ---      | ---    | ---        | ---      | 123    |
| L-2  | 02/20/03 | 0              | N           | ---            | ---     | ---    | ---       | ---     | ND (4.7) *           | 86.8            | ---    | 42.7   | ---    | ---          | ---        | 22.8   | ---      | ---    | ---        | ---      | 122    |
|  | 02/20/03 | 2              | N           | ---            | ---     | ---    | ---       | ---     | 13                   | 3,360           | ---    | 211    | ---    | ---          | ---        | 18     | ---      | ---    | ---        | ---      | 278    |
| L-2-2  | 03/05/03 | - 2            | N           | ---            | ---     | ---    | ---       | ---     | 41                   | 1,610           | ---    | 139    | ---    | ---          | ---        | 19     | ---      | ---    | ---        | ---      | 203    |
| L-2-3  | 03/05/03 | - 2            | N           | ---            | ---     | ---    | ---       | ---     | 99                   | 2,740           | ---    | 288    | ---    | ---          | ---        | 25     | ---      | ---    | ---        | ---      | 299    |
| L-3  | 02/20/03 | 0              | N           | ---            | ---     | ---    | ---       | ---     | ND (4.5) *           | 28.4            | ---    | 22.7   | ---    | ---          | ---        | 18.1   | ---      | ---    | ---        | ---      | 74.3   |
|  | 02/20/03 | 1              | N           | ---            | ---     | ---    | ---       | ---     | 1.2 J                | 379             | ---    | 79.7   | ---    | ---          | ---        | 10.1   | ---      | ---    | ---        | ---      | 252    |
|  | 02/20/03 | 1.5            | N           | ---            | ---     | ---    | ---       | ---     | ND (4) *             | 77.7            | ---    | 17.2   | ---    | ---          | ---        | 11.9   | ---      | ---    | ---        | ---      | 61.9   |
| L-3-2  | 03/05/03 | 0 - 0.5        | N           | ---            | ---     | ---    | ---       | ---     | 9.4                  | 228             | ---    | 40.5   | ---    | ---          | ---        | 15.1   | ---      | ---    | ---        | ---      | 129    |
| PS-21  | 04/13/99 | 0              | N           | ---            | ---     | ---    | ---       | ---     | 0.9                  | 16.5            | ---    | 14.2   | ---    | ---          | ---        | 10.5   | ---      | ---    | ---        | ---      | 43.9   |
|  | 04/13/99 | 2              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.51)            | 90              | ---    | 12.6   | ---    | ---          | ---        | 10.8   | ---      | ---    | ---        | ---      | 59.1   |
| PS-22  | 04/13/99 | 0              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.5)             | 24.7            | ---    | 11.4   | ---    | ---          | ---        | 10.5   | ---      | ---    | ---        | ---      | 85.3   |

Notes:

Category 1: Validated data suitable for all uses, including risk assessment and remedial action decisions.  
Category 2: Validated data suitable for use in characterization of the chemicals of potential concern at the facility and to help define the nature and extent of contamination.  
Category 3: Validated data suitable only for use in qualitative characterization of the nature and extent of contamination.  
Results greater than or equal to the interim screening level are circled; however, if the interim screening level is equal to the background value, only results greater than the interim screening level are circled.

|         |   |
|---------|---|
| Ø       | white powder sample.  |
| *       | Reporting limits greater than or equal to the interim screening level.      |
| ---     | not analyzed  |
| ft bgs  | feet below ground surface   |
| mg/kg   | milligrams per kilogram   |
| DTSC    | California Department of Toxic Substances Control                           |
| DTSC-SL | DTSC Screening Levels   |
| FD      | field duplicate   |
| J       | concentration or reporting limit estimated by laboratory or data validation |
| N       | primary sample  |
| ND      | not detected at the listed reporting limit                                  |
| NE      | not established   |
| USEPA   | United States Environmental Protection Agency                               |

- 1 Interim screening level is background value. If background value is not available then the interim screening value is the lower of the Ecological Comparison Value , residential DTSC-SL, or USEPA residential regional screening value.
- 2 United States Environmental Protection Agency (USEPA). 2017. Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites. November.
- 3 California Department of Toxic Substances Control (DTSC). 2018. Human Health Risk Assessment (HHRA) Note Number 3. January.
- 4 ARCADIS. 2008. "Technical Memorandum 3: Ecological Comparison Values for Metals and Polycyclic Aromatic Hydrocarbons in Soil." May 28.
- 5 CH2M HILL. 2009. "Final Soil Background Technical Memorandum at Pacific Gas and Electric Company Topock Compressor Station, Needles, California." May.





TABLE B-4b  
Sample Results: Dioxins and Furans  
AOC 10 – East Ravine  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |          |           |           |           |             |    |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|----------|-----------|-----------|-----------|-------------|----|
| Interim Screening Level <sup>1</sup> :               |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | NE        | NE          | NE |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | NE        | NE          | NE |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | NE        | NE          | NE |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | NE        | NE          | NE |
| Background <sup>5</sup> :                            |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | NE        | NE          | NE |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD     | OCDF      | TEQ Avian | TEQ Human | TEQ Mammals |    |
| Category 1   |          |                |             |                       |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |          |           |           |           |             |    |
| AOC10-10   | 01/22/16 | 0 - 1          | N           | 650                   | 79                  | 6.7 J               | 4.9 J             | ND (2.3)          | 17                | ND (3.9)          | 13                | ND (1.6)          | ND (2.1)        | ND (1)          | ND (110)          | ND (1)          | ND (0.23)    | ND (0.13)    | 6,300    | 190       | 12        | 20        | 20          |    |
|  | 01/22/16 | 2 - 3          | N           | ND (6.9)              | ND (2)              | ND (1.8)            | ND (0.52)         | ND (0.23)         | ND (0.4)          | ND (0.23)         | ND (0.57)         | 1.3 J             | ND (0.25)       | ND (0.11)       | ND (0.87)         | ND (0.11)       | ND (0.16)    | ND (0.081)   | 31       | ND (6.7)  | 0.57      | 0.56      | 0.56        |    |
|  | 01/22/16 | 5 - 6          | N           | ND (8.4)              | ND (1.8)            | 4.9 J               | ND (0.14)         | ND (0.14)         | ND (0.12)         | ND (0.13)         | 1.2 J             | 1.4 J             | ND (0.27)       | ND (0.14)       | ND (0.2)          | ND (0.071)      | ND (0.043)   | ND (0.13)    | 50       | ND (5.1)  | 0.62      | 0.59      | 0.59        |    |
| AOC10-11   | 01/22/16 | 0 - 1          | N           | 550 J                 | 47                  | 6.1 J               | ND (2.5)          | ND (0.93)         | 14                | ND (0.93)         | 5.5 J             | ND (1.1)          | 0.74 J          | ND (0.33)       | ND (160)          | ND (0.62)       | ND (0.11)    | ND (0.13)    | 3,500 J  | 170 J     | 12        | 18        | 18          |    |
|  | 01/22/16 | 0 - 1          | FD          | 190 J                 | 23                  | ND (1.3)            | ND (1.5)          | ND (0.63)         | 8.6 J             | ND (11)           | 3.4 J             | ND (0.74)         | ND (0.58)       | ND (0.53)       | ND (140)          | ND (0.57)       | ND (0.077)   | ND (0.088)   | 1,100 J  | 65 J      | 9.3       | 12        | 12          |    |
|  | 01/22/16 | 2 - 3          | N           | 590                   | 46                  | 5 J                 | ND (2.1)          | ND (1.2)          | 13                | ND (11)           | ND (5.4)          | ND (0.42)         | ND (0.68)       | ND (1)          | ND (140)          | ND (1.1)        | ND (0.077)   | ND (0.22)    | 4,800    | 190       | 11        | 18        | 18          |    |
|  | 01/22/16 | 5 - 6          | N           | 3,500                 | 760                 | ND (110)            | 15                | ND (6.8)          | 150               | ND (6.3)          | 32                | ND (7.9)          | 3.7 J           | ND (0.55)       | ND (2,400)        | ND (2.8)        | ND (0.28)    | ND (0.33)    | 33,000   | 2,700     | 150       | 200       | 200         |    |
|  | 01/22/16 | 9 - 10         | N           | 170                   | ND (3.8)            | ND (0.54)           | 4.5 J             | ND (0.24)         | ND (0.38)         | ND (2.2)          | ND (0.99)         | ND (0.28)         | ND (0.25)       | ND (0.15)       | ND (23)           | ND (0.16)       | ND (0.093)   | ND (0.066)   | 1,100    | 15 J      | 2.2       | 4.1       | 4.1         |    |
| AOC10-12   | 01/22/16 | 0 - 0.5        | N           | 770                   | ND (1.9)            | ND (6.2)            | ND (4.7)          | ND (3.4)          | 48                | 32                | 25                | ND (3.9)          | ND (3.3)        | ND (2.1)        | ND (380)          | ND (2.1)        | ND (0.34)    | ND (0.88)    | 4,800    | 310       | 30        | 42        | 42          |    |
|  | 01/22/16 | 2 - 3          | N           | 540                   | 57                  | 3.8 J               | ND (2)            | 5.6 J             | 19                | 3.7 J             | ND (1.7)          | ND (1.6)          | ND (1.4)        | ND (1.4)        | ND (130)          | 3 J             | ND (0.32)    | ND (0.51)    | 6,100    | 110       | 14        | 19        | 19          |    |
|  | 01/22/16 | 5 - 6          | N           | 320                   | ND (18)             | ND (21)             | ND (3.8)          | 5.8 J             | 21                | 18                | 18                | ND (2.4)          | ND (4.3)        | 2.1 J           | ND (100)          | 3 J             | ND (0.35)    | ND (1)       | 1,400    | 55        | 16        | 19        | 19          |    |
| AOC10-15   | 12/15/15 | 0 - 1          | N           | 9,000                 | 630                 | ND (96)             | 33                | ND (19)           | 210               | ND (17)           | 59                | ND (22)           | ND (12) *       | ND (11)         | ND (2,300)        | ND (16)         | 4.1 J        | ND (8.6)     | 110,000  | 2,600     | 180       | 290       | 290         |    |
|  | 12/15/15 | 0 - 1          | FD          | 8,200                 | 650                 | 72                  | 30                | 62                | 190               | 17                | 56                | ND (2.8)          | ND (11) *       | ND (8.2)        | ND (2,000)        | ND (8.8)        | ND (2.5)     | 8.2          | 110,000  | 2,100     | 160       | 270       | 270         |    |
|  | 12/15/15 | 2 - 3          | N           | 3,100                 | 230                 | ND (18)             | 14                | 26                | 85                | ND (8.1)          | 27                | ND (10)           | 8.4 J           | ND (3.3)        | ND (820)          | ND (7.8)        | ND (2.4)     | ND (4.5)     | 38,000   | 920       | 74        | 110       | 110         |    |
|  | 12/15/15 | 5 - 6          | N           | 2,300                 | 180                 | 21                  | 9.3 J             | ND (9.4)          | 55                | ND (5)            | 19                | ND (6.3)          | ND (4)          | ND (4.4)        | ND (570)          | ND (4.7)        | ND (2.3)     | 3.1 J        | 31,000   | 700       | 49        | 77        | 77          |    |
|  | 12/15/15 | 9 - 10         | N           | 34                    | ND (3.1)            | ND (1.5)            | ND (1.1)          | 1.4 J             | ND (1.9)          | 1.3 J             | ND (1.7)          | ND (1.1)          | ND (1.1)        | ND (1.4)        | ND (11)           | ND (0.47)       | ND (1.3)     | ND (1.2)     | 340      | 10 J      | 3.2       | 2.9       | 2.9         |    |
| AOC10-16   | 12/15/15 | 0 - 1          | N           | 23                    | ND (1.8)            | ND (1.7)            | 1.6 J             | ND (1.3)          | 2.3 J             | ND (0.66)         | ND (0.76)         | ND (0.83)         | ND (0.85)       | ND (1.4)        | ND (1)            | ND (0.48)       | ND (0.36)    | ND (0.86)    | 110      | ND (1.9)  | 1.7       | 1.6       | 1.6         |    |
|  | 12/15/15 | 2 - 3          | N           | 40                    | ND (4.2)            | 1.5 J               | ND (0.69)         | 1 J               | ND (2.3)          | ND (1.1)          | 2.7 J             | ND (0.63)         | 1.4 J           | ND (1.1)        | ND (7.2)          | ND (1.1)        | ND (1.5)     | 1.6 J        | 240      | ND (5)    | 5.3       | 4         | 4           |    |
|  | 12/15/15 | 5 - 6          | N           | 22                    | ND (6.6)            | ND (1)              | 1.6 J             | 1.3 J             | 2.2 J             | 2.1 J             | ND (0.95)         | ND (0.42)         | ND (1.2)        | 1.2 J           | ND (12)           | ND (0.7)        | ND (0.17)    | ND (1.1)     | 89       | ND (4.9)  | 2.9       | 2.6       | 2.6         |    |
|  | 12/15/15 | 9 - 10         | N           | 6.9 J                 | ND (2)              | ND (1)              | ND (0.74)         | 1.2 J             | ND (1.4)          | ND (1)            | ND (0.62)         | ND (0.79)         | ND (0.38)       | ND (0.41)       | ND (0.88)         | ND (1)          | ND (1.5)     | ND (1.1)     | ND (25)  | 2.6 J     | 2.3       | 1.6       | 1.6         |    |
| AOC10-18   | 12/06/15 | 0 - 1          | N           | 24                    | ND (2.5)            | ND (0.92)           | ND (1)            | ND (0.8)          | 1.5 J             | ND (0.81)         | 1.6 J             | ND (0.57)         | ND (0.2)        | 0.82 J          | 0.56 J            | 0.77 J          | 0.6 J        | 0.46 J       | 190      | 4.3 J     | 2.4       | 1.8       | 1.8         |    |
|  | 12/06/15 | 2 - 3          | N           | ND (4.8)              | ND (1.2)            | ND (0.8)            | ND (0.98)         | ND (0.23)         | 0.97 J            | ND (0.61)         | ND (0.75)         | 0.79 J            | 0.8 J           | ND (0.84)       | 0.7 J             | 0.86 J          | ND (0.26)    | 0.45 J       | 30       | 2 J       | 2.6       | 1.7       | 1.7         |    |
| AOC10-19   | 02/24/16 | 0 - 1          | N           | 83 J                  | 6.3 J               | ND (0.41) J         | ND (0.47) J       | ND (0.4) J        | 2.3 J             | ND (0.37) J       | 1.2 J             | ND (0.44) J       | 0.31 J          | ND (0.19) J     | ND (6) J          | ND (0.091) J    | ND (0.067) J | ND (0.27) J  | 820 J    | 14 J      | 1.3       | 2.3       | 2.3         |    |
|  | 02/24/16 | 2 - 3          | N           | 180 J                 | 13 J                | ND (0.98) J         | 1.7 J             | ND (0.89) J       | 4.8 J             | 1 J               | 2.4 J             | ND (0.12) J       | ND (0.29) J     | ND (0.088) J    | ND (10) J         | ND (0.34) J     | ND (0.11) J  | ND (0.22) J  | 1,600 J  | 25 J      | 2         | 4.2       | 4.2         |    |
| AOC10-20   | 02/17/16 | 0 - 0.5        | N           | ND (5.5)              | ND (0.83)           | ND (1.1)            | ND (0.18)         | ND (0.19)         | ND (0.17)         | ND (0.17)         | ND (0.35)         | ND (0.5)          | ND (0.12)       | ND (0.17)       | ND (0.15)         | ND (0.17)       | ND (0.11)    | ND (0.13)    | 35 J     | ND (3)    | 0.36      | 0.28      | 0.28        |    |
|  | 02/25/16 | 2 - 3          | N           | 1.2 J                 | ND (0.35)           | ND (0.086)          | ND (0.044)        | ND (0.12)         | ND (0.038)        | ND (0.1)          | ND (0.059)        | ND (0.13)         | ND (0.047)      | ND (0.11)       | ND (0.24)         | ND (0.27)       | ND (0.051)   | ND (0.064)   | ND (8.9) | ND (0.21) | 0.26      | 0.15      | 0.15        |    |
| AOC10-21   | 02/25/16 | 0 - 0.5        | N           | 1,700                 | 270                 | ND (11)             | ND (25)           | ND (6.9)          | ND (39)           | ND (6.8)          | ND (14)           | ND (8.1)          | ND (35) *       | ND (2.9)        | ND (7.2)          | ND (3.1)        | ND (2.6)     | ND (5.2) J   | 26,000   | 250       | 33        | 53        | 53          |    |
|  | 02/25/16 | 2 - 3          | N           | 2.6 J                 | ND (0.41)           | ND (0.082)          | ND (0.088)        | ND (0.18)         | ND (0.076)        | ND (0.16)         | ND (0.1)          | ND (0.2)          | ND (0.071)      | ND (0.27)       | ND (0.18)         | ND (0.27)       | ND (0.11)    | ND (0.078)   | ND (22)  | ND (0.72) | 0.33      | 0.22      | 0.22        |    |
| AOC10-22   | 02/17/16 | 0 - 0.5        | N           | 800                   | ND (4.2)            | ND (5)              | ND (3.3)          | ND (5.2)          | 21                | ND (6.7)          | ND (2.1)          | ND (4.7)          | ND (3.1)        | ND (2.3)        | ND (4.2)          | ND (2.4)        | ND (2)       | ND (3.7)     | 6,400    | 90        | 8.6       | 17        | 17          |    |
|  | 02/17/16 | 1 - 2          | N           | 2,100                 | ND (0.79)           | 11 J                | 12 J              | 12 J              | 49                | 6.8 J             | 23                | 2.9 J             | ND (5.4) *      | ND (1.4)        | ND (160)          | 4.9 J           | 1 J          | 1.8 J        | 9,000    | 240       | 27        | 48        | 48          |    |
|  | 02/17/16 | 2 - 3          | N           | 770                   | ND (280)            | ND (14)             | 9.6 J             | ND (7.1)          | 22                | ND (13)           | ND (1.4)          | ND (2.1)          | ND (2.9)        | ND (1.9)        | ND (120)          | 3.9 J           | ND (0.89)    | ND (1.4)     | 7,100    | ND (5.5)  | 17        | 25        | 25          |    |
|  | 02/17/16 | 5 - 6          | N           | 7.9 J                 | ND (1.1)            | ND (0.29)           | ND (0.16)         | ND (0.094)        | ND (0.33)         | ND (0.13)         | ND (0.25)         | ND (0.31)         | ND (0.075)      | ND (0.11)       | ND (0.83)         | ND (0.053)      | ND (0.04)    | ND (0.18)    | 51       | 1.7 J     | 0.29      | 0.28      | 0.28        |    |

TABLE B-4b  
Sample Results: Dioxins and Furans  
AOC 10 – East Ravine  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |           |             |           |           |             |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|-----------|-------------|-----------|-----------|-------------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE        | NE          | 16        | 50        | 5.58        |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE        | NE          | NE        | 4.8       | NE          |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE        | NE          | NE        | 50        | NE          |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE        | NE          | 16        | NE        | 1.6         |
| Background <sup>5</sup> :                            |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE        | NE          | 5.98      | 5.58      | 5.58        |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD      | OCDF        | TEQ Avian | TEQ Human | TEQ Mammals |
| AOC10-23   | 02/25/16 | 0 - 1          | N           | 63,000                | 2,300 J             | 120 J               | ND (31) J         | ND (45) J         | 980 J             | 110 J             | 140 J             | ND (51) J         | ND (21) J*      | ND (7.9) J      | ND (3,300) J      | 100 J           | 2.7 J        | ND (25) J    | 230,000   | 11,000 J    | 440       | 1,100     | 1,100       |
|  | 02/25/16 | 1 - 2          | N           | 230                   | ND (150)            | ND (3.8)            | ND (3.1)          | ND (3)            | 10 J              | ND (6)            | ND (3)            | ND (2)            | ND (5.1) *      | ND (0.54)       | ND (1.7)          | ND (2.1)        | ND (0.46)    | ND (0.63)    | 2,000     | 94          | 6.3       | 8.8       | 8.8         |
|  | 02/25/16 | 2 - 3          | N           | 890                   | 34                  | ND (5.7)            | ND (0.68)         | 4.1 J             | 13                | 1.9 J             | ND (3.8)          | ND (1.9)          | ND (0.62)       | 1.1 J           | ND (64)           | 2 J             | ND (0.38)    | 1.2 J        | 4,300     | 55          | 9.7       | 17        | 17          |
| AOC10-24   | 03/07/16 | 0 - 1          | N           | 590                   | 41                  | ND (2.4)            | 6.5 J             | ND (0.26)         | 17                | 2.5 J             | 11 J              | ND (1)            | 3.4 J           | ND (0.32)       | ND (96)           | 2.6 J           | ND (0.41)    | ND (1.2)     | 5,300     | 130         | 15        | 21        | 21          |
|  | 03/07/16 | 2 - 3          | N           | 3,000                 | ND (37)             | ND (44)             | 22                | ND (23)           | 140               | ND (23)           | 49                | ND (27)           | 8.1 J           | 4.7 J           | ND (2,300)        | 7.9 J           | 0.22 J       | 1 J          | 28,000    | 2,100       | 150       | 190       | 190         |
| AOC10-25   | 01/08/17 | 0 - 0.5        | N           | 30 J                  | ND (2.4)            | ND (0.59)           | ND (0.25)         | ND (0.35)         | ND (0.75)         | ND (0.31)         | 0.63 J            | ND (0.63)         | ND (0.16)       | ND (0.31)       | ND (3.8)          | ND (0.66)       | ND (0.054)   | ND (0.13)    | 200 J     | ND (4.5)    | 0.91      | 0.96      | 0.96        |
|  | 01/08/17 | 0 - 0.5        | FD          | 130 J                 | ND (11)             | ND (1.4)            | ND (2.8)          | ND (0.62)         | ND (0.66)         | ND (1.7)          | ND (0.68)         | ND (0.7)          | ND (0.53)       | ND (0.8)        | 8 J               | ND (5.2)        | ND (0.2)     | 1.5 J        | 1,500 J   | 29          | 5.9       | 4.3       | 4.3         |
|  | 01/08/17 | 2 - 3          | N           | ND (0.24)             | ND (1.1)            | ND (0.73)           | ND (0.34)         | ND (0.16)         | ND (0.54)         | ND (0.28)         | ND (0.41)         | ND (0.7)          | ND (0.14)       | ND (0.1)        | ND (0.51)         | ND (0.14)       | ND (0.14)    | ND (0.41)    | ND (41)   | ND (1.6)    | ND (0.55) | ND (0.35) | ND (0.35)   |
|  | 01/08/17 | 5 - 6          | N           | ND (2.3)              | ND (0.23)           | ND (1.3)            | ND (0.47)         | ND (0.26)         | ND (0.27)         | ND (0.56)         | ND (0.55)         | 1 J               | ND (0.5)        | ND (0.097)      | 0.73 J            | ND (0.1)        | ND (0.064)   | ND (0.095)   | ND (18)   | ND (1.8)    | 0.65      | 0.6       | 0.6         |
|  | 01/08/17 | 9 - 10         | N           | 2.2 J                 | ND (0.49)           | ND (0.56)           | ND (0.3)          | ND (0.13)         | ND (0.22)         | ND (0.12)         | ND (0.11)         | ND (0.39)         | ND (0.14)       | ND (0.076)      | ND (0.36)         | ND (0.2)        | ND (0.12)    | ND (0.082)   | ND (14)   | ND (1.7)    | 0.35      | 0.28      | 0.28        |
| AOC10-26   | 02/21/17 | 0 - 0.5        | N           | 220                   | 21                  | 2.6 J               | 3 J               | ND (1.2)          | 7.8 J             | 1.3 J             | 4.9 J             | ND (0.2)          | 1.7 J           | 0.51 J          | ND (50)           | 1.8 J           | ND (0.15)    | ND (0.39)    | 1,500     | 41          | 7.8       | 9.5       | 9.5         |
|  | 02/21/17 | 2 - 3          | N           | 1,200                 | 170                 | 17                  | 13                | 8 J               | 49                | 28                | 24                | ND (2.5)          | 5.6 J           | 3 J             | ND (910)          | ND (3.7)        | ND (0.04)    | ND (0.1)     | 6,500     | 250         | 64        | 80        | 80          |
|  | 02/21/17 | 2 - 3          | FD          | 3,400                 | 410                 | 44                  | 29                | 19                | 120               | 60                | 57                | 5.6 J             | 13              | 5.1 J           | ND (1,900)        | 6.7 J           | ND (0.16)    | 1.1 J        | 16,000    | 610         | 140       | 180       | 180         |
|  | 02/21/17 | 2.5 - 2.7      | N           | 9,300                 | 1,100               | 110                 | 73                | 48                | 300               | 120               | 140               | 13                | 28              | ND (8.9)        | ND (3,800)        | 13              | ND (0.17)    | 0.75 J       | 54,000    | 2,000       | 300       | 410       | 410         |
|  | 02/21/17 | 4.5 - 5        | N           | 1,800                 | 440                 | 36                  | 11 J              | 12 J              | 80                | 15                | 25                | 3.9 J             | ND (5.7) *      | 2.5 J           | ND (1,100)        | 12 J            | ND (0.1)     | 1.1 J        | 15,000    | 830         | 86        | 100       | 100         |
| AOC10-27   | 01/04/17 | 0 - 0.5        | N           | 450                   | 44                  | ND (4.4)            | ND (3.4)          | ND (6.3)          | 12 J              | ND (5.5)          | 7.9 J             | ND (7.2)          | ND (1.1)        | ND (2)          | ND (6.5)          | 7.7 J           | ND (0.14)    | ND (0.71)    | 6,100     | 71          | 13        | 13        | 13          |
|  | 01/04/17 | 2 - 3          | N           | 260                   | 36                  | 4.6 J               | 3.3 J             | ND (2.3)          | 9.9 J             | 5.7 J             | 5.3 J             | ND (1.7)          | ND (1.8)        | ND (1.4)        | ND (100)          | ND (5)          | ND (0.2)     | ND (0.47)    | 1,800     | 72          | 11        | 13        | 13          |
|  | 01/04/17 | 4 - 5          | N           | 30                    | 6.8 J               | ND (1.2)            | ND (0.22)         | ND (0.3)          | ND (0.22)         | ND (0.59)         | ND (0.22)         | ND (0.36)         | ND (0.21)       | ND (0.3)        | ND (18)           | ND (0.32)       | ND (0.13)    | ND (0.25)    | 260       | 17 J        | 1.6       | 1.7       | 1.7         |
| AOC10-6  | 09/20/08 | 0 - 0.5        | N           | 170 J                 | 13 J                | ND (1.7) J          | 2.2 J             | ND (1) J          | 4.5 J             | ND (1.4) J        | 3.4 J             | ND (0.75) J       | ND (0.26) J     | ND (0.34) J     | ND (17) J         | 1.9 J           | ND (0.099) J | ND (0.39) J  | 1,800 J   | ND (28)     | 4.3       | 5.2       | 5.2         |
|  | 09/20/08 | 2 - 3          | N           | ND (6.3) J            | ND (1.4) J          | ND (1.7) J          | ND (1.3) J        | ND (2) J          | ND (1.6) J        | ND (1.8) J        | ND (1.6) J        | ND (2.3) J        | ND (1.5) J      | ND (1.4) J      | ND (2) J          | ND (1.4) J      | ND (1.1) J   | ND (1.6) J   | ND (5) J  | ND (5.9) J  | ND (3.4)  | ND (2.3)  | ND (2.3)    |
| AOC10a-2   | 01/13/16 | 0 - 1          | N           | 650 J                 | 38 J                | ND (2.2) J          | 7.2 J             | 3.2 J             | 17 J              | ND (3.8) J        | ND (10) J         | ND (0.76) J       | ND (2.8) J      | 3.3 J           | ND (49) J         | ND (0.85) J     | ND (0.18) J  | 0.89 J       | 6,600 J   | 66 J        | 8.9       | 17        | 17          |
|  | 01/13/16 | 2 - 3          | N           | ND (2.5) J            | ND (0.24) J         | ND (0.2) J          | ND (0.21) J       | ND (0.062) J      | ND (0.14) J       | ND (0.058) J      | ND (0.15) J       | ND (0.075) J      | ND (0.093) J    | ND (0.083) J    | ND (0.53) J       | ND (0.088) J    | ND (0.066) J | ND (0.097) J | ND (18) J | ND (0.36) J | ND (0.23) | ND (0.18) | ND (0.18)   |
| AOC10a-3   | 01/13/16 | 0 - 1          | N           | 2,700                 | 550                 | ND (87)             | ND (5.1)          | ND (9.7)          | 100               | ND (8.5)          | 31                | ND (11)           | 7.3 J           | ND (1)          | ND (1,200)        | 4 J             | ND (0.22)    | ND (0.38)    | 22,000    | 1,200       | 88        | 120       | 120         |
|  | 01/13/16 | 2 - 3          | N           | 5,400                 | 660                 | ND (76)             | 18                | ND (15)           | 110               | ND (13)           | 43                | ND (17)           | 8 J             | ND (2.7)        | ND (1,000)        | ND (3.5)        | 0.66 J       | 2.3 J        | 44,000    | 2,200       | 88        | 150       | 150         |
|  | 01/13/16 | 5 - 6          | N           | ND (9.5)              | ND (1.3)            | ND (0.52)           | ND (0.39)         | ND (0.67)         | ND (0.24)         | ND (0.59)         | ND (0.25)         | ND (1.6)          | ND (0.15)       | ND (0.2)        | ND (0.67)         | ND (0.13)       | ND (0.15)    | ND (0.092)   | 75        | ND (2.3)    | 0.49      | 0.48      | 0.48        |
|  | 01/13/16 | 9 - 10         | N           | ND (4.8)              | ND (0.52)           | ND (0.22)           | ND (0.12)         | ND (0.4)          | ND (0.15)         | ND (0.35)         | ND (0.16)         | ND (0.45)         | ND (0.21)       | ND (0.1)        | ND (0.65)         | ND (0.11)       | ND (0.14)    | ND (0.29)    | 34        | ND (1.8)    | 0.49      | 0.36      | 0.36        |
| AOC10a-4   | 01/08/17 | 0 - 0.5        | N           | 770                   | 62                  | 5.5 J               | ND (5)            | 3.7 J             | 17                | ND (1.6)          | 8.5 J             | ND (1.3)          | 2.2 J           | ND (1)          | ND (120)          | 1.3 J           | ND (0.11)    | ND (0.65)    | 8,400     | 150         | 14        | 23        | 23          |
|  | 01/08/17 | 2 - 3          | N           | 4.6 J                 | 1 J                 | ND (0.26)           | ND (0.16)         | ND (0.13)         | ND (0.23)         | ND (0.13)         | ND (0.61)         | ND (0.2)          | ND (0.2)        | ND (0.21)       | ND (0.66)         | ND (0.079)      | ND (0.061)   | ND (0.085)   | 43        | ND (1.9)    | 0.33      | 0.33      | 0.33        |
| AOC10b-1   | 09/30/08 | 0 - 0.5        | N           | 820 J                 | 88 J                | ND (5.3) J          | 5.8 J             | ND (2.2) J        | 20 J              | ND (4.1) J        | 12 J              | ND (2.5) J        | 2.7 J           | ND (0.59) J     | ND (100) J        | ND (0.59) J     | ND (0.14) J  | ND (0.36) J  | 7,900 J   | 230 J       | 13        | 24        | 24          |
|  | 09/30/08 | 2 - 3          | N           | 4,600 J               | 980 J               | ND (83) J           | 33 J              | 25 J              | 170 J             | 42 J              | 67 J              | ND (9.6) J        | 16 J            | ND (1.7) J      | ND (1,700) J      | ND (5.7) J      | ND (0.62) J  | ND (1.6) J   | 38,000 J  | 1,800 J     | 140       | 200       | 200         |
|  | 09/30/08 | 5 - 6          | N           | 2,600 J               | 650 J               | 56 J                | 27 J              | ND (11) J         | ND (1.2) J        | ND (56) J         | 54 J              | ND (12) J         | 15 J            | ND (8.3) J      | ND (1,600) J      | ND (8.3) J      | ND (0.17) J  | ND (0.38) J  | 17,000 J  | 930 J       | 120       | 150       | 150         |

Sample Results: Dioxins and Furans  
AOC 10 – East Ravine  
*Soil Engineering Evaluation/Cost Analysis*  
*PG&E Topock Compressor Station, Needles, California*

Notes:

Category 1: Validated data suitable for all uses, including risk assessment and remedial action decisions.

Category 2: Validated data suitable for use in characterization of the chemicals of potential concern at the facility and to help define the nature and extent of contamination.

Category 3: Validated data suitable only for use in qualitative characterization of the nature and extent of contamination.

Results greater than or equal to the Interim Screening Level are circled.

|         |   |
|---------|---|
| Θ       | white powder sample.  |
| --      | not analyzed  |
| ft bgs  | feet below ground surface   |
| ng/kg   | nanograms per kilogram  |
| DTSC-SL | DTSC Screening Levels   |
| DTSC    | California Department of Toxic Substances Control                           |
| FD      | Field Duplicate   |
| J       | concentration or reporting limit estimated by laboratory or data validation |
| JR      | estimated value, one or more input values is "R" qualified.                 |
| N       | Primary Sample  |

TABLE B-4b  
Sample Results: Dioxins and Furans  
AOC 10 – East Ravine  
*Soil Engineering Evaluation/Cost Analysis*  
*PG&E Topock Compressor Station, Needles, California*

|       |   |
|-------|---|
| NA    | NA = not applicable   |
| NE    | not established   |
| ND    | not detected at the listed reporting limit  |
| R     | The result has been rejected; identification and/or quantitation could not be verified because critical QC specifications were not met (e.g., a non-detect result obtained for an archive sample following a hold time of greater than one year). |
| USEPA | USEPA = United States Environmental Protection Agency   |

- 1 For individual dioxins and furans, selected value is the lower of the ECV, residential DTSC-SL, or USEPA residential regional screening value, unless the background value is higher. For TEQ values, selected value is the DTSC-SL.
- 2 United States Environmental Protection Agency (USEPA). 2017. Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites. November.
- 3 California Department of Toxic Substances Control (DTSC). 2018. Human Health Risk Assessment (HHRA) Note Number 3. JanuaryCalifornia Department of Toxic Substances Control (DTSC). 2017. Human Health Risk Assessment (HHRA) Note 2, Soil Remedial Goals for Dioxins and Dioxin-like Compounds for Consideration at California Hazardous Waste Sites. April.
- 4 ARCADIS. 2008. "Technical Memorandum 3: Ecological Comparison Values for Metals and Polycyclic Aromatic Hydrocarbons in Soil." May 28. ARCADIS. 2009. "Topock Compression Station - Final Technical Memorandum 4: Ecological Comparison Values for Additional Decteded Chemicals in Soil." July 1.
- 5 CH2M. 2017. Revised Ambient Study of Dioxins and Furans at the Pacific Gas and Electric Company, Topock Compressor Station, Needles, California. October.

Calculations:

TEQ = Sum of Result xToxic equivalency factor (TEF), 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.

TEQ Avian = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.

TEQMammals = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.

Teq Humans = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.



TABLE B-5a  
Sample Results: Metals  
AOC 11 – Topographic Low Areas  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |        |              |            |        |          |          |            |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|--------------|------------|--------|----------|----------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125       | 1.37       | 27.3   | 1.47     | 5.15     | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11           | 390        | 1,500  | 390      | 390      | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1            | NE         | 490    | NE       | 390      | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125       | 2.25       | 0.607  | 0.177    | 5.15     | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE           | 1.37       | 27.3   | 1.47     | NE       | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury      | Molybdenum | Nickel | Selenium | Silver   | Thallium   | Vanadium | Zinc   |
| Category 1   |          |                |             |                |         |        |            |            |                      |                 |        |        |        |              |            |        |          |          |            |          |        |
| AOC11-4-OS4  | 06/11/14 | 0              | N           | ND (2) *       | 3.4     | 150    | ND (1) *   | ND (1)     | ND (0.2)             | 16              | 6.2    | 9.6    | 3.5    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2) *   | 32       | 40     |
| AOC11-4-OS6  | 06/11/14 | 0              | N           | ND (2) *       | 3.1     | 140    | ND (1) *   | ND (1)     | 0.22                 | 18              | 5.7    | 9.2    | 7.2    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2) *   | 27       | 39     |
| AOC11-4-OS5  | 06/11/14 | 0              | N           | ND (2) *       | 3.4     | 110    | ND (1) *   | ND (1)     | ND (0.2)             | 21              | 6.8    | 12     | 6.4    | ND (0.1) *   | ND (1)     | 15     | ND (1)   | ND (1)   | ND (2) *   | 32       | 43     |
| AOC11-4-OS3  | 06/11/14 | 0              | N           | ND (2) *       | 3       | 150    | ND (1) *   | ND (1)     | ND (0.2)             | 14              | 5      | 8.6    | 5.3    | ND (0.099) * | ND (1)     | 10     | ND (1)   | ND (1)   | ND (2) *   | 27       | 35     |
| AOC11-4-OS1  | 06/11/14 | 0              | N           | ND (2) J*      | 7.2 J   | 200 J  | ND (1) J*  | ND (1) J   | ND (0.2)             | 18 J            | 7 J    | 11 J   | 4.2 J  | ND (0.1) *   | ND (1) J   | 14 J   | ND (1) J | ND (1) J | ND (2) J*  | 32 J     | 47 J   |
| AOC11-4-OS6  | 06/11/14 | 2 - 3          | N           | ND (2.1) *     | 3       | 120    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 20              | 6.7    | 7.7    | 3.2    | ND (0.11) *  | ND (1.1)   | 15     | ND (1.1) | ND (1.1) | ND (2.1) * | 29       | 36     |
| AOC11-4-OS5  | 06/11/14 | 2 - 3          | N           | ND (2.1) *     | 2.7     | 97     | ND (1) *   | ND (1)     | ND (0.21)            | 18              | 5.7    | 9.3    | 5.4    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2.1) * | 28       | 36     |
| AOC11-4-OS4  | 06/11/14 | 2 - 3          | N           | ND (2) *       | 3.4     | 120    | ND (1) *   | ND (1)     | ND (0.2)             | 14              | 5.9    | 8.6    | 3.2    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2) *   | 33       | 37     |
| AOC11-4-OS3  | 06/11/14 | 2 - 3          | N           | ND (2) *       | 3.1     | 120    | ND (1) *   | ND (1)     | 0.43                 | 18              | 5      | 7.3    | 6.4    | ND (0.1) *   | ND (1)     | 8.9    | ND (1)   | ND (1)   | ND (2) *   | 23       | 30     |
| AOC11-4-OS1  | 06/11/14 | 2 - 3          | N           | ND (2.1) *     | 6.7     | 170    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 16              | 6.5    | 11     | 3.5    | ND (0.11) *  | ND (1.1)   | 13     | ND (1.1) | ND (1.1) | ND (2.1) * | 30       | 41     |
| AOC11-4-OS3  | 06/11/14 | 2 - 3          | FD          | ND (2) *       | 3       | 120    | ND (1) *   | ND (1)     | 0.43                 | 17              | 4.2    | 7.7    | 6.2    | ND (0.1) *   | ND (1)     | 9      | ND (1)   | ND (1)   | ND (2) *   | 23       | 30     |
| AOC11-4-OS4  | 06/11/14 | 5 - 6          | N           | ND (2) *       | 3.6     | 150    | ND (1) *   | ND (1)     | ND (0.21)            | 17              | 6.4    | 10     | 5.5    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2) *   | 30       | 38     |
| AOC11-4-OS5  | 06/11/14 | 5 - 6          | FD          | ND (2.1) *     | 3.4     | 110    | ND (1) *   | ND (1)     | ND (0.21)            | 20              | 6.2    | 8.9    | 5.6    | ND (0.1) *   | ND (1)     | 15     | ND (1)   | ND (1)   | ND (2.1) * | 30       | 40     |
| AOC11-1  | 01/05/16 | 0 - 1          | N           | ND (2.1) *     | 4.9     | 110 J  | ND (1) *   | ND (1)     | ND (0.21)            | 11              | 4.8    | 9.7    | 7.8 J  | ND (0.1) *   | ND (1)     | 9.5    | ND (1)   | ND (1)   | ND (2.1) * | 19       | 67 J   |
|  | 01/05/16 | 0 - 1          | FD          | ND (2) *       | 5.2     | 200 J  | ND (1) *   | ND (1)     | ND (0.21)            | 11              | 4.5    | 8.1    | 5.4 J  | ND (0.1) *   | ND (1)     | 8.9    | ND (1)   | ND (1)   | ND (2) *   | 21       | 50 J   |
|  | 01/05/16 | 2 - 3          | N           | ND (2.1) *     | 3.3     | 140    | ND (1) *   | ND (1)     | ND (0.21)            | 11              | 3.9    | 9.5    | 5.2    | ND (0.1) *   | ND (1)     | 8.3    | ND (1)   | ND (1)   | ND (2.1) * | 22       | 32     |
|  | 01/05/16 | 5 - 6          | N           | ND (2.4) *     | 3.9     | 120    | ND (1.2) * | ND (1.2) * | ND (0.24)            | 18              | 5.8    | 8.1    | 5.3    | ND (0.12) *  | ND (1.2)   | 12     | ND (1.2) | ND (1.2) | ND (2.4) * | 29       | 38     |
|  | 01/05/16 | 9 - 10         | N           | ND (2.8) *     | 6.1     | 140    | ND (1.4) * | ND (1.4) * | ND (0.28)            | 15              | 6      | 9.2    | 6.1    | ND (0.14) *  | ND (1.4) * | 12     | ND (1.4) | ND (1.4) | ND (2.8) * | 30       | 37     |
| AOC11-2  | 01/05/16 | 0 - 1          | N           | ND (2.1) *     | 5.1     | 100    | ND (1) *   | ND (1)     | ND (0.21)            | 21              | 7.4    | 8.7    | 2.4    | ND (0.1) *   | ND (1)     | 15     | ND (1)   | ND (1)   | ND (2.1) * | 36       | 51     |
|  | 01/05/16 | 2 - 3          | N           | ND (2.1) *     | 3.5     | 73     | ND (1) *   | ND (1)     | ND (0.21)            | 21              | 7.9    | 10     | 1.9    | ND (0.1) *   | ND (1)     | 16     | ND (1)   | ND (1)   | ND (2.1) * | 39       | 44     |
|  | 01/05/16 | 5 - 6          | N           | ND (2.1) *     | 2.9     | 81     | ND (1) *   | ND (1)     | ND (0.21)            | 30              | 9.4    | 12     | 2.2    | ND (0.1) *   | ND (1)     | 21     | ND (1)   | ND (1)   | ND (2.1) * | 45       | 45     |
|  | 01/05/16 | 9 - 10         | N           | ND (2.1) *     | 2.6     | 37 J   | ND (1) *   | ND (1)     | ND (0.21)            | 23 J            | 9.4    | 9.4    | 1.8    | ND (0.11) *  | ND (1)     | 17     | ND (1)   | ND (1)   | ND (2.1) * | 38       | 45     |
|  | 01/05/16 | 9 - 10         | FD          | ND (2.1) *     | 2.8     | 26 J   | ND (1) *   | ND (1)     | ND (0.21)            | 17 J            | 8.6    | 12     | 2.7    | ND (0.1) *   | ND (1)     | 16     | ND (1)   | ND (1)   | ND (2.1) * | 38       | 46     |
| AOC11-3  | 01/05/16 | 0 - 1          | N           | ND (2) *       | 3.3     | 98     | ND (1) *   | ND (1)     | ND (0.2)             | 15              | 5.6    | 8      | 2.6    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2) *   | 29       | 31     |
|  | 01/05/16 | 2 - 3          | N           | ND (2.1) *     | 3.6     | 120    | ND (1) *   | ND (1)     | ND (0.21)            | 20              | 7.9    | 10     | 2.3    | ND (0.1) *   | ND (1)     | 15     | ND (1)   | ND (1)   | ND (2.1) * | 40       | 43     |
|  | 01/05/16 | 5 - 6          | N           | ND (2.1) *     | 3.7     | 110    | ND (1) *   | ND (1)     | ND (0.21)            | 20              | 7.7    | 11     | 2.4    | ND (0.1) *   | ND (1)     | 15     | ND (1)   | ND (1)   | ND (2.1) * | 35       | 38     |
|  | 01/05/16 | 9 - 10         | N           | ND (2.1) *     | 3.4     | 110    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 23              | 8.6    | 10     | 2.2    | ND (0.11) *  | ND (1.1)   | 17     | ND (1.1) | ND (1.1) | ND (2.1) * | 42       | 45     |
|  | 01/05/16 | 9 - 10         | FD          | ND (2.1) *     | 3.2     | 90     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 14              | 6.3    | 7.7    | 1.8    | ND (0.1) *   | ND (1.1)   | 11     | ND (1.1) | ND (1.1) | ND (2.1) * | 27       | 34     |
| AOC11-4  | 01/05/16 | 0 - 1          | N           | ND (2.1) *     | 3.3     | 120    | ND (1) *   | ND (1)     | ND (0.2)             | 25              | 5.5    | 9.1    | 4.1    | ND (0.1) *   | 1.3        | 12     | ND (1)   | ND (1)   | ND (2.1) * | 24       | 33     |
|  | 01/05/16 | 2 - 3          | N           | ND (2.1) *     | 3.5     | 140    | ND (1) *   | ND (1)     | 1                    | 16              | 5.8    | 9      | 4.1    | ND (0.1) *   | ND (1)     | 12     | ND (1.1) | ND (1)   | ND (2.1) * | 24       | 33     |
| AOC11-5  | 02/03/16 | 0 - 0.5        | N           | ND (2.5) *     | 7.1     | 170    | ND (1.2) * | ND (1.2) * | ND (0.25) J          | 27              | 7.4    | 22     | 14     | ND (0.13) *  | ND (1.2)   | 16     | ND (1.2) | ND (1.2) | ND (2.5) * | 34       | 70     |
|  | 02/03/16 | 2 - 3          | N           | ND (2.1) *     | 5.8     | 150    | ND (1.1) * | ND (1.1) * | ND (0.21) J          | 18              | 6.9    | 8.9    | 1.7    | ND (0.11) *  | ND (1.1)   | 13     | ND (1.1) | ND (1.1) | ND (2.1) * | 30       | 46     |
|  | 02/03/16 | 5 - 6          | N           | ND (2.1) *     | 5.3     | 210    | ND (1) *   | ND (1)     | ND (0.21) J          | 25              | 9.1    | 10     | 1.7    | ND (0.1) *   | ND (1)     | 16     | ND (1)   | ND (1)   | ND (2.1) * | 37       | 48     |
|  | 02/03/16 | 9 - 10         | N           | ND (2) *       | 7.1     | 140    | ND (1) *   | ND (1)     | ND (0.2) J           | 21              | 8.1    | 9.3    | 2      | ND (0.1) *   | ND (1)     | 15     | ND (1)   | ND (1)   | ND (2) *   | 32       | 56     |
| AOC11-6  | 01/06/16 | 0 - 1          | N           | ND (2.2) *     | 8.7     | 500    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 20              | 7.2    | 12     | 21     | ND (0.11) *  | 1.7        | 18     | ND (1.1) | ND (1.1) | ND (2.2) * | 31       | 67     |
|  | 01/06/16 | 2 - 3          | N           | ND (2) *       | 8.3     | 490    | ND (1) *   | ND (1)     | ND (0.2)             | 20              | 7.4    | 9.5    | 24     | ND (0.1) *   | ND (1)     | 14     | ND (1)   | ND (1)   | ND (2) *   | 32       | 62     |
|  | 01/06/16 | 5 - 6          | N           | ND (2.1) *     | 7.9     | 300    | ND (1) *   | ND (1)     | ND (0.21)            | 25              | 8.9    | 10     | 2.4    | ND (0.1) *   | ND (1)     | 18     | ND (1)   | ND (1)   | ND (2.1) * | 34       | 59     |
|  | 01/06/16 | 9 - 10         | N           | ND (2) *       | 11      | 150    | ND (1) *   | ND (1)     | ND (0.21)            | 14              | 7.4    | 9.1    | 6.1    | ND (0.1) *   | ND (1)     | 10     | ND (1)   | ND (1)   | ND (2) *   | 45       | 79     |

TABLE B-5a  
Sample Results: Metals  
AOC 11 – Topographic Low Areas  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |        |             |            |        |            |          |            |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|-------------|------------|--------|------------|----------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125      | 1.37       | 27.3   | 1.47       | 5.15     | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11          | 390        | 1,500  | 390        | 390      | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1           | NE         | 490    | NE         | 390      | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125      | 2.25       | 0.607  | 0.177      | 5.15     | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE          | 1.37       | 27.3   | 1.47       | NE       | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury     | Molybdenum | Nickel | Selenium   | Silver   | Thallium   | Vanadium | Zinc   |
| AOC11-7  | 01/06/16 | 0 - 1          | N           | ND (2.2) *     | 4.6     | 120    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 11              | 6.1    | 8      | 220    | ND (0.11) * | ND (1.1)   | 8      | ND (1.1)   | ND (1.1) | ND (2.2) * | 25       | 40     |
|  | 01/06/16 | 2 - 3          | N           | ND (2.1) *     | 4.1     | 170    | ND (1) *   | ND (1)     | 0.52                 | 15              | 5.7    | 11     | 30     | ND (0.1) *  | ND (1)     | 9      | ND (1)     | ND (1)   | ND (2.1) * | 23       | 70     |
|  | 01/06/16 | 5 - 6          | N           | ND (2) *       | 9       | 250    | ND (1) *   | ND (1)     | ND (0.2)             | 15              | 9      | 7.5    | 8.5    | ND (0.1) *  | ND (1)     | 11     | ND (1)     | ND (1)   | ND (2) *   | 55       | 79     |
| AOC11-8  | 12/06/15 | 0 - 1          | N           | ND (2) *       | 4       | 77     | ND (1) *   | ND (1)     | ND (0.2)             | 12              | 5      | 9.3    | 26     | ND (0.1) *  | ND (1)     | 7.5    | ND (1)     | ND (1)   | ND (2) *   | 29       | 43     |
|  | 12/06/15 | 2 - 3          | N           | ND (2) *       | 3.1     | 62     | ND (1) *   | ND (1)     | ND (0.2)             | 9.6             | 4.6    | 8.1    | 28     | ND (0.1) *  | ND (1)     | 7.1    | ND (1)     | ND (1)   | ND (2) *   | 25       | 45     |
| AOC11-9  | 12/06/15 | 0 - 1          | N           | ND (2) *       | 3.3     | 57     | ND (1) *   | ND (1)     | ND (0.2)             | 9.6             | 5.1    | 7.5    | 23     | ND (0.1) *  | ND (1)     | 7.8    | ND (1)     | ND (1)   | ND (2) *   | 26       | 61     |
|  | 12/06/15 | 2 - 3          | N           | ND (2) *       | 3.2     | 72     | ND (1) *   | ND (1)     | ND (0.2)             | 11              | 5.5    | 8.6    | 13     | ND (0.1) *  | ND (1)     | 8.6    | ND (1)     | ND (1)   | ND (2) *   | 32       | 63     |
| AOC11a-1   | 09/21/08 | 0 - 0.5        | N           | ND (2) *       | 6       | 170    | ND (2) *   | ND (1)     | ND (0.403)           | 19              | 5.8    | 12     | 9.9    | ND (0.1) *  | ND (2) *   | 13     | ND (1)     | ND (2)   | ND (4) *   | 23       | 46     |
|  | 09/21/08 | 2 - 3          | N           | ND (2.1) J*    | 6.4     | 190    | ND (2.1) * | ND (1)     | ND (0.411)           | 23              | 6.6    | 14     | 20     | ND (0.1) *  | ND (2.1) * | 14     | ND (1)     | ND (2.1) | ND (4.1) * | 30       | 58     |
|  | 09/21/08 | 5 - 6          | N           | ND (2) *       | 4.6     | 190    | ND (1) *   | ND (1)     | ND (0.41)            | 22              | 7.1    | 9      | 4.7    | ND (0.1) *  | ND (1)     | 14     | 1.6        | ND (1)   | ND (2) *   | 31       | 44     |
|  | 09/21/08 | 9 - 10         | N           | ND (2) *       | 6.9     | 190    | ND (2) *   | ND (1)     | 3                    | 19              | 5.8    | 10     | 9.2    | ND (0.1) J* | ND (2) *   | 13     | ND (1)     | ND (2)   | ND (4) *   | 22       | 44     |
| AOC11a-2   | 09/21/08 | 0 - 0.5        | N           | ND (2.1) *     | 8.3     | 210    | ND (2.1) * | ND (1)     | 0.417                | 32              | 6.8    | 20     | 15     | ND (0.11) * | ND (2.1) * | 18     | ND (2.1) * | ND (2.1) | ND (4.1) * | 32       | 75     |
|  | 09/21/08 | 2 - 3          | N           | ND (2.1) *     | 5.5     | 220    | ND (2.1) * | ND (1)     | ND (0.413)           | 19              | 6.9    | 10     | 7.7    | ND (0.11) * | ND (2.1) * | 14     | ND (1)     | ND (2.1) | ND (4.2) * | 32       | 42     |
|  | 09/21/08 | 5 - 6          | N           | ND (2) *       | 5.5     | 1,300  | ND (2) *   | ND (1)     | ND (0.408)           | 25              | 8.9    | 14     | 3.4    | ND (0.1) *  | ND (2) *   | 19     | ND (2) *   | ND (2)   | ND (4.1) * | 41       | 56     |
|  | 09/21/08 | 9 - 10         | N           | ND (2) *       | 5.2     | 480    | ND (1) *   | ND (1)     | ND (0.412)           | 19              | 8.3    | 6.5    | 2.2    | ND (0.1) J* | 1          | 14     | ND (1)     | ND (1)   | ND (2) *   | 35       | 47     |
| AOC11a-3   | 09/20/08 | 0 - 0.5        | N           | ND (2) *       | 6.9     | 190    | ND (2) *   | ND (1)     | ND (0.411)           | 22              | 6.1    | 16     | 13     | ND (0.1) *  | ND (2) *   | 15     | ND (1)     | ND (2)   | ND (4.1) * | 24       | 62     |
|  | 09/20/08 | 2 - 3          | N           | ND (2.1) *     | 6.6     | 220    | ND (2.1) * | ND (1)     | ND (0.423)           | 24              | 7      | 14     | 17     | ND (0.1) *  | 2.2        | 16     | ND (1)     | ND (2.1) | ND (4.2) * | 30       | 63     |
|  | 09/20/08 | 2 - 3          | FD          | ND (2.1) *     | 7.4     | 220    | ND (2.1) * | ND (1)     | ND (0.418)           | 24              | 7.1    | 14     | 16     | ND (0.1) *  | 2.4        | 16     | ND (1)     | ND (2.1) | ND (4.2) * | 31       | 61     |
|  | 09/20/08 | 5 - 6          | N           | ND (2.1) *     | 6.8     | 410    | ND (2.1) * | ND (1)     | 0.634                | 76              | 7.4    | 15     | 25     | ND (0.1) *  | ND (2.1) * | 17     | ND (1)     | ND (2.1) | ND (4.1) * | 36       | 75     |
|  | 09/20/08 | 9 - 10         | N           | ND (2) *       | 5.4     | 110    | ND (1) *   | ND (1)     | ND (0.407)           | 23              | 8.1    | 11     | 2.9    | ND (0.1) J* | 1.1        | 17     | ND (1)     | ND (1)   | ND (2) *   | 33       | 48     |
| AOC11a-4   | 09/20/08 | 0 - 0.5        | N           | ND (2) *       | 7.7     | 180    | ND (2) *   | ND (1)     | ND (0.409)           | 25              | 6.4    | 18     | 17     | ND (0.1) *  | ND (2) *   | 17     | ND (1)     | ND (2)   | ND (4.1) * | 28       | 79     |
|  | 09/20/08 | 2 - 3          | N           | ND (2) *       | 6.2     | 210    | ND (2) *   | ND (1)     | ND (0.41)            | 27              | 8.5    | 13     | 8      | ND (0.1) *  | ND (2) *   | 20     | ND (1)     | ND (2)   | ND (4.1) * | 37       | 52     |
|  | 09/20/08 | 5 - 6          | N           | ND (2) *       | 5       | 140    | ND (2) *   | ND (1)     | ND (0.407) J         | 25              | 8.7    | 11     | 3.7    | ND (0.1) *  | ND (2) *   | 19     | ND (1)     | ND (2)   | ND (4.1) * | 38       | 54     |
|  | 09/20/08 | 9 - 10         | N           | ND (2) *       | 7.5     | 640    | ND (2) *   | ND (1)     | ND (0.41)            | 27              | 9.6    | 14     | 3.5    | ND (0.1) J* | ND (2) *   | 22     | ND (1)     | ND (2)   | ND (4.1) * | 43       | 59     |
| AOC11a-5   | 09/21/08 | 0 - 0.5        | N           | ND (2.1) *     | 7.8     | 210    | ND (2.1) * | ND (1)     | 0.652                | 32              | 6.8    | 17     | 14     | ND (0.1) *  | ND (2.1) * | 16     | ND (1)     | ND (2.1) | ND (4.1) * | 32       | 71     |
|  | 09/21/08 | 2 - 3          | N           | ND (2.1) *     | 6       | 370    | ND (2.1) * | ND (1)     | ND (0.412)           | 30              | 8.5    | 12     | 9.4    | ND (0.1) *  | 2.5        | 18     | ND (1)     | ND (2.1) | ND (4.2) * | 38       | 57     |
|  | 09/21/08 | 5 - 6          | N           | ND (2.1) *     | 4.4     | 82     | ND (1) *   | ND (1)     | ND (0.411)           | 18              | 8.7    | 9.2    | 3      | ND (0.1) *  | 1.5        | 14     | ND (1)     | ND (1)   | ND (2.1) * | 34       | 53     |
|  | 09/21/08 | 5 - 6          | FD          | ND (2) *       | 4.1     | 84     | ND (1) *   | ND (1)     | ND (0.412)           | 18              | 8      | 9.6    | 3.1    | ND (0.1) *  | 1.6        | 14     | 3.2        | ND (1)   | ND (2) *   | 33       | 51     |
|  | 09/21/08 | 9 - 10         | N           | ND (2.1) J*    | 7.6     | 1,000  | ND (2.1) * | ND (1)     | ND (0.415)           | 24              | 8.4    | 9.8    | 3.1    | ND (0.1) J* | 2.5        | 19     | ND (1)     | ND (2.1) | ND (4.1) * | 37       | 62     |
| AOC11a-SS-1  | 09/21/08 | 0 - 0.5        | N           | ND (2) *       | 3.6     | 88     | ND (1) *   | ND (1)     | ND (0.402)           | 13              | 3.2    | 9.4    | 5.6    | ND (0.1) J* | 1.1        | 7.8    | ND (1)     | ND (1)   | ND (2) *   | 13       | 54     |
|  | 09/21/08 | 2 - 3          | N           | ND (2) *       | 7.2     | 130    | ND (2) *   | ND (1)     | ND (0.404)           | 19              | 6.7    | 8.9    | 6      | ND (0.1) J* | ND (2) *   | 14     | ND (1)     | ND (2)   | ND (4) *   | 29       | 48     |
|  | 09/21/08 | 5 - 6          | N           | ND (2) *       | 6.1     | 77     | ND (1) *   | ND (1)     | ND (0.408)           | 16              | 6.7    | 7.6    | 3      | ND (0.1) J* | ND (1)     | 13     | ND (1)     | ND (1)   | ND (2) *   | 29       | 42     |
|  | 09/21/08 | 9 - 10         | N           | ND (2) *       | 6.6     | 230    | ND (1) *   | ND (1)     | ND (0.414)           | 13              | 6.2    | 7      | 3      | ND (0.1) J* | ND (1)     | 11     | ND (1)     | ND (1)   | ND (2) *   | 29       | 40     |
| AOC11a-SS-2  | 09/21/08 | 0 - 0.5        | N           | ND (2) *       | 5.2     | 120    | ND (1) *   | ND (1)     | ND (0.414)           | 15              | 5.1    | 8.1    | 7.1    | ND (0.1) J* | ND (1)     | 11     | ND (1)     | ND (1)   | ND (2) *   | 21       | 42     |
|  | 09/21/08 | 2 - 3          | N           | ND (2) *       | 5.3     | 140    | ND (1) *   | ND (1)     | ND (0.402)           | 19              | 6      | 15     | 5.9    | ND (0.1) J* | ND (1)     | 14     | ND (1)     | ND (1)   | ND (2) *   | 26       | 53     |
| AOC11a-SS-3  | 09/20/08 | 0 - 0.5        | N           | ND (2) *       | 9       | 240    | ND (2) *   | ND (1)     | 0.622                | 29              | 6.8    | 17     | 16     | ND (0.1) J* | ND (2) *   | 17     | ND (1)     | ND (2)   | ND (4) *   | 27       | 73     |
|  | 09/20/08 | 2 - 3          | N           | ND (2) *       | 8.8     | 270    | ND (2) *   | ND (1)     | ND (0.409)           | 27              | 8.5    | 15     | 5.7    | ND (0.1) J* | ND (2) *   | 19     | ND (1)     | ND (2)   | ND (4.1) * | 38       | 57     |
|  | 09/20/08 | 5 - 6          | N           | ND (2) *       | 8.5     | 51     | ND (1) *   | ND (1)     | ND (0.412)           | 19              | 6.8    | 9.5    | 3.7    | ND (0.1) J* | 1.1        | 14     | ND (1)     | ND (1)   | ND (2) *   | 32       | 46     |
|  | 09/20/08 | 9 - 10         | N           | ND (2.1) *     | 7.1     | 150    | ND (1) *   | ND (1)     | ND (0.413)           | 24              | 7.7    | 11     | 3      | ND (0.1) J* | 1.4        | 19     | ND (1)     | ND (1)   | ND (2.1) * | 30       | 48     |

TABLE B-5a  
Sample Results: Metals  
AOC 11 – Topographic Low Areas  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |        |              |            |        |          |          |            |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|--------------|------------|--------|----------|----------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125       | 1.37       | 27.3   | 1.47     | 5.15     | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11           | 390        | 1,500  | 390      | 390      | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1            | NE         | 490    | NE       | 390      | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125       | 2.25       | 0.607  | 0.177    | 5.15     | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE           | 1.37       | 27.3   | 1.47     | NE       | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury      | Molybdenum | Nickel | Selenium | Silver   | Thallium   | Vanadium | Zinc   |
| AOC11b-1   | 09/17/08 | 0 - 0.5        | N           | ND (2) J*      | 6.7     | 200 J  | ND (5) *   | ND (1)     | ND (0.402)           | 27              | 8.1    | 16     | 25     | ND (0.1) *   | ND (5) *   | 20     | ND (1)   | ND (5)   | ND (10) *  | 41       | 71     |
|  | 09/17/08 | 0 - 0.5        | FD          | ND (2) *       | 6.4     | 180    | ND (5) *   | ND (1)     | 0.553                | 25              | 8.1    | 15     | 12     | ND (0.1) *   | ND (5) *   | 19     | ND (1)   | ND (5)   | ND (10) *  | 38       | 68     |
|  | 09/17/08 | 2 - 3          | N           | ND (2) *       | 5.2     | 110    | ND (2) *   | ND (1)     | ND (0.404)           | 17              | 3.6    | 7      | 8.2    | ND (0.1) *   | ND (2) *   | 8.9    | ND (1)   | ND (2)   | ND (4) *   | 33       | 28     |
|  | 09/17/08 | 5 - 6          | N           | ND (2) *       | 6.2     | 230    | ND (2) *   | ND (1)     | ND (0.411)           | 21              | 6.5    | 15     | 22     | ND (0.1) *   | ND (2) *   | 15     | ND (1)   | ND (2)   | ND (4.1) * | 37       | 72     |
|  | 09/17/08 | 9 - 10         | N           | ND (2.1) *     | 6       | 250    | ND (2.1) * | ND (1)     | ND (0.411)           | 20              | 5.7    | 13     | 13     | ND (0.1) J*  | ND (2.1) * | 15     | ND (1)   | ND (2.1) | ND (4.1) * | 33       | 65     |
| AOC11b-2   | 09/17/08 | 0 - 0.5        | N           | ND (2) *       | 4.8     | 190    | ND (2) *   | ND (1)     | 0.645                | 21              | 5.6    | 13     | 45     | ND (0.1) *   | ND (2) *   | 13     | ND (1)   | ND (2)   | ND (4) *   | 30       | 76     |
|  | 09/17/08 | 2 - 3          | N           | ND (2) *       | 13      | 270    | ND (5.1) * | ND (1)     | ND (0.41)            | 32              | 9.1    | 15     | 7.6    | ND (0.1) *   | ND (5.1) * | 20     | ND (1)   | ND (5.1) | ND (10) *  | 43       | 74     |
|  | 09/17/08 | 5 - 6          | N           | ND (2) *       | 10      | 150    | ND (5.1) * | ND (1)     | ND (0.411)           | 24              | 8.3    | 14     | 5.9    | ND (0.1) *   | ND (5.1) * | 18     | ND (1)   | ND (5.1) | ND (10) *  | 40       | 75     |
|  | 09/17/08 | 9 - 10         | N           | ND (2) *       | 9       | 330    | ND (5.1) * | ND (1)     | ND (0.407)           | 24              | 8.3    | 15     | 8.2    | ND (0.1) J*  | ND (5.1) * | 18     | ND (1)   | ND (5.1) | ND (10) *  | 40       | 86     |
| AOC11c-1   | 09/21/08 | 0 - 0.5        | N           | ND (2) *       | 4.8     | 120    | ND (2) *   | ND (1)     | ND (0.4)             | 26              | 4.8    | 9.7    | 30     | ND (0.098) * | 2.7        | 9.8    | ND (1)   | ND (2)   | ND (4) *   | 19       | 47     |
|  | 09/22/08 | 2 - 3          | N           | ND (2.1) *     | 7.9     | 220    | ND (2.1) * | ND (1)     | 2.03                 | 64              | 6.5    | 20     | 26     | ND (0.11) *  | 2.1        | 16     | ND (1)   | ND (2.1) | ND (4.1) * | 32       | 110    |
|  | 09/22/08 | 2 - 3          | FD          | ND (2.1) *     | 7.4     | 220    | ND (2.1) * | ND (1)     | 1.47                 | 63              | 6.5    | 19     | 25     | ND (0.11) *  | 2.3        | 16     | ND (1)   | ND (2.1) | ND (4.1) * | 31       | 110    |
|  | 09/22/08 | 5 - 6          | N           | ND (2.1) *     | 7.7     | 200    | ND (2.1) * | ND (1)     | 2.03                 | 64              | 7.4    | 20     | 24     | ND (0.1) *   | ND (2.1) * | 18     | ND (1)   | ND (2.1) | ND (4.1) * | 35       | 110    |
|  | 09/22/08 | 9 - 10         | N           | ND (2) *       | 5.3     | 140    | ND (2) *   | ND (1)     | 3.33                 | 130             | 5.8    | 17     | 11     | ND (0.1) J*  | ND (2) *   | 13     | ND (1)   | ND (2)   | ND (4.1) * | 24       | 62     |
| AOC11c-2   | 09/21/08 | 0 - 0.5        | N           | ND (2) *       | 5.1     | 170    | ND (2) *   | ND (1)     | 0.744                | 26              | 5.7    | 12     | 11     | ND (0.1) *   | ND (2) *   | 12     | ND (1)   | ND (2)   | ND (4) *   | 23       | 52     |
|  | 09/22/08 | 2 - 3          | N           | ND (2.1) *     | 7.6     | 220    | ND (2.1) * | ND (1.1) * | 2.74                 | 81              | 6.8    | 21     | 28     | ND (0.11) *  | 2.7        | 16     | ND (1.1) | ND (2.1) | ND (4.3) * | 32       | 130    |
|  | 09/22/08 | 5 - 6          | N           | ND (2.1) *     | 6.6     | 190    | ND (2.1) * | ND (1)     | 1.3                  | 56              | 6      | 16     | 18     | ND (0.11) *  | ND (2.1) * | 14     | ND (1)   | ND (2.1) | ND (4.2) * | 27       | 93     |
|  | 09/22/08 | 9 - 10         | N           | ND (2) *       | 6.3     | 160    | ND (2) *   | ND (1)     | 2.05                 | 70              | 6.2    | 16     | 10     | ND (0.1) J*  | ND (2) *   | 14     | ND (1)   | ND (2)   | ND (4) *   | 27       | 70     |
| AOC11C-3   | 02/03/16 | 14 - 15        | N           | ND (2.1) *     | 4.3     | 38     | ND (1.1) * | ND (1.1) * | 0.67 J               | 18              | 7.7    | 8.4    | 2.2    | ND (0.1) *   | ND (1.1)   | 15     | ND (1.1) | ND (1.1) | ND (2.1) * | 33       | 42     |
|  | 02/03/16 | 19 - 20        | N           | ND (2.1) *     | 4.3     | 53     | ND (1) *   | ND (1)     | ND (0.21) J          | 17              | 8.1    | 9.7    | 1.6    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2.1) * | 36       | 42     |
|  | 02/03/16 | 29 - 30        | N           | ND (2) *       | 2.9     | 53     | ND (1) *   | ND (1)     | ND (0.2) J           | 27              | 10     | 14     | ND (1) | ND (0.1) *   | ND (1)     | 19     | ND (1)   | ND (1)   | ND (2) *   | 42       | 39     |
| AOC11c-4   | 01/28/16 | 0 - 1          | N           | ND (2.1) J*    | 3.6     | 89 J   | ND (1) *   | ND (1)     | 0.38                 | 16              | 5.4    | 7.4    | 3.1    | ND (0.1) *   | ND (1)     | 11     | ND (1) J | ND (1)   | ND (2.1) * | 21       | 31     |
|  | 01/28/16 | 2 - 3          | N           | ND (2) *       | 3.6     | 58     | ND (1) *   | ND (1)     | ND (0.2)             | 12              | 6.2    | 9.2    | 1.8    | ND (0.1) *   | ND (1)     | 10     | ND (1)   | ND (1)   | ND (2) *   | 29       | 34     |
|  | 01/28/16 | 5 - 6          | N           | ND (2) *       | 3.5     | 39     | ND (1) *   | ND (1)     | ND (0.2)             | 13              | 7.4    | 8.9    | 2.5    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2) *   | 35       | 62     |
|  | 01/28/16 | 9 - 10         | N           | ND (2) *       | 3.3     | 70 J   | ND (1) *   | ND (1)     | ND (0.2)             | 18              | 8.4    | 8.4    | 1.7    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2) *   | 36       | 67     |
|  | 01/28/16 | 9 - 10         | FD          | ND (2) *       | 3.2     | 53 J   | ND (1) *   | ND (1)     | ND (0.2)             | 16              | 8      | 7.7    | 1.5    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2) *   | 35       | 63     |
|  | 02/02/16 | 14 - 15        | N           | ND (2) *       | 2.4     | 240    | ND (1) *   | ND (1)     | 0.25                 | 21              | 7.8    | 7.8    | ND (1) | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2) *   | 32       | 38     |
|  | 02/02/16 | 19 - 20        | N           | ND (2) *       | 3.4     | 270    | ND (1) *   | ND (1)     | ND (0.2)             | 17              | 6.8    | 8.1    | 1.1    | ND (0.1) *   | ND (1)     | 10     | ND (1)   | ND (1)   | ND (2) *   | 30       | 37     |
| AOC11c-SS-1  | 09/21/08 | 0 - 0.5        | N           | ND (2) *       | 3.6     | 75     | ND (1) *   | ND (1)     | ND (0.401)           | 12              | 3.3    | 5.2    | 6.8    | ND (0.1) J*  | ND (1)     | 6.8    | ND (1)   | ND (1)   | ND (2) *   | 14       | 23     |
|  | 09/22/08 | 2 - 3          | N           | ND (2) *       | 4.3     | 91     | ND (1) *   | ND (1)     | ND (0.403)           | 16              | 4.4    | 11     | 5.5    | ND (0.1) J*  | ND (1)     | 8.6    | ND (1)   | ND (1)   | ND (2) *   | 17       | 30     |
|  | 09/22/08 | 5 - 6          | N           | ND (2) *       | 6.9     | 160    | ND (2) *   | ND (1)     | 1.14                 | 37              | 6.1    | 13     | 11     | ND (0.1) J*  | 2.9        | 14     | ND (1)   | ND (2)   | ND (4.1) * | 25       | 57     |
|  | 09/22/08 | 9 - 10         | N           | ND (2) *       | 5.8     | 110    | ND (2) *   | ND (1)     | ND (0.408)           | 19              | 5.9    | 6.2    | 5      | ND (0.1) J*  | ND (2) *   | 12     | ND (1)   | ND (2)   | ND (4.1) * | 21       | 31     |
| AOC11c-SS-2  | 09/22/08 | 0 - 0.5        | N           | ND (2) *       | 3.5     | 71     | ND (1) *   | ND (1)     | ND (0.401)           | 14              | 3.4    | 4.9    | 8      | ND (0.1) J*  | ND (1)     | 6.6    | ND (1)   | ND (1)   | ND (2) *   | 14       | 25     |
|  | 09/22/08 | 2 - 3          | N           | ND (2) *       | 3.6     | 77     | ND (1) *   | ND (1)     | ND (0.402)           | 16              | 3.9    | 4.9    | 6.5    | ND (0.1) J*  | ND (1)     | 7.5    | ND (1)   | ND (1)   | ND (2) *   | 16       | 30     |
|  | 09/22/08 | 5 - 6          | N           | ND (2) *       | 3.6     | 100    | ND (1) *   | ND (1)     | 7.78                 | 32              | 4.2    | 11     | 8.9    | ND (0.1) J*  | ND (1)     | 9.2    | ND (1)   | ND (1)   | ND (2) *   | 18       | 54     |
|  | 09/22/08 | 9 - 10         | N           | ND (2.1) *     | 3.4     | 98     | ND (1) *   | ND (1)     | 2.06                 | 73              | 3.4    | 30     | 8.6    | ND (0.1) J*  | ND (1)     | 7.7    | ND (1)   | ND (1)   | ND (2.1) * | 15       | 290    |

TABLE B-5a  
Sample Results: Metals  
AOC 11 – Topographic Low Areas  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |        |              |            |        |            |          |            |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|--------------|------------|--------|------------|----------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125       | 1.37       | 27.3   | 1.47       | 5.15     | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11           | 390        | 1,500  | 390        | 390      | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1            | NE         | 490    | NE         | 390      | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125       | 2.25       | 0.607  | 0.177      | 5.15     | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE           | 1.37       | 27.3   | 1.47       | NE       | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury      | Molybdenum | Nickel | Selenium   | Silver   | Thallium   | Vanadium | Zinc   |
| AOC11d-1   | 09/23/08 | 0 - 0.5        | N           | ND (2.1) J*    | 9.5     | 310 J  | ND (2.1) * | ND (1)     | 0.677                | 31              | 8.2    | 19     | 16     | ND (0.1) *   | ND (2.1) * | 18     | ND (1)     | ND (2.1) | ND (4.1) * | 43       | 73     |
|  | 09/23/08 | 0 - 0.5        | FD          | ND (2) *       | 9.2     | 250 J  | ND (2) *   | ND (1)     | 0.628                | 33              | 8.6    | 20     | 14     | ND (0.1) *   | ND (2) *   | 19     | ND (1)     | ND (2)   | ND (4) *   | 44       | 76     |
|  | 09/23/08 | 2.5 - 3        | N           | ND (2.1) *     | 4.5     | 86     | ND (1) *   | ND (1)     | ND (0.414)           | 24              | 9      | 12     | 4.8    | ND (0.1) *   | 1.2        | 17     | ND (1)     | ND (1)   | ND (2.1) * | 32       | 48     |
|  | 09/23/08 | 5 - 6          | N           | ND (2.1) *     | 5.9     | 94     | ND (2.1) * | ND (1)     | ND (0.416)           | 29              | 8.4    | 12     | 5      | ND (0.1) *   | ND (2.1) * | 21     | ND (1)     | ND (2.1) | ND (4.1) * | 39       | 52     |
|  | 09/23/08 | 9 - 10         | N           | ND (2.1) *     | 8.6     | 180    | ND (2.1) * | ND (1)     | 0.659                | 28              | 7.1    | 11     | 9.3    | ND (0.1) J*  | ND (2.1) * | 16     | ND (1)     | ND (2.1) | ND (4.1) * | 31       | 49     |
| AOC11e-1   | 09/23/08 | 0 - 0.5        | N           | ND (2) *       | 5.8     | 180    | ND (2) *   | ND (1)     | 0.959                | 43              | 5.4    | 10     | 10     | ND (0.098) * | ND (2) *   | 11     | ND (1)     | ND (2)   | ND (4) *   | 22       | 54     |
|  | 09/23/08 | 2.5 - 3        | N           | ND (2) *       | 3.4     | 110    | ND (1) *   | ND (1)     | 3.19                 | 92              | 5.8    | 41     | 9      | ND (0.1) *   | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2) *   | 26       | 170    |
|  | 09/23/08 | 5.5 - 6        | N           | ND (2) *       | 4       | 100    | ND (1) *   | ND (1)     | 0.961                | 48              | 5.8    | 17     | 6.4    | ND (0.1) *   | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2) *   | 28       | 59     |
|  | 09/23/08 | 9.5 - 10       | N           | ND (2) *       | 4.6     | 110    | ND (1) *   | ND (1)     | 3.2                  | 84              | 4.6    | 31     | 13     | ND (0.1) J*  | ND (1)     | 9.8    | ND (1)     | ND (1)   | ND (2) *   | 20       | 140    |
| AOC11e-2   | 09/24/08 | 0 - 0.5        | N           | ND (2) *       | 4.8     | 140    | ND (1) *   | ND (1)     | 1.4                  | 37              | 5.1    | 12     | 28     | ND (0.1) *   | 1.1        | 11     | ND (1)     | ND (1)   | ND (2) *   | 24       | 160    |
|  | 09/24/08 | 2 - 3          | N           | ND (2) *       | 3       | 88     | ND (1) *   | ND (1)     | 3.78                 | 130             | 3.4    | 19     | 11     | ND (0.099) * | 2.6        | 7.1    | ND (1)     | ND (1)   | ND (2) *   | 14       | 130    |
|  | 09/24/08 | 2 - 3          | FD          | ND (2.2) *     | 3.3     | 78     | ND (1.1) * | ND (1.1) * | 3.51                 | 130             | 3.5    | 18     | 11     | ND (0.11) *  | 2.9        | 7.3    | ND (1.1)   | ND (1.1) | ND (2.2) * | 15       | 120    |
|  | 09/24/08 | 5 - 6          | N           | ND (2) *       | 3.3     | 100    | ND (1) *   | ND (1)     | 2.25                 | 98              | 4.7    | 30     | 9.6    | ND (0.1) *   | 1.3        | 9.3    | ND (1)     | ND (1)   | ND (2) *   | 20       | 150    |
|  | 09/24/08 | 9 - 10         | N           | ND (2.1) *     | 5.2     | 100    | ND (2.1) * | ND (1)     | ND (0.436)           | 36              | 8.6    | 19     | 4.6    | ND (0.11) J* | ND (2.1) * | 19     | ND (1)     | ND (2.1) | ND (4.2) * | 38       | 53     |
| AOC11e-3   | 01/08/16 | 0 - 1          | N           | ND (2) *       | 3.8     | 80 J   | ND (1) *   | ND (1)     | 2.3 J                | 16              | 3.4    | 6.3    | 5.9    | ND (0.1) *   | ND (1)     | 6      | ND (1)     | ND (1)   | ND (2) *   | 17       | 24     |
|  | 01/08/16 | 0 - 1          | FD          | ND (2) *       | 3.3     | 100 J  | ND (1) *   | ND (1)     | 0.44 J               | 17              | 3.7    | 6.5    | 5.5    | ND (0.1) *   | ND (1)     | 6.5    | ND (1)     | ND (1)   | ND (2) *   | 17       | 27     |
|  | 01/10/16 | 2 - 3          | N           | ND (2) *       | 3.6     | 110    | ND (1) *   | ND (1)     | ND (0.2)             | 11              | 4.1    | 6.7    | 3.6    | ND (0.1) *   | ND (1)     | 7.3    | ND (1)     | ND (1)   | ND (2) *   | 19       | 21     |
|  | 01/10/16 | 5 - 6          | N           | ND (2.2) *     | 4.9     | 180    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 19              | 5.4    | 7.5    | 4.5    | ND (0.11) *  | ND (1.1)   | 12     | ND (1.1)   | ND (1.1) | ND (2.2) * | 26       | 29     |
|  | 01/10/16 | 9 - 10         | N           | ND (2.1) *     | 4.5     | 170    | ND (1) *   | ND (1)     | ND (0.21)            | 12              | 4.7    | 6.9    | 4.4    | ND (0.1) *   | ND (1)     | 8.9    | ND (1)     | ND (1)   | ND (2.1) * | 22       | 25     |
|  | 01/10/16 | 13 - 14        | N           | ND (2) *       | 4       | 120    | ND (1) *   | ND (1)     | ND (0.2)             | 11              | 3.9    | 5.9    | 3.3    | ND (0.1) *   | ND (1)     | 7.3    | ND (1)     | ND (1)   | ND (2) *   | 18       | 35     |
| AOC11e-4   | 01/28/16 | 0 - 1          | N           | ND (2) *       | 4.8     | 58     | ND (1) *   | ND (1)     | 1.2                  | 16              | 4.1    | 7.4    | 4.3    | ND (0.1) *   | ND (1)     | 9.1    | ND (1)     | ND (1)   | ND (2) *   | 20       | 33     |
|  | 01/28/16 | 2 - 3          | N           | ND (2.1) *     | 2.7     | 51     | ND (1) *   | ND (1)     | 2.1                  | 32              | 4.2    | 9      | 7      | ND (0.1) *   | ND (1)     | 7.2    | ND (1)     | ND (1)   | ND (2.1) * | 16       | 42     |
|  | 01/28/16 | 5 - 6          | N           | ND (2.1) *     | 2.7     | 45     | ND (1.1) * | ND (1.1) * | 0.74                 | 27              | 3.4    | 22     | 3.5    | ND (0.1) *   | ND (1.1)   | 6.8    | ND (1.1)   | ND (1.1) | ND (2.1) * | 15       | 76     |
|  | 01/28/16 | 14 - 15        | N           | ND (2) *       | 1.8     | 36     | ND (1) *   | ND (1)     | ND (0.2)             | 17              | 8      | 22     | 1.7    | ND (0.1) *   | ND (1)     | 15     | ND (1)     | ND (1)   | ND (2) *   | 34       | 35     |
| AOC11e-5   | 01/19/16 | 14 - 15        | N           | ND (2.1) *     | 2.7     | 93 J   | ND (1.1) * | ND (1.1) * | ND (0.21)            | 34 J            | 11     | 21 J   | 2      | ND (0.11) *  | ND (1.1)   | 25 J   | ND (1.1) J | ND (1.1) | ND (2.1) * | 41 J     | 48 J   |
|  | 01/19/16 | 19 - 20        | N           | ND (2.1) *     | 2.2     | 60     | ND (1) *   | ND (1)     | ND (0.21)            | 40              | 11     | 16     | 2.4    | ND (0.1) *   | 1.5        | 19     | ND (1)     | ND (1)   | ND (2.1) * | 35       | 38     |
|  | 01/19/16 | 29 - 30        | N           | ND (2.1) *     | 2.3     | 30     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 18              | 8      | 11     | 1.7    | ND (0.1) *   | ND (1.1)   | 14     | ND (1.1)   | ND (1.1) | ND (2.1) * | 30       | 34     |
|  | 01/19/16 | 39 - 40        | N           | ND (2.2) *     | 3.8     | 37     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 30              | 9.1    | 8.3    | 2      | ND (0.11) *  | ND (1.1)   | 21     | ND (1.1)   | ND (1.1) | ND (2.2) * | 36       | 38     |
|  | 01/20/16 | 49 - 50        | N           | ND (2.1) *     | 2       | 55     | ND (1) *   | ND (1)     | ND (0.21)            | 17              | 8.9    | 11     | 1.4    | ND (0.1) *   | ND (1)     | 12     | ND (1)     | ND (1)   | ND (2.1) * | 31       | 36     |
|  | 01/21/16 | 59 - 60        | N           | ND (2.1) *     | 3.1     | 54     | ND (1.1) * | ND (1.1) * | ND (0.21)            | 25              | 10     | 12     | 2      | ND (0.1) *   | ND (1.1)   | 20     | ND (1.1)   | ND (1.1) | ND (2.1) * | 41       | 45     |
|  | 01/21/16 | 69 - 70        | N           | ND (2.2) *     | 4.7     | 28     | ND (1.1) * | ND (1.1) * | ND (0.22)            | 24              | 8.5    | 12     | 2.8    | ND (0.11) *  | ND (1.1)   | 22     | ND (1.1)   | ND (1.1) | ND (2.2) * | 41       | 47     |
| AOC11e-6   | 12/03/15 | 0 - 1          | N           | ND (2.1) *     | 4.6     | 130    | ND (1) *   | ND (1)     | 16                   | 320             | 4.9    | 12     | 8.4    | ND (0.1) *   | 1.6        | 9.6    | ND (1)     | ND (1)   | ND (2.1) * | 18       | 37     |
| AOC11e-SS-1  | 09/23/08 | 0 - 0.5        | N           | ND (2) J*      | 4.6     | 96 J   | ND (1) *   | ND (1)     | 0.698                | 20              | 3.9    | 8.7    | 8.6    | ND (0.1) J*  | ND (1)     | 8.7    | ND (1)     | ND (1)   | ND (2) *   | 18       | 35 J   |
|  | 09/23/08 | 2.5 - 3        | N           | ND (2) *       | 4.6     | 87     | ND (1) *   | ND (1)     | ND (0.411)           | 21              | 4.5    | 7.7    | 4.8    | ND (0.1) J*  | ND (1)     | 8.3    | ND (1)     | ND (1)   | ND (2) *   | 20       | 27     |
|  | 09/23/08 | 5.5 - 6        | N           | ND (2) *       | 4.6     | 110    | ND (1) *   | ND (1)     | ND (0.407)           | 9.2             | 3.8    | 5.1    | 5.2    | ND (0.1) J*  | ND (1)     | 6      | ND (1)     | ND (1)   | ND (2) *   | 16       | 20     |
|  | 09/23/08 | 9.5 - 10       | N           | ND (2) *       | 4.7     | 100    | ND (1) *   | ND (1)     | ND (0.407)           | 10              | 3.2    | 10     | 5.4    | ND (0.1) J*  | ND (1)     | 6.3    | ND (1)     | ND (1)   | ND (2) *   | 15       | 19     |

TABLE B-5a  
Sample Results: Metals  
AOC 11 – Topographic Low Areas  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |        |              |            |        |          |          |             |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|--------------|------------|--------|----------|----------|-------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125       | 1.37       | 27.3   | 1.47     | 5.15     | 0.78        | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11           | 390        | 1,500  | 390      | 390      | 0.78        | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1            | NE         | 490    | NE       | 390      | NE          | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125       | 2.25       | 0.607  | 0.177    | 5.15     | 2.32        | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE           | 1.37       | 27.3   | 1.47     | NE       | NE          | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury      | Molybdenum | Nickel | Selenium | Silver   | Thallium    | Vanadium | Zinc   |
| AOC11e-SS-2  | 09/23/08 | 0 - 0.5        | N           | ND (2) *       | 4.5     | 120    | ND (1) *   | ND (1)     | 1.38                 | 28              | 4.3    | 8.1    | 9.5    | ND (0.1) J*  | ND (1)     | 8.7    | ND (1)   | ND (1)   | ND (2) *    | 17       | 39     |
|  | 09/23/08 | 2.5 - 3        | N           | ND (2) *       | 6.6     | 110    | ND (2) *   | ND (1)     | 0.438                | 21              | 6.2    | 9.7    | 7.4    | ND (0.1) J*  | ND (2) *   | 13     | ND (1)   | ND (2)   | ND (4.1) *  | 24       | 35     |
|  | 09/23/08 | 5.5 - 6        | N           | ND (2.1) *     | 4.8     | 98     | ND (1) *   | ND (1)     | 0.466                | 26              | 6.3    | 10     | 5.1    | ND (0.1) J*  | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2.1) *  | 28       | 39     |
|  | 09/23/08 | 5.5 - 6        | FD          | ND (2) *       | 4.5     | 100    | ND (1) *   | ND (1)     | 0.437                | 27              | 5.6    | 9.6    | 5.5    | ND (0.1) J*  | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2) *    | 24       | 37     |
|  | 09/23/08 | 9.5 - 10       | N           | ND (2.1) *     | 4.5     | 100    | ND (1.1) * | ND (1.1) * | 0.5                  | 21              | 7.4    | 11     | 3.8    | ND (0.11) J* | ND (1.1)   | 15     | ND (1.1) | ND (1.1) | ND (2.1) *  | 34       | 37     |
| AOC11g-OS1   | 04/06/11 | 8.5 - 9        | N           | ND (2) *       | 8.3     | 220    | ND (1) *   | ND (1)     | ND (0.4) J           | 26              | 9.6    | 11     | 4.1    | ND (0.1) J*  | 7.1        | 18     | ND (1)   | ND (1)   | ND (2) *    | 45       | 61     |
| PA-07  | 11/09/15 | 0 - 1          | N           | ND (2) *       | 4.9     | 160    | ND (1) *   | ND (1)     | 1.9                  | 66              | 4.9    | 19     | 17     | ND (0.1) *   | 1.3        | 13     | ND (1)   | ND (1)   | ND (2) *    | 22       | 170    |
| PA-09  | 01/27/16 | 0 - 1          | N           | ND (2) *       | 4.2     | 95     | ND (1) *   | ND (1)     | ND (0.2)             | 21              | 6.7    | 13     | 150    | 0.18         | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2) *    | 32       | 130    |
| PA-10  | 01/27/16 | 0 - 1          | N           | ND (2.1) *     | 7       | 150    | ND (1) *   | ND (1)     | 0.95                 | 40              | 4.3    | 24     | 56     | ND (0.1) *   | ND (1)     | 8      | ND (1)   | ND (1)   | ND (2.1) *  | 20       | 190    |
| PA-11  | 01/27/16 | 0 - 1          | N           | ND (2.1) *     | 4.3     | 140    | ND (1) *   | ND (1)     | 0.35                 | 63              | 5.6    | 23     | 28     | ND (0.1) *   | 3.3        | 16     | ND (1)   | ND (1)   | ND (2.1) *  | 20       | 300    |
|  | 01/25/17 | 2 - 3          | N           | ND (2.1) *     | 4.9     | 180    | ND (1) *   | ND (1)     | ---                  | 10              | 4      | 7.1    | 4.7    | ND (0.1) *   | ND (1)     | 7.4    | ND (1) J | ND (1)   | ND (2.1) *  | 19       | 29     |
|  | 01/25/17 | 2 - 3          | FD          | ND (2.1) *     | 4.7     | 160    | ND (1) *   | ND (1)     | ---                  | 10              | 3.9    | 6.9    | 3.7    | ND (0.1) *   | ND (1)     | 7.4    | ND (1) J | ND (1)   | ND (2.1) *  | 18       | 24     |
| PA-12  | 01/27/16 | 0 - 1          | N           | ND (2.1) *     | 6       | 190    | ND (1) *   | ND (1)     | 0.56                 | 50              | 5.3    | 31     | 12     | ND (0.1) *   | 3.1        | 13     | ND (1)   | ND (1)   | ND (2.1) *  | 25       | 130    |
|  | 01/25/17 | 2 - 3          | N           | ND (2.1) *     | 5.6     | 150    | ND (1) *   | ND (1)     | ---                  | 13              | 4.7    | 9.7    | 5.7    | ND (0.1) *   | ND (1)     | 8.3    | ND (1) J | ND (1)   | ND (2.1) *  | 18       | 37 J   |
| SD-08  | 11/11/15 | 0 - 1          | N           | ND (2) *       | 3.2     | 91     | ND (1) *   | ND (1)     | ND (0.2)             | 9.2 J           | 5.2    | 6      | 5.3 J  | ND (0.1) *   | ND (1)     | 6.7 J  | ND (1)   | ND (1)   | ND (2) *    | 16       | 31     |
|  | 11/11/15 | 0 - 1          | FD          | ND (2) *       | 3.1     | 88     | ND (1) *   | ND (1)     | 0.26                 | 12 J            | 3.8    | 13     | 6.8 J  | ND (0.1) *   | ND (1)     | 8.7 J  | ND (1)   | ND (1)   | ND (2) *    | 18       | 37     |
|  | 11/11/15 | 2 - 3          | N           | ND (2) *       | 8.9     | 92     | ND (1) *   | ND (1)     | 2.7                  | 34              | 4      | 35     | 7.8    | ND (0.1) *   | ND (1)     | 8.4    | ND (1)   | ND (1)   | ND (2) *    | 23       | 97     |
| SD-09  | 11/10/15 | 0 - 1          | N           | ND (2.1) *     | 4.3     | 260    | ND (1) *   | ND (1)     | ND (0.21)            | 11              | 4.3    | 6.4    | 3.8    | ND (0.11) *  | ND (1)     | 9.4    | ND (1)   | ND (1)   | ND (2.1) *  | 22       | 25     |
|  | 11/10/15 | 2 - 3          | N           | ND (2.1) *     | 4.6     | 240    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 11              | 4.3    | 5.6    | 3.1    | ND (0.1) *   | ND (1.1)   | 8.7    | ND (1.1) | ND (1.1) | ND (2.1) *  | 21       | 21     |
|  | 11/10/15 | 5 - 6          | N           | ND (2.1) J*    | 5.3     | 260    | ND (1.1) * | ND (1.1) * | ND (0.21)            | 12              | 4.4    | 7.1    | 4.3    | ND (0.1) *   | ND (1.1)   | 8.9    | ND (1.1) | ND (1.1) | ND (2.1) *  | 25       | 24     |
| SD-10  | 11/10/15 | 0 - 1          | N           | ND (2) *       | 3.3     | 83     | ND (1) *   | ND (1)     | ND (0.2)             | 7.9             | 2.7    | 6.7    | 6.1    | ND (0.1) *   | ND (1)     | 5.6    | ND (1)   | ND (1)   | ND (2) *    | 14       | 36     |
|  | 11/10/15 | 2 - 3          | N           | ND (2) *       | 2.4     | 82     | ND (1) *   | ND (1)     | 1.4                  | 27              | 4.2    | 9      | 16     | 0.37         | ND (1)     | 8.8    | ND (1)   | ND (1)   | ND (2) *    | 19       | 180    |
| SD-11  | 12/06/15 | 0 - 0.5        | N           | ND (2) *       | 2.9     | 99     | ND (1) *   | ND (1)     | ND (0.2)             | 38              | 4.5    | 14     | 22     | ND (0.1) *   | ND (1)     | 9.6    | ND (1)   | ND (1)   | ND (2) *    | 22       | 1,100  |
|  | 12/06/15 | 2 - 3          | N           | ND (2) *       | 2.7     | 62     | ND (1) *   | ND (1)     | 1                    | 21              | 3.3    | 10     | 6.2    | ND (0.1) *   | ND (1)     | 6      | ND (1)   | ND (1)   | ND (2) *    | 17       | 42     |
| SD-11A   | 03/07/16 | 0 - 1          | N           | ND (2) *       | 3.7     | 88     | ND (1) *   | ND (1)     | 0.51                 | 110             | 3.8    | 19     | 20     | ND (0.1) *   | ND (1)     | 7.3    | ND (1)   | ND (1)   | ND (2) *    | 18       | 170    |
|  | 03/07/16 | 2 - 3          | N           | ND (2.1) *     | 2.9     | 90     | ND (1) *   | ND (1)     | 0.63                 | 90              | 4.5    | 44     | 36     | ND (0.1) *   | ND (1)     | 8.8    | ND (1)   | ND (1)   | ND (2.1) *  | 21       | 310    |
|  | 03/07/16 | 5 - 6          | N           | ND (2.1) *     | 2.6     | 71     | ND (1) *   | ND (1)     | 0.79                 | 23              | 3.7    | 11     | 11     | ND (0.1) *   | ND (1)     | 6.6    | ND (1)   | ND (1)   | ND (2.1) *  | 18       | 88     |
| SD-12  | 11/10/15 | 0 - 1          | N           | ND (2) *       | 2.8     | 79     | ND (1) *   | ND (1)     | ND (0.2)             | 8.1             | 2.7    | 5.1    | 7.2    | ND (0.1) *   | ND (1)     | 5.1    | ND (1)   | ND (1)   | ND (2) *    | 15       | 38     |
|  | 11/10/15 | 2 - 3          | N           | ND (2) *       | 2.5     | 92     | ND (1) *   | ND (1)     | 0.51                 | 16              | 4.4    | 8.9    | 4.1    | ND (0.1) *   | ND (1)     | 7.7    | ND (1)   | ND (1)   | ND (2) *    | 19       | 27     |
| SD-13  | 11/10/15 | 0 - 1          | N           | ND (2) *       | 3.2     | 100    | ND (1) *   | ND (1)     | 0.92                 | 33              | 4.7    | 7.8    | 3.6    | ND (0.1) *   | ND (1)     | 7.9    | ND (1)   | ND (1)   | ND (2) *    | 19       | 30     |
|  | 11/10/15 | 2 - 3          | N           | ND (2.1) *     | 2.4     | 70     | ND (1.1) * | ND (1.1) * | 0.34                 | 25              | 7.7    | 9.4    | 3      | ND (0.11) *  | ND (1.1)   | 15     | ND (1.1) | ND (1.1) | ND (2.1) *  | 33       | 40     |
| SD-20  | 11/11/15 | 0 - 1          | N           | ND (2) J*      | 3.4     | 100 J  | ND (1) *   | ND (1)     | 0.5                  | 18 J            | 4.2    | 7.1    | 5.3    | ND (0.1) *   | ND (1)     | 8.8    | ND (1)   | ND (1)   | ND (2) *    | 21       | 48 J   |
|  | 11/11/15 | 0 - 1          | FD          | ND (2) *       | 3.1     | 74 J   | ND (1) *   | ND (1)     | 0.61                 | 14 J            | 3.5    | 7.3    | 4.6    | ND (0.099) * | ND (1)     | 7.4    | ND (1)   | ND (1)   | ND (2) *    | 18       | 71 J   |
|  | 11/11/15 | 2 - 3          | N           | ND (2) *       | 3.8     | 75     | ND (1) *   | ND (1)     | ND (0.2)             | 8.9             | 2.6    | 4.3    | 2.7    | ND (0.1) *   | ND (1)     | 4.3    | ND (1)   | ND (1)   | ND (2) *    | 13       | 17     |
| SD-23  | 03/09/16 | 0 - 1          | N           | ND (2.1) *     | 2.4     | 65     | ND (1.1) * | ND (1.1) * | 0.27                 | 19              | 6.3    | 11     | 5.6    | ND (0.11) *  | ND (1.1)   | 14     | ND (1.1) | ND (1.1) | ND (2.1) *  | 26       | 87     |
|  | 03/09/16 | 2 - 3          | N           | ND (2.2) *     | 2.2     | 51     | ND (1.1) * | ND (1.1) * | ND (0.22)            | 31              | 9.2    | 14     | 3      | ND (0.11) *  | ND (1.1)   | 21     | ND (1.1) | ND (1.1) | ND (2.2) *  | 38       | 39     |
| SD-27  | 02/15/17 | 2 - 3          | N           | ND (2.1) *     | 2.4     | 56     | ND (1) *   | 1.2        | ND (0.21)            | 20              | 6.1    | 9      | ND (1) | ND (0.1) *   | ND (1)     | 12     | ND (1) J | ND (1) J | ND (2.1) J* | 23       | 34     |



|  |          |                |             | Metals (mg/kg) |         |        |           |         |                      |                 |        |        |        |            |            |        |          |        |           |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|-----------|---------|----------------------|-----------------|--------|--------|--------|------------|------------|--------|----------|--------|-----------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672     | 1.1     | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125     | 1.37       | 27.3   | 1.47     | 5.15   | 0.78      | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160       | 71      | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11         | 390        | 1,500  | 390      | 390    | 0.78      | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15        | 5.2     | NE                   | 36,000          | NE     | NE     | 80     | 1          | NE         | 490    | NE       | 390    | NE        | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3      | 0.0151  | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125     | 2.25       | 0.607  | 0.177    | 5.15   | 2.32      | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672     | 1.1     | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE         | 1.37       | 27.3   | 1.47     | NE     | NE        | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium | Cadmium | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury    | Molybdenum | Nickel | Selenium | Silver | Thallium  | Vanadium | Zinc   |
| SD-OS37  | 11/30/16 | 0 - 0.5        | N           | ND (2) *       | 3.5     | 120    | ND (1) *  | ND (1)  | 0.41                 | 35              | 5.2    | 21     | 36     | ND (0.1) * | ND (1)     | 12     | ND (1) J | ND (1) | ND (2) J* | 20       | 92     |
|  | 11/30/16 | 3 - 3.5        | N           | ND (2) *       | 3.1     | 93     | ND (1) *  | ND (1)  | 0.24                 | 16              | 3.2    | 9.4    | 5.4    | ND (0.1) * | 2.7        | 7      | ND (1) J | ND (1) | ND (2) J* | 13       | 24     |
|  | 11/30/16 | 5 - 5.5        | N           | ND (2) *       | 2.9     | 110    | ND (1) *  | ND (1)  | ND (0.2)             | 14              | 4.1    | 7.4    | 3.3    | ND (0.1) * | ND (1)     | 11     | ND (1) J | ND (1) | ND (2) J* | 16       | 20     |

Notes:

Category 1: Validated data suitable for all uses, including risk assessment and remedial action decisions.  
Category 2: Validated data suitable for use in characterization of the chemicals of potential concern at the facility and to help define the nature and extent of contamination.  
Category 3: Validated data suitable only for use in qualitative characterization of the nature and extent of contamination.  
Results greater than or equal to the interim screening level are circled; however, if the interim screening level is equal to the background value, only results greater than the interim screening level are circled.

|         |   |
|---------|---|
| *       | Reporting limits greater than or equal to the interim screening level.      |
| ---     | not analyzed  |
| ft bgs  | feet below ground surface   |
| mg/kg   | milligrams per kilogram   |
| DTSC    | California Department of Toxic Substances Control                           |
| DTSC-SL | DTSC Screening Levels   |
| FD      | field duplicate   |
| J       | concentration or reporting limit estimated by laboratory or data validation |
| N       | primary sample  |
| ND      | not detected at the listed reporting limit                                  |
| NE      | not established   |
| USEPA   | United States Environmental Protection Agency                               |

<sup>1</sup> Interim screening level is background value. If background value is not available then the interim screening value is the lower of the Ecological Comparison Value , residential DTSC-SL, or USEPA residential regional screening value.  
<sup>2</sup> United States Environmental Protection Agency (USEPA). 2017. Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites. November.  
<sup>3</sup> California Department of Toxic Substances Control (DTSC). 2018. Human Health Risk Assessment (HHRA) Note Number 3. January.  
<sup>4</sup> ARCADIS. 2008. "Technical Memorandum 3: Ecological Comparison Values for Metals and Polycyclic Aromatic Hydrocarbons in Soil." May 28.  
<sup>5</sup> CH2M HILL. 2009. "Final Soil Background Technical Memorandum at Pacific Gas and Electric Company Topock Compressor Station, Needles, California." May.

TABLE B-5b  
Sample Results: Dioxins and Furans  
AOC 11 – Topographic Low Areas  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |  |  |  | Dioxin/Furans (ng/kg) |    |    |    |    |    |    |    |    |    |    |     |    |    |    |    |     |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |  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| Interim Screening Level <sup>1</sup> : |  |  |  | NE                    | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | 4.8 | NE | NE | NE | NE | 4.8 | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE</ |

TABLE B-5b  
Sample Results: Dioxins and Furans  
AOC 11 – Topographic Low Areas  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |            |             |           |           |             |    |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|------------|-------------|-----------|-----------|-------------|----|
| Interim Screening Level <sup>1</sup> :   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE         | NE          | 16        | 50        | 5.58        |    |
| Residential Regional Screening Levels <sup>2</sup> :<br>Residential DTSC-SL <sup>3</sup> :<br>Ecological Comparison Values <sup>4</sup> :<br>Background <sup>5</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE         | NE          | NE        | 4.8       | NE          |    |
|  |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE         | NE          | NE        | NE        | NE          | NE |
|  |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE         | NE          | NE        | NE        | NE          | NE |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD       | OCDF        | TEQ Avian | TEQ Human | TEQ Mammals |    |
| AOC11-6  | 01/06/16 | 0 - 1          | N           | 19 J                  | 2.3 J               | ND (0.3) J          | ND (0.22) J       | ND (0.45) J       | ND (0.66) J       | ND (0.43) J       | ND (0.22) J       | ND (0.51) J       | ND (0.24) J     | ND (0.14) J     | ND (2.6) J        | ND (0.37) J     | ND (0.074) J | ND (0.11) J  | 180 J      | 4 J         | 0.69      | 0.74      | 0.74        |    |
|  | 01/06/16 | 2 - 3          | N           | 8.5 J                 | 1.5 J               | ND (0.23) J         | ND (0.2) J        | ND (0.31) J       | ND (0.2) J        | ND (0.29) J       | ND (0.19) J       | ND (0.35) J       | ND (0.25) J     | ND (0.23) J     | ND (1.2) J        | ND (0.24) J     | ND (0.055) J | ND (0.067) J | 95 J       | ND (1.6) J  | 0.47      | 0.46      | 0.46        |    |
| AOC11-7  | 01/06/16 | 0 - 1          | N           | 27 J                  | 3.7 J               | 1.4 J               | ND (1.1) J        | ND (1.2) J        | 1.9 J             | ND (1.1) J        | ND (1.7) J        | 1.4 J             | 1.1 J           | 1 J             | ND (5.1) J        | ND (1.7) J      | 0.63 J       | ND (0.23) J  | 230 J      | 7 J         | 3.5       | 3.3       | 3.3         |    |
|  | 01/06/16 | 2 - 3          | N           | 5.8 J                 | 2.3 J               | ND (0.4) J          | ND (0.41) J       | ND (0.25) J       | ND (0.41) J       | ND (0.24) J       | ND (0.4) J        | ND (0.29) J       | ND (0.35) J     | ND (0.45) J     | ND (2.7) J        | ND (1.3) J      | ND (0.2) J   | ND (0.49) J  | 79 J       | 4.8 J       | 1.4       | 0.84      | 0.84        |    |
| AOC11-8  | 12/06/15 | 0 - 1          | N           | 26 J                  | ND (2.2) J          | ND (0.56) J         | ND (0.22) J       | ND (0.45) J       | ND (0.71) J       | ND (0.43) J       | ND (0.42) J       | ND (0.52) J       | ND (0.18) J     | ND (0.1) J      | ND (5.1) J        | ND (0.11) J     | ND (0.046) J | ND (0.072) J | 340 J      | 16 J        | 0.64      | 0.91      | 0.91        |    |
|  | 12/06/15 | 2 - 3          | N           | 12 J                  | 2.2 J               | ND (0.1) J          | ND (0.23) J       | ND (0.16) J       | ND (0.23) J       | 0.4 J             | ND (0.28) J       | ND (0.18) J       | ND (0.19) J     | ND (0.23) J     | ND (2.6) J        | ND (0.24) J     | ND (0.15) J  | ND (0.19) J  | 140 J      | 4.4 J       | 0.65      | 0.63      | 0.63        |    |
| AOC11-9  | 12/06/15 | 0 - 1          | N           | 22 J                  | 2.5 J               | ND (0.23) J         | 0.39 J            | ND (0.15) J       | ND (0.9) J        | ND (0.15) J       | ND (0.43) J       | ND (0.18) J       | 0.47 J          | ND (0.15) J     | ND (2.5) J        | ND (0.15) J     | ND (0.075) J | ND (0.076) J | 190 J      | ND (3.4) J  | 0.89      | 1.1       | 1.1         |    |
|  | 12/06/15 | 2 - 3          | N           | 7.4 J                 | ND (0.83) J         | ND (0.17) J         | ND (0.11) J       | ND (0.12) J       | ND (0.25) J       | 0.58 J            | ND (0.21) J       | ND (0.14) J       | ND (0.09) J     | ND (0.1) J      | ND (0.7) J        | ND (0.1) J      | ND (0.036) J | ND (0.11) J  | 59 J       | ND (0.83) J | 0.31      | 0.32      | 0.32        |    |
| AOC11a-3   | 09/20/08 | 0 - 0.5        | N           | 1,300 J               | 140 J               | 13 J                | 8.1 J             | 5.5 J             | 30 J              | 9.9 J             | 14 J              | ND (1.4) J        | ND (2.9) J      | 1.7 J           | ND (290) J        | 1.8 J           | ND (0.41) J  | ND (1.1) J   | 12,000 J   | 440 J       | 26        | 42        | 42          |    |
|  | 09/20/08 | 2 - 3          | N           | 910 J                 | 73 J                | 6.3 J               | 4.7 J             | 3.6 J             | 20 J              | ND (2.6) J        | 9.2 J             | ND (0.86) J       | ND (2.5) J      | ND (0.95) J     | ND (130) J        | 1.6 J           | ND (0.15) J  | 0.98 J       | 9,100 J    | 210 J       | 15        | 25        | 25          |    |
|  | 09/20/08 | 5 - 6          | N           | 3,600 J               | 470 J               | 41 J                | 19 J              | 18 J              | 110 J             | 8.5 J             | 33 J              | 4.4 J             | 6.7 J           | ND (2.4) J      | ND (1,400) J      | 4.4 J           | ND (0.14) J  | ND (0.12) J  | 32,000 J   | 1,200 J     | 100       | 150       | 150         |    |
|  | 09/20/08 | 9 - 10         | N           | 6 J                   | 0.71 J              | ND (0.18) J         | ND (0.26) J       | ND (0.17) J       | ND (0.25) J       | ND (0.16) J       | ND (0.25) J       | ND (0.16) J       | ND (0.12) J     | ND (0.11) J     | ND (2.2) J        | ND (0.11) J     | ND (0.11) J  | ND (0.13) J  | 57 J       | ND (1) J    | 0.41      | 0.4       | 0.4         |    |
| AOC11a-5   | 09/21/08 | 0 - 0.5        | N           | 2,600 J               | 230 J               | 21 J                | 16 J              | 9.6 J             | 61 J              | ND (3.8) J        | ND (26) J         | ND (0.84) J       | ND (8) J*       | 4 J             | ND (400) J        | 2.7 J           | ND (0.86) J  | 2.6 J        | 26,000 J   | 750 J       | 42        | 72        | 72          |    |
|  | 09/21/08 | 2 - 3          | N           | 630 J                 | 55 J                | ND (4.7) J          | 4.7 J             | ND (1.7) J        | 15 J              | ND (1.7) J        | ND (5.1) J        | ND (0.5) J        | 2.6 J           | ND (1) J        | ND (97) J         | ND (0.49) J     | ND (0.26) J  | ND (0.52) J  | 6,800 J    | 150 J       | 11        | 19        | 19          |    |
|  | 09/21/08 | 5 - 6          | N           | ND (4.5) J            | ND (0.46) J         | ND (0.29) J         | ND (0.18) J       | ND (0.11) J       | ND (0.18) J       | ND (0.098) J      | ND (0.17) J       | ND (0.13) J       | ND (0.12) J     | ND (0.08) J     | ND (0.4) J        | ND (0.079) J    | ND (0.11) J  | ND (0.12) J  | 53 J       | ND (1.4) J  | 0.28      | 0.24      | 0.24        |    |
|  | 09/21/08 | 9 - 10         | N           | ND (0.93) J           | ND (2.7) J          | ND (0.32) J         | ND (0.43) J       | ND (0.22) J       | ND (0.41) J       | ND (0.2) J        | ND (0.32) J       | ND (0.26) J       | ND (0.55) J     | ND (0.26) J     | ND (0.22) J       | ND (0.26) J     | ND (0.44) J  | ND (0.31) J  | ND (9.3) J | ND (0.54) J | ND (0.88) | ND (0.68) | ND (0.68)   |    |
| AOC11a-SS-1  | 09/21/08 | 0 - 0.5        | N           | 9.6 J                 | 1.3 J               | ND (0.52) J         | ND (0.31) J       | ND (0.28) J       | ND (0.57) J       | ND (0.26) J       | ND (0.42) J       | ND (0.35) J       | ND (0.36) J     | ND (0.17) J     | ND (1.5) J        | ND (0.2) J      | ND (0.17) J  | ND (0.27) J  | 68 J       | ND (2.2)    | 0.69      | 0.63      | 0.63        |    |
|  | 09/21/08 | 2 - 3          | N           | 47 J                  | 4.5 J               | ND (0.95) J         | ND (1) J          | ND (0.71) J       | ND (0.97) J       | ND (1.1) J        | ND (1.6) J        | ND (0.94) J       | ND (1.1) J      | ND (0.68) J     | ND (8.1) J        | 1.3 J           | ND (0.29) J  | ND (1.1) J   | 440 J      | 11 J        | 3.4       | 2.5       | 2.5         |    |
|  | 09/21/08 | 5 - 6          | N           | 1.8 J                 | ND (0.14) J         | ND (0.3) J          | ND (0.17) J       | ND (0.084) J      | ND (0.24) J       | ND (0.076) J      | ND (0.16) J       | ND (0.2) J        | ND (0.16) J     | ND (0.2) J      | ND (0.065) J      | ND (0.2) J      | ND (0.12) J  | ND (0.22) J  | 9.7 J      | ND (0.54) J | 0.4       | 0.26      | 0.26        |    |
| AOC11a-SS-3  | 09/20/08 | 0 - 0.5        | N           | 2,000 J               | 190 J               | 15 J                | ND (14) J         | ND (0.45) J       | 47 J              | ND (3.9) J        | 29 J              | ND (1.5) J        | ND (6) J*       | 2.4 J           | ND (240) J        | ND (2.8) J      | ND (0.54) J  | 2.2 J        | 20,000 J   | 480 J       | 29        | 53        | 53          |    |
|  | 09/20/08 | 5 - 6          | N           | 4.3 J                 | ND (0.22) J         | ND (0.25) J         | ND (0.23) J       | ND (0.12) J       | ND (0.22) J       | ND (0.11) J       | ND (0.22) J       | ND (0.14) J       | ND (0.17) J     | ND (0.096) J    | ND (0.18) J       | ND (0.096) J    | ND (0.12) J  | ND (0.11) J  | 33 J       | ND (1.2) J  | 0.31      | 0.28      | 0.28        |    |
| AOC11b-1   | 09/17/08 | 0 - 0.5        | N           | 4.9 J                 | 1.1 J               | ND (0.13) J         | ND (0.12) J       | ND (0.099) J      | ND (0.23) J       | ND (0.23) J       | ND (0.28) J       | ND (0.11) J       | ND (0.11) J     | ND (0.16) J     | ND (1.3) J        | ND (0.57) J     | ND (0.041) J | ND (0.039) J | 54 J       | ND (2)      | 0.52      | 0.36      | 0.36        |    |
|  | 09/17/08 | 2 - 3          | N           | 77 J                  | 7.5 J               | 0.88 J              | ND (0.87) J       | 0.55 J            | 2.2 J             | ND (0.76) J       | ND (1.5) J        | ND (0.21) J       | ND (0.5) J      | ND (0.33) J     | ND (13) J         | 0.66 J          | ND (0.061) J | ND (0.24) J  | 720 J      | 18 J        | 2.2       | 2.7       | 2.7         |    |
|  | 09/17/08 | 5 - 6          | N           | 100 J                 | 10 J                | ND (0.83) J         | ND (0.84) J       | 0.87 J            | 3.2 J             | 1.3 J             | 2 J               | ND (0.36) J       | ND (0.65) J     | 0.41 J          | ND (16) J         | 1.4 J           | ND (0.06) J  | ND (0.21) J  | 920 J      | 21 J        | 3.5       | 3.8       | 3.8         |    |
| AOC11c-4   | 01/28/16 | 0 - 1          | N           | 520 J                 | 56 J                | 4.6 J               | 4.1 J             | ND (2.5) J        | 15 J              | ND (1.7) J        | 6.4 J             | ND (0.38) J       | 2 J             | 1.3 J           | ND (110) J        | ND (1) J        | ND (0.19) J  | 0.81 J       | 4,800 J    | 180 J       | 12        | 18        | 18          |    |
|  | 01/28/16 | 2 - 3          | N           | 22 J                  | 2.4 J               | ND (0.28) J         | ND (0.15) J       | ND (0.19) J       | ND (0.15) J       | ND (0.18) J       | ND (0.14) J       | ND (0.22) J       | ND (0.16) J     | ND (0.28) J     | ND (5.7) J        | ND (0.24) J     | ND (0.12) J  | ND (0.19) J  | 510 J      | 3.7 J       | 0.79      | 0.93      | 0.93        |    |
|  | 01/28/16 | 5 - 6          | N           | 26 J                  | ND (3.8) J          | ND (0.13) J         | ND (0.26) J       | ND (0.22) J       | ND (0.19) J       | ND (0.34) J       | ND (0.4) J        | ND (0.26) J       | ND (0.14) J     | ND (0.14) J     | ND (20) J         | ND (0.15) J     | ND (0.031) J | ND (0.14) J  | 230 J      | 3.1 J       | 1.4       | 1.6       | 1.6         |    |
| AOC11d-1   | 09/23/08 | 0 - 0.5        | N           | 180 J                 | 15 J                | 1.2 J               | 3.1 J             | ND (1) J          | 6.6 J             | 1.4 J             | 4.8 J             | ND (0.27) J       | 1.8 J           | 0.44 J          | ND (19) J         | 0.73 J          | ND (0.078) J | ND (0.42) J  | 1,800 J    | 38 J        | 5.2       | 7.2       | 7.2         |    |
|  | 09/23/08 | 2.5 - 3        | N           | 20 J                  | 2.9 J               | ND (0.22) J         | ND (0.25) J       | ND (0.11) J       | 0.64 J            | ND (0.11) J       | ND (0.53) J       | ND (0.13) J       | ND (0.1) J      | ND (0.059) J    | ND (2.5) J        | ND (0.062) J    | ND (0.047) J | ND (0.11) J  | 210 J      | 4.7 J       | 0.42      | 0.63      | 0.63        |    |
|  | 09/23/08 | 5 - 6          | N           | 8.8 J                 | 1.2 J               | ND (0.25) J         | ND (0.11) J       | ND (0.059) J      | ND (0.33) J       | ND (0.13) J       | 0.4 J             | ND (0.069) J      | ND (0.13) J     | ND (0.056) J    | ND (1.3) J        | ND (0.099) J    | ND (0.032) J | ND (0.036) J | 81 J       | 2.2 J       | 0.3       | 0.36      | 0.36        |    |
| AOC11e-1   | 09/23/08 | 0 - 0.5        | N           | 4,100 J               | 510 J               | 52 J                | 39 J              | 28 J              | 130 J             | 16 J              | 70 J              | 5.9 J             | 26 J            | 11 J            | ND (710) J        | 8.9 J           | 2.6 J        | 9.2 J        | 49,000 J   | 1,500 J     | 110       | 160       | 160         |    |
|  | 09/23/08 | 2.5 - 3        | N           | 88,000 J              | 17,000 J            | 1,600 J             | 250 J             | 430 J             | 2,200 J           | 610 J             | 430 J             | 100 J             | 90 J            | 30 J            | ND (31,000) J     | 40 J            | 1.9 J        | 5.5 J        | 300,000 J  | 60,000 J    | 2,200     | 3,200     | 3,200       |    |

TABLE B-5b  
Sample Results: Dioxins and Furans  
AOC 11 – Topographic Low Areas  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                   |                | Dioxin/Furans (ng/kg)   |                         |                         |                       |                       |                       |                       |                       |                       |                     |                     |                       |                     |              |              |           |            |           |           |                |
|--|----------|-------------------|----------------|-------------------------|-------------------------|-------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|---------------------|---------------------|-----------------------|---------------------|--------------|--------------|-----------|------------|-----------|-----------|----------------|
| Interim Screening Level <sup>1</sup> :               |          |                   |                | NE                      | NE                      | NE                      | NE                    | NE                    | NE                    | NE                    | NE                    | NE                    | 4.8                 | NE                  | NE                    | NE                  | 4.8          | NE           | NE        | NE         | 16        | 50        | 5.58           |
| Residential Regional Screening Levels <sup>2</sup> : |          |                   |                | NE                      | NE                      | NE                      | NE                    | NE                    | NE                    | NE                    | NE                    | NE                    | 4.8                 | NE                  | NE                    | NE                  | 4.8          | NE           | NE        | NE         | NE        | 4.8       | NE             |
| Residential DTSC-SL <sup>3</sup> :                   |          |                   |                | NE                      | NE                      | NE                      | NE                    | NE                    | NE                    | NE                    | NE                    | NE                    | NE                  | NE                  | NE                    | NE                  | NE           | NE           | NE        | NE         | NE        | 50        | NE             |
| Ecological Comparison Values <sup>4</sup> :          |          |                   |                | NE                      | NE                      | NE                      | NE                    | NE                    | NE                    | NE                    | NE                    | NE                    | NE                  | NE                  | NE                    | NE                  | NE           | NE           | NE        | NE         | 16        | NE        | 1.6            |
| Background <sup>5</sup> :                            |          |                   |                | NE                      | NE                      | NE                      | NE                    | NE                    | NE                    | NE                    | NE                    | NE                    | NE                  | NE                  | NE                    | NE                  | NE           | NE           | NE        | NE         | 5.98      | 5.58      | 5.58           |
| Location   | Date     | Depth<br>(ft bgs) | Sample<br>Type | 1,2,3,4,6,7,8-<br>HpCDD | 1,2,3,4,6,7,8-<br>HpCDF | 1,2,3,4,7,8,9-<br>HpCDF | 1,2,3,4,7,8-<br>HxCDD | 1,2,3,4,7,8-<br>HxCDF | 1,2,3,6,7,8-<br>HxCDD | 1,2,3,6,7,8-<br>HxCDF | 1,2,3,7,8,9-<br>HxCDD | 1,2,3,7,8,9-<br>HxCDF | 1,2,3,7,8-<br>PeCDD | 1,2,3,7,8-<br>PeCDF | 2,3,4,6,7,8-<br>HxCDF | 2,3,4,7,8-<br>PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD      | OCDF       | TEQ Avian | TEQ Human | TEQ<br>Mammals |
| AOC11e-2   | 09/24/08 | 0 - 0.5           | N              | 3,000 J                 | 380 J                   | 31 J                    | 29 J                  | 30 J                  | 120 J                 | ND (26) J             | 46 J                  | ND (2.2) J            | ND (18) J*          | ND (5.1) J          | ND (850) J            | ND (8.8) J          | ND (1.5) J   | ND (4) J     | 23,000 J  | 670 J      | 80        | 120       | 120            |
|  | 09/24/08 | 2 - 3             | N              | 17,000 J                | ND (6) J                | 260 J                   | 110 J                 | ND (7.2) J            | 610 J                 | ND (6.5) J            | ND (9.8) J            | ND (8.4) J            | 71 J                | ND (11) J           | ND (6,700) J          | ND (11) J           | ND (2.3) J   | 8.7 J        | 140,000 J | 9,200 J    | 470       | 700       | 700            |
|  | 09/24/08 | 5 - 6             | N              | 38,000 J                | 10,000 J                | 860 J                   | 140 J                 | 220 J                 | 1,300 J               | 70 J                  | 270 J                 | 49 J                  | 72 J                | 17 J                | ND (18,000) J         | 25 J                | ND (1.8) J   | ND (4) J     | 210,000 J | 89,000 J   | 1,300     | 1,800     | 1,800          |
|  | 09/24/08 | 9 - 10            | N              | 9,700 J                 | 2,000 J                 | 140 J                   | 28 J                  | 46 J                  | 250 J                 | 72 J                  | ND (49) J             | ND (9) J              | 12 J                | ND (3.4) J          | ND (4,200) J          | ND (5) J            | ND (0.51) J  | ND (0.86) J  | 200,000 J | 9,800 J    | 300       | 450       | 450            |
| AOC11e-3   | 01/08/16 | 0 - 1             | N              | 240 J                   | 21 J                    | 2 J                     | ND (2.4) J            | ND (1.4) J            | 7.8 J                 | ND (1.9) J            | 5 J                   | ND (0.79) J           | ND (1.6) J          | ND (0.87) J         | ND (31) J             | 1.5 J               | ND (0.43) J  | ND (0.31) J  | 1,800 J   | 39 J       | 5.8       | 7.8       | 7.8            |
|  | 01/10/16 | 2 - 3             | N              | 110 J                   | 14 J                    | ND (0.9) J              | ND (1.4) J            | ND (1.1) J            | ND (2.9) J            | ND (0.73) J           | ND (0.71) J           | ND (0.42) J           | ND (1.3) J          | ND (0.4) J          | ND (14) J             | ND (0.3) J          | ND (0.14) J  | ND (0.14) J  | 830 J     | 17 J       | 2.2       | 3.3       | 3.3            |
|  | 01/10/16 | 5 - 6             | N              | 54 J                    | 5.7 J                   | ND (0.33) J             | ND (0.25) J           | ND (0.33) J           | ND (0.25) J           | ND (0.32) J           | ND (1.1) J            | ND (0.38) J           | ND (0.29) J         | ND (0.25) J         | ND (9.2) J            | ND (0.6) J          | ND (0.074) J | ND (0.17) J  | 430 J     | 9.8 J      | 1.3       | 1.6       | 1.6            |
|  | 01/10/16 | 9 - 10            | N              | 76 J                    | 7.2 J                   | ND (0.88) J             | ND (0.86) J           | ND (0.39) J           | ND (2.3) J            | ND (0.66) J           | 1.8 J                 | ND (0.45) J           | ND (0.79) J         | ND (0.22) J         | ND (11) J             | ND (0.4) J          | ND (0.1) J   | ND (0.15) J  | 570 J     | 13 J       | 1.8       | 2.5       | 2.5            |
| AOC11e-4   | 01/28/16 | 0 - 1             | N              | 470 J                   | 39 J                    | ND (3) J                | 4 J                   | ND (1.4) J            | 14 J                  | ND (1.8) J            | 6.3 J                 | ND (0.34) J           | ND (2.5) J          | ND (0.46) J         | ND (80) J             | ND (0.48) J         | ND (0.15) J  | ND (0.32) J  | 3,200 J   | 100 J      | 8.1       | 14        | 14             |
|  | 01/28/16 | 2 - 3             | N              | 19,000 J                | 5,000 J                 | 390 J                   | 110 J                 | 130 J                 | 680 J                 | 73 J                  | 180 J                 | 22 J                  | 53 J                | 14 J                | ND (8,900) J          | 25 J                | ND (0.45) J  | 3 J          | 220,000 J | 30,000 J   | 680       | 940       | 940            |
|  | 01/28/16 | 5 - 6             | N              | 6,900 J                 | 920 J                   | 76 J                    | 27 J                  | 29 J                  | 160 J                 | ND (14) J             | 54 J                  | 9.2 J                 | 17 J                | 4 J                 | ND (2,000) J          | 4.9 J               | ND (0.25) J  | ND (1.1) J   | 82,000 J  | 3,200 J    | 160       | 250       | 250            |
| AOC11e-6   | 12/03/15 | 0 - 1             | N              | 49 J                    | ND (3.5) J              | ND (0.7) J              | ND (0.3) J            | ND (1.6) J            | 1.6 J                 | ND (1.4) J            | ND (0.97) J           | ND (0.54) J           | ND (0.63) J         | 4.6 J               | ND (24) J             | 2.6 J               | ND (0.093) J | 10 J         | 230 J     | ND (5.5) J | 15        | 4.5       | 4.5            |
| PA-09  | 01/27/16 | 0 - 1             | N              | 480 J                   | 28 J                    | 1.9 J                   | 5.8 J                 | 2.8 J                 | 16 J                  | ND (3.2) J            | 7.9 J                 | ND (1.3) J            | 3.7 J               | ND (1.8) J          | ND (22) J             | ND (1.8) J          | ND (0.6) J   | 1.9 J        | 2,400 J   | 45 J       | 11        | 15        | 15             |
| PA-10  | 01/27/16 | 0 - 1             | N              | 4,600 J                 | 320 J                   | 20 J                    | 47 J                  | 27 J                  | 130 J                 | 22 J                  | 66 J                  | 4.8 J                 | 28 J                | 9.1 J               | ND (260) J            | 10 J                | ND (2.3) J   | 3.9 J        | 41,000 J  | 530 J      | 85        | 140       | 140            |
|  | 01/26/17 | 2 - 3             | N              | 2.4 J                   | 0.54 J                  | ND (0.11)               | ND (0.15)             | ND (0.09)             | ND (0.13)             | ND (0.13)             | ND (0.13)             | ND (0.1)              | ND (0.25)           | ND (0.17)           | ND (0.89)             | ND (0.37)           | ND (0.14)    | ND (0.14)    | 24 J      | 0.69 J     | 0.54      | 0.38      | 0.38           |
|  | 01/26/17 | 5 - 6             | N              | 7.2 J                   | 0.93 J                  | ND (0.1)                | ND (0.13)             | ND (0.092)            | ND (0.12)             | ND (0.083)            | ND (0.24)             | ND (0.11)             | ND (0.25)           | ND (0.092)          | ND (1.1)              | ND (0.16)           | ND (0.051)   | ND (0.16)    | 79        | 1.6 J      | 0.43      | 0.38      | 0.38           |
| PA-11  | 01/27/16 | 0 - 1             | N              | 3,300 J                 | 340 J                   | 23 J                    | 40 J                  | 23 J                  | 120 J                 | 29 J                  | 60 J                  | 4.4 J                 | 25 J                | 6.1 J               | ND (340) J            | 9.7 J               | ND (2.4) J   | 5.3 J        | 25,000 J  | 460 J      | 83        | 120       | 120            |
|  | 01/25/17 | 2 - 3             | N              | 51                      | 7 J                     | ND (0.42)               | 0.77 J                | ND (0.53)             | ND (2)                | 0.78 J                | 1.2 J                 | ND (0.16)             | ND (0.46)           | ND (0.43)           | ND (10)               | ND (1.1)            | ND (0.19)    | ND (0.23)    | 410       | 11 J       | 2         | 2.1       | 2.1            |
|  | 01/25/17 | 5 - 6             | N              | 2,200                   | 230                     | 16                      | 24                    | 20                    | 70                    | 13                    | 36                    | 3.3 J                 | 16                  | 5.5 J               | ND (290)              | 7.6 J               | ND (2)       | 4.7 J        | 21,000    | 340        | 60        | 82        | 82             |
| PA-12  | 01/27/16 | 0 - 1             | N              | 20,000 J                | 1,500 J                 | 95 J                    | 45 J                  | 160 J                 | 410 J                 | 59 J                  | 94 J                  | 60 J                  | 22 J                | 24 J                | ND (1,900) J          | 42 J                | ND (3.3) J   | 9.5 J        | 290,000 J | 6,000 J    | 280       | 520       | 520            |
|  | 01/25/17 | 2 - 3             | N              | 65                      | 7.5 J                   | ND (0.96)               | ND (0.57)             | ND (0.37)             | 1.8 J                 | ND (0.49)             | ND (1.1)              | ND (0.26)             | ND (0.24)           | ND (0.3)            | ND (5.3)              | ND (0.3)            | ND (0.1)     | ND (0.14)    | 620       | 43         | 1         | 1.7       | 1.7            |
|  | 01/25/17 | 5 - 6             | N              | 210                     | 19                      | 1.8 J                   | 1.7 J                 | ND (3.1)              | 6.9 J                 | 2.9 J                 | ND (0.43)             | ND (0.5)              | ND (0.36)           | 10 J                | ND (82)               | ND (7.9)            | ND (0.39)    | ND (0.45)    | 1,900     | 40         | 11        | 10        | 10             |
| SD-11A   | 03/07/16 | 0 - 1             | N              | 2,700 J                 | ND (2.9) J              | 67 J                    | 42 J                  | 55 J                  | 130 J                 | 50 J                  | 80 J                  | ND (3) J              | ND (130) J*         | ND (2.9) J          | ND (2.7) J            | ND (11) J           | ND (4.4) J   | ND (14) J    | 18,000 J  | 1,000 J    | 110       | 140       | 140            |
|  | 03/07/16 | 2 - 3             | N              | 3,300 J                 | ND (3.5) J              | 59 J                    | ND (28) J             | 41 J                  | 110 J                 | 23 J                  | ND (44) J             | ND (5.4) J            | ND (51) J*          | 240 R               | ND (4.8) J            | ND (250) J          | ND (4.1) J   | ND (12) J    | 33,000 J  | 1,800 J    | 190 JR    | 130 JR    | 130 JR         |
|  | 03/07/16 | 5 - 6             | N              | 1,800 J                 | 260 J                   | ND (20) J               | 16 J                  | ND (3.7) J            | 64 J                  | 12 J                  | 35 J                  | ND (4.3) J            | ND (15) J*          | ND (3.8) J          | ND (380) J            | ND (4) J            | ND (1.6) J   | ND (2.6) J   | 18,000 J  | 670 J      | 44        | 67        | 67             |
| SD-23  | 03/09/16 | 0 - 1             | N              | 460 J                   | 38 J                    | ND (2.4) J              | 5.9 J                 | 3.4 J                 | 14 J                  | 3.4 J                 | 8.2 J                 | ND (0.26) J           | ND (3) J            | ND (0.68) J         | ND (37) J             | 2.3 J               | ND (0.16) J  | ND (0.22) J  | 4,300 J   | 67 J       | 9.1       | 14        | 14             |
| SD-27  | 02/15/17 | 2 - 3             | N              | 12 J                    | 1.5 J                   | ND (0.22)               | ND (0.49)             | ND (0.15)             | ND (0.48)             | ND (0.14)             | ND (0.47)             | ND (0.18)             | ND (0.47)           | ND (0.17)           | ND (4.6)              | ND (0.17)           | ND (0.41)    | ND (0.11)    | 86        | ND (3.4)   | 0.92      | 0.96      | 0.96           |

Notes:

Category 1: Validated data suitable for all uses, including risk assessment and remedial action decisions.

Category 2: Validated data suitable for use in characterization of the chemicals of potential concern at the facility and to help define the nature and extent of contamination.

Category 3: Validated data suitable only for use in qualitative characterization of the nature and extent of contamination.

Results greater than or equal to the Interim Screening Level are circled.

-- not analyzed  
ft bgs feet below ground surface

TABLE B-5b  
Sample Results: Dioxins and Furans  
AOC 11 – Topographic Low Areas  
*Soil Engineering Evaluation/Cost Analysis*  
*PG&E Topock Compressor Station, Needles, California*

|         |   |
|---------|---|
| ng/kg   | nanograms per kilogram  |
| DTSC-SL | DTSC Screening Levels   |
| DTSC    | California Department of Toxic Substances Control   |
| FD      | Field Dupliicate  |
| J       | concentration or reporting limit estimated by laboratory or data validation   |
| JR      | estimated value, one or more input values is "R" qualified.   |
| N       | Primary Sample  |
| NA      | NA = not applicable   |
| NE      | not established   |
| ND      | not detected at the listed reporting limit  |
| R       | The result has been rejected; identification and/or quantitation could not be verified because critical QC specifications were not met (e.g., a non-detect result obtained for an archive sample following a hold time of greater than one year). |
| USEPA   | USEPA = United States Environmental Protection Agency   |

- 1 For individual dioxins and furans, selected value is the lower of the ECV, residential DTSC-SL, or USEPA residential regional screening value, unless the background value is higher. For TEQ values, selected value is the DTSC-SL.
- 2 United States Environmental Protection Agency (USEPA). 2017. Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites. November.
- 3 California Department of Toxic Substances Control (DTSC). 2018. Human Health Risk Assessment (HHRA) Note Number 3. JanuaryCalifornia Department of Toxic Substances Control (DTSC). 2017. Human Health Risk Assessment (HHRA) Note 2, Soil Remedial Goals for Dioxins and Dioxin-like Compounds for Consideration at California Hazardous Waste Sites. April.
- 4 ARCADIS. 2008. "Technical Memorandum 3: Ecological Comparison Values for Metals and Polycyclic Aromatic Hydrocarbons in Soil." May 28. ARCADIS. 2009. "Topock Compression Station - Final Technical Memorandum 4: Ecological Comparison Values for Additional Decteded Chemicals in Soil." July 1.
- 5 CH2M. 2017. Revised Ambient Study of Dioxins and Furans at the Pacific Gas and Electric Company, Topock Compressor Station, Needles, California. October.

Calculations:  
TEQ = Sum of Result xToxic equivalency factor (TEF), 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.  
TEQ Avian = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.  
TEQMammals = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.  
Teq Humans = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.



TABLE B-6a  
Sample Results: Metals  
AOC 14 – Railroad Debris Area  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |                       |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |         |           |          |              |            |        |          |            |            |          |         |
|--|-----------------------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|---------|-----------|----------|--------------|------------|--------|----------|------------|------------|----------|---------|
| Interim Screening Level <sup>1</sup> :               |                       |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7    | 16.8      | 8.39     | 0.0125       | 1.37       | 27.3   | 1.47     | 5.15       | 0.78       | 52.2     | 58      |
| Residential Regional Screening Levels <sup>2</sup> : |                       |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23      | 3,100     | 400      | 11           | 390        | 1,500  | 390      | 390        | 0.78       | 390      | 23,000  |
| Residential DTSC-SL <sup>3</sup> :                   |                       |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE      | NE        | 80       | 1            | NE         | 490    | NE       | 390        | NE         | 390      | NE      |
| Ecological Comparison Values <sup>4</sup> :          |                       |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13      | 20.6      | 0.0166   | 0.0125       | 2.25       | 0.607  | 0.177    | 5.15       | 2.32       | 13.9     | 0.164   |
| Background <sup>5</sup> :                            |                       |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7    | 16.8      | 8.39     | NE           | 1.37       | 27.3   | 1.47     | NE         | NE         | 52.2     | 58      |
| Location   | Date                  | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt  | Copper    | Lead     | Mercury      | Molybdenum | Nickel | Selenium | Silver     | Thallium   | Vanadium | Zinc    |
| Category 1   |                       |                |             |                |         |        |            |            |                      |                 |         |           |          |              |            |        |          |            |            |          |         |
| AOC14-1  | 09/30/08              | 0 - 0.5        | N           | ND (2) *       | 4.8     | 190 J  | ND (2) *   | ND (1)     | 0.841                | 25              | 7.2     | 11        | 18       | ND (0.1) *   | ND (2) *   | 11     | ND (1)   | ND (2)     | ND (4) *   | 30       | 70      |
|  | 09/30/08              | 2 - 3          | N           | ND (2) *       | 4.8     | 220    | ND (2) *   | ND (1)     | ND (0.412)           | 25              | 8.4     | 8.5       | 8.7      | ND (0.1) *   | ND (2) *   | 11     | ND (1)   | ND (2)     | ND (4.1) * | 36       | 47      |
|  | 09/30/08              | 5 - 6          | N           | ND (2) *       | 2.2     | 180    | ND (1) *   | ND (1)     | ND (0.412)           | 27              | 8.5     | 9.5       | 2.3      | ND (0.1) *   | 1.6        | 12     | ND (2) * | ND (1)     | ND (2) *   | 34       | 38      |
|  | 09/30/08              | 9 - 10         | N           | ND (2) *       | 2.3     | 160    | ND (1) *   | ND (1)     | ND (0.403)           | 17              | 7.4     | 8.2       | 2.7      | ND (0.099) * | ND (1)     | 11     | ND (1)   | ND (1)     | ND (2) *   | 31       | 34      |
|  | 09/30/08              | 14 - 15        | N           | ND (2) *       | 2.7     | 140    | ND (1) *   | ND (1)     | ND (0.412)           | 18              | 8.6     | 12        | 2.1      | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1)     | ND (2) *   | 29       | 34      |
| AOC14-2  | 09/30/08              | 0 - 0.5        | N           | ND (2) *       | 5.8     | 190    | ND (2) *   | ND (1)     | 0.768                | 28              | 6.8     | 44        | 18       | ND (0.1) *   | ND (2) *   | 12     | ND (1)   | ND (2)     | ND (4.1) * | 28       | 49      |
|  | 09/30/08              | 2 - 3          | N           | ND (2.1) *     | 11      | 130    | ND (11) *  | ND (1.1) * | 1.04                 | 42              | ND (11) | ND (21) * | 7.6      | ND (0.11) *  | ND (11) *  | 12     | ND (1.1) | ND (11) *  | ND (21) *  | 25       | 34      |
|  | 10/01/08 <sup>Θ</sup> | 3 - 3.25       | N           | ND (2.3) *     | 15      | 120    | ND (11) *  | ND (1.1) * | 2.16                 | 26              | ND (11) | ND (23) * | ND (1.1) | ND (0.11) *  | ND (11) *  | 4.5    | ND (1.1) | ND (11) *  | ND (23) *  | 13       | ND (11) |
|  | 09/30/08              | 5 - 6          | N           | ND (2.1) *     | 8.5     | 150    | ND (5.2) * | ND (1)     | 1.32                 | 42              | 6.6     | 19        | 21       | ND (0.11) *  | ND (5.2) * | 13     | ND (1)   | ND (5.2) * | ND (10) *  | 27       | 51      |
|  | 09/30/08              | 9 - 10         | N           | ND (2) *       | 2.6     | 180    | ND (1) *   | ND (1)     | ND (0.405)           | 21              | 8.5     | 16 J      | 1.8      | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1)     | ND (2) *   | 32       | 40      |
|  | 09/30/08              | 9 - 10         | FD          | ND (2) *       | 2.6     | 180    | ND (1) *   | ND (1)     | ND (0.404)           | 21              | 8.4     | 11 J      | 1.9      | ND (0.1) *   | ND (1)     | 10     | ND (2) * | ND (1)     | ND (2) *   | 33       | 41      |
|  | 09/30/08              | 14 - 15        | N           | ND (2) *       | 3.1     | 120    | ND (1) *   | ND (1)     | ND (0.407)           | 15              | 7.2     | 9.1       | 2.1      | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1)     | ND (2) *   | 28       | 35      |
| AOC14-3  | 10/01/08              | 0 - 0.5        | N           | ND (2) J*      | 3.7     | 140    | ND (1) *   | ND (1)     | ND (0.403)           | 31              | 7.5     | 12        | 8.4      | ND (0.1) *   | 1.6        | 11     | ND (1)   | ND (1)     | ND (2) *   | 30       | 52      |
|  | 10/01/08              | 2 - 3          | N           | ND (2) *       | 3.3     | 90     | ND (1) *   | ND (1)     | ND (0.405)           | 26              | 8.1     | 13        | 6.4      | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1)     | ND (2) *   | 34       | 46      |
|  | 10/01/08              | 5 - 6          | N           | ND (2) *       | 3.4     | 130    | ND (1) *   | ND (1)     | 0.877                | 32              | 6.6     | 11        | 9        | ND (0.1) *   | 2.1        | 11     | ND (1)   | ND (1)     | ND (2) *   | 26       | 40      |
|  | 10/01/08              | 9 - 10         | N           | ND (2) *       | 2.1     | 140    | ND (1) *   | ND (1)     | ND (0.404)           | 19              | 7.5     | 7.1       | 2        | ND (0.1) *   | ND (1)     | 10     | ND (1)   | ND (1)     | ND (2) *   | 30       | 33      |
|  | 10/01/08              | 14 - 15        | N           | ND (2) *       | 2.7     | 110    | ND (1) *   | ND (1)     | ND (0.403)           | 17              | 7.6     | 12        | 2.2      | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1)     | ND (2) *   | 29       | 32      |
| AOC14-4  | 10/01/08              | 0 - 0.5        | N           | ND (2) *       | 4.5     | 99     | ND (1) *   | ND (1)     | ND (0.402)           | 13              | 4.3     | 7.3       | 7.2      | ND (0.1) *   | ND (1)     | 7.1    | ND (1)   | ND (1)     | ND (2) *   | 20       | 31      |
|  | 10/01/08              | 2 - 3          | N           | ND (2) *       | 4.5     | 130    | ND (1) *   | ND (1)     | ND (0.405)           | 16              | 4.4     | 6.2       | 3.5      | ND (0.1) *   | 1.5        | 7.6    | ND (1)   | ND (1)     | ND (2) *   | 21       | 23      |
|  | 10/01/08              | 5 - 6          | N           | ND (2) *       | 4.1     | 110    | ND (1) *   | ND (1)     | ND (0.403)           | 16              | 4.4     | 5.3       | 3.5      | ND (0.1) *   | 1.5        | 7.3    | ND (1)   | ND (1)     | ND (2) *   | 21       | 23      |
|  | 10/01/08              | 9 - 10         | N           | ND (2) *       | 2.9     | 86     | ND (1) *   | ND (1)     | ND (0.403)           | 8.2             | 3.4     | 2.9       | 2.8      | ND (0.1) *   | 1.2        | 4.8    | ND (1)   | ND (1)     | ND (2) *   | 19       | 16      |
|  | 10/01/08              | 9 - 10         | FD          | ND (2) *       | 3.1     | 96     | ND (1) *   | ND (1)     | ND (0.404)           | 8.1             | 3.3     | 2.7       | 2.9      | ND (0.1) *   | 1.2        | 4.8    | ND (1)   | ND (1)     | ND (2) *   | 18       | 16      |
|  | 10/01/08              | 14 - 15        | N           | ND (2) *       | 3.4     | 130    | ND (1) *   | ND (1)     | ND (0.406)           | 15              | 6.4     | 7.9       | 2.2      | ND (0.1) *   | ND (1)     | 10     | ND (1)   | ND (1)     | ND (2) *   | 27       | 29      |
| AOC14-5  | 10/02/08              | 0 - 0.5        | N           | ND (2) *       | 6.8     | 300    | ND (2) *   | ND (1)     | ND (0.403)           | 15              | 6.8     | 9.6       | 5.3      | ND (0.099) * | ND (2) *   | 10     | ND (1)   | ND (2)     | ND (4) *   | 29       | 35      |
|  | 10/02/08              | 2 - 3          | N           | ND (2) *       | 9       | 240    | ND (2) *   | ND (1)     | ND (0.405)           | 17              | 6.1     | 16        | 16       | ND (0.1) *   | ND (2) *   | 13     | ND (1)   | ND (2)     | ND (4) *   | 28       | 46      |
|  | 10/02/08              | 5 - 6          | N           | ND (2) *       | 3.2     | 240    | ND (1) *   | ND (1)     | ND (0.404)           | 15              | 7.3     | 7.9       | 2.7      | ND (0.099) * | ND (1)     | 10     | ND (1)   | ND (1)     | ND (2) *   | 28       | 35      |
|  | 10/02/08              | 9 - 10         | N           | ND (2) *       | 2.8     | 110    | ND (1) *   | ND (1)     | ND (0.403)           | 15              | 7.6     | 9.5       | 2.3      | ND (0.1) *   | ND (1)     | 10     | ND (1)   | ND (1)     | ND (2) *   | 30       | 35      |
|  | 10/02/08              | 14 - 15        | N           | ND (2) *       | 3.2     | 90     | ND (1) *   | ND (1)     | ND (0.406)           | 16              | 6.8     | 7.3       | 2.2      | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2) *   | 28       | 30      |
| AOC14-6  | 10/02/08              | 0 - 0.5        | N           | ND (2) *       | 5       | 120    | ND (1) *   | ND (1)     | ND (0.402)           | 11              | 4       | 6.1       | 7.4      | ND (0.1) *   | 1.2        | 7      | ND (1)   | ND (1)     | ND (2) *   | 20       | 35      |
|  | 10/02/08              | 2 - 3          | N           | ND (2) *       | 6       | 210    | ND (2) *   | ND (1)     | ND (0.403)           | 23              | 7.8     | 9.5       | 3.3      | ND (0.1) *   | 2.4        | 11     | ND (1)   | ND (2)     | ND (4) *   | 34       | 37      |
|  | 10/02/08              | 5 - 6          | N           | ND (2) *       | 3.4     | 140    | ND (1) *   | ND (1)     | ND (0.405)           | 18              | 7.7     | 9.1       | 2.3      | ND (0.099) * | ND (1)     | 11     | ND (1)   | ND (1)     | ND (2) *   | 31       | 35      |
|  | 10/02/08              | 9 - 10         | N           | ND (2) *       | 2.6     | 120    | ND (1) *   | ND (1)     | ND (0.406)           | 18              | 8.3     | 9.6       | 2.4      | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2) *   | 33       | 39      |
|  | 10/02/08              | 9 - 10         | FD          | ND (2) *       | 2.8     | 110    | ND (1) *   | ND (1)     | ND (0.406)           | 18              | 8.4     | 9.7       | 2.3      | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)     | ND (2) *   | 33       | 39      |
|  | 10/02/08              | 14 - 15        | N           | ND (2) *       | 3.3     | 110    | ND (1) *   | ND (1)     | ND (0.402)           | 16              | 5.9     | 7.2       | 2.2      | ND (0.1) *   | ND (1)     | 9.3    | ND (1)   | ND (1)     | ND (2) *   | 25       | 28      |
| AOC14-7  | 10/02/08              | 0 - 0.5        | N           | ND (2) *       | 5       | 160    | ND (1) *   | ND (1)     | ND (0.404)           | 15              | 4.7     | 7.4       | 6.1      | ND (0.099) * | ND (1)     | 9.6    | ND (1)   | ND (1)     | ND (2) *   | 25       | 31      |
|  | 10/02/08              | 2 - 3          | N           | ND (2) *       | 5       | 170    | ND (1) *   | ND (1)     | ND (0.405)           | 13              | 6.1     | 10        | 7.1      | ND (0.1) *   | ND (1)     | 9.3    | ND (1)   | ND (1)     | ND (2) *   | 23       | 30      |
|  | 10/02/08              | 5 - 6          | N           | ND (2) *       | 5.3     | 210    | ND (2) *   | ND (1)     | ND (0.405)           | 18              | 7.5     | 10        | 4.8      | ND (0.1) *   | ND (2) *   | 12     | ND (1)   | ND (2)     | ND (4) *   | 30       | 35      |
|  | 10/02/08              | 9 - 10         | N           | ND (2) *       | 3.9     | 120    | ND (1) *   | ND (1)     | ND (0.404)           | 26              | 10      | 14        | 2.9      | ND (0.1) *   | ND (1)     | 16     | ND (1)   | ND (1)     | ND (2) *   | 38       | 46      |
|  | 10/02/08              | 14 - 15        | N           | ND (2) *       | 3.7     | 150    | ND (1) *   | ND (1)     | ND (0.401)           | 25              | 6.5     | 9.9       | 3.5      | ND (0.1) *   | 2.4        | 11     | ND (1)   | ND (1)     | ND (2) *   | 25       | 32      |

TABLE B-6a  
Sample Results: Metals  
AOC 14 – Railroad Debris Area  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |           |         |                      |                 |        |          |        |              |            |        |          |        |            |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|-----------|---------|----------------------|-----------------|--------|----------|--------|--------------|------------|--------|----------|--------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672     | 1.1     | 0.83                 | 39.8            | 12.7   | 16.8     | 8.39   | 0.0125       | 1.37       | 27.3   | 1.47     | 5.15   | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160       | 71      | 0.3                  | 120,000         | 23     | 3,100    | 400    | 11           | 390        | 1,500  | 390      | 390    | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15        | 5.2     | NE                   | 36,000          | NE     | NE       | 80     | 1            | NE         | 490    | NE       | 390    | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3      | 0.0151  | 139.6                | 36.3            | 13     | 20.6     | 0.0166 | 0.0125       | 2.25       | 0.607  | 0.177    | 5.15   | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672     | 1.1     | 0.83                 | 39.8            | 12.7   | 16.8     | 8.39   | NE           | 1.37       | 27.3   | 1.47     | NE     | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium | Cadmium | Chromium, Hexavalent | Chromium, total | Cobalt | Copper   | Lead   | Mercury      | Molybdenum | Nickel | Selenium | Silver | Thallium   | Vanadium | Zinc   |
| AOC14-8  | 10/02/08 | 0 - 0.5        | N           | ND (2) *       | 6.8     | 110    | ND (2) *  | ND (1)  | ND (0.403)           | 12              | 4.9    | 7.9      | 6.4    | ND (0.099) * | ND (2) *   | 9.4    | ND (1)   | ND (2) | ND (4) *   | 24       | 30     |
|  | 10/02/08 | 2 - 3          | N           | ND (2) *       | 6.9     | 93     | ND (2) *  | ND (1)  | ND (0.406)           | 15              | 5.5    | 8.8      | 6.8    | ND (0.1) *   | ND (2) *   | 11     | ND (1)   | ND (2) | ND (4) *   | 26       | 31     |
|  | 10/02/08 | 5 - 6          | N           | ND (2) *       | 2.8     | 210    | ND (1) *  | ND (1)  | ND (0.404)           | 18              | 8.6    | 6.6      | 2.4    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1) | ND (2) *   | 35       | 39     |
|  | 10/02/08 | 9 - 10         | N           | ND (2) *       | 3.3     | 89     | ND (1) *  | ND (1)  | ND (0.404)           | 19              | 8.5    | 12       | 2.7    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1) | ND (2) *   | 33       | 38     |
|  | 10/02/08 | 9 - 10         | FD          | ND (2) *       | 3.3     | 92     | ND (1) *  | ND (1)  | ND (0.404)           | 19              | 8.5    | 10       | 3      | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1) | ND (2) *   | 35       | 39     |
|  | 10/02/08 | 14 - 15        | N           | ND (2.1) J*    | 4.7     | 73 J   | ND (1) *  | ND (1)  | ND (0.413)           | 23 J            | 9.7    | 18       | 3.7    | ND (0.1) *   | ND (1)     | 16     | ND (1)   | ND (1) | ND (2.1) * | 36 J     | 42 J   |
| AOC14-9  | 10/01/08 | 0 - 0.5        | N           | ND (2) *       | 5.3     | 140    | ND (1) *  | ND (1)  | ND (0.404)           | 13              | 4.8    | 7.6      | 5.4    | ND (0.1) *   | ND (1)     | 9.5    | ND (1)   | ND (1) | ND (2) *   | 23       | 28     |
|  | 10/01/08 | 2 - 3          | N           | ND (2) *       | 6.3     | 170    | ND (2) *  | ND (1)  | ND (0.407)           | 12              | 4.8    | 7.2      | 6      | ND (0.1) *   | ND (2) *   | 9.1    | ND (1)   | ND (2) | ND (4) *   | 23       | 29     |
|  | 10/01/08 | 5 - 6          | N           | ND (2) *       | 3       | 61     | ND (1) *  | ND (1)  | ND (0.4)             | 9               | 2.8    | 4.1      | 2.8    | ND (0.1) *   | ND (1)     | 5      | ND (1)   | ND (1) | ND (2) *   | 13       | 13     |
|  | 10/01/08 | 9 - 10         | N           | ND (2) *       | 4.4     | 220    | ND (1) *  | ND (1)  | ND (0.405)           | 15              | 5.5    | 7.6      | 3.6    | ND (0.1) *   | ND (1)     | 9.1    | ND (1)   | ND (1) | ND (2) *   | 23       | 29     |
|  | 10/01/08 | 14 - 15        | N           | ND (2) J*      | 6.2     | 120 J  | ND (2) *  | ND (1)  | ND (0.406)           | 13              | 5.9    | 8.2      | 5      | ND (0.1) *   | ND (2) *   | 9.4    | ND (1)   | ND (2) | ND (4.1) * | 22       | 32     |
| AOC14-10   | 10/01/08 | 0 - 0.5        | N           | ND (2) *       | 3.6     | 69     | ND (1) *  | ND (1)  | ND (0.401)           | 10              | 2.4    | 3.5      | 3.5    | ND (0.1) *   | ND (1)     | 4.2    | ND (1)   | ND (1) | ND (2) *   | 13       | 14     |
|  | 10/01/08 | 2 - 3          | N           | ND (2) *       | 2.9     | 65     | ND (1) *  | ND (1)  | ND (0.401)           | 11              | 2.4    | 3.1      | 2.9    | ND (0.1) *   | ND (1)     | 3.9    | ND (1)   | ND (1) | ND (2) *   | 11       | 14     |
|  | 10/01/08 | 5 - 6          | N           | ND (2) *       | 3.3     | 110    | ND (1) *  | ND (1)  | ND (0.403)           | 12              | 2.9    | 4.6      | 3.4    | ND (0.1) *   | ND (1)     | 5.2    | ND (1)   | ND (1) | ND (2) *   | 14       | 17     |
|  | 10/01/08 | 5 - 6          | FD          | ND (2) *       | 3.1     | 97     | ND (1) *  | ND (1)  | ND (0.402)           | 12              | 2.6    | 4.1      | 3.1    | ND (0.1) *   | ND (1)     | 4.6    | ND (1)   | ND (1) | ND (2) *   | 13       | 15     |
|  | 10/01/08 | 9 - 10         | N           | ND (2) *       | 5       | 81     | ND (1) *  | ND (1)  | ND (0.409)           | 11              | 4.5    | 7.1      | 5.9    | ND (0.1) *   | ND (1)     | 8.7    | ND (1)   | ND (1) | 2.2        | 21       | 28     |
|  | 10/01/08 | 14 - 15        | N           | ND (2) *       | 7.1     | 110    | ND (4) *  | ND (1)  | ND (0.404)           | 9.8             | ND (4) | ND (8.1) | 2.6    | ND (0.1) *   | ND (4) *   | 4.6    | ND (1)   | ND (4) | ND (8.1) * | 13       | 13     |
| AOC14-11   | 10/01/08 | 5 - 6          | N           | ND (2) *       | 5.5     | 140    | ND (1) *  | ND (1)  | ND (0.406)           | 15              | 5.9    | 7.3      | 4.2    | ND (0.1) *   | 1          | 9.9    | ND (1)   | ND (1) | ND (2) *   | 28       | 28     |
|  | 10/01/08 | 9 - 10         | N           | ND (2) *       | 2.4     | 140    | ND (1) *  | ND (1)  | ND (0.405)           | 18              | 8.4    | 13       | 2      | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1) | ND (2) *   | 34       | 37     |
|  | 10/01/08 | 14 - 15        | N           | ND (2) *       | 4       | 80     | ND (1) *  | ND (1)  | ND (0.41)            | 20              | 8.5    | 9        | 3      | ND (0.1) *   | ND (1)     | 14     | ND (1)   | ND (1) | ND (2) *   | 35       | 39     |
| AOC14-12   | 09/30/08 | 5 - 6          | N           | ND (2) *       | 3.2     | 190    | ND (1) *  | ND (1)  | ND (0.406)           | 27              | 7.5    | 8.4      | 3.2    | ND (0.1) *   | 2.4        | 9.8    | 1.5      | ND (1) | ND (2) *   | 29       | 36     |
|  | 09/30/08 | 9 - 10         | N           | ND (2) *       | 2.3     | 150    | ND (1) *  | ND (1)  | ND (0.405)           | 17              | 7.4    | 7.7      | 3      | ND (0.1) *   | ND (1)     | 11     | 1.2      | ND (1) | ND (2) *   | 29       | 37     |
|  | 09/30/08 | 14 - 15        | N           | ND (2) *       | 3.2     | 140    | ND (1) *  | ND (1)  | ND (0.401)           | 20              | 7.7    | 9.8      | 2.8    | ND (0.1) *   | 1.2        | 13     | ND (1)   | ND (1) | ND (2) *   | 29       | 35     |
| AOC14-13   | 09/30/08 | 5 - 6          | N           | ND (2) *       | 3.3     | 130    | ND (1) *  | ND (1)  | ND (0.405)           | 22              | 5.8    | 11       | 3.6    | ND (0.099) * | 2          | 9      | ND (1)   | ND (1) | ND (2) *   | 21       | 30     |
|  | 09/30/08 | 9 - 10         | N           | ND (2) *       | 1.9     | 140    | ND (1) *  | ND (1)  | ND (0.405)           | 16              | 7.7    | 7.2      | 2.1    | ND (0.1) *   | ND (1)     | 10     | 1.6      | ND (1) | ND (2) *   | 28       | 34     |
|  | 09/30/08 | 14 - 15        | N           | ND (2) *       | 3.2     | 110    | ND (1) *  | ND (1)  | ND (0.409)           | 16              | 7      | 11       | 2.2    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1) | ND (2) *   | 29       | 33     |
|  | 09/30/08 | 14 - 15        | FD          | ND (2) *       | 2.9     | 100    | ND (1) *  | ND (1)  | ND (0.409)           | 16              | 7.5    | 13       | 2.4    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1) | ND (2) *   | 29       | 33     |
| AOC14-14E  | 02/18/16 | 0 - 1          | N           | ND (2) *       | 3.2     | 140    | ND (1) *  | ND (1)  | 0.27                 | 16              | 7.2    | 11       | 7.2    | ND (0.1) *   | ND (1)     | 10     | ND (1)   | ND (1) | ND (2) *   | 27       | 44     |
|  | 02/18/16 | 2 - 3          | N           | ND (2) *       | 3.3     | 71 J   | ND (1) *  | ND (1)  | 0.25                 | 30              | 8.5    | 13       | 3      | ND (0.1) *   | ND (1)     | 17     | ND (1)   | ND (1) | 2.1        | 30       | 42     |
|  | 02/18/16 | 2 - 3          | FD          | ND (2) *       | 3.3     | 87 J   | ND (1) *  | ND (1)  | 0.35                 | 26              | 8.4    | 10       | 3.5    | ND (0.1) *   | ND (1)     | 15     | ND (1)   | ND (1) | ND (2) *   | 34       | 43     |
|  | 02/18/16 | 5 - 5.5        | N           | ND (2) *       | 2.6     | 98     | ND (1) *  | ND (1)  | 0.8                  | 27              | 7.8    | 9.8      | 2.1    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1) | 2.2        | 29       | 38     |
|  | 02/18/16 | 6 - 7          | N           | ND (2.1) *     | 3.2     | 77     | ND (1) *  | ND (1)  | ND (0.2)             | 19              | 8.3    | 9.9      | 2.1    | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1) | ND (2.1) * | 33       | 38     |
|  | 02/18/16 | 9 - 10         | N           | ND (2) *       | 3.4     | 110    | ND (1) *  | ND (1)  | ND (0.2)             | 20              | 7.4    | 8        | 2.6    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1) | 2.6        | 29       | 39     |
| AOC14-14W  | 02/16/16 | 0 - 1          | N           | ND (2) *       | 2.5     | 150    | ND (1) *  | 1.4     | 0.33                 | 16              | 7.2    | 12       | 15     | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1) | ND (2) *   | 30       | 65     |
|  | 02/16/16 | 2 - 3          | N           | ND (2) *       | 2       | 120    | ND (1) *  | ND (1)  | ND (0.2)             | 13              | 7.1    | 12       | 3.4    | ND (0.1) *   | ND (1)     | 8.9    | ND (1)   | ND (1) | ND (2) *   | 30       | 32     |
|  | 02/16/16 | 5 - 5.5        | N           | ND (2.1) *     | 5.9     | 160    | ND (1) *  | 1.9     | 6.7                  | 420             | 7.3    | 170      | 160    | 0.22         | 4.5        | 27     | ND (1)   | ND (1) | ND (2.1) * | 58       | 310    |
|  | 02/16/16 | 6 - 7          | N           | ND (2) *       | 3.4     | 160    | ND (1) *  | 1.3     | 2.7                  | 65              | 7.7    | 80       | 70     | ND (0.1) *   | 2.8        | 16     | ND (1)   | ND (1) | ND (2) *   | 27       | 260    |
|  | 02/16/16 | 9 - 10         | N           | ND (2) *       | 2.5     | 95     | ND (1) *  | ND (1)  | 0.66                 | 15              | 7      | 9.7      | 2.6    | ND (0.1) *   | ND (1)     | 10     | ND (1)   | ND (1) | ND (2) *   | 29       | 34     |

TABLE B-6a  
Sample Results: Metals  
AOC 14 – Railroad Debris Area  
*Soil Engineering Evaluation/Cost Analysis*  
*PG&E Topock Compressor Station, Needles, California*

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |         |            |            |        |          |          |            |          |         |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|---------|------------|------------|--------|----------|----------|------------|----------|---------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39    | 0.0125     | 1.37       | 27.3   | 1.47     | 5.15     | 0.78       | 52.2     | 58      |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400     | 11         | 390        | 1,500  | 390      | 390      | 0.78       | 390      | 23,000  |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80      | 1          | NE         | 490    | NE       | 390      | NE         | 390      | NE      |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166  | 0.0125     | 2.25       | 0.607  | 0.177    | 5.15     | 2.32       | 13.9     | 0.164   |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39    | NE         | 1.37       | 27.3   | 1.47     | NE       | NE         | 52.2     | 58      |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead    | Mercury    | Molybdenum | Nickel | Selenium | Silver   | Thallium   | Vanadium | Zinc    |
| AOC14-15   | 02/18/16 | 0 - 1          | N           | ND (2) *       | 4       | 140    | ND (1) *   | ND (1)     | ND (0.2)             | 14              | 7.8    | 11     | 2.2     | ND (0.1) * | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2) *   | 29       | 36      |
|  | 02/18/16 | 2 - 3          | N           | ND (2) *       | 3       | 190    | ND (1) *   | ND (1)     | 0.21                 | 16              | 6.5    | 12     | 4.6     | ND (0.1) * | ND (1)     | 9.9    | ND (1)   | ND (1)   | 2.3        | 26       | 40      |
|  | 02/18/16 | 5 - 6          | N           | ND (2) *       | 2.9     | 170    | ND (1) *   | ND (1)     | ND (0.2)             | 11              | 6.3    | 9.7    | 3.1     | ND (0.1) * | ND (1)     | 8.9    | ND (1)   | ND (1)   | 2.2        | 24       | 34      |
|  | 02/18/16 | 7 - 8          | N           | ND (2) *       | 3.9     | 150    | ND (1) *   | ND (1)     | ND (0.2)             | 16              | 6.9    | 8.9    | 2.5     | ND (0.1) * | ND (1)     | 12     | ND (1)   | ND (1)   | 2.2        | 30       | 33      |
| AOC14-16E  | 02/23/16 | 0 - 1          | N           | ND (2) *       | 2       | 120    | ND (1) *   | ND (1)     | 0.26                 | 20              | 7.6    | 9.6    | 5.9     | ND (0.1) * | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2) *   | 32       | 62      |
|  | 02/23/16 | 2 - 3          | N           | ND (2.1) *     | 2.3     | 150    | ND (1) *   | ND (1)     | ND (0.21)            | 12              | 7.1    | 9      | 3       | ND (0.1) * | ND (1)     | 8.6    | ND (1)   | ND (1)   | ND (2.1) * | 31       | 33      |
|  | 02/23/16 | 5 - 6          | N           | ND (2) *       | 1.7     | 110    | ND (1) *   | ND (1)     | 0.22                 | 12              | 5.7    | 6.7    | 3       | ND (0.1) * | ND (1)     | 7.6    | ND (1)   | ND (1)   | ND (2) *   | 23       | 30      |
|  | 02/23/16 | 9 - 10         | N           | ND (2.1) *     | 1.3     | 97     | ND (1) *   | ND (1)     | ND (0.21)            | 15              | 7      | 9      | 1.6     | ND (0.1) * | ND (1)     | 10     | ND (1)   | ND (1)   | ND (2.1) * | 27       | 31      |
| AOC14-16W  | 02/22/16 | 0 - 1          | N           | ND (2) J*      | 2.1     | 140 J  | ND (1) *   | ND (1)     | ND (0.2)             | 13              | 6.2    | 7.3    | 2.7     | 0.41       | ND (1)     | 8.4    | ND (1) J | ND (1) J | ND (2) *   | 27 J     | 27      |
|  | 02/22/16 | 2 - 3          | N           | 3.3            | 19      | 100    | ND (1) *   | 4.2        | 20                   | 360             | 11     | 1,300  | 110     | 180        | 63         | 170    | ND (1)   | ND (1)   | ND (2.1) * | 26       | 110     |
|  | 02/22/16 | 5 - 6          | N           | ND (2.2) *     | 4.3     | 130    | ND (1.1) * | ND (1.1) * | 3                    | 50              | 7.7    | 100    | 28      | 72         | 14         | 17     | ND (1.1) | ND (1.1) | ND (2.2) * | 30       | 61      |
|  | 02/22/16 | 7 - 8          | N           | ND (2) *       | 2.8     | 140    | ND (1) *   | ND (1)     | 0.96                 | 23              | 7.6    | 35     | 14      | 17         | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2) *   | 31       | 45      |
|  | 02/22/16 | 9 - 10         | N           | ND (2) *       | 1.4     | 110    | ND (1) *   | ND (1)     | ND (0.2)             | 13              | 7.5    | 8.7    | 2.3     | ND (0.1) * | ND (1)     | 9      | ND (1)   | ND (1)   | ND (2) *   | 32       | 31      |
|  | 02/22/16 | 9 - 10         | FD          | ND (2) *       | ND (1)  | 100    | ND (1) *   | ND (1)     | ND (0.2)             | 13              | 7      | 7.1    | 1.6     | ND (0.1) * | ND (1)     | 8.9    | ND (1)   | ND (1)   | ND (2) *   | 29       | 30      |
| AOC14-17E  | 02/24/16 | 9 - 10         | N           | ND (2) *       | 1.4     | 92     | ND (1) *   | ND (1)     | ND (0.2)             | 11              | 6.4    | 7.8    | 2.7     | ND (0.1) * | ND (1)     | 9.1    | ND (1)   | ND (1)   | ND (2) *   | 27       | 31      |
| AOC14-17W  | 02/24/16 | 0 - 1          | N           | ND (2) *       | 2.6     | 66     | ND (1) *   | ND (1)     | ND (0.2)             | 9               | 3.3    | 4.7    | 3.9     | ND (0.1) * | ND (1)     | 5      | ND (1)   | ND (1)   | ND (2) *   | 17       | 21      |
|  | 02/24/16 | 1 - 2          | N           | ND (2) *       | 3.4     | 90     | ND (1) *   | ND (1)     | ND (0.2)             | 12              | 4.8    | 9.2    | 8.5     | ND (0.1) * | ND (1)     | 7.9    | ND (1)   | ND (1)   | ND (2) *   | 18       | 26      |
|  | 02/24/16 | 2 - 3          | N           | ND (2) *       | 2.7     | 130    | ND (1) *   | ND (1)     | ND (0.2)             | 13              | 6.4    | 7.7    | 3.7     | ND (0.1) * | ND (1)     | 8      | ND (1)   | ND (1)   | ND (2) *   | 27       | 29      |
|  | 02/24/16 | 5 - 6          | N           | ND (2) *       | 3.1     | 180    | ND (1) *   | ND (1)     | ND (0.2)             | 12              | 5      | 10     | 3.4     | ND (0.1) * | ND (1)     | 7.3    | ND (1)   | ND (1)   | ND (2) *   | 24       | 24      |
|  | 02/24/16 | 9 - 10         | N           | ND (2) *       | 4.1     | 110    | ND (1) *   | ND (1)     | ND (0.2)             | 12              | 6.2    | 8.6    | 2.6     | ND (0.1) * | ND (1)     | 8      | ND (1)   | ND (1)   | ND (2) *   | 33       | 29      |
| AOC14-18   | 02/17/16 | 0 - 1          | N           | ND (2) *       | 4       | 250    | ND (1) *   | ND (1)     | ND (0.2)             | 14              | 7.1    | 13     | 14      | ND (0.1) * | ND (1)     | 9.6    | ND (1)   | ND (1)   | ND (2) *   | 30       | 41      |
|  | 02/17/16 | 2 - 3          | N           | ND (2.1) *     | 3.8     | 280    | ND (1) *   | ND (1)     | ND (0.21)            | 13              | 7.8    | 12     | 3.5     | ND (0.1) * | ND (1)     | 9.5    | ND (1)   | ND (1)   | ND (2.1) * | 30       | 34      |
|  | 02/17/16 | 5 - 6          | N           | ND (2.1) *     | 4.5     | 86     | ND (1) *   | ND (1)     | ND (0.21)            | 13              | 8      | 12     | 4.4     | ND (0.1) * | 3          | 12     | ND (1)   | ND (1)   | ND (2.1) * | 33       | 36      |
| AOC14-19   | 02/17/16 | 2 - 3          | N           | 19             | 14      | 410    | ND (1) *   | 7.1 J      | ND (0.21)            | 380 J           | 17     | 1,800  | 1,600 J | ND (0.1) * | 16         | 270    | ND (1) J | ND (1)   | ND (2.1) * | 24 J     | 2,000 J |
|  | 02/17/16 | 3 - 4          | N           | ND (2.1) *     | 2.3     | 190    | ND (1) *   | ND (1)     | ND (0.21)            | 13              | 6.7    | 19     | 6.3     | ND (0.1) * | ND (1)     | 9.7    | ND (1)   | ND (1)   | ND (2.1) * | 27       | 41      |
| AOC14-20   | 04/26/17 | 0 - 0.5        | N           | ND (2) *       | 1.5     | 120    | ND (1) *   | ND (1)     | ND (0.2)             | 14              | 6.7    | 9      | 5.6     | ND (0.1) * | ND (1)     | 9      | ND (1)   | ND (1)   | ND (2) *   | 25       | 37      |
|  | 04/26/17 | 2 - 3          | N           | ND (2) *       | ND (1)  | 140    | ND (1) *   | ND (1)     | ND (0.2)             | 12              | 5.8    | 7.1    | 3.4     | ND (0.1) * | ND (1)     | 7.6    | ND (1)   | ND (1)   | ND (2) *   | 25       | 31      |
|  | 04/26/17 | 5 - 6          | N           | ND (2) *       | 1.6     | 130    | ND (1) *   | ND (1)     | ND (0.2)             | 14              | 6.8    | 11     | 2.6     | ND (0.1) * | ND (1)     | 9      | ND (1)   | ND (1)   | ND (2) *   | 26       | 29      |
|  | 04/26/17 | 8 - 9          | N           | ND (2) *       | ND (1)  | 68     | ND (1) *   | ND (1)     | ND (0.2)             | 9.9             | 5.7    | 6.5    | 1.1     | ND (0.1) * | ND (1)     | 7.1    | ND (1)   | ND (1)   | ND (2) *   | 23       | 24      |
| AOC14-21   | 04/26/17 | 0 - 0.5        | N           | ND (2) *       | ND (1)  | 140    | ND (1) *   | ND (1)     | ND (0.2)             | 15              | 7      | 10     | 11      | ND (0.1) * | ND (1)     | 9      | ND (1)   | ND (1)   | ND (2) *   | 26       | 41      |
|  | 04/26/17 | 2 - 3          | N           | ND (2) *       | ND (1)  | 130    | ND (1) *   | ND (1)     | ND (0.2)             | 15              | 7.9    | 11     | 9.4     | ND (0.1) * | ND (1)     | 9.7    | ND (1)   | ND (1)   | ND (2) *   | 29       | 45      |
|  | 04/26/17 | 2 - 3          | FD          | ND (2) *       | 1.5     | 130    | ND (1) *   | ND (1)     | ND (0.2)             | 17              | 7.3    | 12     | 9.8     | ND (0.1) * | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2) *   | 26       | 44      |
|  | 04/26/17 | 5 - 6          | N           | ND (2) *       | 1.1     | 60     | ND (1) *   | ND (1)     | ND (0.2)             | 13              | 5.7    | 40     | 1.4     | ND (0.1) * | ND (1)     | 8      | ND (1)   | ND (1)   | ND (2) *   | 24       | 39      |
|  | 04/26/17 | 9 - 10         | N           | ND (2) *       | 1       | 98     | ND (1) *   | ND (1)     | ND (0.2)             | 14              | 6.7    | 8.1    | 2       | ND (0.1) * | ND (1)     | 9.2    | ND (1)   | ND (1)   | ND (2) *   | 25       | 30      |
| AOC14-SS-1   | 10/01/08 | 0 - 0.5        | N           | ND (2) *       | 5       | 150    | ND (1) *   | ND (1)     | ND (0.405)           | 15              | 5.2    | 9.4    | 7.2     | ND (0.1) * | ND (1)     | 8.8    | ND (1)   | ND (1)   | ND (2) *   | 23       | 34      |
|  | 10/01/08 | 2 - 3          | N           | ND (2) *       | 7.2     | 150    | ND (2) *   | ND (1)     | 0.456                | 22              | 5.7    | 15     | 11      | 0.25       | ND (2) *   | 13     | ND (1)   | ND (2)   | ND (4) *   | 23       | 32      |
|  | 10/01/08 | 5 - 6          | N           | ND (2) *       | 6       | 240    | ND (2) *   | ND (1)     | ND (0.406)           | 18              | 6.7    | 15     | 4.8     | ND (0.1) * | ND (2) *   | 12     | ND (1)   | ND (2)   | ND (4.1) * | 25       | 35      |
|  | 10/01/08 | 9 - 10         | N           | ND (2) *       | 2.8     | 120    | ND (1) *   | ND (1)     | ND (0.402)           | 17              | 7      | 7.4    | 1.6     | ND (0.1) * | ND (1)     | 10     | ND (1)   | ND (1)   | ND (2) *   | 26       | 33      |
|  | 10/01/08 | 14 - 15        | N           | ND (2) *       | 3.1     | 110    | ND (1) *   | ND (1)     | ND (0.406)           | 13              | 6.7    | 9      | 2.6     | ND (0.1) * | ND (1)     | 10     | ND (1)   | ND (1)   | ND (2) *   | 27       | 31      |

TABLE B-6a  
Sample Results: Metals  
AOC 14 – Railroad Debris Area  
*Soil Engineering Evaluation/Cost Analysis*  
*PG&E Topock Compressor Station, Needles, California*

|  |                       |                |             | Metals (mg/kg) |         |        |             |           |                      |                 |        |        |        |            |            |        |          |          |            |          |           |
|--|-----------------------|----------------|-------------|----------------|---------|--------|-------------|-----------|----------------------|-----------------|--------|--------|--------|------------|------------|--------|----------|----------|------------|----------|-----------|
| Interim Screening Level <sup>1</sup> :               |                       |                |             | 0.285          | 11      | 410    | 0.672       | 1.1       | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125     | 1.37       | 27.3   | 1.47     | 5.15     | 0.78       | 52.2     | 58        |
| Residential Regional Screening Levels <sup>2</sup> : |                       |                |             | 31             | 0.68    | 15,000 | 160         | 71        | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11         | 390        | 1,500  | 390      | 390      | 0.78       | 390      | 23,000    |
| Residential DTSC-SL <sup>3</sup> :                   |                       |                |             | NE             | 0.11    | NE     | 15          | 5.2       | NE                   | 36,000          | NE     | NE     | 80     | 1          | NE         | 490    | NE       | 390      | NE         | 390      | NE        |
| Ecological Comparison Values <sup>4</sup> :          |                       |                |             | 0.285          | 11.4    | 330    | 23.3        | 0.0151    | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125     | 2.25       | 0.607  | 0.177    | 5.15     | 2.32       | 13.9     | 0.164     |
| Background <sup>5</sup> :                            |                       |                |             | NE             | 11      | 410    | 0.672       | 1.1       | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE         | 1.37       | 27.3   | 1.47     | NE       | NE         | 52.2     | 58        |
| Location   | Date                  | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium   | Cadmium   | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury    | Molybdenum | Nickel | Selenium | Silver   | Thallium   | Vanadium | Zinc      |
| AOC14-SS-2   | 10/01/08              | 0 - 0.5        | N           | ND (2) *       | 4.8     | 160    | ND (1) *    | ND (1)    | ND (0.403)           | 14              | 4.8    | 8.8    | 4.8    | ND (0.1) * | 1.1        | 10     | ND (1)   | ND (1)   | ND (2) *   | 24       | 27        |
|  | 10/01/08              | 2 - 3          | N           | ND (2) *       | 7       | 160    | ND (2) *    | ND (1)    | ND (0.407)           | 14              | 4.9    | 7.6    | 5.5    | ND (0.1) * | ND (2) *   | 9.4    | ND (1)   | ND (2)   | ND (4) *   | 22       | 29        |
|  | 10/01/08              | 5 - 6          | N           | ND (2) *       | 7       | 150    | ND (2) *    | ND (1)    | ND (0.405)           | 10              | 4.2    | 6.5    | 5.5    | ND (0.1) * | ND (2) *   | 8.2    | ND (1)   | ND (2)   | ND (4.1) * | 19       | 25        |
|  | 10/01/08              | 9 - 10         | N           | ND (2) *       | 4.6     | 130    | ND (1) *    | ND (1)    | ND (0.407)           | 9.5             | 4.2    | 6.7    | 5.3    | ND (0.1) * | ND (1)     | 8.1    | ND (1)   | ND (1)   | ND (2) *   | 18       | 24        |
|  | 10/01/08              | 14 - 15        | N           | ND (2) *       | 3.3     | 120    | ND (1) *    | ND (1)    | ND (0.404)           | 17              | 7      | 9.6    | 3      | ND (0.1) * | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2) *   | 27       | 32        |
|  | 10/01/08              | 14 - 15        | FD          | ND (2) *       | 3       | 130    | ND (1) *    | ND (1)    | ND (0.405)           | 18              | 7.3    | 9.6    | 3      | ND (0.1) * | ND (1)     | 13     | ND (1)   | ND (1)   | ND (2) *   | 28       | 33        |
| AOC14-SS-3   | 10/02/08              | 0 - 0.5        | N           | ND (2) *       | 5.4     | 190    | ND (1) *    | ND (1)    | ND (0.401)           | 17              | 7.1    | 11     | 3.8    | ND (0.1) * | ND (1)     | 10     | ND (1)   | ND (1)   | ND (2) *   | 30       | 35        |
|  | 10/02/08              | 2 - 3          | N           | ND (2) *       | 4       | 180    | ND (1) *    | ND (1)    | ND (0.402)           | 18              | 8.3    | 9.5    | 2.7    | ND (0.1) * | ND (1)     | 12     | ND (1)   | ND (1)   | ND (2) *   | 33       | 36        |
|  | 10/02/08              | 5 - 6          | N           | ND (2) *       | 2.9     | 100    | ND (1) *    | ND (1)    | ND (0.403)           | 12              | 5.4    | 6.7    | 2      | ND (0.1) * | ND (1)     | 7.2    | ND (1)   | ND (1)   | ND (2) *   | 23       | 29        |
|  | 10/02/08              | 9 - 10         | N           | ND (2) *       | 3       | 160    | ND (1) *    | ND (1)    | ND (0.404)           | 16              | 7      | 8.4    | 2.2    | ND (0.1) * | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2) *   | 31       | 32        |
|  | 10/02/08              | 14 - 15        | N           | ND (2) *       | 3.2     | 89     | ND (1) *    | ND (1)    | ND (0.404)           | 17              | 8.9    | 9.5    | 2.4    | ND (0.1) * | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2) *   | 34       | 35        |
| AOC14-SS-4   | 10/02/08              | 0 - 0.5        | N           | ND (2) *       | 5       | 190    | ND (1) *    | ND (1)    | ND (0.402)           | 15              | 6.3    | 8.1    | 5.1    | ND (0.1) * | ND (1)     | 9.6    | ND (1)   | ND (1)   | ND (2) *   | 27       | 31        |
|  | 10/02/08              | 2 - 3          | N           | ND (2) *       | 5       | 130    | ND (1) *    | ND (1)    | ND (0.401)           | 14              | 4.4    | 6.9    | 10     | ND (0.1) * | ND (1)     | 7      | ND (1)   | ND (1)   | ND (2) *   | 20       | 27        |
|  | 10/02/08              | 5 - 6          | N           | ND (2) *       | 4.5     | 120    | ND (1) *    | ND (1)    | ND (0.403)           | 16              | 4.1    | 6.4    | 11     | ND (0.1) * | 1.5        | 6.7    | ND (1)   | ND (1)   | ND (2) *   | 19       | 27        |
|  | 10/02/08              | 9 - 10         | N           | ND (2) *       | 3       | 120    | ND (1) *    | ND (1)    | ND (0.404)           | 16              | 8      | 11     | 2.3    | ND (0.1) * | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2) *   | 31       | 32        |
|  | 10/02/08              | 14 - 15        | N           | ND (2) *       | 2.7     | 120    | ND (1) *    | ND (1)    | ND (0.405)           | 17              | 8.5    | 11     | 3      | ND (0.1) * | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2) *   | 32       | 37        |
|  | 10/02/08              | 14 - 15        | FD          | ND (2) *       | 2.5     | 120    | ND (1) *    | ND (1)    | ND (0.405)           | 17              | 8.6    | 8.5    | 1.6    | ND (0.1) * | ND (1)     | 11     | ND (1)   | ND (1)   | ND (2) *   | 32       | 34        |
| S1-20  | 11/01/98              | 3              | N           | ---            | ---     | ---    | ---         | ---       | 0.7                  | 31.8            | ---    | 15.7   | ---    | ---        | ---        | 14     | ---      | ---      | ---        | ---      | 49.4      |
| S2-6   | 11/01/98 <sup>Θ</sup> | 3              | N           | ---            | ---     | ---    | ---         | ---       | 12                   | 45.5            | ---    | 1.8    | ---    | ---        | ---        | 0.57   | ---      | ---      | ---        | ---      | 14.5      |
|  | 11/01/98              | 5              | N           | ---            | ---     | ---    | ---         | ---       | 1.8                  | 39.9            | ---    | 9.7    | ---    | ---        | ---        | 9.4    | ---      | ---      | ---        | ---      | 35.7      |
| S2-62  | 11/01/98 <sup>Θ</sup> | 2              | N           | ---            | ---     | ---    | ---         | ---       | 1                    | 32              | ---    | 4.1    | ---    | ---        | ---        | 1.8    | ---      | ---      | ---        | ---      | 8.4       |
|  | 11/01/98 <sup>β</sup> | 3              | N           | 1.1 J          | 2.6     | 72.2   | ND (0.89) * | ND (0.89) | ---                  | 72.7            | 5.9    | 22.2   | 7.9    | 0.046 J    | 0.86 J     | 47     | 0.99 J   | ND (2.2) | ND (22) *  | 39.2     | ND (29.3) |
|  | 11/01/98              | 4              | N           | ---            | ---     | ---    | ---         | ---       | ND (0.5)             | 21.9            | ---    | 11.5   | ---    | ---        | ---        | 10.2   | ---      | ---      | ---        | ---      | 39.8      |
| S2-130   | 11/01/98              | 1              | N           | ---            | ---     | ---    | ---         | ---       | ND (0.5)             | 22.1            | ---    | 10.6   | ---    | ---        | ---        | 10.8   | ---      | ---      | ---        | ---      | 34.5      |
| S3-15  | 11/01/98              | 2              | N           | ---            | ---     | ---    | ---         | ---       | ND (0.5)             | 13.8            | ---    | 9.4    | ---    | ---        | ---        | 7.5    | ---      | ---      | ---        | ---      | 24.1      |
|  | 11/01/98              | 4              | N           | ---            | ---     | ---    | ---         | ---       | ND (0.5)             | 12.1            | ---    | 11     | ---    | ---        | ---        | 9.6    | ---      | ---      | ---        | ---      | 29.2      |
| S3-72  | 11/01/98 <sup>Θ</sup> | 1              | N           | ---            | ---     | ---    | ---         | ---       | ND (0.5)             | 18.7            | ---    | 6.7    | ---    | ---        | ---        | 5.9    | ---      | ---      | ---        | ---      | 27        |
|  | 11/01/98              | 2              | N           | ---            | ---     | ---    | ---         | ---       | ND (0.5)             | 11.3            | ---    | 8      | ---    | ---        | ---        | 8.6    | ---      | ---      | ---        | ---      | 28.9      |
| S3-120   | 11/01/98              | 1              | N           | ---            | ---     | ---    | ---         | ---       | ND (0.5)             | 12.1            | ---    | 4.2    | ---    | ---        | ---        | 4.3    | ---      | ---      | ---        | ---      | 18        |
| S4-4   | 11/01/98 <sup>Θ</sup> | 4              | N           | ---            | ---     | ---    | ---         | ---       | 15.4                 | 23.4            | ---    | 3.2    | ---    | ---        | ---        | 0.43 J | ---      | ---      | ---        | ---      | 1.9       |
|  | 11/01/98              | 6              | N           | ---            | ---     | ---    | ---         | ---       | 1                    | 13.7            | ---    | 10.3   | ---    | ---        | ---        | 9.8    | ---      | ---      | ---        | ---      | 32.6      |
| S4-95  | 11/01/98 <sup>Θ</sup> | 2              | N           | ---            | ---     | ---    | ---         | ---       | ND (0.5)             | 10.3            | ---    | 2.5    | ---    | ---        | ---        | 4.3    | ---      | ---      | ---        | ---      | 4.3       |
|  | 11/01/98              | 3              | N           | ---            | ---     | ---    | ---         | ---       | ND (0.5)             | 14.9            | ---    | 8.3    | ---    | ---        | ---        | 8.8    | ---      | ---      | ---        | ---      | 27        |
| S4-160   | 11/01/98              | 2              | N           | ---            | ---     | ---    | ---         | ---       | 0.5                  | 25              | ---    | 11.8   | ---    | ---        | ---        | 10.9   | ---      | ---      | ---        | ---      | 38.2      |
| S8-23  | 11/01/98 <sup>β</sup> | 3              | N           | 0.43 J         | 4.3     | 154    | 0.19 J      | ND (0.83) | ---                  | 28.7            | 8.4    | 14.3   | 12.5   | 0.092 J    | 0.42 J     | 21     | 0.59 J   | ND (2.1) | ND (21) *  | 36.4     | 57        |
| S8-30  | 11/01/98              | 3              | N           | ---            | ---     | ---    | ---         | ---       | 0.5                  | 12.8            | ---    | 10.8   | ---    | ---        | ---        | 9.4    | ---      | ---      | ---        | ---      | 40.9      |
| GS-1   | 11/01/98 <sup>Θ</sup> | 0              | N           | ---            | ---     | ---    | ---         | ---       | 0.59                 | 33.7            | ---    | 2.2    | ---    | ---        | ---        | 0.28 J | ---      | ---      | ---        | ---      | 31.3      |
| GS-2   | 11/01/98 <sup>Θ</sup> | 0              | N           | ---            | ---     | ---    | ---         | ---       | ND (0.5)             | 21.9            | ---    | 8.2    | ---    | ---        | ---        | 6      | ---      | ---      | ---        | ---      | 32.7      |
| RR-1   | 02/02/00              | 0              | N           | ---            | ---     | ---    | ---         | ---       | ND (0.5)             | 23.4            | ---    | 15.6   | ---    | ---        | ---        | 15.8   | ---      | ---      | ---        | ---      | 44        |

|  |                       |                |             | Metals (mg/kg) |         |        |           |         |                      |                 |         |        |        |            |            |        |          |           |           |          |        |
|--|-----------------------|----------------|-------------|----------------|---------|--------|-----------|---------|----------------------|-----------------|---------|--------|--------|------------|------------|--------|----------|-----------|-----------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |                       |                |             | 0.285          | 11      | 410    | 0.672     | 1.1     | 0.83                 | 39.8            | 12.7    | 16.8   | 8.39   | 0.0125     | 1.37       | 27.3   | 1.47     | 5.15      | 0.78      | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |                       |                |             | 31             | 0.68    | 15,000 | 160       | 71      | 0.3                  | 120,000         | 23      | 3,100  | 400    | 11         | 390        | 1,500  | 390      | 390       | 0.78      | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |                       |                |             | NE             | 0.11    | NE     | 15        | 5.2     | NE                   | 36,000          | NE      | NE     | 80     | 1          | NE         | 490    | NE       | 390       | NE        | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |                       |                |             | 0.285          | 11.4    | 330    | 23.3      | 0.0151  | 139.6                | 36.3            | 13      | 20.6   | 0.0166 | 0.0125     | 2.25       | 0.607  | 0.177    | 5.15      | 2.32      | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |                       |                |             | NE             | 11      | 410    | 0.672     | 1.1     | 0.83                 | 39.8            | 12.7    | 16.8   | 8.39   | NE         | 1.37       | 27.3   | 1.47     | NE        | NE        | 52.2     | 58     |
| Location   | Date                  | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium | Cadmium | Chromium, Hexavalent | Chromium, total | Cobalt  | Copper | Lead   | Mercury    | Molybdenum | Nickel | Selenium | Silver    | Thallium  | Vanadium | Zinc   |
| RR-2   | 02/02/00              | 0              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.5)             | 16.1            | ---     | 13.8   | ---    | ---        | ---        | 12.3   | ---      | ---       | ---       | ---      | 37.5   |
| RR-3   | 02/02/00              | 0              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.5)             | 18.3            | ---     | 11.6   | ---    | ---        | ---        | 13     | ---      | ---       | ---       | ---      | 35     |
| RR-4   | 02/02/00 <sup>Θ</sup> | 0              | N           | ---            | ---     | ---    | ---       | ---     | 0.6                  | 19.4            | ---     | 19.2   | ---    | ---        | ---        | 0.92   | ---      | ---       | ---       | ---      | 27.1   |
| RR-5   | 02/02/00              | 0              | N           | ---            | ---     | ---    | ---       | ---     | 5.8                  | 39.5            | ---     | 7.1    | ---    | ---        | ---        | 0.33   | ---      | ---       | ---       | ---      | 34.1   |
| RR-6   | 02/02/00              | 0              | N           | ---            | ---     | ---    | ---       | ---     | 4.8                  | 74.9            | ---     | 7.5    | ---    | ---        | ---        | 0.39   | ---      | ---       | ---       | ---      | 243    |
| RR-7   | 02/02/00 <sup>Θ</sup> | 0              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.51)            | 28.6            | ---     | 9.7    | ---    | ---        | ---        | 10.4   | ---      | ---       | ---       | ---      | 35.1   |
| RR-8   | 02/02/00              | 0              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.51)            | 28.9            | ---     | 9.9    | ---    | ---        | ---        | 7.4    | ---      | ---       | ---       | ---      | 29.8   |
| RR-9   | 02/02/00 <sup>Θ</sup> | 0              | N           | ---            | ---     | ---    | ---       | ---     | 2.7                  | 19.6            | ---     | 27.9   | ---    | ---        | ---        | 2.2    | ---      | ---       | ---       | ---      | 15.4   |
| RR-10  | 02/02/00              | 0              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.51)            | 18.8            | ---     | 12.9   | ---    | ---        | ---        | 11.6   | ---      | ---       | ---       | ---      | 36.3   |
| RR-11  | 02/02/00              | 0              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.51)            | 18.1            | ---     | 20.2   | ---    | ---        | ---        | 13.4   | ---      | ---       | ---       | ---      | 47.5   |
| RR-12  | 02/02/00 <sup>Θ</sup> | 0              | N           | ---            | ---     | ---    | ---       | ---     | ND (0.5)             | 17.5            | ---     | 3.8    | ---    | ---        | ---        | 1.5    | ---      | ---       | ---       | ---      | 11.3   |
| Category 3   |                       |                |             |                |         |        |           |         |                      |                 |         |        |        |            |            |        |          |           |           |          |        |
| AOC14-13   | 10/01/08 <sup>Υ</sup> | 0.5 - 1.5      | N           | ND (2) *       | 18      | 160    | ND (10) * | ND (1)  | 0.487                | 63              | ND (10) | 33     | 16     | ND (0.1) * | 98         | 57     | ND (1)   | ND (10) * | ND (20) * | ND (10)  | 39     |

Notes:

Category 1: Validated data suitable for all uses, including risk assessment and remedial action decisions.  
Category 2: Validated data suitable for use in characterization of the chemicals of potential concern at the facility and to help define the nature and extent of contamination.  
Category 3: Validated data suitable only for use in qualitative characterization of the nature and extent of contamination.  
Results greater than or equal to the interim screening level are circled; however, if the interim screening level is equal to the background value, only results greater than the interim screening level are circled.

- Θ
- white powder sample.
- Ⓑ
- black sandy material
- Υ
- debris sample
- \*
- Reporting limits greater than or equal to the interim screening level.
- 
- not analyzed
- ft bgs
- feet below ground surface
- mg/kg
- milligrams per kilogram
- DTSC
- California Department of Toxic Substances Control
- DTSC-SL
- DTSC Screening Levels
- FD
- field duplicate
- J
- concentration or reporting limit estimated by laboratory or data validation
- N
- primary sample
- ND
- not detected at the listed reporting limit
- NE
- not established
- USEPA
- United States Environmental Protection Agency

<sup>1</sup> Interim screening level is background value. If background value is not available then the interim screening value is the lower of the Ecological Comparison Value , residential DTSC-SL, or USEPA residential regional screening value.  
<sup>2</sup> United States Environmental Protection Agency (USEPA). 2017. Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites. November.  
<sup>3</sup> California Department of Toxic Substances Control (DTSC). 2018. Human Health Risk Assessment (HHRA) Note Number 3. January.  
<sup>4</sup> ARCADIS. 2008. "Technical Memorandum 3: Ecological Comparison Values for Metals and Polycyclic Aromatic Hydrocarbons in Soil." May 28.  
<sup>5</sup> CH2M HILL. 2009. "Final Soil Background Technical Memorandum at Pacific Gas and Electric Company Topock Compressor Station, Needles, California." May.





TABLE B-6b  
Sample Results: Dioxins and Furans  
AOC 14 – Railroad Debris Area  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |        |            |           |           |             |    |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|--------|------------|-----------|-----------|-------------|----|
| Interim Screening Level <sup>1</sup> :   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE     | NE         | 16        | 50        | 5.58        |    |
| Residential Regional Screening Levels <sup>2</sup> :<br>Residential DTSC-SL <sup>3</sup> :<br>Ecological Comparison Values <sup>4</sup> :<br>Background <sup>5</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE     | NE         | NE        | 4.8       | NE          |    |
|  |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE     | NE         | NE        | NE        | NE          | NE |
|  |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE     | NE         | NE        | NE        | NE          | NE |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD   | OCDF       | TEQ Avian | TEQ Human | TEQ Mammals |    |
| Category 1   |          |                |             |                       |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |        |            |           |           |             |    |
| AOC14-14E  | 02/18/16 | 0 - 1          | N           | 160 J                 | 15                  | ND (1.4)            | ND (1.3)          | 2.2 J             | 4.1 J             | ND (0.81)         | ND (2.2)          | ND (0.2)          | ND (0.22)       | ND (0.47)       | ND (20)           | ND (0.64)       | ND (0.16)    | ND (0.21)    | 2,200  | 27         | 2.6       | 4.6       | 4.6         |    |
|  | 02/18/16 | 2 - 3          | N           | 510                   | 30                  | 2.7 J               | ND (1.6)          | ND (0.44)         | 8.6 J             | ND (0.43)         | 3.5 J             | ND (0.52)         | 0.9 J           | ND (0.3)        | ND (83)           | ND (0.32)       | ND (0.19)    | ND (0.21)    | 5,900  | 94         | 7.4       | 14        | 14          |    |
|  | 02/18/16 | 2 - 3          | FD          | 380                   | 35                  | ND (2.9)            | ND (0.72)         | ND (1.3)          | 9.1 J             | ND (1.3)          | 3.5 J             | ND (1.5)          | ND (0.58)       | ND (0.39)       | ND (82)           | 0.39 J          | ND (0.12)    | ND (0.18)    | 5,000  | 100        | 6.9       | 12        | 12          |    |
|  | 02/18/16 | 5 - 5.5        | N           | 800                   | 140                 | 12 J                | 4.2 J             | ND (4)            | 22                | ND (3.9)          | 9.3 J             | ND (4.6)          | 2.1 J           | ND (0.34)       | ND (260)          | ND (1.3)        | ND (0.13)    | ND (0.15)    | 8,300  | 380        | 21        | 32        | 32          |    |
|  | 02/18/16 | 6 - 7          | N           | 72                    | 9.1 J               | ND (0.74)           | ND (0.29)         | ND (0.43)         | 1.5 J             | ND (0.42)         | 0.69 J            | ND (0.5)          | 0.16 J          | ND (0.63)       | ND (15)           | ND (0.66)       | ND (0.071)   | ND (0.14)    | 880    | 34         | 1.8       | 2.5       | 2.5         |    |
|  | 02/18/16 | 9 - 10         | N           | 240                   | 23                  | ND (1.8)            | ND (0.7)          | ND (0.21)         | 4.6 J             | 0.58 J            | 1.9 J             | ND (0.24)         | ND (0.42)       | ND (0.19)       | ND (38)           | ND (0.2)        | ND (0.049)   | ND (0.16)    | 3,300  | 64         | 3.5       | 6.6       | 6.6         |    |
| AOC14-14W  | 02/16/16 | 0 - 1          | N           | 84                    | 9.3 J               | 0.87 J              | ND (0.74)         | ND (0.12)         | 3 J               | ND (0.38)         | ND (1.6)          | ND (0.14)         | 0.51 J          | ND (0.31)       | ND (22)           | ND (0.35)       | 0.18 J       | ND (0.24)    | 880    | 21 J       | 2.5       | 3.5       | 3.5         |    |
|  | 02/16/16 | 2 - 3          | N           | 15                    | 3 J                 | ND (0.22)           | ND (0.37)         | 0.37 J            | ND (0.37)         | ND (0.19)         | ND (0.16)         | ND (0.22)         | ND (0.13)       | ND (0.093)      | ND (12)           | ND (0.19)       | ND (0.031)   | 0.2 J        | 150    | 8.2 J      | 1.1       | 1.1       | 1.1         |    |
|  | 02/16/16 | 5 - 5.5        | N           | 3,700                 | 1,700               | 140                 | 130               | ND (350)          | 260               | 380               | 220               | 83                | ND (110) *      | 210             | 640               | 490             | 20           | ND (17)      | 16,000 | 740        | 780       | 480       | 480         |    |
|  | 02/16/16 | 6 - 7          | N           | 490                   | 150                 | 8.1 J               | 6.2 J             | 16                | 16                | 16                | 9.6 J             | 4.3 J             | ND (5.6) *      | 9.8 J           | 19                | 18              | 1.4 J        | ND (0.22)    | 4,900  | 120        | 33        | 27        | 27          |    |
|  | 02/16/16 | 9 - 10         | N           | 260                   | 12 J                | 1.5 J               | 0.59 J            | ND (0.59)         | 2.8 J             | ND (0.58)         | 1.2 J             | ND (0.69)         | ND (0.44)       | ND (0.51)       | ND (26)           | ND (0.76)       | ND (0.13)    | 0.44 J       | 3,300  | 62         | 3.4       | 6         | 6           |    |
| AOC14-15   | 02/18/16 | 0 - 1          | N           | 94                    | 16                  | 1.4 J               | ND (0.52)         | ND (0.13)         | 3.1 J             | ND (0.5)          | ND (1.1)          | ND (0.35)         | ND (0.34)       | ND (1.7)        | ND (20)           | ND (0.14)       | ND (0.055)   | ND (0.3)     | 740    | 49         | 2         | 3         | 3           |    |
|  | 02/18/16 | 2 - 3          | N           | 180                   | 28                  | ND (1.4)            | ND (1.1)          | ND (0.21)         | 5.1 J             | ND (0.59)         | 2 J               | ND (0.25)         | ND (0.76)       | ND (0.22)       | ND (44)           | ND (0.23)       | ND (0.14)    | ND (0.17)    | 1,500  | 98         | 3.8       | 6.1       | 6.1         |    |
|  | 02/18/16 | 5 - 6          | N           | 140                   | 19                  | 1.5 J               | ND (0.57)         | ND (0.11)         | 3.9 J             | ND (0.37)         | 2.1 J             | ND (0.29)         | ND (0.49)       | ND (0.45)       | ND (26)           | ND (0.33)       | ND (0.15)    | ND (0.4)     | 1,500  | 57         | 2.8       | 4.4       | 4.4         |    |
|  | 02/18/16 | 7 - 8          | N           | 16                    | 1.8 J               | ND (0.18)           | ND (0.12)         | ND (0.27)         | 0.44 J            | ND (0.13)         | ND (0.14)         | ND (0.15)         | ND (0.12)       | ND (0.062)      | ND (3.6)          | ND (0.11)       | ND (0.039)   | 0.11 J       | 140    | 4.5 J      | 0.52      | 0.59      | 0.59        |    |
| AOC14-16E  | 02/23/16 | 0 - 1          | N           | 220                   | ND (0.099)          | 1.9 J               | 1.1 J             | ND (0.32)         | 5.8 J             | ND (5.6)          | 2.4 J             | ND (0.38)         | 0.55 J          | ND (0.32)       | ND (66)           | ND (0.29)       | ND (0.022)   | ND (0.24)    | 2,500  | 53         | 5.3       | 8.2       | 8.2         |    |
|  | 02/23/16 | 2 - 3          | N           | 140                   | ND (0.15)           | ND (0.76)           | ND (0.42)         | ND (0.36)         | 2.5 J             | ND (0.35)         | 1.3 J             | ND (0.42)         | ND (0.12)       | ND (0.21)       | ND (27)           | ND (0.17)       | ND (0.099)   | ND (0.25)    | 1,400  | 20 J       | 2.2       | 3.8       | 3.8         |    |
|  | 02/23/16 | 5 - 6          | N           | 26                    | 1.6 J               | ND (0.27)           | ND (0.13)         | 0.25 J            | ND (0.69)         | ND (0.082)        | 0.44 J            | ND (0.061)        | ND (0.067)      | ND (0.051)      | ND (15)           | ND (0.054)      | ND (0.022)   | ND (0.16)    | 270    | 5 J        | 1.1       | 1.3       | 1.3         |    |
|  | 02/23/16 | 9 - 10         | N           | 3.8 J                 | 0.29 J              | ND (0.12)           | ND (0.047)        | ND (0.053)        | ND (0.03)         | ND (0.053)        | ND (0.074)        | ND (0.037)        | ND (0.02)       | ND (0.068)      | ND (0.71)         | ND (0.053)      | ND (0.013)   | ND (0.087)   | 30     | ND (0.92)  | 0.15      | 0.13      | 0.13        |    |
| AOC14-16W  | 02/22/16 | 0 - 1          | N           | 5.6 J                 | 0.9 J               | ND (0.11)           | ND (0.06)         | ND (0.044)        | ND (0.13)         | ND (0.043)        | 0.16 J            | ND (0.051)        | ND (0.044)      | ND (0.054)      | ND (1)            | ND (0.056)      | ND (0.024)   | 0.16 J       | 52     | 2.2 J      | 0.32      | 0.22      | 0.22        |    |
|  | 02/22/16 | 2 - 3          | N           | 230                   | 27                  | ND (2.6)            | ND (4.5)          | ND (5)            | ND (4.5)          | ND (4.9)          | ND (4.3)          | ND (5.9)          | ND (3)          | ND (1.4)        | ND (21)           | ND (1.5)        | ND (1.5)     | ND (1.2)     | 1,800  | ND (42)    | 6.6       | 8.2       | 8.2         |    |
|  | 02/22/16 | 5 - 6          | N           | 44                    | ND (8.1)            | ND (0.34)           | ND (0.6)          | ND (0.38)         | ND (0.43)         | ND (0.73)         | ND (0.41)         | ND (0.52)         | ND (0.22)       | ND (0.23)       | ND (5.5)          | ND (0.25)       | ND (0.13)    | ND (0.35)    | 370    | 9.8 J      | 1         | 1.3       | 1.3         |    |
|  | 02/22/16 | 7 - 8          | N           | 62                    | 19                  | ND (0.98)           | 1.3 J             | ND (0.48)         | 2 J               | ND (0.94)         | ND (0.83)         | ND (0.56)         | ND (0.39)       | ND (0.19)       | ND (10)           | ND (0.41)       | ND (0.1)     | ND (0.3)     | 650    | 17 J       | 1.7       | 2.3       | 2.3         |    |
|  | 02/22/16 | 9 - 10         | N           | ND (0.45)             | ND (0.062)          | ND (0.074)          | ND (0.066)        | ND (0.08)         | ND (0.067)        | ND (0.078)        | ND (0.064)        | ND (0.094)        | ND (0.058)      | ND (0.05)       | ND (0.3)          | ND (0.052)      | ND (0.061)   | ND (0.098)   | 3.2 J  | ND (0.21)  | 0.17      | 0.11      | 0.11        |    |
|  | 02/22/16 | 9 - 10         | FD          | ND (0.47)             | ND (0.059)          | ND (0.07)           | ND (0.074)        | ND (0.075)        | ND (0.051)        | ND (0.073)        | ND (0.086)        | ND (0.087)        | ND (0.029)      | ND (0.042)      | ND (0.28)         | ND (0.044)      | ND (0.018)   | ND (0.046)   | 4.7 J  | ND (0.18)  | 0.1       | 0.074     | 0.074       |    |
| AOC14-17E  | 02/24/16 | 9 - 10         | N           | 0.23 J                | 0.088 J             | ND (0.062)          | ND (0.02)         | ND (0.026)        | ND (0.02)         | ND (0.032)        | ND (0.019)        | ND (0.053)        | ND (0.066)      | ND (0.034)      | ND (0.23)         | ND (0.036)      | ND (0.018)   | ND (0.07)    | 1.9 J  | ND (0.15)  | 0.12      | 0.075     | 0.075       |    |
| AOC14-17W  | 02/24/16 | 0 - 1          | N           | 14                    | 1.7 J               | ND (0.13)           | ND (0.18)         | ND (0.16)         | ND (0.47)         | ND (0.15)         | ND (0.39)         | ND (0.18)         | ND (0.083)      | ND (0.11)       | ND (1.7)          | ND (0.11)       | ND (0.049)   | ND (0.073)   | 110    | 2.9 J      | 0.34      | 0.44      | 0.44        |    |
|  | 02/24/16 | 1 - 2          | N           | 35                    | 3.2 J               | ND (0.3)            | ND (0.43)         | ND (0.14)         | ND (1)            | ND (0.12)         | 0.78 J            | ND (0.046)        | ND (0.24)       | ND (0.12)       | ND (3.4)          | ND (0.12)       | ND (0.049)   | ND (0.043)   | 270    | 6.3 J      | 0.61      | 0.97      | 0.97        |    |
|  | 02/24/16 | 2 - 3          | N           | 14                    | ND (1)              | ND (0.16)           | ND (0.15)         | ND (0.063)        | ND (0.39)         | ND (0.062)        | ND (0.42)         | ND (0.11)         | ND (0.065)      | ND (0.083)      | ND (1.3)          | ND (0.088)      | ND (0.087)   | ND (0.11)    | 120    | 2.4 J      | 0.31      | 0.4       | 0.4         |    |
|  | 02/24/16 | 5 - 6          | N           | ND (0.44)             | ND (0.16)           | ND (0.071)          | ND (0.029)        | ND (0.049)        | ND (0.03)         | ND (0.058)        | ND (0.028)        | ND (0.055)        | ND (0.029)      | ND (0.059)      | ND (0.041)        | ND (0.062)      | ND (0.086)   | ND (0.19)    | 2 J    | ND (0.089) | 0.2       | 0.096     | 0.096       |    |
|  | 02/24/16 | 9 - 10         | N           | ND (1.1)              | ND (0.16)           | ND (0.19)           | ND (0.039)        | ND (0.047)        | ND (0.043)        | ND (0.046)        | ND (0.038)        | ND (0.055)        | ND (0.021)      | ND (0.11)       | ND (0.31)         | ND (0.12)       | ND (0.037)   | 0.2 J        | 6.1 J  | ND (0.28)  | 0.32      | 0.11      | 0.11        |    |

TABLE B-6b  
Sample Results: Dioxins and Furans  
AOC 14 – Railroad Debris Area  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |         |           |           |           |             |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|---------|-----------|-----------|-----------|-------------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | 4.8               | NE              | NE           | NE           | NE      | NE        | NE        | NE        | NE          |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | 4.8               | NE              | NE           | NE           | NE      | NE        | NE        | NE        | NE          |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE      | NE        | NE        | NE        | NE          |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE      | NE        | NE        | NE        | NE          |
| Background <sup>5</sup> :                            |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE      | NE        | NE        | NE        | NE          |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD    | OCDF      | TEQ Avian | TEQ Human | TEQ Mammals |
| AOC14-19   | 02/17/16 | 2 - 3          | N           | 610                   | 390                 | 23                  | 29                | 110               | 60                | 110               | 52                | ND (11)           | ND (49) *       | 92              | 220               | ND (190)        | 17           | ND (5.8)     | 1,800   | 79        | 210       | 140       | 140         |
|  | 02/17/16 | 3 - 4          | N           | 15                    | ND (0.48)           | ND (0.57)           | ND (0.9)          | ND (0.3)          | ND (0.43)         | ND (1.3)          | ND (0.41)         | ND (1.1)          | ND (0.91)       | ND (0.11)       | ND (1)            | ND (0.12)       | ND (0.43)    | ND (0.66)    | 43      | ND (1.3)  | 1.3       | 1.2       | 1.2         |
| AOC14-20   | 04/26/17 | 0 - 0.5        | N           | 6.1 J                 | ND (0.79)           | 0.3 J               | ND (0.19)         | ND (0.21)         | ND (0.49)         | ND (0.27)         | 0.58 J            | ND (0.22)         | ND (0.089)      | ND (0.2)        | ND (1.1)          | ND (0.2)        | ND (0.042)   | ND (0.045)   | 40      | 1.2 J     | 0.37      | 0.36      | 0.36        |
|  | 04/26/17 | 2 - 3          | N           | 3.6 J                 | ND (0.64)           | ND (0.12)           | ND (0.18)         | ND (0.11)         | ND (0.18)         | ND (0.11)         | ND (0.31)         | ND (0.15)         | ND (0.15)       | ND (0.16)       | ND (1.3)          | ND (0.13)       | ND (0.044)   | ND (0.094)   | 22 J    | 1.1 J     | 0.33      | 0.29      | 0.29        |
|  | 04/26/17 | 5 - 6          | N           | 8.7 J                 | ND (0.73)           | ND (0.14)           | ND (0.14)         | ND (0.18)         | ND (0.073)        | ND (0.18)         | ND (0.28)         | ND (0.076)        | ND (0.1)        | 0.33 J          | ND (1.5)          | ND (0.17)       | ND (0.056)   | 0.53 J       | 66      | ND (1.4)  | 0.86      | 0.4       | 0.4         |
|  | 04/26/17 | 8 - 9          | N           | ND (1.8)              | ND (0.61)           | ND (0.32)           | ND (0.21)         | ND (0.1)          | ND (0.13)         | ND (0.23)         | ND (0.43)         | ND (0.13)         | ND (0.34)       | ND (0.25)       | ND (0.97)         | ND (0.082)      | ND (0.07)    | ND (0.061)   | 15 J    | ND (1.2)  | 0.4       | 0.35      | 0.35        |
| AOC14-21   | 04/26/17 | 0 - 0.5        | N           | 12 J                  | 2.5 J               | ND (0.25)           | 0.25 J            | 0.38 J            | ND (0.88)         | 0.35 J            | ND (0.61)         | ND (0.11)         | ND (0.45)       | ND (0.19)       | ND (3.1)          | ND (0.26)       | ND (0.1)     | 0.32 J       | 82      | ND (3.7)  | 1.1       | 0.85      | 0.85        |
|  | 04/26/17 | 2 - 3          | N           | 60                    | 8.5 J               | ND (0.65)           | 0.63 J            | ND (0.45)         | 2.5 J             | ND (0.62)         | ND (1.3)          | ND (0.15)         | 0.57 J          | 0.35 J          | ND (17)           | ND (0.34)       | ND (0.11)    | ND (0.13)    | 620     | 23 J      | 2.1       | 2.9       | 2.9         |
|  | 04/26/17 | 2 - 3          | FD          | 89                    | 8.6 J               | 0.69 J              | 0.5 J             | 0.48 J            | 2.9 J             | 0.75 J            | 1.2 J             | ND (0.14)         | ND (0.58)       | 0.47 J          | ND (20)           | ND (0.39)       | ND (0.073)   | ND (0.085)   | 780     | 23 J      | 2.2       | 3.2       | 3.2         |
|  | 04/26/17 | 5 - 6          | N           | ND (1.3)              | ND (0.25)           | ND (0.094)          | ND (0.12)         | ND (0.067)        | ND (0.14)         | ND (0.17)         | ND (0.14)         | ND (0.1)          | ND (0.15)       | ND (0.053)      | ND (0.43)         | ND (0.053)      | ND (0.064)   | ND (0.047)   | ND (10) | ND (0.43) | ND (0.21) | ND (0.19) | ND (0.19)   |
|  | 04/26/17 | 9 - 10         | N           | 4.1 J                 | ND (0.61)           | ND (0.027)          | ND (0.061)        | ND (0.047)        | ND (0.061)        | ND (0.045)        | ND (0.067)        | ND (0.053)        | ND (0.1)        | ND (0.13)       | ND (0.75)         | ND (0.14)       | ND (0.052)   | ND (0.11)    | 39      | 1.8 J     | 0.27      | 0.22      | 0.22        |

Notes:

Category 1: Validated data suitable for all uses, including risk assessment and remedial action decisions.

Category 2: Validated data suitable for use in characterization of the chemicals of potential concern at the facility and to help define the nature and extent of contamination.

Category 3: Validated data suitable only for use in qualitative characterization of the nature and extent of contamination.

Results greater than or equal to the Interim Screening Level are circled.

- not analyzed
- ft bgsfeet below ground surface
- ng/kgnanograms per kilogram
- DTSC-SLDTSC Screening Levels
- DTSCCalifornia Department of Toxic Substances Control
- FDField Dupliicate
- Jconcentration or reporting limit estimated by laboratory or data validation
- JRestimated value, one or more input values is “R” qualified.
- NPrimary Sample
- NA NA = not applicable
- NEnot established
- NDnot detected at the listed reporting limit
- RThe result has been rejected; identification and/or quantitation could not be verified because critical QC specifications were not met (e.g., a non-detect result obtained for an archive sample following a hold time of greater than one year).
- USEPAUSEPA = United States Environmental Protection Agency

1 For individual dioxins and furans, selected value is the lower of the ECV, residential DTSC-SL, or USEPA residential regional screening value, unless the background value is higher. For TEQ values, selected value is the DTSC-SL.

2 United States Environmental Protection Agency (USEPA). 2017. Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites. November.

3 California Department of Toxic Substances Control (DTSC). 2018. Human Health Risk Assessment (HHRA) Note Number 3. JanuaryCalifornia Department of Toxic Substances Control (DTSC). 2017. Human Health Risk Assessment (HHRA) Note 2, Soil Remedial Goals for Dioxins and Dioxin-like Compounds for Consideration at California Hazardous Waste Sites. April.

4 ARCADIS. 2008. "Technical Memorandum 3: Ecological Comparison Values for Metals and Polycyclic Aromatic Hydrocarbons in Soil." May 28. ARCADIS. 2009. "Topock Compression Station - Final Technical Memorandum 4: Ecological Comparison Values for Additional Decteded Chemicals in Soil." July 1.

5 CH2M. 2017. Revised Ambient Study of Dioxins and Furans at the Pacific Gas and Electric Company, Topock Compressor Station, Needles, California. October.

TABLE B-6b  
Sample Results: Dioxins and Furans  
AOC 14 – Railroad Debris Area  
*Soil Engineering Evaluation/Cost Analysis*  
*PG&E Topock Compressor Station, Needles, California*

Calculations:  
TEQ = Sum of Result xToxic equivalency factor (TEF), 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.  
TEQ Avian = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.  
TEQMammals = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.  
Teq Humans = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.



TABLE B-7a  
Sample Results: Metals  
AOC 27 – MW-24 Bench  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Metals (mg/kg) |         |        |            |            |                      |                 |        |        |        |              |            |        |          |           |            |          |        |
|--|----------|----------------|-------------|----------------|---------|--------|------------|------------|----------------------|-----------------|--------|--------|--------|--------------|------------|--------|----------|-----------|------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | 0.285          | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125       | 1.37       | 27.3   | 1.47     | 5.15      | 0.78       | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | 31             | 0.68    | 15,000 | 160        | 71         | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11           | 390        | 1,500  | 390      | 390       | 0.78       | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE             | 0.11    | NE     | 15         | 5.2        | NE                   | 36,000          | NE     | NE     | 80     | 1            | NE         | 490    | NE       | 390       | NE         | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151     | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125       | 2.25       | 0.607  | 0.177    | 5.15      | 2.32       | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |          |                |             | NE             | 11      | 410    | 0.672      | 1.1        | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE           | 1.37       | 27.3   | 1.47     | NE        | NE         | 52.2     | 58     |
| Location   | Date     | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium    | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury      | Molybdenum | Nickel | Selenium | Silver    | Thallium   | Vanadium | Zinc   |
| Category 1   |          |                |             |                |         |        |            |            |                      |                 |        |        |        |              |            |        |          |           |            |          |        |
| 24soil-01  | 01/31/08 | 2.5 - 3        | N           | ND (0.4) *     | 3.1     | 130    | ND (0.1)   | 0.71       | ND (0.4)             | 15              | 3.5    | 7.2    | 6.4    | ND (0.1) *   | 0.63       | 6.8    | 6.2      | ND (0.25) | ND (1) *   | 17       | 16     |
| 24soil-02  | 01/31/08 | 2.5 - 3        | N           | ND (0.4) *     | 2.9     | 89     | ND (0.1)   | 0.3        | ND (0.4)             | 15              | 3.4    | 9.1    | 8.7    | ND (0.1) *   | 0.7        | 7.2    | 1.4      | ND (0.25) | ND (1) *   | 18       | 17     |
| AOC27-1  | 03/18/16 | 0 - 1          | N           | ND (2.1) *     | 3.1     | 130    | ND (1) *   | ND (1)     | 0.35                 | 17              | 5.8    | 11     | 28     | ND (0.1) *   | ND (1)     | 9      | ND (1)   | ND (1)    | ND (2.1) * | 27       | 37     |
|  | 03/18/16 | 2 - 3          | N           | ND (2) *       | 4       | 160    | ND (1) *   | ND (1)     | ND (0.2)             | 11              | 6.3    | 12     | 5.4    | ND (0.1) *   | ND (1)     | 8.8    | ND (1)   | ND (1)    | ND (2) *   | 28       | 31     |
|  | 03/18/16 | 5 - 6          | N           | ND (2) *       | 2       | 90     | ND (1) *   | ND (1)     | ND (0.2)             | 17              | 6.7    | 11     | 2.9    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1)    | ND (2) *   | 31       | 31     |
|  | 03/18/16 | 9 - 10         | N           | ND (2) *       | 1.2     | 98     | ND (1) *   | ND (1)     | ND (0.2)             | 13              | 7.2    | 8.6    | 1.9    | ND (0.1) *   | ND (1)     | 8.7    | ND (1)   | ND (1)    | ND (2) *   | 32       | 29     |
| AOC27-18   | 03/17/16 | 0 - 1          | N           | ND (2) *       | 2.6     | 110    | ND (1) *   | ND (1)     | 0.3                  | 15              | 4.1    | 8.3    | 5.7    | ND (0.1) *   | ND (1)     | 7.3    | ND (1)   | ND (1)    | ND (2) *   | 22       | 26     |
|  | 03/17/16 | 2 - 3          | N           | ND (2.1) *     | 3.1     | 91     | ND (1) *   | ND (1)     | 0.36                 | 22              | 5.4    | 9.7    | 8.4    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)    | ND (2.1) * | 24       | 31     |
|  | 03/17/16 | 5 - 6          | N           | ND (2.1) *     | 2.5     | 100    | ND (1) *   | ND (1)     | ND (0.21)            | 11              | 4.1    | 7.4    | 6.9    | ND (0.1) *   | ND (1)     | 7.7    | ND (1)   | ND (1)    | ND (2.1) * | 19       | 27     |
|  | 03/17/16 | 9 - 10         | N           | ND (2.1) *     | 2.5     | 81     | ND (1) *   | ND (1)     | 1.2                  | 22              | 3.2    | 6.8    | 7.1    | ND (0.1) *   | ND (1)     | 5.4    | ND (1)   | ND (1)    | ND (2.1) * | 17       | 47     |
| AOC27-18E  | 03/17/16 | 4 - 5          | N           | ND (2) *       | 2.7     | 110    | ND (1) *   | 1.8        | ND (0.2)             | 11              | 3.9    | 6.6    | 10     | ND (0.1) *   | ND (1)     | 6.7    | ND (1)   | ND (1)    | ND (2) *   | 18       | 250    |
| AOC27-2  | 03/18/16 | 0 - 1          | N           | ND (2) *       | 4.2     | 100    | ND (1) *   | ND (1)     | 0.2                  | 13              | 3.2    | 5.6    | 3.8    | ND (0.1) *   | ND (1)     | 5.2    | ND (1)   | ND (1)    | ND (2) *   | 19       | 24     |
|  | 03/18/16 | 2 - 3          | N           | ND (2) *       | 5.3     | 150    | ND (1) *   | ND (1)     | 0.28                 | 16              | 3.9    | 8.1    | 5.7    | ND (0.1) *   | ND (1)     | 5.7    | ND (1)   | ND (1)    | ND (2) *   | 23       | 24     |
|  | 03/18/16 | 5 - 6          | N           | ND (2) *       | 3.5     | 160    | ND (1) *   | ND (1)     | ND (0.2)             | 11              | 5.2    | 8.5    | 4.9    | ND (0.1) *   | ND (1)     | 7.9    | ND (1)   | ND (1)    | ND (2) *   | 24       | 30     |
|  | 03/18/16 | 9 - 10         | N           | ND (2) *       | 2.1     | 96     | ND (1) *   | ND (1)     | ND (0.2)             | 14              | 6.6    | 9.3    | 3.3    | ND (0.1) *   | ND (1)     | 9.1    | ND (1)   | ND (1)    | ND (2) *   | 32       | 32     |
| AOC27-20   | 03/01/16 | 0 - 1          | N           | ND (2) *       | 1.9     | 84     | ND (1) *   | ND (1)     | ND (0.2)             | 17              | 7.2    | 9.2    | 8.4    | ND (0.1) *   | ND (1)     | 10     | ND (1)   | ND (1)    | ND (2) *   | 27       | 38     |
|  | 03/01/16 | 2 - 3          | N           | ND (2.1) *     | 3.2     | 70 J   | ND (1) *   | ND (1)     | ND (0.21)            | 19              | 8.8    | 11     | 4.6    | ND (0.1) *   | ND (1)     | 14     | ND (1)   | ND (1)    | ND (2.1) * | 31       | 42     |
|  | 03/01/16 | 2 - 3          | FD          | ND (2.1) *     | 3.2     | 51 J   | ND (1.1) * | ND (1.1) * | ND (0.21)            | 18              | 8.3    | 9.7    | 3.6    | ND (0.11) *  | ND (1.1)   | 14     | ND (1.1) | ND (1.1)  | ND (2.1) * | 32       | 42     |
|  | 03/01/16 | 5 - 6          | N           | ND (2.1) *     | 2.4     | 65     | ND (1) *   | ND (1)     | 0.29                 | 20              | 7.2    | 27     | 15     | 0.13         | ND (1)     | 14     | ND (1)   | ND (1)    | ND (2.1) * | 27       | 74     |
|  | 03/01/16 | 9 - 10         | N           | ND (2.1) *     | 3.5     | 32     | ND (1) *   | ND (1)     | ND (0.21)            | 20              | 9.5    | 11     | 2.7    | ND (0.1) *   | ND (1)     | 14     | ND (1)   | ND (1)    | ND (2.1) * | 38       | 41     |
| AOC27-24   | 03/18/16 | 0 - 1          | N           | ND (2) *       | 3.9     | 180    | ND (1) *   | ND (1)     | 0.36                 | 29              | 6.2    | 12     | 6.2    | ND (0.1) *   | ND (1)     | 9.2    | ND (1)   | ND (1)    | ND (2) *   | 31       | 37     |
|  | 03/18/16 | 2 - 3          | N           | ND (2) *       | 2.6     | 150    | ND (1) *   | ND (1)     | ND (0.2)             | 19              | 6.6    | 9.4    | 3.6    | ND (0.1) *   | ND (1)     | 9.8    | ND (1)   | ND (1)    | ND (2) *   | 33       | 33     |
|  | 03/18/16 | 5 - 6          | N           | ND (2) *       | 2.6     | 120    | ND (1) *   | ND (1)     | ND (0.2)             | 14              | 6.5    | 11     | 4.1    | ND (0.1) *   | ND (1)     | 9.2    | ND (1)   | ND (1)    | ND (2) *   | 30       | 30     |
|  | 03/18/16 | 9 - 10         | N           | ND (2) *       | 2       | 130    | ND (1) *   | ND (1)     | ND (0.2)             | 20              | 7.5    | 14     | 3      | ND (0.1) *   | ND (1)     | 13     | ND (1)   | ND (1)    | ND (2) *   | 34       | 34     |
| AOC27-24SW   | 03/18/16 | 0 - 1          | N           | ND (2) *       | 3.2     | 150    | ND (1) *   | ND (1)     | ND (0.2)             | 15              | 6.9    | 13     | 4.3    | ND (0.1) *   | ND (1)     | 10     | ND (1)   | ND (1)    | ND (2) *   | 31       | 32     |
|  | 03/18/16 | 2 - 3          | N           | ND (2) *       | 4.4     | 170    | ND (1) *   | ND (1)     | 0.34                 | 17              | 5.4    | 8.9    | 7      | ND (0.1) *   | ND (1)     | 8.1    | ND (1)   | ND (1)    | ND (2) *   | 25       | 29     |
|  | 03/18/16 | 5 - 6          | N           | ND (2) *       | 1.8     | 100    | ND (1) *   | ND (1)     | ND (0.2)             | 20              | 7.6    | 11     | 2.9    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)    | ND (2) *   | 29       | 33     |
|  | 03/18/16 | 9 - 10         | N           | ND (2) *       | 1.2     | 97     | ND (1) *   | ND (1)     | ND (0.2)             | 12              | 7      | 9.3    | 1.9    | ND (0.1) *   | ND (1)     | 8.4    | ND (1)   | ND (1)    | ND (2) *   | 32       | 29     |
| AOC27-27   | 03/02/16 | 0 - 1          | N           | ND (2) *       | 3.3     | 100    | ND (1) *   | ND (1)     | ND (0.2)             | 22              | 6.4    | 11     | 5.5    | 0.12         | ND (1)     | 11     | ND (1)   | ND (1)    | ND (2) *   | 34       | 38     |
|  | 03/02/16 | 2 - 3          | N           | ND (2.1) *     | 2.6     | 100    | ND (1) *   | ND (1)     | ND (0.21)            | 16              | 7.6    | 8.2    | 3.8    | 0.1          | ND (1)     | 12     | ND (1)   | ND (1)    | ND (2.1) * | 36       | 38     |
| AOC27-36   | 03/17/16 | 0 - 1          | N           | ND (2.1) J*    | 4.6     | 150 J  | ND (1) *   | ND (1)     | ND (0.21)            | 14              | 5.4    | 11     | 6      | ND (0.1) *   | ND (1)     | 11     | ND (1) J | ND (1)    | ND (2.1) * | 25       | 59 J   |
|  | 03/17/16 | 2 - 3          | N           | ND (2.1) *     | 4.4     | 210    | ND (1) *   | ND (1)     | ND (0.21)            | 14              | 3.9    | 7      | 4.3    | ND (0.11) *  | ND (1)     | 7      | ND (1)   | ND (1)    | ND (2.1) * | 21       | 24     |
|  | 03/17/16 | 5 - 6          | N           | ND (2.2) *     | 2.8     | 100    | ND (1.1) * | ND (1.1) * | ND (0.22)            | 16              | 6.1    | 8.8    | 3.7    | ND (0.11) *  | ND (1.1)   | 9.8    | ND (1.1) | ND (1.1)  | ND (2.2) * | 29       | 29     |
|  | 03/17/16 | 9.6 - 10       | N           | ND (2.2) *     | 5.2     | 81     | ND (1.1) * | ND (1.1) * | ND (0.22)            | 13              | 5.6    | 11     | 6.5    | ND (0.11) *  | ND (1.1)   | 11     | ND (1.1) | ND (1.1)  | ND (2.2) * | 27       | 34     |
| AOC27-4  | 03/17/16 | 0 - 1          | N           | ND (2) *       | 2.8     | 110 J  | ND (1) *   | ND (1)     | 0.23                 | 16              | 4      | 7.5    | 7.3    | ND (0.1) *   | ND (1)     | 7.2    | ND (1)   | ND (1)    | ND (2) *   | 21       | 31     |
|  | 03/17/16 | 0 - 1          | FD          | ND (2) *       | 3.2     | 150 J  | ND (1) *   | ND (1)     | 0.28                 | 16              | 4.8    | 8.9    | 6.6    | ND (0.1) *   | ND (1)     | 6.9    | ND (1)   | ND (1)    | ND (2) *   | 25       | 31     |
|  | 03/17/16 | 2 - 3          | N           | ND (2) *       | 4       | 180    | ND (1) *   | ND (1)     | ND (0.2)             | 13              | 5.7    | 9.5    | 5.9    | ND (0.1) *   | ND (1)     | 8.1    | ND (1)   | ND (1)    | ND (2) *   | 25       | 27     |
|  | 03/17/16 | 5 - 6          | N           | ND (2) *       | 1.1     | 76     | ND (1) *   | ND (1)     | ND (0.2)             | 14              | 7.1    | 8.1    | 2      | ND (0.099) * | ND (1)     | 9.1    | ND (1)   | ND (1)    | ND (2) *   | 36       | 28     |

TABLE B-7a  
Sample Results: Metals  
AOC 27 – MW-24 Bench  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |                        |                |             | Metals (mg/kg) |         |        |            |          |                      |                 |        |        |        |              |            |        |          |           |             |          |        |
|--|------------------------|----------------|-------------|----------------|---------|--------|------------|----------|----------------------|-----------------|--------|--------|--------|--------------|------------|--------|----------|-----------|-------------|----------|--------|
| Interim Screening Level <sup>1</sup> :               |                        |                |             | 0.285          | 11      | 410    | 0.672      | 1.1      | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | 0.0125       | 1.37       | 27.3   | 1.47     | 5.15      | 0.78        | 52.2     | 58     |
| Residential Regional Screening Levels <sup>2</sup> : |                        |                |             | 31             | 0.68    | 15,000 | 160        | 71       | 0.3                  | 120,000         | 23     | 3,100  | 400    | 11           | 390        | 1,500  | 390      | 390       | 0.78        | 390      | 23,000 |
| Residential DTSC-SL <sup>3</sup> :                   |                        |                |             | NE             | 0.11    | NE     | 15         | 5.2      | NE                   | 36,000          | NE     | NE     | 80     | 1            | NE         | 490    | NE       | 390       | NE          | 390      | NE     |
| Ecological Comparison Values <sup>4</sup> :          |                        |                |             | 0.285          | 11.4    | 330    | 23.3       | 0.0151   | 139.6                | 36.3            | 13     | 20.6   | 0.0166 | 0.0125       | 2.25       | 0.607  | 0.177    | 5.15      | 2.32        | 13.9     | 0.164  |
| Background <sup>5</sup> :                            |                        |                |             | NE             | 11      | 410    | 0.672      | 1.1      | 0.83                 | 39.8            | 12.7   | 16.8   | 8.39   | NE           | 1.37       | 27.3   | 1.47     | NE        | NE          | 52.2     | 58     |
| Location   | Date                   | Depth (ft bgs) | Sample Type | Antimony       | Arsenic | Barium | Beryllium  | Cadmium  | Chromium, Hexavalent | Chromium, total | Cobalt | Copper | Lead   | Mercury      | Molybdenum | Nickel | Selenium | Silver    | Thallium    | Vanadium | Zinc   |
| AOC27-5  | 03/17/16               | 0 - 1          | N           | ND (2) *       | 3.4     | 110    | ND (1) *   | ND (1)   | 0.31                 | 15              | 3.7    | 7.6    | 7      | ND (0.1) *   | ND (1)     | 7.2    | ND (1)   | ND (1)    | ND (2) *    | 19       | 48     |
|  | 03/17/16               | 2 - 3          | N           | ND (2) *       | 4.1     | 120    | ND (1) *   | 1.5      | 0.48                 | 21              | 4.7    | 14     | 38     | ND (0.1) *   | ND (1)     | 8.8    | ND (1)   | ND (1)    | ND (2) *    | 24       | 500    |
|  | 03/17/16               | 5 - 6          | N           | ND (2) *       | 1.3     | 82     | ND (1) *   | ND (1)   | ND (0.2)             | 15              | 6.9    | 9.2    | 2.4    | ND (0.099) * | ND (1)     | 10     | ND (1)   | ND (1)    | ND (2) *    | 34       | 32     |
|  | 03/17/16               | 9 - 10         | N           | ND (2) *       | 1.6     | 93     | ND (1) *   | ND (1)   | ND (0.2)             | 13              | 6.3    | 8.6    | 2.5    | ND (0.1) *   | ND (1)     | 8.8    | ND (1)   | ND (1)    | ND (2) *    | 30       | 33     |
| AOC27-50   | 03/02/16               | 0 - 1          | N           | ND (2) *       | 2.1     | 180    | ND (1) *   | ND (1)   | 0.3                  | 25              | 8.3    | 25     | 73     | 0.13         | ND (1)     | 13     | ND (1)   | ND (1)    | ND (2) *    | 38       | 250    |
|  | 03/02/16               | 2 - 3          | N           | ND (2.1) J*    | 4.4     | 190    | ND (1) *   | 1.1      | 1.3                  | 50 J            | 7.6    | 100 J  | 190 J  | 0.47         | 4.7 J      | 16     | ND (1) J | ND (1.7)  | ND (2.1) J* | 26 J     | 330 J  |
|  | 03/02/16               | 5 - 6          | N           | ND (2.1) *     | 2.1     | 62     | ND (1) *   | ND (1)   | ND (0.21)            | 18              | 8      | 7.9    | 2.1    | 0.13         | ND (1)     | 14     | ND (1)   | ND (1)    | ND (2.1) *  | 29       | 39     |
|  | 03/02/16               | 9 - 10         | N           | ND (2.1) *     | 2.1     | 36     | ND (1) *   | ND (1)   | ND (0.21)            | 18              | 7.7    | 9.1    | 2.1    | 0.12         | ND (1)     | 13     | ND (1)   | ND (1)    | ND (2.1) *  | 31       | 38     |
| AOC27-51   | 02/17/17               | 0 - 0.5        | N           | ND (2.1) *     | 2.3     | 130    | ND (1) *   | 2.3      | ND (0.21)            | 20              | 7.7    | 36     | 19     | ND (0.1) *   | ND (1)     | 15     | ND (1) J | ND (1)    | ND (2.1) J* | 22       | 1,200  |
|  | 02/17/17               | 2 - 3          | N           | ND (2) *       | ND (1)  | 68     | ND (1) *   | ND (1)   | ND (0.2)             | 10              | 5      | 7.4    | 1.4    | ND (0.1) *   | ND (1)     | 6.9    | ND (1) J | ND (1)    | ND (2) J*   | 18       | 28     |
|  | 02/17/17               | 5 - 6          | N           | ND (2) *       | 1.4     | 97     | ND (1) *   | 1.2      | ND (0.2)             | 13              | 6.3    | 8.3    | ND (1) | ND (0.1) *   | ND (1)     | 8.2    | ND (1) J | ND (1)    | ND (2) J*   | 24       | 30     |
| AOC27-6  | 02/29/16               | 0 - 1          | N           | ND (2.1) *     | 5.2     | 200    | ND (1.1) * | 1.5      | 0.87 J               | 43              | 6.7    | 500    | 630    | 0.51         | 8.3        | 22     | ND (1.1) | ND (1.1)  | ND (2.1) *  | 23       | 700    |
|  | 02/29/16               | 2 - 3          | N           | ND (2.1) *     | 3.4     | 120    | ND (1) *   | ND (1)   | 4.8                  | 24              | 6.9    | 76     | 37     | 0.26         | ND (1)     | 16     | ND (1)   | ND (1)    | ND (2.1) *  | 26       | 130    |
|  | 02/29/16               | 5 - 6          | N           | ND (2.1) *     | 2.7     | 70     | ND (1) *   | ND (1)   | ND (0.21)            | 39              | 8.6    | 18     | 51     | 0.14         | ND (1)     | 26     | ND (1)   | ND (1)    | ND (2.1) *  | 33       | 92     |
| AOC27-7  | 02/29/16               | 0 - 1          | N           | ND (2) *       | 5.7     | 190    | ND (1) *   | 1.7      | 2.7                  | 150             | 11     | 580    | 170    | 0.32         | 11         | 35     | ND (1)   | ND (1)    | ND (2) *    | 27       | 420    |
|  | 02/29/16               | 2 - 3          | N           | 3.5            | 20      | 180    | ND (1.1) * | 4.5      | 4                    | 290             | 16     | 1,000  | 570    | 0.95         | 26         | 97     | ND (1.1) | ND (1.1)  | ND (2.3) *  | 17       | 1,300  |
|  | 03/01/16               | 5 - 6          | N           | ND (2) *       | 2.6     | 28     | ND (1) *   | ND (1)   | 0.5                  | 16              | 7.7    | 9.8    | 2.6    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)    | ND (2) *    | 29       | 38     |
| AOC27-8  | 03/01/16               | 1 - 2          | N           | ND (2) *       | 2       | 130    | ND (1) *   | ND (1)   | 0.49                 | 20              | 7      | 29     | 24     | 0.17         | ND (1)     | 11     | ND (1)   | ND (1)    | ND (2) *    | 28       | 93     |
|  | 03/01/16               | 5 - 6          | N           | ND (2) *       | 2.5     | 39     | ND (1) *   | ND (1)   | ND (0.2)             | 17              | 7.3    | 15     | 6.1    | ND (0.1) *   | ND (1)     | 12     | ND (1)   | ND (1)    | ND (2) *    | 30       | 45     |
| AOC27-9  | 03/08/16               | 0 - 1          | N           | ND (2) J*      | 2.2     | 140    | ND (1) *   | ND (1)   | ND (0.2)             | 13              | 5.9    | 8.2    | 2.5    | ND (0.1) *   | ND (1)     | 9.2    | ND (1) J | ND (1)    | ND (2) *    | 25       | 30 J   |
|  | 03/08/16               | 0 - 1          | FD          | ND (2) J*      | 2.9     | 140    | ND (1) *   | ND (1)   | ND (0.2)             | 14              | 5.8    | 14     | 5.9    | ND (0.1) *   | ND (1)     | 9.7    | ND (1) J | ND (1)    | ND (2) *    | 25       | 38 J   |
|  | 03/08/16               | 2 - 3          | N           | ND (2) *       | 2.1     | 120    | ND (1) *   | ND (1)   | ND (0.2)             | 14              | 5.7    | 8.3    | 3.7    | ND (0.1) *   | ND (1)     | 9.3    | ND (1)   | ND (1)    | ND (2) *    | 25       | 35     |
|  | 03/08/16               | 5 - 6          | N           | ND (2) *       | 2.1     | 120    | ND (1) *   | ND (1)   | ND (0.2)             | 15              | 6.7    | 11     | 2.7    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1)    | ND (2) *    | 33       | 36     |
|  | 03/08/16               | 9 - 10         | N           | ND (2) *       | 1.2     | 88     | ND (1) *   | ND (1)   | ND (0.2)             | 11              | 5.8    | 7.8    | 1.6    | ND (0.1) *   | ND (1)     | 7.9    | ND (1)   | ND (1)    | ND (2) *    | 28       | 28     |
| PA-13  | 01/27/16               | 0 - 1          | N           | ND (2.1) *     | 4.8     | 200    | ND (1) *   | ND (1)   | 0.26                 | 15              | 6.3    | 12     | 5.8    | ND (0.1) *   | ND (1)     | 11     | ND (1)   | ND (1)    | ND (2.1) *  | 27       | 45     |
| Category 3   |                        |                |             |                |         |        |            |          |                      |                 |        |        |        |              |            |        |          |           |             |          |        |
| 24debris-01  | 01/18/08 <sup>IO</sup> | Unknown        | N           | 1.3            | 4.1     | 89     | ND (0.1)   | 0.49     | 0.43                 | 9.6             | 2.9    | 17     | 66     | ND (0.1) *   | 0.42       | 7.3    | 8        | ND (0.25) | ND (1) *    | 16       | 26     |
| 24debris-02  | 01/18/08 <sup>K</sup>  | Unknown        | N           | 3.8            | 0.89    | 43     | ND (0.1)   | ND (0.1) | ND (0.4)             | 190             | 0.7    | 3.9    | 830    | ND (0.1) *   | 0.56       | 1.4    | 8.9      | ND (0.25) | ND (1) *    | 1.9      | 170    |
| 24debris-03  | 01/18/08 <sup>Ψ</sup>  | Unknown        | N           | ND (0.4) *     | 4.6     | 45     | ND (0.1)   | 0.74     | ND (0.4)             | 16              | 2.7    | 5.1    | 20     | ND (0.1) *   | 1.5        | 100    | 6.6      | ND (0.25) | ND (1) *    | 120      | 41     |



Notes:

Category 1: Validated data suitable for all uses, including risk assessment and remedial action decisions.  
Category 2: Validated data suitable for use in characterization of the chemicals of potential concern at the facility and to help define the nature and extent of contamination.  
Category 3: Validated data suitable only for use in qualitative characterization of the nature and extent of contamination.  
Results greater than or equal to the interim screening level are circled; however, if the interim screening level is equal to the background value, only results greater than the interim screening level are circled.

|         |   |
|---------|---|
| ψ       | tar sample  |
| Ж       | wood sample   |
| Ю       | debris sample   |
| *       | Reporting limits greater than or equal to the interim screening level.      |
| ---     | not analyzed  |
| ft bgs  | feet below ground surface   |
| mg/kg   | milligrams per kilogram   |
| DTSC    | California Department of Toxic Substances Control                           |
| DTSC-SL | DTSC Screening Levels   |
| FD      | field duplicate   |
| J       | concentration or reporting limit estimated by laboratory or data validation |
| N       | primary sample  |
| ND      | not detected at the listed reporting limit                                  |
| NE      | not established   |
| USEPA   | United States Environmental Protection Agency                               |

- 1 Interim screening level is background value. If background value is not available then the interim screening value is the lower of the Ecological Comparison Value , residential DTSC-SL, or USEPA residential regional screening value.
- 2 United States Environmental Protection Agency (USEPA). 2017. Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites. November.
- 3 California Department of Toxic Substances Control (DTSC). 2018. Human Health Risk Assessment (HHRA) Note Number 3. January.
- 4 ARCADIS. 2008. "Technical Memorandum 3: Ecological Comparison Values for Metals and Polycyclic Aromatic Hydrocarbons in Soil." May 28.
- 5 CH2M HILL. 2009. "Final Soil Background Technical Memorandum at Pacific Gas and Electric Company Topock Compressor Station, Needles, California." May.



TABLE B-7b  
Sample Results: Dioxins and Furans  
AOC 27 – MW-24 Bench  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |          |           |           |           |             |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|----------|-----------|-----------|-----------|-------------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | 4.8               | NE              | NE           | NE           | NE       | NE        | NE        | NE        | NE          |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | 4.8               | NE              | NE           | NE           | NE       | NE        | NE        | NE        | NE          |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | NE        | NE          |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | NE        | NE          |
| Background <sup>5</sup> :                            |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE        | NE        | NE        | NE          |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD     | OCDF      | TEQ Avian | TEQ Human | TEQ Mammals |
| Category 1   |          |                |             |                       |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |          |           |           |           |             |
| AOC27-1  | 03/18/16 | 2 - 3          | N           | ND (1.4)              | ND (0.43)           | ND (0.1)            | ND (0.093)        | ND (0.059)        | ND (0.095)        | ND (0.058)        | ND (0.09)         | ND (0.15)         | ND (0.073)      | ND (0.06)       | ND (0.062)        | ND (0.063)      | ND (0.053)   | ND (0.15)    | 11 J     | ND (0.32) | 0.2       | 0.12      | 0.12        |
| AOC27-18   | 03/17/16 | 0 - 1          | N           | 280                   | ND (1.3)            | ND (1.5)            | ND (1.7)          | 1.4 J             | 7.8 J             | 2.1 J             | 4.9 J             | ND (0.68)         | ND (0.53)       | ND (0.47)       | ND (65)           | ND (0.88)       | ND (0.14)    | ND (0.68)    | 3,300    | 110       | 6         | 9.3       | 9.3         |
|  | 03/17/16 | 2 - 3          | N           | 290                   | ND (170)            | ND (4.3)            | ND (1.7)          | ND (1.9)          | 11 J              | ND (5.8)          | ND (2.7)          | ND (0.76)         | ND (1)          | ND (0.95)       | 1.9 J             | ND (1)          | ND (0.37)    | ND (0.37)    | 3,300    | 190       | 3.8       | 7.6       | 7.6         |
|  | 03/17/16 | 5 - 6          | N           | 240                   | ND (100)            | ND (2.7)            | 14                | ND (1.3)          | ND (1.3)          | ND (13)           | ND (2.1)          | ND (1.5)          | ND (0.63)       | ND (1.1)        | ND (1.3)          | ND (1.2)        | ND (0.26)    | ND (0.41)    | 2,600    | 96        | 4         | 6.8       | 6.8         |
| AOC27-18E  | 03/17/16 | 4 - 5          | N           | 330                   | ND (96)             | ND (5.5)            | ND (1.2)          | ND (1.7)          | 5.4 J             | ND (14)           | ND (1.1)          | ND (2)            | ND (0.83)       | ND (1.5)        | ND (66)           | ND (1.6)        | ND (0.2)     | ND (0.9)     | 3,800    | 110       | 7.4       | 11        | 11          |
| AOC27-2  | 03/18/16 | 0 - 1          | N           | 16                    | ND (0.54)           | ND (0.64)           | ND (0.29)         | ND (0.13)         | 0.56 J            | ND (1.3)          | ND (0.41)         | ND (0.15)         | ND (0.27)       | ND (0.31)       | ND (4.4)          | ND (0.33)       | ND (0.066)   | ND (0.31)    | 160      | 6.2 J     | 0.87      | 0.84      | 0.84        |
|  | 03/18/16 | 2 - 3          | N           | 15                    | ND (0.076)          | ND (0.31)           | ND (0.26)         | ND (0.33)         | ND (0.44)         | ND (0.89)         | ND (0.35)         | ND (0.39)         | ND (0.17)       | ND (0.53)       | ND (5.6)          | ND (0.56)       | ND (0.066)   | ND (0.34)    | 130      | 7.2 J     | 1         | 0.83      | 0.83        |
| AOC27-20   | 03/01/16 | 0 - 1          | N           | 470                   | 67                  | ND (6.4)            | 4.1 J             | ND (2.8)          | 16                | 5.5 J             | 7.3 J             | ND (3.2)          | ND (1.4)        | ND (0.41)       | ND (160)          | ND (0.92)       | ND (0.54)    | ND (0.44)    | 4,200    | 170       | 13        | 19        | 19          |
|  | 03/01/16 | 2 - 3          | N           | 130                   | 15                  | ND (3.3)            | 2.2 J             | ND (1.1)          | 5.5 J             | 1.8 J             | ND (5.2)          | ND (0.41)         | ND (0.4)        | ND (0.35)       | ND (48)           | ND (0.35)       | ND (0.16)    | ND (0.17)    | 1,000    | 36        | 4         | 5.8       | 5.8         |
|  | 03/01/16 | 5 - 6          | N           | 200                   | 31                  | ND (3.8)            | ND (1.8)          | ND (2.1)          | 8.8 J             | ND (1.9)          | ND (3.2)          | ND (2.4)          | 1.6 J           | ND (0.59)       | ND (75)           | ND (0.59)       | ND (0.95)    | 0.54 J       | 1,700    | 84        | 8         | 10        | 10          |
| AOC27-4  | 03/17/16 | 0 - 1          | N           | 1,100                 | ND (0.34)           | 7.1 J               | ND (5.4)          | 8.9 J             | 20                | ND (14)           | 7.8 J             | ND (0.31)         | ND (1.4)        | ND (0.4)        | ND (0.3)          | ND (0.43)       | ND (0.16)    | 0.73 J       | 11,000   | 260       | 6.8       | 20        | 20          |
|  | 03/17/16 | 0 - 1          | FD          | 1,000                 | 45                  | 5.3 J               | 6 J               | 7.8 J             | 18                | ND (0.81)         | 6.9 J             | ND (0.76)         | 1.2 J           | ND (0.55)       | ND (150)          | ND (0.58)       | ND (0.24)    | ND (0.36)    | 9,800    | 200       | 14        | 26        | 26          |
|  | 03/17/16 | 2 - 3          | N           | 77                    | ND (0.39)           | ND (1.5)            | 0.73 J            | ND (0.79)         | 2.1 J             | ND (0.77)         | 1.3 J             | ND (0.92)         | ND (0.46)       | ND (0.35)       | ND (15)           | ND (0.17)       | ND (0.34)    | ND (0.33)    | 790      | 31        | 1.9       | 2.8       | 2.8         |
|  | 03/17/16 | 5 - 6          | N           | ND (6.2)              | ND (0.38)           | ND (0.66)           | ND (0.36)         | ND (0.28)         | ND (0.21)         | ND (0.25)         | ND (0.21)         | ND (0.32)         | ND (0.19)       | ND (0.092)      | ND (0.83)         | ND (0.093)      | ND (0.1)     | ND (0.11)    | ND (88)  | ND (0.29) | ND (0.37) | ND (0.34) | ND (0.34)   |
| AOC27-5  | 03/17/16 | 2 - 3          | N           | 740                   | ND (0.88)           | 21                  | ND (3.7)          | ND (3.9)          | ND (11)           | ND (9.7)          | ND (5.7)          | ND (0.52)         | ND (1.5)        | ND (0.48)       | ND (98)           | ND (0.57)       | ND (0.24)    | ND (0.29)    | 10,000   | 200       | 9.3       | 18        | 18          |
|  | 03/17/16 | 5 - 6          | N           | ND (2.4)              | ND (0.076)          | ND (0.09)           | ND (0.2)          | ND (0.072)        | ND (0.095)        | ND (0.095)        | ND (0.09)         | ND (0.084)        | ND (0.099)      | ND (0.18)       | ND (0.62)         | ND (0.19)       | ND (0.054)   | ND (0.099)   | 35       | ND (0.73) | 0.29      | 0.2       | 0.2         |
| AOC27-50   | 03/02/16 | 0 - 1          | N           | 96                    | 19                  | ND (1.2)            | 3.7 J             | 3.2 J             | 9.1 J             | 3.6 J             | 7.4 J             | ND (0.9)          | 5.8 J           | ND (1.9)        | 4.3 J             | 3.1 J           | ND (1.5)     | 1.2 J        | 380      | 12 J      | 13        | 12        | 12          |
|  | 03/02/16 | 2 - 3          | N           | 420                   | ND (79)             | 6.6 J               | ND (15)           | 12 J              | 52                | ND (13)           | 34                | ND (3)            | 32              | ND (5.7)        | ND (13)           | 12 J            | ND (9.1) *   | ND (4.6)     | 1,100    | 40        | 59        | 57        | 57          |
|  | 03/02/16 | 5 - 6          | N           | 9 J                   | ND (1.5)            | ND (0.95)           | ND (0.31)         | ND (0.2)          | ND (0.27)         | ND (0.13)         | ND (0.38)         | 0.55 J            | ND (0.17)       | ND (0.14)       | ND (0.34)         | ND (0.14)       | ND (0.091)   | ND (0.31)    | ND (33)  | ND (0.89) | 0.5       | 0.41      | 0.41        |
| AOC27-51   | 02/17/17 | 0 - 0.5        | N           | 71                    | 15                  | ND (0.91)           | 2.5 J             | 1.6 J             | 6.4 J             | 1.7 J             | 5.6 J             | ND (0.27)         | 4 J             | ND (0.89)       | ND (12)           | 1.5 J           | 1.3 J        | 0.78 J       | 420      | 34        | 9.6       | 9.2       | 9.2         |
|  | 02/17/17 | 2 - 3          | N           | 6.2 J                 | 1.2 J               | ND (0.13)           | 0.29 J            | ND (0.072)        | 0.87 J            | ND (0.15)         | 0.68 J            | ND (0.083)        | ND (0.51)       | ND (0.14)       | ND (0.8)          | ND (0.14)       | ND (0.099)   | ND (0.067)   | ND (29)  | ND (1)    | 0.58      | 0.65      | 0.65        |
|  | 02/17/17 | 5 - 6          | N           | 2.2 J                 | ND (0.27)           | ND (0.051)          | ND (0.057)        | ND (0.094)        | ND (0.057)        | ND (0.09)         | ND (0.056)        | ND (0.11)         | ND (0.074)      | ND (0.11)       | ND (0.41)         | ND (0.11)       | ND (0.038)   | ND (0.026)   | ND (27)  | ND (0.85) | 0.17      | 0.15      | 0.15        |
| AOC27-6  | 02/29/16 | 0 - 1          | N           | 610                   | 99                  | 6.4 J               | 32                | 14                | 77                | 12 J              | 67                | 3.1 J             | 70              | 7.6 J           | 14                | 11 J            | 19           | 5.4          | 2,300    | 84        | 120       | 120       | 120         |
|  | 02/29/16 | 2 - 3          | N           | 180                   | 24                  | 1.6 J               | 7.3 J             | 3.6 J             | 17                | ND (2.8)          | 16                | ND (0.94)         | 17              | 2 J             | ND (18)           | 3.2 J           | 5.7          | 1.5 J        | 860      | 29        | 32        | 32        | 32          |
|  | 02/29/16 | 5 - 6          | N           | 47                    | 10 J                | ND (0.19)           | 1.9 J             | ND (0.77)         | 5.2 J             | ND (0.92)         | ND (4.7)          | ND (0.57)         | 4.3 J           | ND (0.29)       | ND (5.9)          | ND (0.68)       | ND (0.87)    | ND (0.35)    | 330      | ND (12)   | 6.2       | 6.9       | 6.9         |
| AOC27-7  | 02/29/16 | 0 - 1          | N           | 1,500                 | 240                 | 17                  | 38                | 27                | 100               | 26                | ND (63)           | ND (5.7)          | 45              | 16              | 26                | 26              | 6.4          | 17           | 6,500    | 140       | 110       | 110       | 110         |
|  | 02/29/16 | 2 - 3          | N           | 1,500                 | 380                 | 36                  | 62                | 68                | 160               | ND (25)           | 120               | ND (14)           | 110             | 39              | 81                | 65              | 29           | ND (26)      | 4,000    | 190       | 260       | 230       | 230         |
|  | 03/01/16 | 5 - 6          | N           | 45                    | ND (0.48)           | ND (0.57)           | 2 J               | 1.1 J             | 4.1 J             | 0.88 J            | ND (3.1)          | ND (0.2)          | 2.4 J           | ND (0.59)       | ND (1)            | 0.85 J          | ND (0.25)    | ND (0.15)    | ND (190) | ND (5.4)  | 4.1       | 4.3       | 4.3         |
| AOC27-8  | 03/01/16 | 1 - 2          | N           | 330                   | 67                  | ND (3.9)            | 11 J              | 7 J               | 27                | ND (6.6)          | 21                | ND (1)            | 14              | 3.9 J           | ND (30)           | 6.7 J           | 4 J          | 3.9 J        | 1,500    | 53        | 36        | 33        | 33          |
|  | 03/01/16 | 5 - 6          | N           | 31                    | 4.7 J               | ND (1.2)            | 1.4 J             | 0.72 J            | ND (1.8)          | ND (0.52)         | ND (1.3)          | ND (1.2)          | 1.4 J           | ND (0.43)       | ND (5.1)          | 0.51 J          | ND (0.17)    | ND (0.43)    | ND (170) | ND (6.8)  | 2.9       | 2.8       | 2.8         |

TABLE B-7b  
Sample Results: Dioxins and Furans  
AOC 27 – MW-24 Bench  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

|  |          |                |             | Dioxin/Furans (ng/kg) |                     |                     |                   |                   |                   |                   |                   |                   |                 |                 |                   |                 |              |              |          |          |           |           |             |
|--|----------|----------------|-------------|-----------------------|---------------------|---------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|-------------------|-----------------|--------------|--------------|----------|----------|-----------|-----------|-------------|
| Interim Screening Level <sup>1</sup> :               |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | 4.8             | NE              | NE                | NE              | 4.8          | NE           | NE       | NE       | 16        | 50        | 5.58        |
| Residential Regional Screening Levels <sup>2</sup> : |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | 4.8               | NE              | NE              | NE                | 4.8             | NE           | NE           | NE       | NE       | 4.8       | NE        | NE          |
| Residential DTSC-SL <sup>3</sup> :                   |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE       | NE        | 50        | NE          |
| Ecological Comparison Values <sup>4</sup> :          |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE       | 16        | NE        | 1.6         |
| Background <sup>5</sup> :                            |          |                |             | NE                    | NE                  | NE                  | NE                | NE                | NE                | NE                | NE                | NE                | NE              | NE              | NE                | NE              | NE           | NE           | NE       | NE       | 5.98      | 5.58      | 5.58        |
| Location   | Date     | Depth (ft bgs) | Sample Type | 1,2,3,4,6,7,8-HpCDD   | 1,2,3,4,6,7,8-HpCDF | 1,2,3,4,7,8,9-HpCDF | 1,2,3,4,7,8-HxCDD | 1,2,3,4,7,8-HxCDF | 1,2,3,6,7,8-HxCDD | 1,2,3,6,7,8-HxCDF | 1,2,3,7,8,9-HxCDD | 1,2,3,7,8,9-HxCDF | 1,2,3,7,8-PeCDD | 1,2,3,7,8-PeCDF | 2,3,4,6,7,8-HxCDF | 2,3,4,7,8-PeCDF | 2,3,7,8-TCDD | 2,3,7,8-TCDF | OCDD     | OCDF     | TEQ Avian | TEQ Human | TEQ Mammals |
| AOC27-9  | 03/08/16 | 0 - 1          | N           | 110                   | 23                  | ND (1.8)            | 1.3 J             | ND (0.84)         | 3.7 J             | 1.3 J             | ND (2.2)          | ND (0.36)         | ND (0.37)       | ND (0.69)       | ND (36)           | ND (0.69)       | ND (1.2)     | 1.4 J        | 960      | 120      | 5.2       | 5.3       | 5.3         |
|  | 03/08/16 | 2 - 3          | N           | 60                    | ND (0.64)           | ND (0.76)           | ND (0.41)         | ND (0.73)         | ND (0.35)         | ND (0.64)         | ND (0.36)         | ND (0.83)         | ND (0.57)       | ND (0.82)       | ND (9.7)          | ND (0.52)       | ND (0.21)    | ND (1.9)     | 540      | 23 J     | 2.4       | 2         | 2           |
|  | 03/08/16 | 5 - 6          | N           | 20                    | 3.3 J               | ND (0.94)           | ND (0.7)          | ND (0.27)         | ND (1.1)          | ND (0.32)         | ND (0.79)         | ND (0.34)         | ND (0.32)       | ND (0.36)       | ND (3.6)          | ND (0.33)       | ND (0.2)     | 0.91 J       | ND (150) | ND (6.4) | 1.7       | 1         | 1           |

Notes:

Category 1: Validated data suitable for all uses, including risk assessment and remedial action decisions.  
Category 2: Validated data suitable for use in characterization of the chemicals of potential concern at the facility and to help define the nature and extent of contamination.  
Category 3: Validated data suitable only for use in qualitative characterization of the nature and extent of contamination.  
Results greater than or equal to the Interim Screening Level are circled.

|         |   |
|---------|---|
| --      | not analyzed  |
| ft bgs  | feet below ground surface   |
| ng/kg   | nanograms per kilogram  |
| DTSC-SL | DTSC Screening Levels   |
| DTSC    | California Department of Toxic Substances Control   |
| FD      | Field Duplicate   |
| J       | concentration or reporting limit estimated by laboratory or data validation   |
| JR      | estimated value, one or more input values is "R" qualified.   |
| N       | Primary Sample  |
| NA      | NA = not applicable   |
| NE      | not established   |
| ND      | not detected at the listed reporting limit  |
| R       | The result has been rejected; identification and/or quantitation could not be verified because critical QC specifications were not met (e.g., a non-detect result obtained for an archive sample following a hold time of greater than one year). |
| USEPA   | USEPA = United States Environmental Protection Agency   |

- 1 For individual dioxins and furans, selected value is the lower of the ECV, residential DTSC-SL, or USEPA residential regional screening value, unless the background value is higher. For TEQ values, selected value is the DTSC-SL.
- 2 United States Environmental Protection Agency (USEPA). 2017. Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites. November.
- 3 California Department of Toxic Substances Control (DTSC). 2018. Human Health Risk Assessment (HHRA) Note Number 3. JanuaryCalifornia Department of Toxic Substances Control (DTSC). 2017. Human Health Risk Assessment (HHRA) Note 2, Soil Remedial Goals for Dioxins and Dioxin-like Compounds for Consideration at California Hazardous Waste Sites. April.
- 4 ARCADIS. 2008. "Technical Memorandum 3: Ecological Comparison Values for Metals and Polycyclic Aromatic Hydrocarbons in Soil." May 28. ARCADIS. 2009. "Topock Compression Station - Final Technical Memorandum 4: Ecological Comparison Values for Additional Decteded Chemicals in Soil." July 1.
- 5 CH2M. 2017. Revised Ambient Study of Dioxins and Furans at the Pacific Gas and Electric Company, Topock Compressor Station, Needles, California. October.

Calculations:  
TEQ = Sum of Result xToxic equivalency factor (TEF), 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.  
TEQ Avian = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.  
TEQMammals = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.  
Teq Humans = Sum of Result x TEF, 1/2 reporting limit used for nondetects. If all Dioxins and Furans are nondetect, the final qualifier code is U.

## **Appendix C**

### **Soil HHERA Executive Summary**





Pacific Gas and Electric Company

# **SOIL HHERA EXECUTIVE SUMMARY**

Topock Compressor Station, Needles, CA

February 2020

## EXECUTIVE SUMMARY

This appendix is the executive summary from the Soil Human Health and Ecological Risk Assessment (HHERA) Report (Arcadis 2019) for the Topock site. The executive summary is reproduced here without alteration. This information is attached to the Soil Engineering Evaluation/Cost Analysis (EE/CA) document prepared by Jacobs (2020) to provide additional information on the approach and methods used in the HHERA. Citations in this text for document sections, tables, and figures refers to the sections, tables, and figures in the HHERA document.

The relevance of this information to the suggestions and recommendations for potential remediation at the Topock site is discussed in the body of the EE/CA document.

### ES.1 Introduction

This Soil Human Health and Ecological Risk Assessment (HHERA) Report describes the potential risks to human health and ecological receptors that may contact soil impacted by historical discharges and operations at the Pacific Gas and Electric Company (PG&E) Topock Compressor Station (TCS). The TCS is an active natural gas compressor station located in eastern San Bernardino County, approximately 15 miles southeast of Needles, California. The compressor station occupies approximately 15 acres of a 65-acre parcel of PG&E-owned land. The study area for investigative and remedial activities covers additional surrounding land including portions of a 100-acre parcel owned by the Fort Mojave Indian Tribe (FMIT) and land owned and/or managed by government agencies including the U.S. Bureau of Land Management (USBLM), U.S. Bureau of Reclamation (USBOR), U.S. Fish and Wildlife Service (USFWS), San Bernardino County, California Department of Transportation, and Burlington Northern Santa Fe (BNSF) Railroad. The TCS and the additional surrounding areas investigated together are referred to as the “site” in this report.

PG&E is conducting investigative and remedial activities at the site, including this HHERA, pursuant to the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA). Under CERCLA, the primary purpose of a baseline risk assessment (BRA) is to provide risk managers with an understanding of the potential adverse health effects (current or future) to human and ecological receptors posed by the release of hazardous substance from the site and in the absence of any actions to control or mitigate those releases. This information may be useful in determining whether a potential current or future threat to human health or the environment exists that warrants an action. This Soil HHERA, in conjunction with the Groundwater Risk Assessment (GWRA) (Arcadis 2009c), represent a BRA. The HHERA conducted for the TCS involved two primary components:

- Human health risk assessment (HHRA), which identifies potential human receptors and exposure pathways and presents the potential risks to human health that could result from exposure to constituents of potential concern (COPCs) in soil (discussed in Section 5 of the HHERA Report).
- Ecological risk assessment (ERA), which identifies potential ecological receptors and exposure pathways and presents the potential risks to ecological receptors that could result from exposure to constituents of potential ecological concern (COPECs) in soil (discussed in Section 6 of the HHERA Report).

## SOIL HHERA EXECUTIVE SUMMARY

The HHERA findings will be helpful in making risk management decisions. In accordance with the Human Health and Ecological Risk Assessment Work Plan (RAWP; Arcadis 2008a), specific objectives of the HHERA are twofold:

1. Help determine the need for remedial action with respect to soil conditions
2. Provide a basis for determining levels of constituents that can remain in soil at the site and still adequately protect public health and the environment (U.S. Environmental Protection Agency [USEPA] 1989).

The solid waste management units (SWMUs), areas of concern (AOCs), and additional surrounding areas investigated as part of the RCRA Facility Investigation/Remedial Investigation (RFI/RI) are those associated with the historical discharge to soil by operations and activities at the site. Site areas are organized into these two categories:

- Outside the TCS Fenceline – Evaluated for both potential human health and ecological impacts.
- Inside the TCS Fenceline – Evaluated for potential human health impacts only. Because this is an active operating facility, activities, and conditions inside the fenceline do not offer a suitable or attractive habitat for ecological populations at this time. All potential exposure pathways for ecological receptors are considered incomplete inside the TCS fenceline (Eichelberger 2006).

The HHERA evaluated all constituents detected in the soil during the RFI/RI and identifies those constituents that could potentially pose an unacceptable risk to either human health or the ecological environment using the methodology presented in the approved RAWP documents (Arcadis 2008a, 2009a, 2015) and California Environmental Protection Agency (CalEPA), Department of Toxic Substances Control (DTSC)-issued Directive Letter (DTSC 2017).

## ES.2 Site History and Characteristics

### ES.2.1 Site Historical Operations

The TCS began operations in December 1951 to compress natural gas supplied from the southwestern United States for transport through pipelines to PG&E's service territory in central and northern California. Current operations at the TCS are very similar to the operations that have occurred since 1951. The greatest use of chemical products at the facility involves treatment of cooling water, and the greatest volume of waste produced consists of untreated wastewater (or, blowdown) from the cooling towers.

From 1951 to 1964, untreated wastewater containing hexavalent chromium (used to inhibit corrosion, minimize scale formation, and control biological growth) was discharged to Bat Cave Wash (BCW), an ephemeral drainage that extends from the Chemehuevi Mountains to the north. From 1964 to 1969, PG&E treated the wastewater by converting hexavalent chromium to trivalent chromium. Beginning in May 1970, treated wastewater was discharged to an injection well (which is named PGE-08) located on PG&E property inside the TCS, and discharges to BCW generally ceased. Use of the injection well ceased in 1973 and wastewater was discharged exclusively to the four, single-lined evaporation ponds, located about 1,600 feet west of the TCS.

In the 1980s and 1990s, PG&E ended use of hexavalent chromium, removed the wastewater treatment system, and replaced the single-lined ponds with four new, Class II (double-lined) ponds. PG&E still uses the double-lined ponds, which are on USBLM property.

## SOIL HHERA EXECUTIVE SUMMARY

PG&E conducted soil investigations at six SWMUs, 29 AOCs, and seven additional investigation areas located inside and outside the TCS fenceline. The investigation areas carried forward into this HHERA are listed in the table titled Investigation Areas Carried Forward into the HHERA.

### Investigation Areas Carried Forward into the HHERA

| Location       | Investigation Areas Carried Forward into the HHERA   |
|----------------|--|
| Inside the TCS | <ul style="list-style-type: none"><li>• SWMU 5 (Sludge Drying Bed)</li><li>• SWMU 6 (Chromate Reduction Tank)</li><li>• SWMU 8 (Process Pump Tank)</li><li>• SWMU 9 (Transfer Pump)</li><li>• SWMU 11 (Former Sulfuric Acid Tanks)</li><li>• AOC 5 (Cooling Tower A)</li><li>• AOC 6 (Cooling Tower B)</li><li>• AOC 7 (Hazardous Materials Storage Area)</li><li>• AOC 8 (Paint Shed)</li><li>• AOC 13 (Unpaved Area Within the TCS)</li><li>• AOC 15 (Auxiliary Jacket Cooling Water Pumps)</li><li>• AOC 16 (Former Sandblast Shelter)</li><li>• AOC 17 (Onsite Septic System)</li><li>• AOC 18 (Combine Wastewater Transference Pipelines)</li><li>• AOC 19 (Former Cooling Liquid Mixing Area and Former Hotwell)</li><li>• AOC 20 (Industrial Floor Drains)</li><li>• AOC 21 (Round Depression Near Sludge Drying Bed)</li><li>• AOC 22 (Unidentified Three-Sided Structure)</li><li>• AOC 23 (Former Water Conditioning Building)</li><li>• AOC 24 (Stained Area and Former API Oil/Water Separator)</li><li>• AOC 25 (Compressor and Generator Engine Basements)</li><li>• AOC 26 (Former Scrubber Oil Sump)</li><li>• AOC 32 (Oil Storage Tanks and Waste Oil Sump)</li><li>• AOC 33 (Potential Former Burn Area Near AOC 17)</li><li>• Unit 4.3 (Oily Water Holding Tank)</li><li>• Unit 4.4 (Oil/Water Separator)</li><li>• Unit 4.5 (Portable Waste Oil Holding Tank)</li><li>• Portions of AOC 4 Inside the Fence Line</li><li>• Perimeter Area</li></ul> |

## SOIL HHERA EXECUTIVE SUMMARY

| Location               | Investigation Areas Carried Forward into the HHERA  |
|------------------------|---|
| <b>Outside the TCS</b> | <ul style="list-style-type: none"> <li>• SWMU 1 (Former Percolation Bed)</li> <li>• TCS Well #4 (Capped Well)</li> <li>• AOC 1 (Area Around the Percolation Bed)</li> <li>• AOC 4 (Debris Ravine)</li> <li>• AOC 9 (Southeast Fence Line)</li> <li>• AOC 10 (East Ravine)</li> <li>• AOC 11 (Topographic Low Areas)</li> <li>• AOC 12 (Fill Areas)</li> <li>• AOC 14 (Railroad Debris Site)</li> <li>• AOC 27 (MW-24 Bench)</li> <li>• AOC 28 (Pipeline Drip Legs)</li> <li>• AOC 31 (Former Tea Pot Dome Oil Pit)</li> <li>• Undesignated Area 2 (UA-2) (Former 300B Pipeline Liquids Tank)</li> <li>• Perimeter Area</li> <li>• Storm Drain System</li> </ul> |

### ES.2.2 Soil Investigations and AOC 4 Interim Action

Investigative and remedial activities at the TCS date back to the 1980s when a RCRA Facility Assessment was completed, identifying a series of SWMUs at the site. The RFI began in 1996, and numerous phases of data collection and evaluation have been completed. Since 2005, investigative and remedial activities have been performed pursuant to both RCRA and CERCLA. The primary reports documenting these investigations are as follows in the table titled Primary Investigation Reports.

#### Primary Investigation Reports

| Report Name  | Notes   |
|--|---|
| RFI/RI Report Volume 1<br>Site Background and History<br>(CH2M Hill [CH2M] 2007a)  | <ul style="list-style-type: none"> <li>• Completed in August 2007.</li> <li>• Approved by CalEPA, DTSC (2007) and U.S. Department of the Interior (DOI 2007a).</li> </ul>               |
| RFI/RI Report Volume 2<br>Hydrogeologic Characterization<br>and Results of Groundwater<br>and Surface Water<br>Investigation and Addendum<br>(CH2M 2009) | <ul style="list-style-type: none"> <li>• Report completed in February 2009.</li> <li>• Addendum completed in June 2009.</li> <li>• Approved by DTSC (2009b) and DOI (2009a).</li> </ul> |
| PG&E Topock Compressor<br>Station Soil Investigation<br>Data Package (PG&E 2018)   | <ul style="list-style-type: none"> <li>• PG&amp;E TCS soil investigation data package transmittal to DOI, dated May 8, 2018.</li> </ul>   |

## SOIL HHERA EXECUTIVE SUMMARY

| Report Name  | Notes   |
|--|---|
| RFI/RI Report Volume 3<br>Results of Soil and Sediment<br>Investigation (forthcoming)    | <ul style="list-style-type: none"><li>• Currently being prepared by Jacobs.</li><li>• Includes final characterization data to complete the RFI/RI requirements for remaining TCS operations, including the results of soil investigations and the storm drain alignment investigation.</li><li>• Data provided to DOI in the TCS soil investigation data package transmittal (PG&amp;E 2018), will be included in the Draft RFI RI Report Volume 3, and form the basis for the risk evaluations in the Soil HHERA.</li></ul>  |
| Time-Critical Removal Action<br>(TCRA) at the AOC 4<br>Debris Ravine Site<br>(DOI 2009b) | <ul style="list-style-type: none"><li>• Result of DOI Action Memorandum that directed PG&amp;E to initiate TCRA at AOC 4.</li><li>• Fill material and debris were believed to be deposited and trash reportedly was burned at AOC 4.</li><li>• Removed 11,799 tons of soil and debris from AOC 4.</li><li>• Based on confirmation dataset and installation of erosion control measures, substantial threat of release of contaminated material from AOC 4 was stabilized and mitigated by the TCRA (Alisto Engineering Group [Alisto] et al. 2011).</li></ul>           |
| Soil Background Investigations<br>(Various reports/authors)                              | <ul style="list-style-type: none"><li>• Conducted to characterize the background conditions for the presence of metals, polycyclic aromatic hydrocarbon (PAHs), and dioxins/furans, and to establish background concentrations in soil.</li><li>• Site-related concentrations of constituents were compared to background concentrations to assess whether the delineation of nature and extent of contamination in soils at investigation areas was adequate.</li><li>• Results are provided in a series of reports (see Section 2.2.4 of the HHERA Report).</li></ul> |

### ES.2.3 Site Conditions and Characteristics

The site is located in the Mohave Valley, along the California-Arizona border in eastern San Bernardino County, California. The Chemehuevi Mountains are located to the south and the Colorado River is located to the east and north. The site occupies approximately 3 square miles of the north-sloping piedmont alluvial terrace and floodplain along the northern margin of the mountains.

#### ES.2.3.1 Physical and Ecological Characteristics

The tables in this section summarize the physical and ecological characteristics, and current and future land use at the site that are important for the HHERA.



## Site Physical and Ecological Characteristics and Land Use

| Physical/<br>Ecological<br>Characteristic | Description  |
|---|--|
| Geology                                   | <ul style="list-style-type: none"> <li>• Geology of the landforms is characterized by alluvial terraces and incised drainage channels.</li> <li>• BCW is a prominent desert wash that crosses the Study Area from south to north.</li> <li>• Unconsolidated alluvial and fluvial deposits are underlain by the Miocene conglomerate and pre-Tertiary metamorphic and igneous bedrock.</li> <li>• In the upland area, the subsurface shallow aquifer zone consists of alluvial deposits.</li> </ul>   |
| Hydrology and<br>Hydrogeology             | <ul style="list-style-type: none"> <li>• Site is situated at the southern extent of unconsolidated alluvial aquifer material in the Mohave groundwater basin.</li> <li>• Colorado River runs north to south through the basin.</li> <li>• Groundwater occurs under unconfined to semi-confined conditions beneath most of the site.</li> <li>• Saturated portion of the alluvial fan and fluvial sediments are collectively referred as the alluvial aquifer.</li> <li>• In the floodplain area adjacent to the Colorado River, the fluvial deposits interfinger with, and are hydraulically connected to, the alluvial fan deposits.</li> <li>• Unconsolidated alluvial and fluvial deposits are underlain by bedrock with very low permeability; therefore, groundwater movement occurs primarily in the overlying unconsolidated deposits, and groundwater flow is generally north to northeasterly.</li> <li>• Due to the variable topography at the site, the depth to groundwater ranges from as shallow as 5 feet below ground surface (bgs) in floodplain wells next to the river to approximately 170 feet bgs at the upland alluvial terrace areas.</li> </ul>   |
| Ecological<br>Overview                    | <ul style="list-style-type: none"> <li>• Site is located adjacent to and includes a portion of the 37,515-acre Havasu National Wildlife Refuge (HNWR) managed by USFWS.</li> <li>• Area is characterized by arid conditions and high temperatures and consists of a series of terraces divided by dry desert washes (CH2M 2007a).</li> <li>• Site is located either within the Mojave Desert province of California, the Colorado Desert, or the boundary between these two deserts (CH2M 2007a). Upland terrestrial habitats are typical of Mojave Desert uplands dominated by creosote bush scrub, with Mojave Wash, desert riparian, and tamarisk thicket.</li> <li>• BCW (AOC 1/SWMU 1) is relatively barren of vegetation, consisting of sand, gravel, and cobblestone substrate (CH2M 2014); BCW is a primarily north-south-trending channel located west of the Colorado River; large volume surface flows are generally infrequent and occur only briefly in response to high intensity rainfall events, but remains dry throughout most of the year due to arid desert conditions (PG&amp;E 2013, 2014). Dense vegetation is present in the Tamarisk Thicket area, located at the northern end of BCW.</li> <li>• East Ravine (AOC 10) is 1,600 foot long and runs eastward toward the Colorado River. The ravine is bisected by three constructed berms and contains three drainage</li> </ul> |

## SOIL HHERA EXECUTIVE SUMMARY

| Physical/<br>Ecological<br>Characteristic | Description   |
|---|---|
|   | <p>depression areas that are located behind these berms. AOC 10 is relatively barren of vegetation; may periodically flood during stormwater runoff events but remains dry throughout most of the year due to arid desert conditions. Flooding events are periodic; on the frequency of one or two times a year and usually during the summer monsoon season.</p> <ul style="list-style-type: none"> <li>Riparian corridors consisting of small patches of emergent vegetation exist along the banks of the Colorado River, with little to no submergent vegetation within the river. East of the Colorado River, the Action Area is a sand and salt cedar (Tamarisk) environment very similar to that found on the floodplain on the California side. Various wildlife and plant species are supported by the riparian habitat. Saturated sediments along the edge of the Colorado River that are ephemerally (temporarily) flooded are located at the mouth of BCW and at the mouth of East Ravine (east of AOC 10). The ephemeral flooding is due to infrequent high flow in the wash or annual variations in stage along the Colorado River, the latter of which is not associated with the potential for transport of site-related materials.</li> </ul>   |
| Special-Status<br>Species                 | <ul style="list-style-type: none"> <li>Programmatic Biological Assessments (PBAs; CH2M 2007b and 2014) and the reinitiations (PG&amp;E 2017a, b) were conducted to evaluate potential impacts to species and habitats; concluded “may affect but likely to not adversely affect” for all the special-status species evaluated and their critical habitat for all terrestrial species for ongoing and planned activities at the site, including federally listed species.</li> <li>No state- or federal-listed threatened or endangered (T&amp;E) plant species are potentially present in the upland or riparian areas.</li> <li>In the upland areas, special-status plant species are potentially present (CH2M 2017). California Desert Native Plant Act (CDNPA) or ethnobotanical plants include blue palo verde, catclaw acacia, desert smoke tree, and the western honey mesquite. California Rare Plants include mousetail suncup and the hillside palo verde.</li> <li>No federal listed T&amp;E wildlife species were observed at the site, except for a single observation of the southwestern willow flycatcher (federally listed T&amp;E species) in 2009 in the Tamarisk Thicket (Garcia and Associates [GANDA] 2017), which is not considered to be resident at the site.</li> <li>Other federally listed species including desert tortoise, yellow-billed cuckoo, and Yuma clapper rail were not directly observed at the site (CH2M 2014, Konecny Biological Services [Konecny] 2012).</li> <li>Two large home-range species have been observed: the ring-tailed cat and Nelson's bighorn sheep. The ring-tailed cat is a California fully protected species. To be consistent with the GWRA (Arcadis 2009c) and observations made by a PG&amp;E employee at the site Nelson's bighorn sheep was evaluated.</li> <li>Bat surveys indicated presence of the cave myotis and pallid bat (state species of concern) at BCW (Harvey 2015). Townsend big-eared bats (a state species of concern) have not been directly observed at the site (CH2M 2015, Brown and Rainey 2015).</li> </ul> |

## SOIL HHERA EXECUTIVE SUMMARY

| Land Use                               | Description  |
|--|--|
| Current – General                      | <ul style="list-style-type: none"> <li>Site is located in a sparsely populated, rural area.</li> <li>Major gas utility and transportation corridor, BNSF Railroad (railroad-owned land), and Interstate 40 (I-40) (California Department of Transportation-owned land) are located within the site.</li> </ul>   |
| Current – TCS                          | <ul style="list-style-type: none"> <li>TCS in an active operation and occupies approximately 15 acres of a 65-acre parcel of PG&amp;E-owned land.</li> <li>The surrounding area includes land owned and/or managed by a number of government agencies, including USBLM, USBOR, USFWS, and San Bernardino County.</li> <li>USBLM-managed lands within the area are owned by USBLM, San Bernardino County, and USBOR and are considered public; however, public use is not encouraged, as the Topock Maze, a culturally significant area for several Native American tribes, is located here.</li> </ul>   |
| Current – Tribes                       | <ul style="list-style-type: none"> <li>The Tribes indicated in a memorandum (FMIT 2012) and a letter (FMIT 2013) that the tribal use of the land in the area of the site including the Topock Maze is limited to: Tribal Group Activities several times a year for prayer and reflection; Tribal Education Activities for students and young people to visit the area to learn about its importance and spiritual significance; and Tribal Member Individual Visits to the Mojave Valley on a regular but infrequent basis for quiet time and reflection as part of religious practice and culture, to pay homage to the area and to honor their ancestors.</li> </ul>   |
| Current – Residential and Recreational | <ul style="list-style-type: none"> <li>Nearest residents are located 2,000 feet away across the river in Topock, Arizona, a seasonal community of about 20 (mostly retired senior citizens) in a small mobile home park near the Topock 66 Marina.</li> <li>Few permanently occupied homes are located on the southern side of I-40, along the shoreline between the pipeline bridge and the I-40.</li> <li>Moabi Regional Park is a recreational facility operated by the San Bernardino County Department of Parks and Recreation, which is located on land leased from USBLM. As a regional park, it has no permanent full-time residents.</li> </ul>   |
| Future                                 | <ul style="list-style-type: none"> <li>PG&amp;E plans to continue owning and operating the TCS and associated property as an industrial operation for the foreseeable future. The railroad and highway will also continue in their current use for the foreseeable future. Accordingly, the reasonably anticipated future use of these areas is the same as their current use, industrial operations.</li> <li>The primary conservation mission of USFWS, as it applies to the HNWR, limits human use of HNWR property. Therefore, in the future, human use of HNWR property will continue to be restricted to recreational uses.</li> <li>Similarly, future use of the USBLM-owned land at the site is likely to remain recreational. Nonetheless, as recommended by DOI, future uses of the USBLM-owned property could include seasonal residential use and year-round residential use for San Bernardino County staff at Park Moabi, and recreational (such as camping) use on the floodplain.</li> <li>Although future residential use of the USBLM land is unlikely, DOI has specifically requested an evaluation of future residential use on USBLM property.</li> </ul> |

### ES.2.3.2 Conceptual Site Model

The conceptual site model (CSM) for the site shows the relationships between a chemical source, exposure pathways, and potential receptors. The components that constitute the fate and transport portions of the CSM include potential sources, release mechanisms, and retention and transport media. These components apply to both the HHRA and ERA and are discussed in more detail in Section 2.5 of the HHRA Report.

For this site, several CSMs (Figures 2-2 through 2-7 of the HHRA Report) were prepared that illustrate the potential source-pathway-receptor relationships and provide the basis for the quantitative exposure assessment undertaken as part of the HHRA. Most sources for site-related compounds found both inside and outside the compressor station originated inside the compressor station or from associated activities, including incidental spills/releases from various processes and activities for the operating facility. Current data indicate that the primary site related constituents in soils are metals, primarily hexavalent chromium and trivalent chromium, as well as dioxins (CH2M 2007a).

Once constituents are in soil, the potential pathways through which the constituents may move from the soil to other environmental media include: transport and release through surface water runoff, leaching to groundwater, fugitive dust emissions, and volatilization of volatile organic compounds (VOCs) from soil and release into ambient/indoor air. For the HHRA, soil direct contact exposure pathways (that is, incidental ingestion, inhalation, and dermal contact) were the primary potentially complete exposure pathways evaluated. For the ERA, the primary potentially complete exposure pathways for soil are direct contact (plants and soil invertebrates) and incidental ingestion and uptake of constituents from soil into biota and subsequent ingestion of biota as part of the diet for wildlife (mammals and birds).

## ES.3 Data Evaluation

During the HHRA, the data evaluation process analyzed site characteristics and analytical data to identify constituents that are potentially related to the site and for which there are data of sufficient quality to be used in a quantitative risk assessment (USEPA 1989). Data collected from 1997 through 2017 during multiple phases of site investigation were consolidated and used in the quantitative risk assessment.

The soil and soil gas data included in the HHRA are summarized in the table titled Overview of Data Included in the HHRA; Section 3 of the HHRA Report provides more details. Soil and soil gas sample locations for data evaluated in the HHRA are presented on Figures 3-1a and 3-1b for areas outside the TCS and on Figure 3-2 for the area inside the TCS.

**Overview of Data Included in the HHERA**

| Media    | Data Included in the HHERA   |
|----------|--|
| Soil     | <ul style="list-style-type: none"> <li>Only Category 1 data are included in the datasets used in the quantitative risk assessment. Soil samples representative of soil that has been removed as part of a removal action were not included in the HHERA datasets.</li> <li>Soil samples were analyzed for one or more of the following chemical analytical suites: <ul style="list-style-type: none"> <li>Metals</li> <li>Contract Laboratory Program (CLP) inorganics</li> <li>PAHs</li> <li>Semivolatile organic compounds (SVOCs) and VOCs</li> <li>Total petroleum hydrocarbons (TPHs)</li> <li>General chemistry parameters</li> <li>Pesticides</li> <li>Polychlorinated biphenyls (PCBs)</li> <li>Dioxins/furans.</li> </ul> </li> <li>Samples designated 'white powder' collected from AOC 9, AOC 10, AOC 14, and SWMU 1 are included in the datasets used in the quantitative risk assessment as a conservative measure assuming that contact would not differ significantly from exposure to surrounding soil.</li> </ul> |
| Soil Gas | <ul style="list-style-type: none"> <li>Soil gas samples were collected in January 2016 and February 2017 at several locations inside the TCS fenceline at 3 or 6 feet bgs and analyzed for VOCs.</li> </ul>  |

Additionally, data are available for sediment, porewater, and various debris materials. Sediment and porewater data, collected in 2003 and 2017 at the mouth of BCW and in East Ravine along the Colorado River, were not used to estimate potential risk to human and ecological receptors in the HHERA because potential receptor exposures in the sediment areas were found to be insignificant based on a transport pathway evaluation and gradient analysis conducted as described in Section 2.5 of the HHERA Report.

**ES 3.1 Data Usability**

Data usability criteria identified by USEPA (1992) were used to confirm that the data were suitable for risk assessment. Data validation was conducted in accordance with the Quality Assurance Project Plan QAPP (CH2M 2004), and overall, the data were determined to be of acceptable quality (except where noted with appropriate flags), and the completeness objectives were accomplished. Section 3.2 of the HHERA Report discusses the data usability criteria and application to site data.

**ES 3.2 Groupings of Data**

As described in the RAWP documents (Arcadis 2008a, 2009a, 2015) and based on subsequent direction from DTSC (2017), areas at the site were identified for independent evaluation in the HHERA for potential human and/or ecological exposures. Data were grouped into datasets for each potential exposure area and evaluated for the relevant human and/or ecological receptors, as described in Section 3.3. Figure 3-3 presents the potential exposure areas based on individual AOCs/investigation areas evaluated in the HHERA for relevant human receptors, ecological communities (plants and soil invertebrates), and small home range wildlife (mammals and birds). Larger areas based on combined potential exposure areas were

## SOIL HHERA EXECUTIVE SUMMARY

evaluated for relevant human receptors (Figure 3-4a) and large home range wildlife (mammals and birds) (Figure 3-4b). The potential exposure areas evaluated in the HHERA include the following areas listed in the table titled Potential Exposure Areas Evaluated in the HHERA.

### Potential Exposure Areas Evaluated in the HHERA

| Exposure Areas Based on Individual AOCs | Sample Locations Representative of:  | HHRA          | ERA           |
|---|--|---------------|---------------|
| BCW                                     | BCW (AOC 1, AOC 28d, SWMU 1, TCS-4, Tamarisk Thicket)                      | Evaluated     | Evaluated     |
| SWMU1                                   | SWMU 1 and TCS-4   | Evaluated     | Evaluated     |
| BCWxSWMU1                               | BCW excluding SWMU 1 and TCS-4   | Evaluated     | Evaluated     |
| AOC4                                    | AOC 4  | Evaluated     | Evaluated     |
| AOC9                                    | AOC 9 and AOC 10a  | Evaluated     | Evaluated     |
| AOC10                                   | AOC 10 and Subareas b, c, d  | Evaluated     | Evaluated     |
| AOC11                                   | AOC 11   | Evaluated     | Evaluated     |
| AOC12                                   | AOC 12   | Evaluated     | Evaluated     |
| AOC14                                   | AOC 14   | Evaluated     | Evaluated     |
| AOC27                                   | AOC 27   | Evaluated     | Evaluated     |
| AOC28                                   | AOC 28   | Evaluated     | Evaluated     |
| AOC31                                   | AOC 31   | Evaluated     | Evaluated     |
| UA-2                                    | UA-2   | Evaluated     | Evaluated     |
| TT                                      | Tamarisk Thicket   | Not Evaluated | Evaluated     |
| NORR                                    | AOC 1 North of the Railroad / USBLM Land                                   | Evaluated     | Not Evaluated |
| ICS                                     | Inside the Compressor Station  | Evaluated     | Not Evaluated |
| Combined Exposure Areas                 | Sample Locations Representative of:  | HHRA          | ERA           |
| OCS                                     | Outside the Compressor Station:<br>All Soil Exposure Areas Outside the TCS | Evaluated     | Evaluated     |
| OCSxBCW                                 | Outside the Compressor Station<br>excluding BCW                            | Evaluated     | Not Evaluated |
| BCW+AOC4                                | BCW and AOC 4  | Not Evaluated | Evaluated     |
| OCSxBCW+AOC4                            | Outside the Compressor Station<br>excluding BCW and AOC 4                  | Not Evaluated | Evaluated     |

#### Notes:

ICS = Inside the Compressor Station

NORR = North of the Railroad

OCS = Outside the Compressor Station

TT = Tamarisk Thicket



## SOIL HHERA EXECUTIVE SUMMARY

Data for each of these potential exposure areas were also grouped according to exposure depth intervals evaluated in the HHERA. For human health, the various potential receptors were assumed to contact soil from 0 to 10 feet bgs, with interim intervals defined for specific receptor activities (see Section 5.3 of the HHERA Report). For ecological populations, the various potential receptors were assumed to contact soil from 0 to 6 feet bgs with interim intervals defined for specific receptor activities (see Section 6.4 of the HHERA Report).

Additionally, for the two soil potential exposure areas encompassing wash areas (BCW and AOC 10), two scouring scenarios were evaluated. The 2-foot scouring scenario assumes that the top 2 feet of soil is removed during potential future scouring resulting from surface runoff following heavy rainfalls. Similarly, in the 5-foot scouring scenario, 5 feet of soil is assumed to be removed during scouring. Datasets were adjusted so that potential exposures for the HHRA were from the 'new' surface to a depth of 10 feet bgs, and the ERA exposures were from the 'new' surface to 6 feet bgs.

### ES 3.3 COPC/COPEC Selection

Selecting the COPCs/COPECs to be included in the risk assessments was a sequential process where compounds detected in site media were eliminated from further consideration based on either the concentration, if a constituent is deemed to be consistent with ambient background conditions, or their status as an essential nutrient. COPCs/COPECs were selected following appropriate guidance (DTSC 1997; USEPA 1989, 1997, 2000), according to the potential exposure areas previously described.

Using the agency-approved background soils datasets for inorganics, dioxins/furans, and PAHs, various statistical comparisons and tests were conducted to assess whether concentrations of constituents detected in the soil at the various potential exposures areas and depths are elevated above background levels. The statistical comparisons and tests conducted include: comparison of maximum observed values for each potential exposure area to a background threshold value (BTV); comparison of central tendency between potential exposure area data and background data; and comparison of upper quantiles of potential exposure area data and background data. Inorganics, dioxin/furans, and PAHs determined to be elevated above background levels were included as COPCs/COPECs in the risk assessments.

For essential nutrients determined to be elevated above background levels and where toxicity values were available, they were selected as COPCs to be evaluated further in the risk assessments. All other constituents detected in soil and soil gas were included in the quantitative HHRA.

## ES.4 Estimation of Exposure Point Concentrations

An exposure point concentration (EPC) is the representative concentration of a constituent in an environmental medium that is potentially contacted by the potential receptor (USEPA 2002). In the HHERA, EPCs were calculated using depth-weighted data to account for variable depth profiles at each sampling location. For a given relevant exposure depth for the risk assessment, if only a single sample is available at a given location, that value was used to represent the concentration for the entire exposure depth. For locations with samples from multiple depths, the samples were weighted to account for the different lengths of the segments in the manner described in USEPA (1996).

Three types of EPCs were calculated based on the depth-weighted soil datasets: depth-weighted maximum, depth-weighted 95UCL (95% upper confidence limit on the mean), and depth- and area-weighted 95UCL (referred to as area-weighted EPCs for simplicity). USEPA's ProUCL v. 5.1 software was the basis for, and primary analytical tool used for, the statistical analyses conducted for soil and soil transitioning to sediments. For the depth-weighted 95UCL EPC, the ProUCL-recommended 95UCL method was selected as the

representative EPC. Area-weighted EPCs were calculated using Thiessen polygons and the bias-corrected, accelerated (BCa) Bootstrap method, one of the nonparametric statistics provided in ProUCL.

If the soil dataset had fewer than four detected values (that is, concentrations reported above the detection limit) or fewer than eight total observations, the EPC defaulted to the maximum depth-weighted concentration in that dataset. In summary, the EPC for each soil dataset is either a 95UCL (UCL method recommended by ProUCL for depth-weighted EPCs, BCa Bootstrap UCL for area-weighted EPCs), or the maximum depth-weighted concentration.

For soil gas data, individual observations for each given chemical and exposure scenario, were treated as separate estimates of exposure; no 95UCL calculations were made for soil gas.

## **ES.5 Human Health Risk Assessment**

The HHRA for soil evaluated the likelihood that constituents detected in soils at the various potential exposure areas of the site could adversely impact human health under the assumed set of current and reasonable future land-use scenarios. The results of the risk assessment also provide key information that assists risk managers with making health-protective site management and remedial decisions.

### **ES.5.1 Exposure Assessment**

The exposure assessment estimated the intensity, frequency, and duration of potential human exposure to COPCs in environmental media at the site, such as soil, soil gas, and air. To quantify potential exposure to site constituents, in addition to EPCs for COPCs, these components are required:

1. Relevant current and future potential receptors and their associated site related activities
2. Potentially complete exposure pathways for each current and future potential receptor as they engage in site related activities
3. Quantitative exposure assumptions for pathway specific intake of soil constituents.

#### **ES.5.1.1 Potentially Exposed Populations**

The potential human receptors identified in the RAWP documents (Arcadis 2008a, 2009a, 2015) were evaluated in the HHRA as four main categories: worker, recreational user, tribal user, and hypothetical future resident. The potential soil exposure pathways evaluated for workers, recreational users, and the hypothetical future resident include ingestion and dermal contact with soil, as well as inhalation of particulates from ambient air and inhalation of VOCs that may volatilize from the soil. In addition to these potential soil exposure pathways, potential exposure to COPCs from consumption of home-produced food was also evaluated for the hypothetical future resident. The potential soil exposure pathways evaluated for tribal users include inhalation of particulates from ambient air and inhalation of VOCs that may volatilize from the soil.

Three types of workers were evaluated. The long- and short-term maintenance workers were assumed to conduct repair and maintenance activities both inside and outside the TCS fenceline. Their activities include intrusive work and they are assumed to contact surface soil (0 to 0.5 foot bgs), shallow soil (0 to 3 feet bgs) subsurface I soil (0 to 6 feet bgs) and subsurface II soil (0 to 10 feet). The commercial worker is assumed to be involved in routine administrative and other non-intrusive activities consistent with commercial/industrial activities inside the fenceline only. Potential pathways for commercial worker exposure to soil include those listed above for soil as well as potential exposure to VOCs in soil gas via inhalation of indoor air. The commercial worker was evaluated using a screening approach, as described in Section 5.3.4.5.

## SOIL HHERA EXECUTIVE SUMMARY

Four types of potential recreational users were evaluated outside the TCS: camper, hiker, hunter, and off-highway vehicle (OHV) rider (OHVs also referred to as all-terrain vehicles [ATVs]). The adult and/or youth recreators were evaluated for potential exposure to surface soil (0 to 0.5 foot bgs) and shallow soil (0 to 3 feet bgs).

Tribal use and associated potential exposure are expected to occur at areas outside the TCS. The potential indirect pathway for exposure to soil for tribal use is the inhalation of dust arising from wind erosion and of VOCs that may volatilize from the soil. The inhalation of dust was evaluated for surface soil (0 to 0.5 foot bgs) and shallow soil (0 to 3 feet bgs). and inhalation of VOCs volatilized from subsurface II soil (0 to 10 feet bgs). The exposure assumptions for this exposure scenario were developed using site-specific input from the Tribes.

USBLM has specifically requested an evaluation of a hypothetical future residential user on their property (DOI 2007b), even though unrestricted residential use is highly unlikely (DOI 2014). The hypothetical future residential user is assumed to contact surface soil (0 to 0.5 foot bgs), shallow soil (0 to 3 feet bgs), subsurface I soil (0 to 6 feet bgs) and subsurface II soil (0 to 10 feet bgs) via inhalation of particulates entrained in ambient air, incidental ingestion of soil, and dermal contact with soil. In addition, they are assumed to grow and consume vegetables, fruits, and poultry from the site (see Section 5.3.4.4 of the HHERA Report for exposure assumptions).

### ES.5.1.2 Exposure Areas

The following two areas represent the upper bound potential exposure areas for the site-specific human receptors evaluated for this site – area outside the compressor station including BCW (OCS); and area inside the compressor station (ICS). For the purposes of risk management, the OCS and ICS potential exposure areas were considered most relevant to typical behaviour patterns anticipated for receptors and their activities. In addition, at the direction of DTSC, potential exposure areas based on individual AOCs outside TCS fenceline were evaluated in separate appendices as listed above in Section ES.3.2.

### ES.5.1.3 Exposure Point Concentrations

As described above in ES.4, EPCs were calculated on a depth-weighted and area-weighted basis. EPCs were estimated for each of the soil intervals described above for each potential exposure area and the potentially exposed populations evaluated for that area. To ensure that the implications of averaging concentrations over one depth zone versus another are clearly understood, the Soil HHRA evaluated representative exposure concentrations for soils within the following depth categories:

- Surface soil (0 to 0.5 foot bgs)
- Shallow soil (0 to 3 feet bgs)
- Subsurface I soil (0 to 6 feet bgs)
- Subsurface II soil (0 to 10 feet bgs).

For the 2-foot and 5-foot scouring scenarios for BCW and AOC 10, datasets were adjusted to the revised surface level for the intervals. For example, for the 2-foot scouring scenario, the surface soil is adjusted to evaluate data collected from 2 to 3 feet bgs, while the shallow soil uses data from 2 to 6 feet bgs.

## **ES.5.2 Toxicity Assessment**

The toxicity assessment was completed to characterize the relationship between the magnitude of assumed exposure to a constituent and the potential for adverse effects. More specifically, the toxicity assessment identifies or derives toxicity values that can be used to estimate the likelihood of adverse effects occurring in humans at different exposure levels. Consistent with regulatory risk assessment policy, adverse health effects resulting from constituent exposures are evaluated in two categories: carcinogenic effects and noncarcinogenic effects. Toxicity values to evaluate carcinogenic effects and noncarcinogenic effects were identified from available CalEPA and USEPA toxicity information databases and were selected for use in this HHRA in the RAWP documents (Arcadis 2008a, 2009a, 2015) and in accordance with DTSC (2015, 2014, 2018) and USEPA (1989, 2003) risk assessment guidance. In addition, the adverse health effects associated with potential exposure to lead are evaluated separately, using models developed by CalEPA DTSC and USEPA.

## **ES.5.3 Risk Characterization**

Estimating incremental lifetime cancer risks (ILCRs) and noncancer hazard indices (HIs) for potential exposures to constituents in soil and/or soil gas requires information regarding constituent concentrations in the soil and/or soil gas, the level of exposure to each constituent, and the relationship between exposure to the constituent and its toxicity. Cumulative incremental lifetime cancer risks (that is, sum of chemical-specific ILCRs) posed by a site are compared to a range of one in one million ( $1 \times 10^{-6}$ ) to one hundred in a million ( $1 \times 10^{-4}$ ). As indicated in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (which is 40 Code of Federal Regulations [CFR] Part 300), cancer risks between one in a million and one hundred in a million probability of occurrence ( $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ ) fall within a risk management range. This is generally referred to as the acceptable risk range. Within this estimated cancer risk range, there is flexibility for risk managers in deciding what action, if any, is necessary and appropriate for the protection of human health. CalEPA DTSC point of departure for excess incremental lifetime cancer risk is  $1 \times 10^{-6}$ , and risk management decisions may raise this criterion depending on site specific conditions. A cumulative non-cancer HI of less than or equal to 1 implies that the predicted exposure for a given population and chemical is not expected to result in adverse noncancer health effects for multi-chemical exposures (USEPA 1989).

### **ES.5.3.1 Methodology**

The methodology used to derive the ILCRs and noncancer HIs for the selected COPCs is based principally on guidance provided in the regulatory documents and the equations listed in Sections 5.5.1 and 5.5.2 of the HHRA Report. These calculation methods were applied to relevant receptors for all potential exposure areas outside and inside the TCS fenceline.

### **ES.5.3.2 Results of the Cancer Risk and Noncancer Hazard Assessment**

ILCRs and HIs were estimated for each HHRA potential exposure area and its associated receptors using the methods described above. A detailed description of the calculated risks/hazards, including the tables that provide the breakdown of risk/hazard by individual chemical and exposure pathway, is provided in the exposure area-specific appendices, which are provided as Appendices BCW through ICS, and summarized in Section 5.5.3 of the HHRA Report. It should be noted that risks/hazards calculated separately for individual AOCs are conservative and likely overestimate site risks/hazards.

## SOIL HHRA EXECUTIVE SUMMARY

The potential exposure areas for which estimated HIs  $\leq 1$  and ILCRs were at or below the *de minimis* point of departure for risk management of  $1 \times 10^{-6}$  for cancer risk include BCWxSWMU1/TCS4, AOC 12, AOC 14, AOC 27, AOC 28, and AOC 31.

The estimated ILCRs and HIs for the hunter and tribal user were at or below *de minimis* levels for all potential exposure areas evaluated in the HHRA. In addition, the estimated ILCRs and HIs for the short-term maintenance worker were at or below *de minimis* levels for the ICS potential exposure area.

This section summarizes the results for the two most representative upper-bound potential exposure areas, which are the OCS and ICS potential exposure areas. The risks/hazards estimated for the OCS potential exposure area are believed to provide a more appropriate representation of the potential exposures for the human populations that could be present in the areas outside of TCS, which are maintenance workers, recreational users, and tribal users, than the risks/hazards estimated for individual AOCs/SWMU/UA potential exposure areas. In addition, potential risks/hazards for COPCs in soil in the NORR potential exposure area are estimated for hypothetical future residents, at the request of the agencies, although future unrestricted land use in this area is highly unlikely. The results of the HHRA for the OCS and ICS potential exposure areas support these findings.

### *OCS Potential Exposure Area Conclusions*

The tables in this section summarize the results of the HHRA for the OCS potential exposure area.

#### **OCS Estimated Cumulative Incremental Lifetime Cancer Risk and Hazard Index for the OCS Potential Exposure Area**

| Potential Receptor            | Estimated Cumulative ILCR less than or equal to $1 \times 10^{-6}$ | Estimated Cumulative ILCR greater than $1 \times 10^{-6}$ and less than or equal to $5 \times 10^{-6}$ | Estimated Cumulative ILCR greater than $5 \times 10^{-6}$ and less than or equal to $1 \times 10^{-5}$ | Estimated Cumulative ILCR greater than $1 \times 10^{-5}$ and less than or equal to $1 \times 10^{-4}$ | Estimated Cumulative ILCR greater than $1 \times 10^{-4}$ | Estimated HI less than or equal to 1 | Estimated HI greater than 1 |
|-------------------------------|--|--|--|--|---|--------------------------------------|-----------------------------|
| Short-Term Maintenance Worker |  | Yes (depth- and area-weighted)   |  |  |   | Yes (depth- and area-weighted)       |                             |
| Long-Term Maintenance Worker  |  |  | Yes (area-weighted)  | Yes (depth-weighted)   |   | Yes (depth- and area-weighted)       |                             |
| Camper                        |  | Yes (depth- and area-weighted)   |  |  |   | Yes (depth- and area-weighted)       |                             |
| Hiker                         |  | Yes (area-weighted)  | Yes (depth-weighted)   |  |   | Yes (depth- and area-weighted)       |                             |
| Hunter                        | Yes (depth- and area-weighted)                                     |  |  |  |   | Yes (depth- and area-weighted)       |                             |

## SOIL HHRA EXECUTIVE SUMMARY

| Potential Receptor | Estimated Cumulative ILCR less than or equal to $1 \times 10^{-6}$ | Estimated Cumulative ILCR greater than $1 \times 10^{-6}$ and less than or equal to $5 \times 10^{-6}$ | Estimated Cumulative ILCR greater than $5 \times 10^{-6}$ and less than or equal to $1 \times 10^{-5}$ | Estimated Cumulative ILCR greater than $1 \times 10^{-5}$ and less than or equal to $1 \times 10^{-4}$ | Estimated Cumulative ILCR greater than $1 \times 10^{-4}$ | Estimated HI less than or equal to 1 | Estimated HI greater than 1 |
|--------------------|--|--|--|--|---|--------------------------------------|-----------------------------|
| OHV Rider          |  |  | Yes<br>(depth- and area-weighted)  |  |   | Yes<br>(depth- and area-weighted)    |                             |
| Tribal User        | Yes<br>(depth- and area-weighted)                                  |  |  |  |   | Yes<br>(depth- and area-weighted)    |                             |

### OCS Estimated Cumulative Incremental Lifetime Cancer Risk and Hazard Index for the NORR Potential Exposure Area

| Potential Receptor  | Estimated Cumulative ILCR less than or equal to $1 \times 10^{-6}$ | Estimated Cumulative ILCR greater than $1 \times 10^{-6}$ and less than or equal to $5 \times 10^{-6}$ | Estimated Cumulative ILCR greater than $5 \times 10^{-6}$ and less than or equal to $1 \times 10^{-5}$ | Estimated Cumulative ILCR greater than $1 \times 10^{-5}$ and less than or equal to $1 \times 10^{-4}$ | Estimated Cumulative ILCR greater than $1 \times 10^{-4}$ | Estimated HI less than or equal to 1 | Estimated HI greater than 1       |
|---|--|--|--|--|---|--------------------------------------|-----------------------------------|
| Hypothetical Future Resident                                  |  |  | Yes<br>(area-weighted)   | Yes<br>(depth-weighted)  |   | Yes<br>(area-weighted)               | Yes<br>(depth-weighted)           |
| Hypothetical Future Resident – Consumer of Home-Produced Food |  |  |  |  | Yes<br>(depth- and area-weighted)                         |                                      | Yes<br>(depth- and area-weighted) |

- **Noncancer HIs.** HIs for maintenance workers, recreational users, and tribal users were all  $\leq 1$ . **Based on the results of the HHRA, the levels of COPCs in OCS soil are safe and protective of potential noncancer health effects for all receptors except the hypothetical residential user in NORR potential exposure area.**
- **Lead.** The depth- and area-weighted EPCs for lead in the OCS potential exposure area are not expected to result in an increase in blood lead levels above the Office of Environmental Health Hazard Assessment's (OEHHA's) benchmark value of 1 microgram per liter ( $\mu\text{g/dL}$ ) for child receptors or the fetus of any of the adult receptors evaluated. **Based on the results of the OCS HHRA, the levels of lead in soil are safe and protective of all potential receptors evaluated.**



## SOIL HHRA EXECUTIVE SUMMARY

- **Tribal User and Hunter.** Estimated lifetime cancer risks for tribal users and hunters were at or below *de minimis* levels. **Based on the results of the HHRA, levels of COPCs in OCS soils are safe and protective of tribal users and hunters.**
- **Short-Term Maintenance Worker.** The depth- and area-weighted estimated cumulative ILCRs for the short-term maintenance worker for the OCS potential exposure area are above  $1 \times 10^{-6}$ , the point of departure for risk management decisions, but below  $5 \times 10^{-6}$ ; which is well within the risk-management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ . Estimated ILCRs above  $1 \times 10^{-6}$  are due primarily to hexavalent chromium via the inhalation of particulate pathway. However, with health and safety work practices in place that limit the amount of exposure to soil, estimated ILCRs for the short-term maintenance worker are overestimated and actual risks are likely at or below  $1 \times 10^{-6}$ . **In sum, the overall weight of evidence (WOE) supports that the levels of COPCs in OCS soils are safe and protective of short-term maintenance workers.**
- **Long-Term Maintenance Worker.** The depth-weighted estimated cumulative ILCRs for the long-term maintenance worker for the OCS potential exposure area are above  $1 \times 10^{-6}$ , the point of departure for risk management decisions, and slightly above  $1 \times 10^{-5}$ . The area-weighted estimated cumulative ILCRs for the long-term maintenance worker for the OCS potential exposure area are at  $1 \times 10^{-5}$ , which is well within the risk-management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ . Estimated ILCRs above  $1 \times 10^{-6}$  are due primarily to hexavalent chromium via the inhalation of particulate pathway. However, with health and safety work practices in place that limit the amount of exposure to soil, the estimated ILCRs for the long-term maintenance worker are overestimated and actual risks are likely below  $1 \times 10^{-5}$  and well within the risk management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ . **In sum, the overall WOE supports that the levels of COPCs in OCS soils are safe and protective of the long-term maintenance worker.**
- **Recreational User – Camper.** The depth- and area-weighted estimated cumulative ILCRs for the camper for the OCS potential exposure area are slightly above  $1 \times 10^{-6}$ , the point of departure for risk management decisions due primarily to hexavalent chromium and dioxin toxicity equivalent (TEQ) via the soil ingestion pathway. The ILCRs are within the risk-management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ . The results of the sensitivity analysis suggest that the majority of the depth- and area-weighted estimated ILCRs above  $1 \times 10^{-6}$  for campers exposed to soils in the OCS potential exposure area are attributed to elevated concentrations of hexavalent chromium and/or dioxin TEQ. **Based on the results of the OCS HHRA for campers, risks are within the risk management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ . Some targeted form of risk management or remediation, addressing elevated levels of hexavalent chromium and dioxin TEQ in select locations, would be effective at reducing risks to levels below the CalEPA DTSC point of departure for excess ILCR of  $1 \times 10^{-6}$ .** No risk management or remediation would be necessary to reduce risks for the camper to levels below  $1 \times 10^{-5}$ .
- **Recreational User – Hiker.** The depth- and area-weighted estimated cumulative ILCRs for the hiker for the OCS potential exposure area are at or slightly above  $5 \times 10^{-6}$ ; due primarily to hexavalent chromium and dioxin TEQ via the ingestion pathway. These estimated ILCRs are above  $1 \times 10^{-6}$ , the point of departure for risk management decisions, but within the risk-management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ . The results of the sensitivity analysis suggest that the majority of the depth- and area-weighted estimated ILCRs above  $1 \times 10^{-6}$  for hikers exposed to soils in the OCS potential exposure area are attributed to elevated concentrations of hexavalent chromium and/or dioxin TEQ. **Based on the results of the OCS HHRA for hikers, risks are within the risk management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ . Some targeted form of risk management or remediation, addressing elevated levels of hexavalent chromium and dioxin TEQ in select locations, would be effective at reducing risks to**

levels below the CalEPA DTSC point of departure for excess ILCR of  $1 \times 10^{-6}$ . No risk management or remediation would be necessary to reduce risks for the hiker to levels below  $1 \times 10^{-5}$ .

- **Recreational User – OHV Rider.** The depth- and area-weighted estimated cumulative ILCRs for the OHV rider for the OCS potential exposure area are at  $1 \times 10^{-5}$  and above  $5 \times 10^{-6}$ , respectively due primarily to hexavalent chromium via the inhalation particulate pathway and dioxin TEQ via the ingestion pathway. These estimated ILCRs are above  $1 \times 10^{-6}$ , the point of departure for risk management decisions, but within the risk-management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ . The results of the sensitivity analysis suggest that the majority of the depth- and area-weighted estimated ILCRs above  $1 \times 10^{-6}$  for OHV riders exposed to soils in the OCS potential exposure area are attributed to elevated concentrations of hexavalent chromium and/or dioxin TEQ. **Based on the results of the OCS HHRA for OHV riders, risks are within the risk management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ . Some targeted form of risk management or remediation, addressing elevated levels of hexavalent chromium and dioxin TEQ in select locations, would TEQ would be effective at reducing risks to levels below the CalEPA DTSC point of departure for excess ILCR of  $1 \times 10^{-6}$ . No risk management or remediation would be necessary to reduce risks for the OHV rider to levels below  $1 \times 10^{-5}$ .**
- **Hypothetical Future Resident.** The depth- and area-weighted estimated cumulative ILCRs and HIs associated with theoretical exposure to COPCs in soil and home-produced food in NORR potential exposure area for hypothetical future residents are above  $1 \times 10^{-6}$ , the point of departure for risk management decisions and an HI of 1, respectively, due to hexavalent chromium, cobalt, total PCBs, dioxin TEQ, and/or TPHd. The estimated cumulative ILCRs associated with potential exposure to COPCs in soil and home-produced food are slightly above  $1 \times 10^{-5}$  and at  $1 \times 10^{-3}$ , respectively. Note that risks/hazards estimated for NORR potential exposure area are not considered representative of the realistic or likely potential exposures for the human populations that could be present in this area or anywhere at the site. Specifically, it is highly unlikely that any area of the site will ever be used for residential purposes. However, the hypothetical future unrestricted residential scenario was evaluated for the NORR potential exposure area at the request of the DOI. **The estimated risks and hazards presented for the hypothetical future resident in the NORR potential exposure area are provided for informational purposes only.**

In sum, **based on the results of the OCS HHRA, the levels of COPCs in OCS soils are safe and protective of short- and long-term maintenance workers, hunters, and tribal users.**

**Recommendation for OCS:** Some targeted form of risk management or remediation, addressing elevated levels of hexavalent chromium and dioxin, would be effective at reducing risks for the campers, hikers and OHV riders to levels below  $1 \times 10^{-6}$ , the point of departure for risk management decisions. No risk management or remediation would be necessary to reduce risks for the the campers, hikers and OHV riders to levels below  $1 \times 10^{-5}$ . The estimated risks and hazards presented for the hypothetical future resident in the NORR potential exposure area are provided for informational purposes only. However, the hypothetical future residential land use is not a reasonable anticipated future land use for the NORR area.

### *ICS Potential Exposure Area*

The table in this section summarizes the results of the HHRA for the ICS potential exposure area.

**Estimated Cumulative Incremental Lifetime Cancer Risk and Hazard Index for the ICS Potential Exposure Area**

| Potential Receptor            | Estimated Cumulative ILCR less than or equal to $1 \times 10^{-6}$ | Estimated Cumulative ILCR greater than $1 \times 10^{-6}$ and less than or equal to $5 \times 10^{-6}$ | Estimated Cumulative ILCR greater than $5 \times 10^{-6}$ and less than or equal to $1 \times 10^{-5}$ | Estimated Cumulative ILCR greater than $1 \times 10^{-5}$ and less than or equal to $1 \times 10^{-4}$ | Estimated Cumulative ILCR greater than $1 \times 10^{-4}$ | Estimated HI less than or equal to 1           | Estimated HI greater than 1 |
|-------------------------------|--|--|--|--|---|--|-----------------------------|
| Commercial Worker             |  |  | Yes <sup>1</sup><br>(depth- and area-weighted)   |  |   | Yes <sup>1</sup><br>(depth- and area-weighted) |                             |
| Short-Term Maintenance Worker | Yes<br>(depth-weighted)  |  |  |  |   | Yes<br>(depth-weighted)                        |                             |
| Long-Term Maintenance Worker  |  | Yes<br>(area-weighted)   | Yes<br>(depth-weighted)  |  |   | Yes<br>(depth- and area-weighted)              |                             |

**Note:**

<sup>1</sup> Represents the estimated cumulative ILCR and HI for the commercial worker associated with COPCs in soil and soil gas.

- Noncancer HIs.** The depth- and area-weighted estimated cumulative HIs for commercial worker, short-term maintenance worker, and long-term maintenance worker for ICS potential exposure area are below an HI of 1. **Based on the results of the ICS HHRA, the levels of the levels of COPCs in ICS soil are safe and protective of potential noncancer health effects for all worker receptors evaluated.**
- Lead.** The depth- and area-weighted EPCs for lead in ICS potential exposure area soils are not expected to result in an increase in blood lead levels above OEHHA's benchmark value of 1 µg/dL for the fetus of any of the workers. **Based on the results of the ICS HHRA, the levels of lead in soil are safe and protective for all worker receptors evaluated.**
- Commercial Worker.** The depth- and area-weighted estimated cumulative ILCRs associated with potential exposure to COPCs in soil in the ICS potential exposure area for the commercial worker are above  $1 \times 10^{-6}$ , the point of departure for risk management decisions, but at or below  $1 \times 10^{-5}$  which is well within the risk management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ . However, the active TCS facility has work practices in place that limit the amount of exposure to soil. The overly conservative assumption that all areas within the ICS potential exposure area are uncovered, overestimates ILCRs for the commercial worker and reasonable upper bound values are likely below  $1 \times 10^{-5}$  and well within the risk management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ . The estimated ILCRs and HIs associated with potential COPCs in soil gas in the ICS potential exposure area for commercial workers exposed via the inhalation of vapors in indoor air pathway is well below  $1 \times 10^{-6}$  and an HI of 1, respectively. **In sum, the overall WOE supports that the conditions at the facility and levels of COPCs in soils and soil gas in ICS are safe and protective of the commercial worker.**

- **Short-Term Maintenance Worker.** The depth-weighted estimated cumulative ILCRs associated with potential exposure to COPCs in soil in ICS potential exposure areas for the short-term maintenance worker are below  $1 \times 10^{-6}$ , the point of departure for risk management decisions. **Based on the results of the ICS HHRA, levels of COPCs in ICS soils are safe and protective of short-term maintenance workers.**
- **Long-Term Maintenance Worker.** The depth- and area-weighted estimated cumulative ILCRs associated with potential exposure to COPCs in soil in ICS potential exposure areas for the long-term maintenance worker are above  $1 \times 10^{-6}$ , the point of departure for risk management decisions, but at or below  $1 \times 10^{-5}$  which is well within the risk management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ . However, with work practices in place that limit the amount of exposure to soil and the overly conservative assumption that all areas within the ICS potential exposure area are uncovered, estimated ILCRs for the long-term maintenance worker are overestimated and likely well below  $1 \times 10^{-5}$  and well within the risk management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ . **Based on the results of the ICS HHRA, the overall WOE supports that the levels of COPCs in soils ICS are safe and protective of the long-term maintenance worker.**

#### ES.5.4 HHRA Uncertainty Analysis

Many of the assumptions used in this HHRA are conservative, including representativeness of the sampling data, human exposures, fate and transport modeling, and chemical toxicity. Following agency guidance, the assumptions used reflect a 90th or 95th percentile UCL value, rather than a typical or average value. By using multiple conservative exposure assumptions or toxicity estimates, the risk estimates likely develop a conservative bias that may result in significant overestimation of potential risk and hazard.

In addition, as recommended by DOI (Arcadis 2015), it is assumed that each of the recreational activities could take place at any location on federal land. In reality, specific locations may be preferred for certain activities, while other locations may be less attractive or may have limited recreational options. No physical barrier (such as fencing) is present that would stop an individual recreational user from accessing any and all areas of the AOCs outside the TCS. Therefore, potential receptor populations would more likely be exposed randomly, over the course of a lifetime, to soils present across the OCS potential exposure area, rather than have a lifetime of contact limited to a potential exposure area based on an individual AOC (as evaluated in the area-specific appendices at the request of DTSC). Therefore, risk and/or hazards presented for individual potential exposure areas are not believed to be the most representative of the estimated health risks to humans potentially contacting the soil outside the TCS and are not recommended for remedial decision making. Section 5.6 of the HHRA Report discusses the uncertainties in the HHRA.

#### ES.6 Ecological Risk Assessment

A Phase I Predictive ERA was completed for the site and includes ERAs for 17 individual potential ecological exposure areas, which were evaluated for the ecological communities and small home-range wildlife receptors (Figure 3-3), and large home-range wildlife receptors (Figure 3-4b) listed in the table titled Potential Ecological Exposure Areas Evaluated in the ERA.

**Potential Ecological Exposure Areas Evaluated in the Ecological Risk Assessment**

| <b>Potential Ecological Exposure Areas</b>   | <b>Evaluated in the Ecological Risk Assessment</b>  |
|--|---|
| <b>Potential Terrestrial Exposure (Soil) for Plants, Soil Invertebrates, and Small Home-Range Wildlife Receptors (mammals and birds)</b> | <ul style="list-style-type: none"> <li>• BCW</li> <li>• SWMU 1</li> <li>• BCW excluding SWMU 1 and AOC 4</li> <li>• AOC 4</li> <li>• AOC 9</li> <li>• AOC 10</li> <li>• AOC 11</li> <li>• AOC 12</li> <li>• AOC 14</li> <li>• AOC 27</li> <li>• AOC 28</li> <li>• AOC 31</li> <li>• UA-2</li> <li>• Tamarisk Thicket</li> </ul> |
| <b>Potential Terrestrial Exposures (Soil) for Large Home-Range Wildlife Receptors (mammals and birds)</b>                                | <ul style="list-style-type: none"> <li>• OCS</li> <li>• BCW and AOC 4</li> <li>• OCS excluding BCW and AOC 4</li> </ul>   |

The overall goal of the ERA is to estimate potential unacceptable risk to potential ecological receptors from exposure to COPECs in soil. The results of the risk assessment also provide key information that assists risk managers with making site management and remedial decisions protective of ecological receptors.

**ES.6.1 Problem Formulation**

A problem formulation step was completed to identify societal or regulatory goals and assessment endpoints to evaluate potential impact to ecological populations from site constituents. The problem formulation relies on data collected during site investigations and incorporates features of the ecological setting, evaluation of the complete pathways in the CSM, and selection of the assessment and measurement endpoints.

**ES.6.1.1 Ecological Conceptual Site Model**

The ecological CSM is the framework for relating potential ecological receptors to chemically affected media and evaluating the potentially complete exposure pathways.

The primary terrestrial potential exposure pathways for soil are direct contact or incidental ingestion of surface soil (0 to 0.5 foot bgs), shallow soil (0 to 3 feet bgs), and subsurface I soil (0 to 6 feet bgs)<sup>1</sup> and, for mammals and birds, uptake and subsequent ingestion of constituents in biota. Potential receptors evaluated include plants, soil invertebrates, birds, and mammals. Reptiles, while common in the Mojave Desert, were not evaluated quantitatively in the ERA because methods to evaluate exposure and toxicity to these receptors are generally unavailable. However, it was assumed that conservative assumptions used in the evaluation of risks for other species are protective of reptiles as well.

### ES.6.1.2 Assessment and Measurement Endpoints

Assessment endpoints, which define the valued ecological resource (that is, ecological entity) and a characteristic of the resource to protect (that is, attributes), and measurement endpoints (measurable ecological characteristics that are related to the assessment endpoint) for each indicator receptor were selected in the RAWP documents (Arcadis 2008a, 2009a, 2015) and are presented in Table 6-1. The assessment endpoints included sufficient rates of survival, growth, and reproduction to sustain communities of plants and soil invertebrates and populations of mammals and birds.

## ES.6.2 Exposure Assessment

The exposure assessment was completed to estimate exposure concentrations or doses based on receptor contact with COPECs in the potential exposure areas for the assumed complete and significant exposure pathways described in the CSM. The exposure assessment identified the assumptions necessary to estimate direct exposure EPCs (that is, soil concentrations) and EPCs used as the basis for estimating bioaccumulation and subsequent exposure of upper trophic-level receptors (that is, soil and biota tissue EPCs).

### ES.6.2.1 Exposure Point Concentrations and Exposure Depths

The EPC is the representative concentration of a constituent in an environmental medium that is potentially contacted by the receptor (USEPA 1997). During the ERA, soil EPCs were estimated for each individual potential exposure area, as described above in Section ES.4. Biota tissue EPCs were calculated from soil EPCs using soil-to-biota uptake relationships for plants, invertebrates, and small mammals selected in the RAWP documents (Arcadis 2008a, 2009a, 2015).

As described in the CSM, potential receptor exposure to soil varies by receptor type. The ERA evaluated up to three relevant exposure depths for direct contact/incidental ingestion and biota uptake of soil for each receptor. The soil depths evaluated included surface soil (0 to 0.5 foot bgs), shallow soil (0 to 3 feet bgs), and subsurface I soil (0 to 6 feet bgs). EPCs were developed for each soil exposure interval for each potential exposure area. Ecological receptors were evaluated for potential exposure to soil, as listed in the table titled Soil Uptake Evaluations.

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<sup>1</sup> Subsurface soil exposure intervals are defined as subsurface I soil (0 to 6 feet bgs) and subsurface II soil (0 to 10 feet bgs). Subsurface soil II is considered in the human health risk assessment only.



## Soil Uptake Evaluations

| Exposure   | Soil Uptake Evaluations   |
|--|---|
| <b>Assumed Direct Contact / Incidental Ingestion</b> | <ul style="list-style-type: none"> <li>Plants – based on the highest EPCs from surface, shallow, and subsurface I soil</li> <li>Soil invertebrates – based on surface soil EPCs</li> <li>Granivorous, insectivorous, carnivorous birds, and invertivorous small mammals (non-burrowing) – EPCs from surface soil</li> <li>Granivorous and carnivorous mammals (burrowing) – EPCs based on the highest EPCs from surface, shallow, and subsurface I soil</li> <li>Herbivorous mammals (Nelson's desert bighorn sheep) – although not a burrowing receptor, soil EPCs based on the highest EPCs from surface, shallow, and subsurface I soil were conservatively selected for this special-status receptor</li> </ul> |
| <b>Assumed Biota Uptake</b>                          | <ul style="list-style-type: none"> <li>Plant tissue as food – based on the highest EPCs from surface, shallow, and subsurface I soil</li> <li>Soil invertebrate tissue as prey – based on surface soil EPCs</li> <li>Small mammal tissue as prey – based on surface soil EPCs</li> </ul>  |

Additionally, EPCs for the soil exposure intervals were estimated for scouring scenarios in BCW and AOC 10 in the table titled EPCs for Soil Exposure Intervals for Scouring Scenarios.

## EPCs for Soil Exposure Intervals for Scouring Scenarios

| Baseline Scenario                   | 2-foot Scouring                      | 5-foot Scouring                      |
|-------------------------------------|--------------------------------------|--------------------------------------|
| Surface soil (0 to 0.5 foot bgs)    | Surface soil (2 to 3 feet bgs)       | Surface soil (5 to 6 feet bgs)       |
| Shallow soil (0 to 3 feet bgs)      | Shallow soil (2 to 6 feet bgs)       | Shallow soil (5 to 10 feet bgs)      |
| Subsurface I soil (0 to 6 feet bgs) | Subsurface I soil (2 to 10 feet bgs) | Subsurface I soil (5 to 15 feet bgs) |

## ES.6.2.2 Exposure Concentrations and Exposure Dose Models

For ecological communities (plants and soil invertebrates), potential exposures are expressed as soil concentrations, in units of milligram per kilogram (mg/kg) or nanogram per kilogram (ng/kg).

For potential wildlife receptors (mammals and birds), route-specific and food-web or dietary exposure models were used to estimate exposure doses in milligram per kilogram body weight per day (mg/kg-bw/day). To calculate exposure doses for wildlife receptors, soil data and receptor-specific parameters were used in the dose equations.

Consistent with DTSC guidance (1996), modelled exposure doses were estimated using both the maximum and 95UCL concentrations for each COPEC in soil. In most cases, an area-weighted 95UCL was also used to refine exposure doses when data were sufficient for that calculation. Risk estimates are presented for all EPC scenarios, however, risk conclusions presented in the ERA rely predominately on the exposure doses using an area-weighted 95UCL, as they are more resistant to sampling bias potentially present using depth-weighted EPCs.

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For dietary dose modeling, species-specific values used for the terrestrial receptors were selected, and include body weight, dietary composition, ingestion rate, and home range. For terrestrial birds and mammals, risks were evaluated using two site-specific use factor (SUF) scenarios: a generic SUF of 1 and a SUF based on a species- and site-specific home range (referred to as the site-specific SUF for simplicity) compared to the total area of each exposure area. For each area, COPECs with HQs greater than 1 using the depth-weighted EPCs were identified for further evaluation using refined exposure and effects assumptions, including site-specific SUFs. For ecological receptor populations exposed to COPECs in soil, risk conclusions were ultimately characterized based on HQs that were calculated using refined exposure and effects assumptions associated with a higher level of confidence in predicting risks (area-weighted EPCs, site-specific SUF, and selected TRVs) and supporting lines of evidence (LOEs). To estimate bioaccumulation in animal tissue or uptake into plants soil-to-biota uptake factors were developed as either regression equations or bioaccumulation factors (BAFs). Uptake regressions and BAFs that were selected in the RAWP (Arcadis 2008a) and technical memoranda (Arcadis 2007, 2008b, 2009b) were used to estimate concentrations of COPECs in biota and food item tissue (that is, prey) from soil.

For dioxin TEQ, the selected BAFs are based on uptake of a single congener: 2,3,7,8- tetrachlorodibenzo-p-dioxin (2,3,7,8-TCDD). Because of the uncertainty associated with use of a single congener based BAF to estimate uptake for all 17 dioxin/furan congeners included in the dioxin TEQ mixture, dioxin TEQ uptake was evaluated using two congener-specific BAF approaches. Although the uptake regression for dioxin TEQ (based on 2,3,7,8-TCDD uptake) was used to estimate risk (that is, to calculate hazard quotients [HQs]) to potential ecological receptors at the site, the alternate and more robust BAFs approaches for dioxin TEQ based on congener-specific uptake are recommended for developing risk-based remediation goals (RBRGs) when considering risk management decisions.

### ES.6.3 Effects Assessment

For the ERA, media-based screening levels for ecological communities of plants and soil invertebrates and dose-based toxicity reference values (TRVs) for wildlife (mammals and birds) were selected in the RAWP documents (Arcadis 2008a, 2009a, 2015) with review and/or input from the DTSC and USFWS. Screening levels and TRVs were updated with current values since the submission of the RAWP (Arcadis 2008a) and are presented in Table 6-6 of the HHERA Report.

For plants and soil invertebrates, screening levels are generic benchmarks obtained from publicly available guidance documents and other sources commonly used in ERAs.

For wildlife, range of risks were estimated using the no-observed adverse effects level (NOAEL)-based TRVs and lowest-observed adverse effects level (LOAEL)-based TRVs presented in the RAWP (Arcadis 2008a) and supporting technical memoranda (Arcadis 2007, 2008b, 2009b). These selected TRVs were primarily based on the TRVs used to develop USEPA's Ecological Soil Screening Levels (EcoSSLs; (USEPA 2008); other sources included the Toxicological Benchmarks for Wildlife from the Oak Ridge National Laboratory (Sample et al. 1996) and the USEPA Region 6's ERA Guidance (USEPA 1999). In addition, a second set of NOAEL- and LOAEL-TRVs based on the Navy/Biological Technical Assistance Group (BTAG) TRVs (California DTSC 2002, 2009b) were also used for COPECs, where available. Following DTSC guidance (1996, 2000), TRVs were adjusted when the differences in body weight between the site-specific potential wildlife receptor and the laboratory animals used in the studies to develop the TRVs were significant (greater than two orders of magnitude).

No avian TRVs were proposed in the RAWP documents (Arcadis 2008a, 2009a, 2015) to evaluate potential risk to birds from hexavalent chromium at the site, as published TRVs were unavailable. Avian NOAEL- and LOAEL-based TRVs for hexavalent chromium were developed for the ERA (2.5 mg/kg-bw/day and 25

mg/kg-bw/day, respectively), based on a literature search for recent studies. Uncertainty associated with these TRVs is discussed in Section 6.7.5 of the HHERA Report.

For dioxin TEQ, the selected mammalian and avian TRVs for the ERA were based on TRVs presented in the RAWP documents (Arcadis 2008a, 2009a, 2015), and are based on the lowest available TRVs. Following the approach used by USEPA in developing TRVs for the EcoSSLs (USEPA 2008), alternate and more robust dioxin TEQ TRVs were developed for mammals and birds based the geometric mean of the reproduction and growth endpoints for the NOAEL and LOAEL effect levels, respectively. Although the dioxin TEQ TRVs selected in the RAWP (Arcadis 2008a) were used to estimate risk (that is, to calculate HQs) to potential ecological receptors at the site, the alternate and more robust TRVs for dioxin TEQ based on more recent data are recommended for developing RBRGs when considering risk management decisions.

### ES.6.4 Risk Characterization

The ERA risk characterization integrated the results of the exposure assessment and toxicity assessment and includes two major components: risk estimation and risk description. Following the approach described in the RAWP documents (Arcadis 2008a, 2009a, 2015), HQs were estimated for each potential receptor population in each potential exposure area using EPCs for each COPEC and appropriate soil exposure depth.

HQs only account for a single LOE. Following USEPA guidance (1998) guidance, risk estimates for each potential receptor and COPEC within a potential exposure area were interpreted based on a semi-quantitative WOE approach using multiple LOE. LOE could include but are not limited to the following: supporting statistical and site use information (such as the frequency of detection [FOD]), basis of the exposure concentrations (maximum versus 95UCL), confidence in the toxicity values, the direction of uncertainty in the risk estimates, consideration of special-status species at the site, and spatial extent of elevated concentrations. The WOE assessment, including the HQs based on the most refined exposure assumptions (area-weighted EPC and site-specific SUF) and supporting LOE, was used to evaluate the assessment endpoints, reduce uncertainty, and ultimately draw risk conclusions. These components comprise the risk description.

#### ES.6.4.1 Approach

Risks to potential ecological receptors from COPECs in soil were estimated for all 17 potential ecological exposure areas by calculating HQs for each receptor and COPEC. For plants and soil invertebrates, risks (HQs) were estimated by comparing the soil EPCs for each COPEC with respective screening levels and these HQs were compared to the target HQ of 1. For wildlife, HQs are an expression of the ratio of an exposure estimated dose (ADD<sub>i</sub>) to an effects dose (that is, TRV). ADD<sub>i</sub> for indicator species were compared to the NOAEL-based (low) and LOAEL-based (high) TRVs, and these HQs were compared to the target HQ of 1.

For wildlife, HQs represent potential risk to individual receptors and potential risk to populations must be extrapolated from these HQ values following a standard HQ equation (USEPA 1997). For wildlife, risks were estimated using a generic SUF of 1 and also using site-specific SUFs. Following the RAWP (Arcadis 2008a), area-weighted EPCs were calculated only if risks based on depth-weighted EPCs suggested potential risk to ecological receptors (that is, HQ greater than 1 for any COPEC).

The ERAs for each potential ecological exposure area are presented in detail in the exposure area-specific appendices, including risk calculations based on depth-weighted and area-weighted EPCs (when calculated)

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for all COPECs, and the WOE conclusions. At the conclusion of each potential exposure area ERA, risk drivers were identified based on those COPECs for which unacceptable community/population level risk (that is, HQs greater than 1 for plants and soil invertebrate communities and LOAEL-based HQs for wildlife populations [or LOAEL-based HQs greater than 10 for dioxin TEQ]) was predicted using the most refined exposure and effects assumptions (which are selected TRVs, area-weighted EPCs, and site-specific SUF) and additional supporting LOE. For T&E species and other species of concern observed onsite (ring-tail cat and bats, respectively), a qualitative assessment was completed based on surrogate and representative receptors.

### ES.6.4.2 Results of the ERA

As noted above, risk conclusions are based on HQs calculated using refined exposure and effects assumptions associated with a higher level of confidence in predicting risks (area-weighted EPCs, site-specific SUF, and selected TRVs) and the supporting LOEs. The HQs, LOEs, and risk conclusions are summarized in Table 6-11 of the HHERA Report (see exposure area-specific appendices for details).

In summary, based on the WOE approach, there were no potentially unacceptable risks identified for T&E species potentially present at the site. In addition, no potentially unacceptable risk was identified for most ecological receptors, including granivorous small mammals, small home range birds, and all large home range receptors, for any of the potential exposure areas evaluated.

The potential for unacceptable risk was identified only for three ecological receptors in four potential exposure areas located along the TCS fenceline. These potential exposure areas, risk-driving COPECs, and potential receptors are presented in the table titled Potential Exposure Areas, Risk-Driving COPECs, and Potential Receptors and summarized in the following sections.

#### Potential Exposure Areas, Risk-Driving COPECs, and Potential Receptors

| Exposure Area | Risk Driver         | Plants | Invertebrates | Shrew |
|---------------|---------------------|--------|---------------|-------|
| BCW           | Dioxin TEQ          | No     | No            | Yes   |
| SWMU1         | Hexavalent Chromium | Yes    | Yes           | No    |
| SWMU1         | Total Chromium      | No     | Yes           | Yes   |
| SWMU1         | Dioxin TEQ          | No     | No            | Yes   |
| AOC9          | Hexavalent Chromium | Yes    | Yes           | No    |
| AOC9          | Total Chromium      | No     | Yes           | Yes   |
| AOC9          | Copper              | Yes    | Yes           | Yes   |
| AOC9          | Dioxin TEQ          | No     | No            | Yes   |
| AOC 10        | Hexavalent Chromium | Yes    | Yes           | No    |
| AOC 10        | Total Chromium      | No     | Yes           | No    |
| AOC 10        | Dioxin TEQ          | No     | No            | Yes   |

For ecological communities of plants and soil invertebrates, only generic risk-based screening levels were available to estimate HQs. As discussed in Section 6.7, screening levels for the risk-driving COPECs are

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often below BTVs and there is low confidence in their ability to predict risk at the site. The screening levels are published values based on toxicity data that have limited relevance for the site and are designed for use in conservative screening level risk assessments and for site-characterization purposes. Therefore, use of these generic screening levels can result in significant uncertainty in the risk estimates. For plants, observations of plant communities made during floristic surveys were also used as a key LOE.

### BCW

For the baseline scenario, and based on a WOE approach, no potentially unacceptable risk was identified for: plants, soil invertebrates, granivorous mammals and birds, or insectivorous birds. Area-weighted HQs for plants and soil invertebrates and LOAEL-based HQs for wildlife were greater than 1 for some COPECs and receptors; however, the WOE supports the conclusion that unacceptable risk is unlikely for: antimony and thallium for plants; hexavalent chromium and total chromium for soil invertebrates; total chromium, mercury, and dioxin TEQ for cactus wren; antimony for desert shrew; and dioxin TEQ for Merriam's kangaroo rat. Potential for unacceptable risk was identified only for dioxin TEQ for invertivorous mammals (desert shrew) with risk-driving locations primarily within SWMU 1 in the BCW potential exposure area.

The risk conclusions for the 2-foot scouring scenario are similar to the baseline scenario, with the same risk drivers and associated receptors showing potentially unacceptable risk. In the 5-foot scouring scenario, the potential for unacceptable risk to desert shrew is no longer present, indicating that the concentrations of concern for dioxin TEQ are not within the surface soil interval following scouring (5 to 5.5 feet bgs) evaluated in this scenario.

As discussed previously, SWMU 1 is located within the BCW potential exposure area. The ERA conducted for the BCW excluding SWMU 1 and TCS-4 (BCWxSWMU1) potential exposure area identified no potentially unacceptable risk for any receptor or COPEC evaluated. This supports the observation that the potentially unacceptable risks identified for BCW were due to COPEC concentrations present in SWMU 1 soil.

### SWMU 1

For the baseline scenario, and based on a WOE approach, no potentially unacceptable risk was identified for granivorous mammals and birds, or insectivorous birds. Unacceptable risks were driven by: hexavalent chromium for plants; hexavalent chromium and total chromium for soil invertebrates; and total chromium and dioxin TEQ for invertivorous mammals (desert shrew).

### AOC 9

For the baseline scenario, and based on a WOE approach, no potentially unacceptable risk was identified for granivorous mammals and birds, or insectivorous birds. Potentially unacceptable risks were driven by: hexavalent chromium and copper for plants; hexavalent chromium, total chromium, and copper for soil invertebrates; and total chromium, copper, and dioxin TEQ for invertivorous mammals (desert shrew) at locations along the TCS fenceline.

### AOC 10

For the baseline scenario, and based on a WOE approach, no potentially unacceptable risk was identified for granivorous mammals and birds, or insectivorous birds. Potentially unacceptable risks were identified for: hexavalent chromium for plants; hexavalent chromium and total chromium for soil invertebrates; and dioxin TEQ for invertivorous mammals (desert shrew). Elevated concentrations of hexavalent chromium and dioxin TEQ are present in a few locations, primarily located within the drainage depressions (which are subareas AOC10b, c, and d) behind the berms at AOC 10. The risk conclusions are similar for the 2-foot scouring scenario, although total chromium also was noted as a risk driver for the desert shrew in the 2-foot scouring

scenario. For the 5-foot scouring scenario, potential for unacceptable risk was identified only for dioxin TEQ and the desert shrew.

### ES.6.5 ERA Uncertainty Analysis

Sources of uncertainty that influenced the ERA risk characterization included uncertainties in the analytical results, data evaluation, problem formulation, CSM, exposure point concentrations, exposure assessment, effects assessment, and interpretation of the risk estimates. Because of these approaches and other protective assumptions made throughout the ERAs, risk estimates are expected to be overestimated rather than underestimated.

Similar to the uncertainties in the HHRA, many of these sources of uncertainty are generic in nature and inherent in the risk assessment process. Site-specific uncertainties are also discussed.

## ES.7 Conclusions and Recommendations

This section summarizes the conclusions of the HHRA and ERA for COPCs/COPECs in soil at the site and provides recommendations for constituents of concern (COCs) to be addressed in the Soil Corrective Measure Study/Feasibility Study (CMS/FS). For purposes of this HHRA, COCs refers to those chemicals that most significantly contribute to estimates of unacceptable risk (also referred to as 'risk drivers') and that are recommended to be the focus of future remedial planning.

### ES.7.1 HHRA Conclusions and Recommendations

The results of the HHRA for the OCS and ICS potential exposure areas support the following findings:

#### Conclusions for the HHRA

- The depth- and area-weighted EPCs for lead in all potential exposure areas evaluated are not expected to result in an increase in blood lead levels above the OEHHA benchmark value of 1 µg/dL for child receptors or the fetus of any of the adult receptors evaluated. **Based on the results of the HHRA, the levels of lead in soil are safe and protective for all potential receptors evaluated.**
- The HHRA results for the ICS potential exposure area support that the levels of COPCs in ICS soil and/or soil gas are safe and protective of commercial and short- and long-term maintenance workers for current and anticipated future operational conditions and practices.
- While **AOC-specific evaluations provide useful information regarding limited areas or areas of highest impact, they are not suitable as the sole basis for the conclusions of the HHRA** or risk management decisions going forward. Assuming lifetime soil contact is limited to these specific individual potential exposure areas is not representative of either the potential receptors evaluated, or the likely future land use for the site.
- **The OCS potential exposure area is considered the most representative baseline scenario for potential human exposures and associated risks for soil contact outside TCS.** Human populations that could be present at the site would more likely be exposed randomly, over the course of a lifetime, to soil present in all areas located outside the TCS, rather than have a lifetime of contact limited to a single AOC/SWMU/UA.



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- HIs for maintenance workers, recreational users, and tribal users were all  $\leq 1$  for both depth- and area-weighted EPCs for the OCS potential exposure area. **Based on the results of the HHRA, the levels of COPCs in OCS soil are safe and protective of potential noncancer health effects.**
- Estimated lifetime cancer risks for tribal users and hunters were at or below *de minimis* levels for the OCS potential exposure area. **Based on the results of the HHRA, levels of COPCs in soil are safe and protective of tribal users and hunters.**
- The HHRA results of the OCS potential exposure area support that the **levels of COPCs in OCS soil are safe and protective of short- and long-term maintenance workers** for current and anticipated future operational conditions and practices.
- **For all potential human receptors evaluated, COPCs in soil driving risks or hazards above *de minimis* levels are hexavalent chromium and dioxin TEQ, located predominately in the top 3 feet of soil.** Soil risk drivers appear to be predominately located in SWMU 1/TCS 4 and AOC 9.
- **The ILCR and HI estimates for the hypothetical future resident are likely highly overestimated.** Multiple conservative factors contributing to this overestimation include: the use of maximum depth-weighted concentrations to estimate exposure to PCBs and TPH as diesel and several conservative assumptions associated with food uptake modeling for hexavalent chromium and TPH as diesel.
- **The hypothetical future resident is not representative of likely future land use on DOI land or other areas of the site.** This evaluation is included in the HHRA for informational purposes only. As stated in DOI (2015) Land Use Memo, "DOI will not utilize a future residential scenario on Federal lands within the project area when evaluating cleanup options in the Feasibility Study phase."

### Recommendations for the HHRA

- For this HHRA, the OCS potential exposure area evaluation is the most representative scenario for the basis of HHRA conclusions and recommendations for the protection and safety of potential human receptors outside the fenceline.
- Based on the estimated cumulative ILCRs calculated for the HHRA, for the protection of human health, COPCs to be carried forward for developing RBRGs for soil are hexavalent chromium and dioxin TEQ.
- RBRGs for the potential recreational users are the most appropriate benchmarks for the protection of human health and associated risk management decisions going forward.
- Risks are within the risk management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ . Within this estimated cancer risk range, there is flexibility for risk managers in deciding what action, if any, is necessary and appropriate for the protection of human health. This approach to response actions at the site is consistent with the NCP (40 CFR 300). Some targeted form of risk management or remediation, addressing elevated soil levels of hexavalent chromium and dioxin TEQ would be effective at reducing risks for the potential camper, hiker, and OHV rider to levels below the CalEPA DTSC point of departure for excess ILCR of  $1 \times 10^{-6}$ . No risk management or remediation would be necessary to reduce risks for the potential camper, hiker and OHV rider to levels below  $1 \times 10^{-5}$ .

### ES.7.2 ERA Conclusions and Recommendations

Potential for unacceptable risk was identified for a certain few receptors (plants, soil invertebrates, and invertivorous small mammals) based on estimated exposure to a small number of COPECs (primarily hexavalent chromium, total chromium, dioxin TEQ) in three potential exposure areas near the TCS:

SWMU1, AOC9, and AOC10. Potentially unacceptable risk to invertivorous small mammal populations from risk drivers at BCW is due to elevated concentrations within the SWMU 1 potential exposure area. Copper was also identified as a risk driving COPEC for plants, soil invertebrates, and invertivorous small mammals in the AOC 9 potential exposure area. The risk driving COPECs are associated with known historical site releases and/or activities at or adjacent to the TCS (Section 2 of the HHERA Report).

Potential for unacceptable risk was not expected (based on HQs less than 1) or considered unlikely (based on the WOE) for all other potential receptors including granivorous small mammals, small home range birds, and all large home range receptors. Additionally, unacceptable risk was not expected or was considered unlikely in all remaining potential exposure areas more distant from the TCS. Based on the conservative assumptions incorporated in ERA, these risk conclusions likely overestimate potential for unacceptable risk at the site.

Some targeted form of risk management or remediation, addressing elevated concentrations of the following risk drivers in the following potential exposure areas would be effective at reducing potential exposures and thus risks to acceptable levels:

- Dioxin TEQ in SWMU1 – Targeted soil remediation for these risk drivers would be effective at reducing potential exposures and thus risks to acceptable levels within BCW (the potential exposure area considered to be the reasonable exposure area for receptor populations [and not SWMU 1]).
- Hexavalent chromium, total chromium, copper, and dioxin TEQ in AOC 9 – Targeted soil remediation for these risk drivers at locations along the TCS fenceline would be effective at reducing potential exposures and thus risks to acceptable levels within AOC 9.
- Hexavalent chromium, total chromium, and dioxin TEQ in AOC 10 – Targeted soil remediation for these risk drivers at locations within the AOC10c subarea (which is the drainage depression behind the middle berm in East Ravine), would be effective at reducing potential exposures and thus risks to desert shrew (which is an invertivorous small mammal) to acceptable levels within AOC 10.

## ES.8 Risk-Based Remedial Goals for Risk Drivers

As stated in the RAWP (Arcadis 2008a), risk management decisions to be made in the CMS/FS step of the regulatory process will be focused on COPCs/COPECs that contribute most significantly to risk and/or that exceed *de minimis* risk levels for soil for the potential receptors being evaluated (that is, COCs). RBRGs are concentrations at or below which COCs do not present potentially unacceptable risk to human health and ecological receptors. These values can be used in upcoming remedial planning including the CMS/FS to identify those COCs and areas of the site that may warrant some form of remedial or risk management action. RBRGs are proposed health protective target cleanup concentrations that can be used, in combination with other factors such as background concentrations, as a starting point for making risk management decisions. Consistent with the HHERA approach, RBRGs are applied based on the potential exposure area of interest (that is, the 95UCL for the exposure area should be less than or equal to the RBRG).

### ES.8.1 Human Health RBRGs

RBRGs were calculated for hexavalent chromium and dioxin TEQ, those compounds driving cancer risk estimates to greater than *de minimis* levels for the camper, hiker, and OHV rider exposure scenarios.

### ES.8.1.1 Methodology and Calculated RBRG Values

The methodology used to develop the RBRGs for the COPCs in soil at the site is based on USEPA and CalEPA guidance and the specific equations provided in the guidance documents (USEPA 1989, 1991; DTSC 1992, 2015). Exposure, transport, and toxicity assumptions remain unchanged from those described and used in the HHRA risk characterization (Section 5.0). Rearranging the equations used to estimate the ILCRs and noncancer hazards and using the CalEPA DTSC point of departure for the target ILCR of  $1 \times 10^{-6}$  (and  $1 \times 10^{-5}$  for dioxin TEQ) and the target noncancer HQ of 1, the concentration of each risk driver associated with the target ILCR and HQ levels was determined. Note that as indicated in the NCP (40 CFR 300), cancer risks between  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$  fall within a risk management range. This is generally referred to as the acceptable risk range. Within this estimated cancer risk range, there is flexibility for risk managers in deciding what action, if any, is necessary and appropriate for the protection of human health. The CalEPA DTSC point of departure for excess incremental lifetime cancer risk is  $1 \times 10^{-6}$ , and risk management decisions may raise the target criterion above  $1 \times 10^{-6}$  depending on site specific conditions.

RBRGs protective of potential human receptors are summarized in the table titled Risk-Based Remediation Goals Protective of Potential Human Receptors. RBRGs are a tool and not intended as a "bright line" for remediation.

#### Risk-Based Remediation Goals Protective of Potential Human Receptors

| <b>Risk Drivers for Potential Recreational Users</b> | <b>Human Health RBRG</b> | <b>RBRG Basis</b>                    |
|--|--------------------------|--------------------------------------|
| CrVI   | 3.1 mg/kg                | OHV rider at $1 \times 10^{-6}$ risk |
| CrVI   | 31 mg/kg                 | OHV rider at $1 \times 10^{-5}$ risk |
| CrVI   | 310 mg/kg                | OHV rider at $1 \times 10^{-4}$ risk |
| Dioxin TEQ   | 100 ng/kg                | Hiker at $1 \times 10^{-6}$ risk     |
| Dioxin TEQ   | 1,000 ng/kg              | Hiker at $1 \times 10^{-5}$ risk     |
| Dioxin TEQ   | 10,000 ng/kg             | Hiker at $1 \times 10^{-4}$ risk     |

### ES.8.1.2 Locations Driving Risk for the HHRA

The following discussion of the locations driving risk for the HHRA OCS potential exposure area is provided as an example of one method that can be used to apply the RBRGs and assist with identifying remedial design possibilities. This is not intended to substitute for actual remedial design and comprises part of the set of tools available to risk managers to make site-specific decisions regarding risk.

The lowest recreational user RBRGs for hexavalent chromium and dioxin TEQ are 3.1 mg/kg (for OHV rider at  $1 \times 10^{-6}$  risk level) and 0.00010 mg/kg (or 100 ng/kg; for hiker at  $1 \times 10^{-6}$  risk level), respectively (Table 8-1). Depth-weighted concentrations of the risk drivers, hexavalent chromium and dioxin TEQ, were ranked and the highest concentrations were iteratively removed from the baseline soil dataset. Then residual depth-weighted EPCs were calculated for the 0- to 0.5-foot bgs and 0- to 3-foot bgs exposure depths and compared with respective RBRGs. This process was repeated until the resulting residual depth-weighted 95UCL for the OCS potential exposure area was at or below the RBRG. To achieve this outcome, the following soil locations were identified as driving risks. When they were removed, the RBRG was achieved by the 95UCL for the remaining data.

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- SWMU 1
  - SWMU1-25 to meet the RBRG of 100 ng/kg for dioxin TEQ based on target cancer risk of  $1 \times 10^{-6}$  for both the 0- to 0.5-foot bgs and 0- to 3-foot bgs exposure depths; no sample data needs to be removed to meet the RBRG of 1,000 ng/kg for dioxin TEQ based on target cancer risk of  $1 \times 10^{-5}$  for both the 0- to 0.5-foot bgs and 0- to 3-foot bgs exposure depths.
- AOC 9
  - AOC10-20 to meet the RBRG of 3.1 mg/kg for hexavalent chromium for both the 0- to 0.5-foot bgs and 0- to 3-foot bgs exposure depths
  - #10 to meet the RBRG of 3.1 mg/kg for hexavalent chromium for the 0- to 3-foot bgs exposure depth.
- AOC 10
  - MW-58BR\_S to meet the RBRG of 3.1 mg/kg for hexavalent chromium for the 0- to 3-foot bgs exposure depth.

### ES.8.2 Ecological RGRGs

The ERA identified the following risk drivers and potential exposure areas as presenting an unacceptable risk to one or more potential ecological receptors:

- BCW (baseline) –dioxin TEQ for small mammals
- AOC 9 – hexavalent chromium and copper for plants; hexavalent chromium, total chromium, and copper for invertebrates; total chromium, copper, and dioxin TEQ for small mammals
- AOC 10 – hexavalent chromium and total chromium for plants; total chromium for invertebrates; and total chromium and dioxin TEQ for small mammals.

#### ES.8.2.1 Methodology and Calculated RBRG Values

For potential ecological communities of plants and soil invertebrates, only generic risk-based screening levels are available, and there is low confidence in their ability to predict risk at the site. Therefore, these generic screening levels for plants and soil invertebrates are not recommended for use as RBRGs at the site. Because the key risk drivers for plants and soil invertebrates (hexavalent chromium and total chromium) tend to be co-located, risk-management or remedial actions considered for the protection of wildlife receptors potentially exposed to total chromium will also reduce risk to plants and invertebrates.

For potential wildlife receptors, RBRGs based on protection of wildlife populations (that is, based on LOAEL-based TRVs) were derived for invertivorous small mammals (desert shrew), the only potential wildlife receptor identified with the potential for unacceptable risk associated with exposure to COPECs in soil at this site. The RBRGs (Table 8-3 of the HHERA Report) for small home range invertivorous mammals (desert shrew) were derived using the dietary dose model used to estimate HQs in the predictive ERAs (Sections 6.4 and 6.6). The RBRGs were calculated using Microsoft® Excel Solver™ software that determines the soil concentration for a target HQ equal to 1.

For dioxin TEQ, a range of RBRGs were calculated using the alternate and more robust BAF and TRV approaches/values. The congener-specific BAFs (USEPA 1999, Fagervold et al. 2010) and a recommended mammalian dioxin TRV developed in HHERA Report Section 6.7.5 of 30 ng/kg-bw/day derived using the

## SOIL HHERA EXECUTIVE SUMMARY

USEPA EcoSSL approach were used to calculate the RBRGs protective of invertivorous small mammals. Ecological RBRGs are summarized in the table titled Ecological Risk-Based Remediation Goals.

### Ecological Risk-Based Remediation Goals

| Risk Driver for Shrew | BAF                     | LOAEL-Based Mammalian TRV                | Ecological RBRG |
|-----------------------|-------------------------|--|-----------------|
| Total Chromium        | ERA / RAWP              | ERA / RAWP                               | 145 mg/kg       |
| Copper                | ERA / RAWP              | ERA / RAWP                               | 145 mg/kg       |
| Dioxin TEQ            | USEPA (1999)            | 30 ng/kg-day (geomean of rodent studies) | 190 ng/kg       |
| Dioxin TEQ            | Fagervold et al. (2010) | 30 ng/kg-day (geomean of rodent studies) | 360 ng/kg       |

**Note:**

ng/kg-day = nanograms per kilogram per day

### ES.8.2.2 Locations Driving Risk for the ERA

The following discussion of the locations driving risk for the ERA is provided as an example of one method that can be used to apply the RBRGs and assist with identifying remedial design possibilities. This is not intended to substitute for actual remedial design and comprises part of the set of tools available to the risk manager to make site-specific decisions regarding risk.

For each potential exposure area, depth-weighted concentrations of the risk-driving COPECs were ranked and the highest concentrations were iteratively removed from the baseline soil dataset. Then residual depth-weighted EPCs were calculated for the 0- to 0.5-foot bgs exposure depth and compared with respective RBRGs for the risk driving compounds. This process was repeated until the resulting residual depth-weighted 95UCL for the potential exposure area was at or below the relevant RBRG. To achieve this outcome, the following soil locations were identified as driving risks. When they were removed from the dataset, the RBRG was achieved by the 95UCL for the remaining data. Details of the exact samples and sampling locations included in each potential exposure area are presented in the Data Evaluation and COPC/COPEC Selection section (Section 2) of each exposure area-specific appendix.

To summarize, these include removal of soil the following locations:

- BCW:
  - SWMU1-25 to meet the RBRG of 190 ng/kg for dioxin TEQ at 0 to 0.5 foot bgs. No sample data were removed to meet the RBRG of 360 ng/kg for dioxin TEQ.
- AOC 9:
  - AOC10-21 to meet the RBRG of 145 mg/kg for copper at 0 to 0.5 foot bgs
  - AOC10-20 to meet the RBRG of 145 mg/kg for total chromium at 0 to 0.5 foot bgs
  - PA-20, AOC10-23, and PA-21 to meet the RBRG of 190 ng/kg for dioxin TEQ at 0 to 0.5 foot bgs; and PA-20 and AOC10-23 to meet the RBRG of 360 ng/kg for dioxin TEQ at 0 to 0.5 foot bgs.
- AOC 10:
  - AOC10c-4 to meet the RBRG of 190 ng/kg for dioxin TEQ at 0 to 0.5 foot bgs. No sample data were removed to meet the RBRG of 360 ng/kg for dioxin TEQ.

## ES.9 Key Findings

Overall, the HHERA conducted herein found no potentially unacceptable risk to most human and ecological receptors potentially exposed to COPCs/COPECs in soil at the site, both within the TCS (ICS potential exposure area) and potential exposure areas outside the TCS. No unacceptable risk was identified for all relevant potential exposure areas for the following receptors:

- Potential Human Receptors:
  - Tribal users
  - Hunter
  - Workers (commercial and short- and long-term maintenance workers).
- Potential Ecological Receptors
  - Special-status species, including ring-tailed cat (California fully protected species), cave myotis (California species of concern), and pallid bats (California species of concern)
  - Large home-range receptors (desert kit fox, Nelson's desert bighorn sheep, and red-tailed hawk)
  - Herbivorous and insectivorous birds (Gambel's quail and cactus wren)
  - Herbivorous small mammals (Merriam's kangaroo rat).

For the remaining potential receptors (camper, hiker, OHV rider, and desert shrew), the potential for unacceptable risk was identified as being driven by a limited number of compounds (that is, dioxin TEQ and hexavalent chromium for human health; dioxin TEQ, total chromium, and copper for ecological receptors) in areas within SWMU 1, AOC 9, and/or AOC 10.

The RBRGs calculated for the risk drivers and relevant human and ecological receptors, were used in an example of applying the RBRGs to identify locations driving risk above acceptable levels for both human and ecological populations. That process revealed a total of nine locations in three potential exposure areas (SWMU 1, AOC 9, and AOC 10) as associated with unacceptable risk. Those locations are as follows:

- Protection of potential human recreators (four total locations for all potential exposure depth intervals [0- to 3-foot bgs depth interval]):
  - Dioxin TEQ: SWMU1-25 in OCS / SWMU1
  - Hexavalent chromium: AOC10-20, #10 in AOC 9, and MW-58BR\_S in AOC 10 for the 0- to 3-foot bgs depth interval.
- Protection of desert shrew (up to seven total locations for the 0- to 0.5-foot bgs depth interval):
  - Dioxin TEQ (based on RBRG of 190 ng/kg): SWMU1-25 in BCW; PA-20, AOC10-23, and PA-21 in AOC 9; and AOC10c-4 in AOC 10
    - Based on dioxin TEQ RBRG of 360 ng/kg: PA-20 and AOC10-23 in AOC 9
  - Total chromium: AOC10-20 in AOC 9
  - Copper: AOC10-21 in AOC 9.

The overall results of the HHERA support that focusing remedial planning on limited specific locations should be effective in reducing overall risks to levels that are protective of human health and ecological receptors.



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**Appendix D**  
**Derivation of Risk-Based Remediation Goals**  
**for Risk Drivers in Soil**





Pacific Gas & Electric Company

# **DERIVATION OF RISK-BASED REMEDIATION GOALS FOR RISK DRIVERS IN SOIL**

Topock Compressor Station, Needles, CA

February 2020

This Appendix to the Soil Engineering Evaluation/Cost Analysis (EE/CA) document is an excerpt from the Soil Human Health and Ecological Risk Assessment Report (HHERA; Arcadis 2019). Specifically, the entirety of Section 8 of the Soil HHERA is presented without alteration. The information provided in this document describes the process used to develop Risk-Based Remediation Goals (RBRGs) for site specific human and ecological populations evaluated in the HHERA. Citations in this text for document sections, tables, and figures refers to the sections, tables, and figures in the HHERA document.

## **1 RISK-BASED REMEDIATION GOALS FOR RISK DRIVERS IN SOIL**

As stated in the Human Health and Ecological Risk Assessment Work Plan (RAWP; Arcadis 2008), risk management decisions to be made in the CMS/FS step of the regulatory process will be focused on constituents of potential concern/constituents of potential ecological concern (COPCs/COPECs) that contribute most significantly to risk and/or that exceed *de minimis* risk levels for soil for the potential receptors being evaluated (i.e., the risk drivers). The overall remedial action goal is to ensure that residual concentrations of chemicals remaining at the site are protective of human health and the environment for the reasonable anticipated future land uses.

This section presents the RBRGs that can be used in the upcoming remedial planning, including the Soil Corrective Measures Study/Feasibility Study (CMS/FS) and EE/CA, to identify those areas of the site that may warrant some form of remedial or risk management action. RBRGs are concentrations that do not present unacceptable risk to human health and ecological receptors. An RBRG is a proposed health protective target cleanup concentration that can be used, in combination with other factors such as background concentrations, as a starting point for making risk management decisions. RBRGs are calculated for constituents in soil for a given potential receptor where the findings of the HHERA suggest some form of risk management or remediation may be warranted. Consistent with the HHERA approach, RBRGs are applied based on the potential exposure area of interest (i.e., the 95% upper confidence limit on the mean [95UCL] for the potential exposure area should be less than or equal to the RBRG).

The approach for the derivation of RBRGs and the calculated RBRGs for potential human and ecological receptors are discussed in the sections below. Additionally, an example is provided showing one method to identify specific soil locations that, when removed from the potential exposure area dataset, result in exposure point concentrations (EPCs) at or below RBRGs. This evaluation also constitutes a hot spot analysis in that it identifies the locations with elevated COPC/COPEC concentrations associated with unacceptable risk for an area. At these locations, deep impacts that potentially represent a threat to groundwater will be further identified in the forthcoming RCRA Facility Investigation/Remedial Investigation (RFI/RI) Report Volume 3 (currently being prepared by Jacobs).

### **1.1 Human Health RBRGs**

Based on the results of the soil Human Health Risk Assessment (HHRA), the concentrations of COPCs in Outside the Compressor Station (OCS) exposure area soil are safe and protective of short- and long-term maintenance workers, hunters, and tribal users. Concentrations of COPCs in Inside the Compressor Station (ICS) soils are safe and protective of commercial workers and short- and long-term maintenance

## DERIVATION OF RISK-BASED REMEDIATION GOALS FOR RISK DRIVERS IN SOIL

workers. Concentrations of COPCs in OCS soils result in calculated risks for the potential campers, hikers, and off-highway vehicle (OHV) riders that are within the risk management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ . Within this estimated cancer risk range, there is flexibility for risk managers in deciding what action, if any, is necessary and appropriate for the protection of human health. However, some targeted form of risk management or remediation, addressing elevated levels of hexavalent chromium and dioxin, would be effective at reducing calculated risks for the potential campers, hikers and OHV riders to levels below California Environmental Protection Agency (CalEPA) Department of Toxic Substances Control (DTSC) point of departure for excess incremental lifetime cancer risk (ILCR) of  $1 \times 10^{-6}$ . No risk management or remediation would be necessary to reduce risks for the the potential camper, hiker, and OHV rider to levels below  $1 \times 10^{-5}$ . The result of the north of the railroad (NORR) HHRA for hypothetical future residents are presented at the request of the Department of Interior (DOI) and for informational purposes only; the hypothetical future residential land use is not a reasonable anticipated future land use for the NORR potential exposure area.

Consistent with U.S. Environmental Protection Agency (USEPA) guidance (1991), a risk-based process was used to estimate RBRGs for COPCs that drive soil risk concerns above *de minimis* risk levels. For compounds identified as carcinogens negligible or *de minimis* risk levels are defined in accordance with state and federal guidance as one in one million ( $1 \times 10^{-6}$ ). This will be the point of departure, recognizing that DTSC and USEPA ultimately have authority to allow for residual risks to be within the risk management range of  $1 \times 10^{-4}$  to  $1 \times 10^{-6}$ . RBRGs are a tool to aid in risk management decisions and are not intended to provide a bright line for remediation.

For dioxins toxicity equivalent (TEQ), DTSC's Human and Ecological Risk Office (HERO) supports the use of residential and indoor commercial worker remedial goals equal to 10 times the theoretical potential cancer risk of  $1 \times 10^{-6}$  (equal to that associated with a theoretical potential cancer risk of  $1 \times 10^{-5}$ ). This regulatory approach is based on studies of bioavailability of dioxins that demonstrate exposure to soil under normal residential and indoor commercial conditions has minimal influence on the serum of exposed individuals. The  $1 \times 10^{-5}$  potential risk level is considered by DTSC to be a likely overestimate of the actual potential risk for exposure to soil with dioxin TEQ (DTSC 2017). For outdoor workers with direct contact with site soils such that regular incidental ingestion of soil impacted with dioxin TEQs may occur, DTSC recommends RBRGs equal to a theoretical potential cancer risk of  $1 \times 10^{-6}$  (DTSC 2017). Note that recreational users are assumed to have the same intake rates via ingestion, dermal contact, and inhalation exposure pathways as under a residential scenario, but exposure occurs on a less frequent basis than assumed under a residential scenario. Therefore, potential exposure to dioxin TEQ in soil for the recreational users over a lifetime would be less than for a hypothetical resident. As such, the RBRGs for recreational users equal to 10 times the theoretical potential cancer risk of  $1 \times 10^{-6}$  may be appropriate for the site.

For noncancer health effects, a hazard quotient (HQ) of less than or equal to 1 implies that the predicted exposure for a given population and chemical is not expected to result in adverse noncancer health effects; a hazard index (HI) of less than or equal to 1 implies the same for multi-chemical exposures (USEPA 1989).

The identification of risk drivers in the HHRA was based on the summary of results and overall conclusions of the Human Health Risk Assessment (HHRA) as presented in Section 7.1.3 and Table 5-6. RBRGs were calculated for hexavalent chromium and dioxin TEQ, the significant contributors to soil risks

above *de minimis* levels<sup>1</sup>, under the camper, hiker, and OHV rider potential exposure scenarios. The approach for the derivation of the human health RBRGs, the calculated RBRGs for recreational users, and soil locations that contribute most significantly to calculated unacceptable risks for recreational users are discussed in the sections below.

### 1.1.1 Methodology for Deriving Human Health RBRGs and Values

RBRGs for soil are developed by combining information regarding the level of assumed intake of the constituent, the levels of acceptable risk, and the relationship between the assumed intake of constituent and the calculated incidence of an adverse health effect as a function of human exposure to the constituent. The methodology used to develop the RBRGs for the COPCs in soil at the site is based on USEPA and DTSC guidance and the specific equations provided in the guidance documents below:

- Risk Assessment Guidance for Superfund, Volume I: Human Health Evaluation Manual (Part A) (USEPA 1989)
- Risk Assessment Guidance for Superfund, Volume I: Human Health Evaluation Manual (Part B: Development of Risk-Based Preliminary Remediation Goals) (USEPA 1991)
- Supplemental Guidance for Human Health Multimedia Risk Assessments of Hazardous Waste Sites and Permitted Facilities (DTSC 1992)
- Preliminary Endangerment Assessment Guidance Manual (DTSC 2015).

Section 5.5 presents the estimated ILCRs and noncancer hazards posed by a representative concentration of constituent present at the site for potential recreational user scenarios. Assumptions for potential exposure, transport, and toxicity remain unchanged from those described and used in Section 5.0. Rearranging the equations used to estimate the ILCRs and noncancer hazards and using the target ILCRs at the lower and upper bounds the risk management range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$  and the target noncancer HQ of 1, the concentration of each constituent associated with the target ILCR and HQ levels can be determined. This is the common method used to estimate RBRGs for a site, where the results of the risk assessment indicate that some form of remediation or risk management may be warranted. The soil RBRGs for the potential recreational user scenarios presented in Table 8-1 were developed using the equations below. RBRGs are rounded to two significant figures. Note that risk-based concentrations (RBCs) were developed for the list of COPCs identified in the HHRA using the same approach and equations as for the development of the human health RBRGs. The RBCs were developed for the Soil Management Plan to be used to support decisions for the handling, management, and storage of potentially contaminated and displaced soil at the site during implementation of a groundwater remedy at the site to address chromium contamination in groundwater. The RBCs are presented in Appendix RBC.

For carcinogenic effects, the following equation is used to derive the soil RBRG for assumed incidental ingestion of soil, dermal contact with soil, and inhalation of particulates and volatile organic compound (VOC) vapors in ambient outdoor air from soil:

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<sup>1</sup> In accordance with the RAWP (Arcadis 2008), the conclusions and recommendations for this HHRA are based on the risks estimated for the ICS and OCS potential exposure areas.

## DERIVATION OF RISK-BASED REMEDIATION GOALS FOR RISK DRIVERS IN SOIL

### Equation 1-1

$$RBRG_{a,carcinogen} = \frac{\text{Target Risk Level}}{\left[ \frac{Risk_{a,inhv}}{Conc_{a,inhv}} \right] + \left[ \frac{Risk_{a,inhp}}{Conc_{a,inhp}} \right] + \left[ \frac{Risk_{a,ing}}{Conc_{a,ing}} \right] + \left[ \frac{Risk_{a,der}}{Conc_{a,der}} \right]}$$

Where:

$RBRG_{a,carcinogen}$  = Risk-based remediation goal for constituent a, for carcinogenic effects, (milligrams per kilogram [mg/kg])

Target Risk Level = Target cancer risk level (unitless)

$Risk_{a,inhv}$  = Calculated cancer risk for constituent a for the vapor inhalation pathway, developed as described above (unitless)

$Risk_{a,inhp}$  = Calculated cancer risk for constituent a for the particulate inhalation pathway, developed as described above (unitless)

$Risk_{a,ing}$  = Calculated cancer risk for constituent a for the soil ingestion pathway, developed as described above (unitless)

$Risk_{a,der}$  = Calculated cancer risk for constituent a for the dermal contact pathway, developed as described above (unitless)

$Conc_{a,inhv}$  = Representative exposure concentration of constituent a for the vapor inhalation pathway; mg/kg

$Conc_{a,inhp}$  = Representative exposure concentration of constituent a for the particulate inhalation pathway; mg/kg

$Conc_{a,ing}$  = Representative exposure concentration of constituent a for the soil ingestion pathway; mg/kg

$Conc_{a,der}$  = Representative exposure concentration of constituent a for the dermal contact pathway; mg/kg

For noncarcinogenic effects, the following equation was used to derive the soil RBRG for incidental ingestion of soil, dermal contact with soil, and inhalation of particulates and VOC vapors in ambient outdoor air from soil:

### Equation 1-2

$$RBRG_{a,noncarcinogen} = \frac{\text{Target HQ}}{\left[ \frac{HQ_{a,inhv}}{Conc_{a,inhv}} \right] + \left[ \frac{HQ_{a,inhp}}{Conc_{a,inhp}} \right] + \left[ \frac{HQ_{a,ing}}{Conc_{a,ing}} \right] + \left[ \frac{HQ_{a,der}}{Conc_{a,der}} \right]}$$

Where:

$RBRG_{a,noncarcinogen}$  = Risk-based remediation goal for constituent a, for noncarcinogenic effects, (mg/kg)

Target HQ = Target hazard quotient level (unitless)

## DERIVATION OF RISK-BASED REMEDIATION GOALS FOR RISK DRIVERS IN SOIL

$HQ_{a,inhv}$  = Calculated hazard quotient for constituent a for the vapor inhalation pathway, developed as described above (unitless)

$HQ_{a,inhp}$  = Calculated hazard quotient for constituent a for the particulate inhalation pathway, developed as described above (unitless)

$HQ_{a,ing}$  = Calculated hazard quotient for constituent a for the soil ingestion pathway, developed as described above (unitless)

$HQ_{a,der}$  = Calculated hazard quotient for constituent a for the dermal contact pathway, developed as described above (unitless)

$Conc_{a,inhv}$  = Representative exposure concentration of constituent a for the vapor inhalation pathway; mg/kg

$Conc_{a,inhp}$  = Representative exposure concentration of constituent a for particulate inhalation pathway; mg/kg

$Conc_{a,ing}$  = Representative exposure concentration of constituent a for soil ingestion pathway; mg/kg

$Conc_{a,der}$  = Representative exposure concentration of constituent a for dermal contact pathway; mg/kg

The RBRGs for hexavalent chromium and dioxin TEQ for the potential camper, hiker, and OHV rider are presented in Table 8-1 and the lowest recreational user RBRGs for hexavalent chromium (CrVI) and dioxin TEQ are summarized in the table titled Lowest Recreational User Risk-Based Remediation Goals for Hexavalent Chromium.

### Lowest Recreational User Risk-Based Remediation Goals for Hexavalent Chromium

| Risk Drivers for Potential Recreational Users | Human Health RBRG | RBRG Basis                           |
|---|-------------------|--------------------------------------|
| CrVI  | 3.1 mg/kg         | OHV rider at $1 \times 10^{-6}$ risk |
| CrVI  | 31 mg/kg          | OHV rider at $1 \times 10^{-5}$ risk |
| CrVI  | 310 mg/kg         | OHV rider at $1 \times 10^{-4}$ risk |
| Dioxin TEQ                                    | 100 ng/kg         | Hiker at $1 \times 10^{-6}$ risk     |
| Dioxin TEQ                                    | 1,000 ng/kg       | Hiker at $1 \times 10^{-5}$ risk     |
| Dioxin TEQ                                    | 10,000 ng/kg      | Hiker at $1 \times 10^{-4}$ risk     |

#### Notes:

mg/kg = milligrams per kilogram

ng/kg = nanograms per kilogram

The RBRGs calculated for hexavalent chromium (3.1 mg/kg) and dioxin TEQ (ranging from 100 to 1,000 ng/kg) were used to identify soil locations associated with calculated levels of risk above the CalEPA DTSC point of departure for excess ILCR of  $1 \times 10^{-6}$ , as described in following section. RBRGs are a tool and not intended as a "bright line" for remediation.

### 1.1.2 Soil Locations Contributing to Calculated Risks Above De Minimis Levels for Potential Human Receptors

This section discusses the locations that drive risk for the HHRA for the OCS potential exposure area and is provided as an example of one method that can be used to apply the RBRGs and assist with identifying remedial design possibilities. This is not intended to substitute for actual remedial design and comprises part of the set of tools available to risk managers to make site-specific decisions regarding risk.

As previously stated in Section 8.1, based on the results of the HHRA, some targeted form of risk management or remediation, addressing elevated levels of the calculated risk drivers, hexavalent chromium and dioxin TEQ, would be effective at reducing calculated risks for potential campers, hikers, and OHV riders to levels below  $1 \times 10^{-6}$ . As indicated in Table 8-1, the lowest recreational user RBRGs for hexavalent chromium and dioxin TEQ are 3.1 mg/kg (for OHV rider at  $1 \times 10^{-6}$  risk level) and 0.00010 mg/kg (or 100 ng/kg; for hiker at  $1 \times 10^{-6}$  risk level), respectively.

To further refine the locations that could be considered for targeted risk management in the OCS potential exposure area, depth-weighted concentrations of the risk drivers, hexavalent chromium and dioxin TEQ, were ranked and the highest concentrations were iteratively removed from the baseline soil dataset. Using the remaining data, depth-weighted EPCs were calculated for the 0 to 0.5 foot below ground surface (bgs) and 0 to 3 foot bgs exposure depths and compared to the respective RBRGs. Table 8-2 identifies soil locations at three investigation areas (Solid Waste Management Unit [SWMU] 1, Area of Concern [AOC] 9, and AOC 10) within the OCS potential exposure area where the depth-weighted concentrations of hexavalent chromium and/or dioxin TEQ in the top 0 to 3 feet bgs of soil exceed the RBRGs. If removed from the OCS potential exposure area baseline dataset (i.e., mimicking a hypothetical remediation), the resulting residual depth-weighted 95UCL for the OCS potential exposure area is at or below the RBRG. These locations were identified based on depth-weighted EPCs for simplicity and as a conservative approach to identifying the areas/locations that if removed, would result in residual concentrations of Cr VI and dioxin TEQ in soil that are calculated to be protective of the potential camper, hiker, and OHV rider. As mentioned above, this is just one example of the application of RBRGs, and the specific locations identified in Table 8-2 are not intended to be used either for remedial design without further consideration or as a post remediation risk evaluation. Confirmation sampling and a post-remediation risk assessment may be necessary to demonstrate that residual contamination is not of concern if removal of soil is implemented as a remedial and risk management decision at the site.

To summarize, this example included removal of soil data for the following locations:

- **SWMU 1**
  - SWMU1-25 to meet the RBRG of 100 ng/kg for dioxin TEQ based on target cancer risk of  $1 \times 10^{-6}$  for both the 0- to 0.5-foot bgs and 0- to 3-foot bgs exposure depths; no sample data need to be removed to meet the RBRG of 1,000 ng/kg for dioxin TEQ based on target cancer risk of  $1 \times 10^{-5}$  for both the 0- to 0.5-foot bgs and 0- to 3-foot bgs exposure depths.
- **AOC 9**
  - AOC10-20 to meet the RBRG of 3.1 mg/kg for hexavalent chromium for both the 0- to 0.5-foot bgs and 0- to 3-foot bgs exposure depths



- #10 to meet the RBRG of 3.1 mg/kg for hexavalent chromium for the 0- to 3-foot bgs exposure depth.
- **AOC 10**
  - MW-58BR\_S to meet the RBRG of 3.1 mg/kg for hexavalent chromium for the 0 to 3 foot bgs exposure depth.

## 1.2 Ecological RBRGs

Ecological RBRGs are calculated health protective concentrations below which no potentially unacceptable calculated risk to potential ecological receptor populations is expected. RBRGs protective of potential ecological receptors are developed for risk drivers; that is, those COPECs, and potential exposure areas for which potential unacceptable risk to receptor populations was concluded in the Ecological Risk Assessment (ERA) (Section 7.2.5). For COPECs with HQs greater than 1 using the most refined exposure and effects assumptions (i.e., area-weighted EPCs, selected screening levels/toxicity reference values (TRVs), and site-specific site use factors (SUFs), a weight of evidence (WOE) assessment was used to draw risk conclusions and identify potential risk drivers for each potential exposure area. The various lines of evidence (LOEs) considered in the WOE assessment and risk conclusions are presented in Table 6-11.

The ERA calculated the following risk drivers and potential exposure areas as presenting potentially unacceptable risk to one or more ecological receptors:

- Bat Cave Wash (BCW) – dioxin TEQ for small invertivorous mammals (desert shrew)
- AOC 9 – hexavalent chromium and copper for plants; hexavalent chromium, total chromium, and copper for invertebrates; total chromium, copper, and dioxin TEQ for small invertivorous mammals
- AOC 10 – hexavalent chromium and total chromium for plants; total chromium for invertebrates (baseline and 2-foot scouring scenarios only); and total chromium and dioxin TEQ for small invertivorous mammals.

For potential ecological communities of plants and soil invertebrates, only generic risk-based screening levels (Table 6-6) are available as RBRGs. As discussed in Section 6.7.5, screening levels for the risk-driving COPECs are often below background threshold values (BTVs) and there is low confidence in their ability to predict risk at the site. The screening levels are published values based on toxicity data (typically using agriculturally important produce or crop species and conducted in laboratory settings) that have limited relevance for the Topock site. The screening levels are designed for use in conservative screening level risk assessments and for site-characterization purposes (as was done for determining nature and extent for the RFI/RI).

Surveys were conducted for special-status species only, not for general populations. The results of these special-status species surveys are summarized in Section 2.4.5 and in the individual potential exposure area appendices.

Vegetation communities observed at the site during the floristic surveys conducted in 2013 (GANDA and CH2M 2013) and 2017 (CH2M 2017) is typical of Mojave Desert plant communities (summarized in Section 2.4.2). More than 100 different vascular plant species have been observed at the site and documented in these survey reports (GANDA and CH2M 2013; CH2M 2017). The floristic surveys report

a diverse assemblage of plants species found in typical abundance, density, cover, and vigor of plant communities in undisturbed desert habitat. These observations are not consistent with impairment of the plant community at the site. The floristic surveys provide site-specific observations that support the health of plant communities at the site and is considered a stronger LOE than the exceedances of low-confidence generic plant screening values, which are widely acknowledged to have low ability to predict toxicity in plants. Therefore, these generic screening levels for plants and soil invertebrates are not recommended for use as RBRGs at the site. Because the key risk drivers for plants and soil invertebrates (hexavalent chromium and total chromium) tend to be co-located, risk-management or remedial actions considered for the protection of wildlife receptors (i.e., mammals and birds) potentially exposed to total chromium will also reduce risk to plants and invertebrates.

The methodology for the derivation of ecological RBRGs, the calculated RBRGs for potential ecological receptors, and soil locations associated with calculated unacceptable risk to potential ecological receptors are discussed in the sections below.

### 1.2.1 Methodology for Deriving Ecological RBRGs and Values

Ecological RBRGs based on protection of wildlife populations (i.e., based on lowest observed adverse effects level (LOAEL)-based TRVs) were derived for invertivorous small mammals (desert shrew), the only wildlife receptor identified with the potential for unacceptable risk associated with assumed exposure to COPECs in soil at this site. Based on the conclusion of no unacceptable risk for T&E species potentially present at the site, RBRGs based on the protection of individual potential receptors (i.e., based on the no observed adverse effect level (NOAEL)-based TRVs) were not warranted.

The RBRGs (Table 8-3) for small home-range invertivorous mammals (desert shrew) were derived following USEPA guidance (1997, 2008) and using the dietary dose model integrating exposure assumptions and LOAEL-based TRVs used to estimate HQs in the predictive ERAs, as described in Sections 6.2 and 6.3, respectively. Note that RBCs were developed for the list of COPECs identified in the HHERA using the same approach and equations as for the development of the ecological RBRGs. The RBCs were developed for the Soil Management Plan to be used to support decisions for the handling, management, and storage of potentially contaminated and displaced soil at the site during implementation of a groundwater remedy at the site to address chromium contamination in groundwater. The RBCs are presented in Appendix RBC.

Ecological RBRGs were developed by re-arranging the standard USEPA (1997) HQ model (i.e., Equation 6-7 presented in Section 6.4) to solve for a target HQ of 1:

#### Equation 1-3

$$RBRG = C_{soil} = \frac{HQ \times TRV \times BW}{(SIR + [FIR \times BAF]) \times SUF}$$

Where:

HQ = hazard quotient (unitless) = 1

TRV = toxicity reference value (milligrams per kilogram of body weight per day [mg/kg-bw/day])

C<sub>soil</sub> = concentration of constituent in soil (milligrams per kilogram of soil mg/kg soil) = RBRG

## DERIVATION OF RISK-BASED REMEDIATION GOALS FOR RISK DRIVERS IN SOIL

SIR = soil ingestion rate (kilograms of soil per day [kg soil/day])

FIR = food or biota ingestion rate (kilograms of tissue per day [kg tissue/day])

SUF = site-use factor (unitless) = 1 (home range for shrews are less than the size of all the exposure areas)

BW = body weight of receptor (kilograms of body weight [kg bw])

BAF = bioaccumulation factor or regression for media-to-biota uptake (kilograms of soil per kilograms of tissue [kg soil/kg tissue])

Incorporating uptake regressions in lieu of a simple BAF in the dose equation significantly complicates the overall dose calculation and, therefore, the Ecological RBRGs were calculated using Microsoft® Excel Solver™ software that determines the soil concentration for a target HQ equal to 1.

For dioxin TEQ, as discussed in detail in Section 6.7.6, the uncertainties associated with the calculated baseline risk estimates for the desert shrew are mainly driven by use of conservative uptake and toxicity assumptions. For desert shrew, these uncertainties together can overestimate risk by at least 10 times. Therefore, for remediation and risk-management considerations, alternate and more robust uptake models and TRVs were developed for dioxin TEQ. These alternate values are based on more defensible science (e.g., congener-specific uptake approach for dioxin TEQ BAFs) and/or more recent and comprehensive literature search and data. The alternate BAF and TRV approaches used to develop dioxin TEQ RBRGs for desert shrew have been used at various dioxin impacted sites (e.g., Tittabawasee River, MI; Rolling Knolls, NJ; Centredale Manor, RI; San Jacinto River, TX; and St. Helens, OR).

For dioxin TEQ, a range of RBRGs was calculated using the alternate and more robust approaches/values. The congener-specific BAFs (USEPA 1999; Fagervold et al. 2010) and a recommended mammalian dioxin TEQ LOAEL-based TRV of 30 ng/kg-bw/day were used to calculate the RBRGs protective of invertivorous small mammals. As noted in Section 6.7.4, the congener-specific BAF approach is based on current scientific understanding of uptake for dioxin TEQ mixtures and is more scientifically defensible than assuming all congener uptake is the same as 2,3,7,8-TCDD. The recommended TRV is based on the geometric mean of reproduction and growth LOAELs for rodents. This approach, used by USEPA (2008) for development of the Ecological Soil Screening Levels (EcoSSLs), is widely accepted as it accounts for a range of values and reduces the uncertainty associated with using toxicity data from a single study. The dioxin LOAEL-based TRV of 10 ng/kg-bw/day used in the ERA (cited in Sample et al. [1996] and based on a study by Murray et al. [1979]) is included in the toxicity dataset used to derive the alternate TRV of 30 ng/kg-bw/day (Section 6.7.5). Ecological RBRGs are summarized in the table titled Ecological Risk-Based Remediation Goals and details of the RBRG calculations are presented in Table 8-3.

**Ecological Risk-Based Remediation Goals**

| <b>Risk Driver for Shrew</b> | <b>BAF</b>            | <b>LOAEL-based Mammalian TRV</b>         | <b>Ecological RBRG</b> |
|------------------------------|-----------------------|--|------------------------|
| Total Chromium               | ERA / RAWP            | ERA / RAWP                               | 145 mg/kg              |
| Copper                       | ERA / RAWP            | ERA / RAWP                               | 145 mg/kg              |
| Dioxin TEQ                   | USEPA 1999            | 30 ng/kg-day (geomean of rodent studies) | 190 ng/kg              |
| Dioxin TEQ                   | Fagervold et al. 2010 | 30 ng/kg-day (geomean of rodent studies) | 360 ng/kg              |

**Note:**

ng/kg-day = nanograms per kilogram per day

A dioxin TEQ RBRG based on the 2,3,7,8- tetrachlorodibenzo-p-dioxin (TCDD) uptake regression and the TRV used in the ERA (10 ng/kg; lowest available LOAEL-based TRV) was not calculated. The BAF approach based on the 2,3,7,8-TCDD regression is not supported by available science related to the uptake and toxicity of dioxin/furans (i.e., dioxin TEQ mixtures), and the TRV does not account for variability in species sensitivity to dioxin TEQ. The RBRGs calculated for total chromium (145 mg/kg), copper (145 mg/kg), and dioxin TEQ (ranging from 190 to 360 ng/kg) were used to identify soil locations associated with potentially unacceptable risk, as described in the following section.

### **1.2.2 Soil Locations Associated with Calculated Levels of Unacceptable Risk to Potential Ecological Receptors**

This section discusses the locations that drive risk for the ERA and is provided as an example of one method that can be used to apply the RBRGs and assist with identifying remedial design possibilities. This is not intended to substitute for actual remedial design and comprises part of the set of tools available to the risk manager to make site-specific decisions regarding risk.

As previously discussed above in Section 7.2, based on the conclusions of the ERA, some targeted form of risk management or remediation, addressing elevated concentrations of total chromium, copper, and dioxin TEQ in the SWMU 1 within BCW, AOC 9, and AOC 10 would be effective at reducing calculated risks for potential ecological receptors<sup>2</sup> to acceptable risk levels. The Ecological RBRGs based on invertivorous small mammals (desert shrew) include 145 mg/kg for total chromium; 145 mg/kg for copper; and 190 to 360 ng/kg for dioxin TEQ (based on the range of alternate RBRGs).

For each potential exposure area, depth-weighted concentrations of the risk-driving COPECs were ranked and the highest concentrations were iteratively removed from the baseline soil dataset. Using the

<sup>2</sup> As elevated concentrations of hexavalent chromium and total chromium tend to be co-located, remediation for other risk drivers (e.g., total chromium) and potential receptors (human health and wildlife) will reduce exposure and risk for plants and soil invertebrates as well.

remaining data, depth-weighted EPCs were calculated and compared to the respective RBRGs. Table 8-4 identifies soil locations at the three potential exposure areas (BCW, AOC 9, and AOC 10) where depth-weighted concentrations of total chromium, copper, and/or dioxin TEQ in the top 0 to 0.5 foot bgs of soil exceed the RBRGs and, if removed from the potential exposure area baseline dataset (i.e., mimicking a hypothetical remediation), the resulting residual depth-weighted 95UCL for the potential exposure area is below the RBRG. These locations were identified based on depth-weighted EPCs for simplicity and as a conservative approach to identifying the areas/locations that, if removed, would result in residual soil concentrations of total chromium, copper, and dioxin TEQ that are protective of potential ecological receptors. As mentioned above, this is just one example of the application of RBRGs and the specific locations identified in Table 8-4 are not intended to be used either for remedial design without further consideration or as a post remediation risk evaluation. Confirmation sampling and a post-remediation risk assessment may be necessary to demonstrate that residual contamination is not of concern if excavation and removal of soil is implemented as a remedial and risk management decision at the site.

To summarize, this example included removal of soil data for the following locations:

- **BCW**
  - SWMU1-25 at 0 to 0.5 foot bgs to meet the RBRG of 190 ng/kg for dioxin TEQ; No sample data needs to be removed to meet the RBRG of 360 ng/kg for dioxin TEQ.
- **AOC 9**
  - AOC10-21 at 0 to 0.5 foot bgs to meet the RBRG of 145 mg/kg for copper.
  - AOC10-20 at 0 to 0.5 foot bgs to meet the RBRG of 145 mg/kg for total chromium.
  - PA-20, AOC10-23, and PA-21 at 0 to 0.5 foot bgs to meet the RBRG of 190 ng/kg for dioxin TEQ; and locations PA-20 and AOC10-23 at 0 to 0.5 foot bgs to meet the RBRG of 360 ng/kg for dioxin TEQ.
- **AOC 10**
  - AOC10c-4 at 0 to 0.5 foot bgs to meet the RBRG of 190 ng/kg for dioxin TEQ; no sample data need to be removed to meet the RBRG of 360 ng/kg for dioxin TEQ.

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## **Appendix E**

### **Removal Action Objective 2 Data Screening**



TABLE E-1

## Constituent Concentrations

Solid Waste Management Unit (SWMU) 1 – Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| MW-09                       |                             | 06/30/97 | 1              | N           | ND (0.05)            | 15              | 7.2     | ---     | ---       | ---        | 19.7    | ---       |
|                             |                             | 06/30/97 | 3.5            | N           | 0.06                 | 4.1             | 3.1     | ---     | ---       | ---        | 11.8    | ---       |
|                             |                             | 06/30/97 | 3.5            | FD          | 0.21                 | 7.6             | 3.5     | ---     | ---       | ---        | 12.6    | ---       |
|                             |                             | 06/30/97 | 6              | N           | ND (0.05)            | 11.8            | 6.4     | ---     | ---       | ---        | 21      | ---       |
|                             |                             | 07/01/97 | 10             | N           | ND (0.05)            | 42.2            | 6.8     | 2.7     | ---       | ND (0.2)   | 29      | ---       |
|                             |                             | 06/30/97 | 20             | N           | ND (0.05)            | 9               | 7.1     | ---     | ---       | ---        | 21.7    | ---       |
|                             |                             | 07/01/97 | 30             | N           | ND (0.05)            | 16.3            | 12.4    | 3.9     | ---       | ND (0.2)   | 29.4    | ---       |
|                             |                             | 06/30/97 | 40             | N           | ND (0.05)            | 9.7             | 7.5     | ---     | ---       | ---        | 22.5    | ---       |
|                             |                             | 07/01/97 | 50             | N           | ND (0.05)            | 11.7            | 14.7    | 3.2     | ---       | ND (0.2)   | 23.3    | ---       |
|                             |                             | 06/30/97 | 60             | N           | ND (0.05)            | 28.8            | 17.4    | ---     | ---       | ---        | 34.4    | ---       |
|                             |                             | 06/30/97 | 70             | N           | ND (0.05)            | 8.9             | 10      | ---     | ---       | ---        | 19      | ---       |
|                             |                             | 07/01/97 | 87             | N           | ND (0.05)            | 9.8             | 10.2    | 8.4     | ---       | ND (0.2)   | 126     | ---       |
|                             |                             | 07/01/97 | 87             | FD          | 0.06                 | 11.9            | 11.4    | ---     | ---       | ---        | 121     | ---       |
| SWMU1-1                     | SWMU1 PAA #1                | 10/16/08 | 0 - 0.5        | N           | 0.524                | 44              | 12      | 4.2     | ND (0.12) | ND (1.2)   | 41      | ---       |
|                             |                             | 10/16/08 | 2 - 3          | N           | 0.462                | 67              | 9.4     | 3       | ND (0.1)  | ND (1)     | 37      | ---       |
|                             |                             | 10/16/08 | 5 - 6          | N           | 14.1                 | 3,200           | 9.5     | 4.5     | ND (0.1)  | 7.8        | 76      | ---       |
|                             |                             | 10/16/08 | 9 - 10         | N           | 0.907                | 55              | 8.6     | 1.7     | ND (0.1)  | ND (1)     | 89      | ---       |
| SWMU1-2                     | SWMU1 PAA #1                | 10/15/08 | 0 - 0.5        | N           | ND (0.401)           | 26              | 22      | 6.5     | ND (0.1)  | ND (1)     | 37      | ---       |
|                             |                             | 10/15/08 | 2 - 3          | N           | ND (0.404)           | 36              | 10      | 3.7     | ND (0.1)  | ND (1)     | 38      | ---       |
|                             |                             | 10/15/08 | 5 - 6          | N           | ND (0.404)           | 44              | 12      | 6.1     | ND (0.1)  | 3          | 38      | ---       |
|                             |                             | 10/15/08 | 9 - 10         | N           | 22.8                 | 2,000           | 15      | 4       | ND (0.1)  | 2.8        | 100     | ---       |

TABLE E-1

## Constituent Concentrations

Solid Waste Management Unit (SWMU) 1 – Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| SWMU1-3                     | SWMU1 PAA #1                | 10/06/08 | 0 - 0.5        | N           | ND (0.405)           | 28              | 11      | 3.9     | ND (0.1)  | ND (1)     | 33      | ---       |
|                             |                             | 10/06/08 | 2 - 3          | N           | ND (0.413)           | 41              | 9.4     | 2.3     | ND (0.1)  | 1.5        | 38      | ---       |
|                             |                             | 10/06/08 | 2 - 3          | FD          | ND (0.41)            | 38              | 9       | 2.9     | ND (0.1)  | 1.4        | 37      | ---       |
|                             |                             | 10/06/08 | 5 - 6          | N           | 22.7                 | 1,300           | 11      | 3.8     | ND (0.1)  | 4.2        | 78      | ---       |
|                             |                             | 10/06/08 | 9 - 10         | N           | 1.55 J               | 96              | 11      | 2.7     | ND (0.11) | ND (1)     | 140     | ---       |
|                             |                             | 10/06/08 | 19 - 20        | N           | ND (0.416)           | 20              | 10      | 2.9     | ND (0.1)  | ND (2.1)   | 39      | ---       |
|                             |                             | 10/06/08 | 29 - 30        | N           | ND (0.424)           | 21              | 15      | 2.4     | ND (0.1)  | ND (5.3)   | 38      | ---       |
|                             |                             | 10/06/08 | 39 - 40        | N           | ND (0.424)           | 22              | 8.5     | 2.7     | ND (0.1)  | ND (2.1)   | 35      | ---       |
|                             |                             | 10/06/08 | 49 - 50        | N           | ND (0.405)           | 25              | 12      | 3.2     | ND (0.11) | ND (2.1)   | 39      | ---       |
|                             |                             | 10/06/08 | 59 - 60        | N           | ND (0.418)           | 38              | 14      | 3       | ND (0.1)  | 2.1        | 36      | ---       |
|                             |                             | 10/07/08 | 69 - 70        | N           | ND (0.42)            | 29              | 14      | 2.6     | ND (0.1)  | ND (2.1)   | 38      | ---       |
|                             |                             | 10/07/08 | 79 - 80        | N           | ND (0.427)           | 20              | 13      | 3.1     | ND (0.11) | ND (2.2)   | 39      | ---       |
|                             |                             | 10/07/08 | 79 - 80        | FD          | ND (0.441)           | 21              | 15      | 2.6     | ND (0.11) | 1.3        | 34      | ---       |
| SWMU1-4                     |                             | 10/15/08 | 0 - 0.5        | N           | ND (0.401)           | 17              | 6.8     | 2.6     | ND (0.1)  | ND (1)     | 26      | ---       |
|                             |                             | 10/15/08 | 2 - 3          | N           | 4.95                 | 870             | 11      | 3.6     | ND (0.1)  | 1.7        | 72      | ---       |
|                             |                             | 10/15/08 | 5 - 6          | N           | 1.39                 | 100             | 10      | 1.8     | ND (0.1)  | ND (1)     | 170     | ---       |
|                             |                             | 10/15/08 | 7 - 8          | N           | ND (0.415)           | 40              | 7.6     | 1.6     | ND (0.1)  | ND (1)     | 120     | ---       |
|                             |                             | 10/15/08 | 9 - 10         | N           | ND (0.414)           | 23              | 7.9     | 1.7     | ND (0.1)  | ND (1)     | 110     | ---       |
|                             |                             | 10/15/08 | 13 - 14        | N           | ND (0.413)           | 18              | 7.1     | 1.7     | ND (0.1)  | ND (1)     | 67      | ---       |
| SWMU1-5                     | SWMU1 PAA #1                | 10/15/08 | 9 - 10         | N           | 0.874                | 47              | 8.3     | 2.1     | ND (0.1)  | ND (1)     | 100     | ---       |
|                             |                             | 10/15/08 | 13 - 14        | N           | ND (0.42)            | 21              | 7.9     | 2.8     | ND (0.1)  | ND (2.1)   | 42      | ---       |
|                             |                             | 10/15/08 | 13 - 14        | FD          | ND (0.423)           | 21              | 8       | 2.9     | ND (0.1)  | ND (2.1)   | 44      | ---       |
|                             |                             | 10/15/08 | 15 - 16        | N           | ND (0.414)           | 21              | 9.1     | 2.8     | ND (0.1)  | ND (2.1)   | 34      | ---       |
|                             |                             | 10/15/08 | 19 - 20        | N           | ND (0.423)           | 19              | 11      | 3.1     | ND (0.11) | 1.5        | 37      | ---       |
| SWMU1-6                     |                             | 10/15/08 | 0 - 0.5        | N           | 1.32                 | 220             | 11      | 3.3     | ND (0.1)  | 1.2        | 42      | ---       |
|                             |                             | 10/15/08 | 2 - 3          | N           | 2.15                 | 270             | 12      | 2.6     | ND (0.1)  | 1.9        | 46      | ---       |
|                             |                             | 10/15/08 | 5 - 6          | N           | ND (0.405)           | 32              | 10      | 2.6     | ND (0.1)  | ND (1)     | 29      | ---       |
|                             |                             | 10/15/08 | 9 - 10         | N           | 0.531                | 33              | 8.6     | 1.7     | ND (0.1)  | ND (1)     | 88      | ---       |

TABLE E-1

Constituent Concentrations

Solid Waste Management Unit (SWMU) 1 – Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| SWMU1-7                     | SWMU1 PAA #1                | 10/15/08 | 0 - 0.5        | N           | ND (0.403)           | 27              | 13      | 6.6     | ND (0.1)  | ND (1)     | 38      | ---       |
|                             |                             | 10/15/08 | 2 - 3          | N           | 6.45                 | 630             | 14      | 3.6     | ND (0.1)  | 1.7        | 130     | ---       |
|                             |                             | 10/15/08 | 5 - 6          | N           | 5.3                  | 330             | 20      | 2.8     | ND (0.1)  | ND (1)     | 190     | ---       |
|                             |                             | 10/15/08 | 9 - 10         | N           | 0.517                | 51              | 9.2     | 1.9     | ND (0.1)  | ND (1)     | 150     | ---       |
|                             |                             | 10/15/08 | 9 - 10         | FD          | 0.554                | 47              | 8.3     | 1.6     | ND (0.1)  | ND (1)     | 150     | ---       |
| SWMU1-8                     | SWMU1 PAA #1                | 10/15/08 | 0 - 0.5        | N           | 0.618                | 120             | 9.1     | 4.7     | ND (0.1)  | ND (1)     | 36      | ---       |
|                             |                             | 10/15/08 | 2 - 3          | N           | 22.3                 | 970             | 11      | 3.5     | ND (0.1)  | 2.2        | 160     | ---       |
|                             |                             | 10/15/08 | 5 - 6          | N           | 9.25                 | 1,600           | 22      | 3.3     | ND (0.1)  | 3.2        | 120     | ---       |
|                             |                             | 10/15/08 | 9 - 10         | N           | ND (0.433)           | 15              | 7.1     | 2.8     | ND (0.11) | ND (1.1)   | 32      | ---       |
| SWMU1-9                     |                             | 10/14/08 | 0 - 0.5        | N           | 0.697                | 87              | 10      | 2.9     | ND (0.11) | 1.4        | 37      | ---       |
|                             |                             | 10/14/08 | 2 - 3          | N           | ND (0.42)            | 13              | 5.9     | 5       | ND (0.11) | ND (1)     | 26      | ---       |
|                             |                             | 10/14/08 | 5 - 6          | N           | ND (0.417)           | 26              | 8.1     | 3.1     | ND (0.1)  | ND (2.1)   | 39      | ---       |
|                             |                             | 10/14/08 | 9 - 10         | N           | ND (0.425)           | 22              | 11      | 3.2     | ND (0.1)  | ND (1.1)   | 38      | ---       |
| SWMU1-10                    |                             | 10/14/08 | 0 - 0.5        | N           | ND (0.401)           | 19              | 11      | 2.6     | ND (0.1)  | ND (1)     | 32      | ---       |
|                             |                             | 10/14/08 | 2 - 3          | N           | ND (0.403)           | 26              | 13      | 2.2     | ND (0.1)  | 1.8        | 33      | ---       |
|                             |                             | 10/14/08 | 5 - 6          | N           | ND (0.413)           | 21              | 8.4     | 2.9     | ND (0.1)  | ND (1)     | 42      | ---       |
|                             |                             | 10/14/08 | 5 - 6          | FD          | ND (0.413)           | 22              | 10      | 2.9     | ND (0.1)  | ND (1)     | 41      | ---       |
|                             |                             | 10/14/08 | 9 - 10         | N           | ND (0.431)           | 25              | 15      | 3.6     | ND (0.11) | ND (1.1)   | 44      | ---       |
| SWMU1-11                    | SWMU1 PAA #1                | 10/15/08 | 0 - 0.5        | N           | 1.81                 | 200             | 11      | 3.8     | ND (0.11) | 1.2        | 65      | ---       |
|                             |                             | 10/15/08 | 2 - 3          | N           | 8.82                 | 840             | 11      | 4.3     | ND (0.11) | 4          | 120     | ---       |
|                             |                             | 10/15/08 | 5 - 6          | N           | ND (0.431)           | 34              | 12      | 3.2     | ND (0.11) | ND (2.1)   | 96      | ---       |
|                             |                             | 10/15/08 | 9 - 10         | N           | ND (0.432)           | 22              | 10      | 3.4     | ND (0.11) | ND (1.1)   | 43      | ---       |
| SWMU1-12                    |                             | 10/14/08 | 0 - 0.5        | N           | ND (0.403)           | 19              | 8.5     | 2.7     | ND (0.1)  | ND (1)     | 31      | ---       |
|                             |                             | 10/14/08 | 2 - 3          | N           | ND (0.406)           | 24              | 11      | 2.3     | ND (0.1)  | ND (2)     | 37      | ---       |
|                             |                             | 10/14/08 | 5 - 6          | N           | ND (0.412)           | 20              | 13      | 2.7     | ND (0.1)  | ND (2)     | 40      | ---       |
|                             |                             | 10/14/08 | 9 - 10         | N           | ND (0.419)           | 21              | 11      | 3.1     | ND (0.1)  | ND (5.2)   | 41      | ---       |

TABLE E-1

## Constituent Concentrations

Solid Waste Management Unit (SWMU) 1 – Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| SWMU1-13                    |                             | 10/14/08 | 0 - 0.5        | N           | ND (0.407)           | 23              | 14      | 5.3     | ND (0.1)   | ND (1)     | 35      | ---       |
|                             |                             | 10/14/08 | 2 - 3          | N           | ND (0.409)           | 28              | 11      | 3.5     | ND (0.1)   | ND (5.1)   | 39      | ---       |
|                             |                             | 10/14/08 | 2 - 3          | FD          | ND (0.411)           | 27              | 11      | 3.5     | ND (0.1)   | ND (5.1)   | 39      | ---       |
|                             |                             | 10/14/08 | 5 - 6          | N           | ND (0.416)           | 34              | 13      | 2.8     | ND (0.1)   | ND (2.1)   | 44      | ---       |
|                             |                             | 10/14/08 | 9 - 10         | N           | ND (0.426)           | 30              | 16      | 3.5     | ND (0.1)   | ND (1)     | 45      | ---       |
| SWMU1-14                    |                             | 10/14/08 | 0 - 0.5        | N           | ND (0.404)           | 20              | 8.2     | 2.6     | ND (0.1)   | ND (1)     | 33      | ---       |
|                             |                             | 10/14/08 | 2 - 3          | N           | ND (0.408)           | 19              | 14      | 2.3     | ND (0.1)   | ND (1)     | 33      | ---       |
|                             |                             | 10/14/08 | 5 - 6          | N           | ND (0.413)           | 28              | 17      | 3.4     | ND (0.1)   | ND (2)     | 42      | ---       |
|                             |                             | 10/14/08 | 9 - 10         | N           | ND (0.415)           | 52              | 35      | 3.9     | ND (0.1)   | ND (1)     | 45      | ---       |
| SWMU1-15                    |                             | 09/22/08 | 0 - 0.5        | N           | 1.14                 | 25              | 12      | 4.1     | ND (0.1)   | 1.9        | 36      | ---       |
|                             |                             | 09/22/08 | 2 - 3          | N           | ND (0.422)           | 23              | 11      | 3       | ND (0.11)  | 1.2        | 34      | ---       |
|                             |                             | 09/22/08 | 5 - 6          | N           | ND (0.424)           | 41              | 18      | 4.5     | ND (0.11)  | ND (2.1)   | 46      | ---       |
|                             |                             | 09/22/08 | 9 - 10         | N           | ND (0.419)           | 58              | 24      | 4.4     | ND (0.11)  | ND (2.1)   | 50      | ---       |
|                             |                             | 09/22/08 | 9 - 10         | FD          | ND (0.42)            | 60              | 23      | 4.5     | ND (0.1)   | ND (2.1)   | 50      | ---       |
|                             |                             | 09/22/08 | 19 - 20        | N           | ND (0.425)           | 51              | 41      | 4.5     | ND (0.11)  | ND (2.1)   | 50      | ---       |
|                             |                             | 09/22/08 | 29 - 30        | N           | ND (0.433)           | 54              | 23      | 5.4     | ND (0.11)  | ND (5.3)   | 54      | ---       |
|                             |                             | 09/22/08 | 39 - 40        | N           | ND (0.422)           | 40              | 23      | 3       | ND (0.1)   | ND (1)     | 47      | ---       |
|                             |                             | 09/22/08 | 49 - 50        | N           | ND (0.439)           | 55              | 25      | 5.4     | ND (0.11)  | ND (2.2)   | 59      | ---       |
|                             |                             | 09/22/08 | 59 - 60        | N           | ND (0.449)           | 47              | 23      | 3       | ND (0.1)   | ND (5.3)   | 49      | ---       |
|                             |                             | 09/22/08 | 59 - 60        | FD          | ND (0.411)           | 44              | 24      | 4.3     | ND (0.1)   | ND (2.1)   | 47      | ---       |
|                             |                             | 09/22/08 | 69 - 70        | N           | ND (0.43)            | 39              | 25      | 3.8     | ND (0.11)  | ND (1.1)   | 53      | ---       |
|                             |                             | 09/22/08 | 79 - 80        | N           | ND (0.43)            | 28              | 20      | 3.2     | ND (0.11)  | ND (1.1)   | 60      | ---       |
|                             |                             | 09/23/08 | 89 - 90        | N           | ND (0.4)             | 6.5             | ND (4)  | ND (2)  | ND (0.1)   | ND (2)     | 21      | ---       |
| SWMU1-16                    |                             | 09/21/08 | 0 - 0.5        | N           | ND (0.405)           | 10              | 5.2     | 2.3     | ND (0.099) | ND (1)     | 21      | ---       |
|                             |                             | 09/21/08 | 2 - 3          | N           | ND (0.408)           | 18              | 8.3     | 2       | ND (0.1)   | 1          | 34      | ---       |
|                             |                             | 09/21/08 | 5 - 6          | N           | ND (0.406)           | 18              | 8.9     | 2       | ND (0.1)   | ND (1)     | 35      | ---       |

TABLE E-1

## Constituent Concentrations

Solid Waste Management Unit (SWMU) 1 – Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| SWMU1-17                    |                             | 09/21/08 | 0 - 0.5        | N           | ND (0.403)           | 27              | 16      | 3.5     | ND (0.1)  | ND (2)     | 46      | ---       |
|                             |                             | 09/21/08 | 2 - 3          | N           | ND (0.405)           | 29              | 12      | 3.9     | ND (0.1)  | ND (2)     | 40      | ---       |
|                             |                             | 09/21/08 | 5 - 6          | N           | ND (0.407)           | 29              | 12      | 3.1     | ND (0.1)  | 2.4        | 44      | ---       |
|                             |                             | 09/21/08 | 9 - 10         | N           | ND (0.408)           | 43 J            | 26      | 4.4     | ND (0.1)  | ND (2)     | 41      | ---       |
|                             |                             | 09/21/08 | 9 - 10         | FD          | ND (0.408)           | 53 J            | 24      | 4.7     | ND (0.1)  | ND (2)     | 46      | ---       |
| SWMU1-18                    |                             | 01/07/16 | 0 - 1          | N           | 2.6                  | 16              | 7.4     | 2       | 0.28      | ND (1.1)   | 30      | 140       |
|                             |                             | 01/07/16 | 2 - 3          | N           | ND (0.22)            | 26              | 20      | 2.5     | 0.27      | ND (1.1)   | 40      | 0.37      |
|                             |                             | 01/07/16 | 5 - 6          | N           | ND (0.22)            | 110             | 8.5     | 2.1     | 0.3       | ND (1.1)   | 130     | 0.2       |
|                             |                             | 01/07/16 | 9 - 10         | N           | ND (0.21)            | 41              | 17      | 2.6     | 0.34      | ND (1.1)   | 43      | 0.23      |
|                             |                             | 01/07/16 | 14 - 15        | N           | ND (0.21)            | 48              | 19 J    | 2.4     | 0.35      | ND (1.1)   | 41      | ---       |
|                             |                             | 01/07/16 | 14 - 15        | FD          | ND (0.21)            | 50              | 25 J    | 3.5     | 0.29      | ND (1.1)   | 44      | ---       |
|                             |                             | 01/07/16 | 19 - 20        | N           | ND (0.22)            | 50              | 21      | 3.6     | 0.33      | ND (1.1)   | 49      | ---       |
|                             |                             | 01/07/16 | 29 - 30        | N           | ND (0.21)            | 29              | 22      | 2       | 0.29      | ND (1.1)   | 33      | ---       |
|                             |                             | 01/07/16 | 39 - 40        | N           | ND (0.21)            | 42              | 19      | 2.9     | 0.29      | ND (1.1)   | 44      | ---       |
|                             |                             | 01/08/16 | 49 - 50        | N           | ND (0.24)            | 33 J            | 19      | 4.2     | 0.27      | ND (1.2)   | 46 J    | ---       |
|                             |                             | 01/08/16 | 59 - 60        | N           | ND (0.26)            | 27              | 16      | 5.6     | 0.31      | ND (1.3)   | 54      | ---       |
|                             |                             | 01/08/16 | 69 - 70        | N           | ND (0.23)            | 21              | 13      | 2.5     | ND (0.12) | ND (1.1)   | 41      | ---       |
|                             |                             | 01/08/16 | 79 - 80        | N           | ND (0.25)            | 28              | 17      | 2.1     | ND (0.13) | ND (1.3)   | 37      | ---       |



TABLE E-1

## Constituent Concentrations

Solid Waste Management Unit (SWMU) 1 – Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| SWMU1-19                    | SWMU1 PAA #1                | 01/09/16 | 0 - 1          | N           | 1.3                  | 1,400           | 10      | 3.5     | ND (0.1)  | 1.1        | 160     | 3.9       |
|                             |                             | 01/09/16 | 2 - 3          | N           | 22                   | 23              | 8.8     | 1.8     | ND (0.11) | ND (1.1)   | 34      | 1,100     |
|                             |                             | 01/09/16 | 5 - 6          | N           | 4.9                  | 680             | 9.9     | 1.8     | ND (0.1)  | ND (1)     | 87      | 41        |
|                             |                             | 01/09/16 | 9 - 10         | N           | 22                   | 2,100           | 18      | 2.4     | ND (0.1)  | ND (1)     | 120     | 210       |
|                             |                             | 01/09/16 | 14 - 15        | N           | 6.8                  | 240             | 23      | 1.6     | ND (0.1)  | ND (1)     | 150     | 63        |
|                             |                             | 01/09/16 | 19 - 20        | N           | ND (0.21)            | 24 J            | 12      | 3.3     | ND (0.11) | ND (1.1)   | 120     | 2         |
|                             |                             | 01/09/16 | 19 - 20        | FD          | ND (0.21)            | 31 J            | 11      | 1.9     | ND (0.11) | ND (1.1)   | 110     | ---       |
|                             |                             | 01/09/16 | 29 - 30        | N           | ND (0.21)            | 19              | 59      | 1.8     | ND (0.11) | ND (1.1)   | 35      | ---       |
|                             |                             | 01/09/16 | 39 - 40        | N           | ND (0.21)            | 16              | 14      | 1.7     | ND (0.1)  | ND (1)     | 33      | ---       |
|                             |                             | 01/09/16 | 49 - 50        | N           | ND (0.21)            | 32              | 28      | 2.2     | ND (0.1)  | ND (1.1)   | 40      | ---       |
|                             |                             | 01/09/16 | 59 - 60        | N           | ND (0.21)            | 29              | 16      | 2.5     | 0.24      | ND (1.1)   | 38      | ---       |
|                             |                             | 01/10/16 | 69 - 70        | N           | ND (0.21)            | 22              | 17      | 2.6     | 0.23      | ND (1)     | 38      | ---       |
|                             |                             | 01/10/16 | 79 - 80        | N           | ND (0.21)            | 16              | 10      | 1.6     | 0.27      | ND (1.1)   | 34      | ---       |
| SWMU1-20                    | SWMU1 PAA #1                | 01/13/16 | 1 - 1.5        | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 5.5       |
|                             |                             | 01/13/16 | 2 - 3          | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 3.7       |
|                             |                             | 01/13/16 | 5 - 6          | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 110       |
|                             |                             | 01/13/16 | 9 - 10         | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 950       |
|                             |                             | 01/13/16 | 14 - 15        | N           | 8.9                  | 190             | 12      | 1.6     | ND (0.1)  | ND (1)     | 110     | 140       |
|                             |                             | 01/13/16 | 14 - 15        | FD          | 7.9                  | 200             | 9.9     | 2.2     | ND (0.1)  | ND (1)     | 98      | ---       |
|                             |                             | 01/13/16 | 19 - 20        | N           | ND (0.21)            | 23              | 8       | 1.8     | ND (0.11) | ND (1)     | 37      | 0.29      |
|                             |                             | 01/13/16 | 29 - 30        | N           | ND (0.21)            | 14              | 11      | 1.2     | ND (0.1)  | ND (1)     | 30      | ---       |
|                             |                             | 01/14/16 | 39 - 40        | N           | ND (0.21)            | 18              | 13      | 1.7     | ND (0.1)  | ND (1)     | 36      | ---       |
|                             |                             | 01/14/16 | 49 - 50        | N           | ND (0.22)            | 15              | 8       | 2       | ND (0.11) | ND (1.1)   | 37      | ---       |
|                             |                             | 01/14/16 | 59 - 60        | N           | ND (0.21)            | 21              | 38      | 1.2     | ND (0.1)  | ND (1)     | 32      | ---       |
|                             |                             | 01/14/16 | 69 - 70        | N           | ND (0.2)             | 23              | 10      | 1.2     | ND (0.1)  | ND (1)     | 34      | ---       |
|                             |                             | 01/14/16 | 79 - 80        | N           | ND (0.21)            | 27              | 11      | 1.7     | ND (0.1)  | ND (1)     | 41      | ---       |

TABLE E-1

## Constituent Concentrations

Solid Waste Management Unit (SWMU) 1 – Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| SWMU1-21                    | SWMU1 PAA #1                | 01/26/16 | 0 - 1          | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 190       |
|                             |                             | 01/26/16 | 2 - 3          | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 870       |
|                             |                             | 01/26/16 | 5 - 6          | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 41        |
|                             |                             | 01/26/16 | 9 - 10         | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 1.8       |
|                             |                             | 01/26/16 | 14 - 15        | N           | 0.5                  | 19              | 13      | 1.4     | ND (0.1)  | ND (1)     | 78      | 0.68      |
|                             |                             | 01/26/16 | 19 - 20        | N           | 0.3                  | 16              | 8.7     | ND (1)  | ND (0.1)  | ND (1)     | 69      | 0.39      |
|                             |                             | 01/27/16 | 29 - 30        | N           | ND (0.21)            | 16              | 11      | 1.3     | ND (0.1)  | ND (1)     | 34      | ---       |
|                             |                             | 01/27/16 | 39 - 40        | N           | ND (0.21)            | 14              | 7.9     | 1.3     | ND (0.1)  | ND (1)     | 37      | ---       |
|                             |                             | 01/27/16 | 49 - 50        | N           | ND (0.21)            | 14              | 9       | 1.5     | ND (0.1)  | ND (1)     | 33      | ---       |
|                             |                             | 01/27/16 | 59 - 60        | N           | ND (0.21)            | 22              | 12      | 1.7     | ND (0.1)  | ND (1.1)   | 41      | ---       |
|                             |                             | 01/27/16 | 69 - 70        | N           | ND (0.21)            | 23              | 10      | 1.5     | ND (0.1)  | ND (1)     | 40      | ---       |
|                             |                             | 01/27/16 | 79 - 80        | N           | ND (0.22)            | 19              | 16      | 1.2     | ND (0.11) | ND (1.1)   | 32      | ---       |
|                             |                             | 01/27/16 | 79 - 80        | FD          | ND (0.22)            | 17              | 11      | 1.3     | ND (0.11) | ND (1.1)   | 35      | ---       |
| SWMU1-22                    |                             | 12/17/15 | 0 - 1          | N           | ND (0.2)             | 18              | 12      | 6.5     | ND (0.1)  | ND (1)     | 33      | 6.2       |
| SWMU1-23                    |                             | 12/17/15 | 0 - 1          | N           | 0.36                 | 23              | 11      | 7.5     | ND (0.1)  | ND (1)     | 39      | 16        |
| SWMU1-24                    | SWMU1 PAA #3                | 12/17/15 | 0 - 1          | N           | 1.6                  | 55              | 13      | 6.5     | ND (0.1)  | ND (1)     | 44      | 1,300     |
| SWMU1-25                    | SWMU1 PAA #1                | 01/26/16 | 0 - 1          | N           | 42                   | 2,000           | 12      | 4.4     | ND (0.1)  | 20         | 60      | 12,000    |
|                             |                             | 01/26/16 | 2 - 3          | N           | 9.5                  | 450             | 13      | 1.6     | ND (0.11) | ND (1.1)   | 200     | 9.9       |
|                             |                             | 01/26/16 | 5 - 6          | N           | 2.3                  | 200             | 14      | 1.6     | ND (0.11) | ND (1.1)   | 170     | 6.4       |
|                             |                             | 01/26/16 | 9 - 10         | N           | ND (0.21)            | 17              | 11      | 2.1     | ND (0.11) | ND (1.1)   | 37      | 2.6       |
| SWMU1-26                    |                             | 01/08/17 | 0 - 0.5        | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 13        |
|                             |                             | 01/08/17 | 0 - 0.5        | FD          | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 26        |
|                             |                             | 01/08/17 | 2 - 3          | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 1.5       |
|                             |                             | 01/08/17 | 5 - 6          | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 31        |
|                             |                             | 01/08/17 | 9 - 10         | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 1         |
|                             |                             | 01/08/17 | 14 - 15        | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 0.22      |
|                             |                             | 01/08/17 | 19 - 20        | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 0.26      |

TABLE E-1

Constituent Concentrations

Solid Waste Management Unit (SWMU) 1 – Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| SWMU1-27                    |                             | 01/07/17 | 0 - 0.5        | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 7.9       |
|                             |                             | 01/07/17 | 2 - 3          | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 1.1       |
|                             |                             | 01/07/17 | 5 - 6          | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 5.9       |
|                             |                             | 01/07/17 | 9 - 10         | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 0.24      |
|                             |                             | 01/07/17 | 14 - 15        | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | 0.26      |
|                             |                             | 01/07/17 | 19 - 20        | N           | ---                  | ---             | ---     | ---     | ---       | ---        | ---     | ND (0.17) |
| SWMU1-28                    |                             | 02/14/17 | 0 - 0.5        | N           | ND (0.2)             | 15              | 9.1     | 1.6     | ND (0.1)  | ND (1)     | 31      | 3.8       |
|                             |                             | 02/14/17 | 0 - 0.5        | FD          | ND (0.2)             | 16              | 13      | 1.5     | ND (0.1)  | ND (1)     | 34      | 3.6       |
|                             |                             | 02/14/17 | 2 - 3          | N           | ND (0.2)             | 13              | 8.3     | 3       | ND (0.1)  | ND (1)     | 31      | 1.5       |
| SWMU1-29                    |                             | 02/16/17 | 0 - 0.5        | N           | ND (0.2)             | 19              | 8.5     | 1.2     | ND (0.1)  | ND (1)     | 28 J    | 7.8       |
|                             |                             | 02/16/17 | 2 - 3          | N           | 17                   | 1,100           | 8.7     | 2.3     | ND (0.1)  | 1.2        | 41      | 320       |
|                             |                             | 02/16/17 | 5 - 6          | N           | 5.6                  | 270             | 11      | ND (1)  | ND (0.1)  | ND (1)     | 33      | 19        |
|                             |                             | 02/16/17 | 9 - 10         | N           | 1.4                  | 98              | 13      | 1.1     | ND (0.1)  | ND (1)     | 140     | 15        |
| SWMU1-WP-1h                 |                             | 10/07/08 | 0 - 0.5        | N           | ND (0.418)           | 25              | 11      | 3.9     | ND (0.1)  | ND (1)     | 38      | ---       |
|                             |                             | 10/07/08 | 2 - 3          | N           | ND (0.418)           | 17              | 8.9     | 2.8     | ND (0.1)  | ND (1)     | 34      | ---       |
|                             |                             | 10/07/08 | 5 - 6          | N           | ND (0.417)           | 15              | 7.1     | 2.5     | ND (0.11) | ND (1.1)   | 39      | ---       |
|                             |                             | 10/07/08 | 9 - 10         | N           | ND (0.422)           | 28              | 8.7     | 2.9     | ND (0.1)  | ND (1)     | 58      | ---       |
| SWMU1-WP-3a                 |                             | 10/14/08 | 0 - 0.5        | N           | ND (0.419)           | 27              | 11      | 3.6     | ND (0.11) | ND (1.1)   | 40      | ---       |
|                             |                             | 10/14/08 | 2 - 3          | N           | ND (0.419)           | 20              | 9.4     | 2.3     | ND (0.11) | 1.1        | 34      | ---       |
|                             |                             | 10/14/08 | 5 - 6          | N           | ND (0.425)           | 27              | 15      | 6.2     | ND (0.11) | ND (2.1)   | 45      | ---       |
|                             |                             | 10/14/08 | 7 - 8          | N           | ND (0.417)           | 23              | 11      | 3.4     | ND (0.1)  | ND (2.1)   | 39      | ---       |
|                             |                             | 10/14/08 | 9 - 10         | N           | ND (0.415)           | 66              | 21      | 2.8     | ND (0.1)  | ND (5.1)   | 46      | ---       |
|                             |                             | 10/14/08 | 9 - 10         | FD          | ND (0.414)           | 66              | 22      | 2.7     | ND (0.1)  | ND (5.1)   | 47      | ---       |
|                             |                             | 10/14/08 | 11 - 12        | N           | ND (0.421)           | 30              | 27      | 4       | ND (0.1)  | ND (1)     | 40      | ---       |
|                             |                             | 10/14/08 | 13 - 14        | N           | ND (0.426)           | 28              | 31      | 3.8     | ND (0.1)  | ND (1)     | 40      | ---       |
| SWMU1-WP-3h                 | SWMU1 PAA #2                | 10/07/08 | 0 - 0.5        | N           | ND (0.433)           | 17              | 6.3     | 1.8     | ND (0.11) | ND (2.1)   | 33      | ---       |
|                             |                             | 10/07/08 | 2 - 3          | N           | ND (0.404)           | 17              | 8.6     | 2.1     | ND (0.1)  | ND (1)     | 34      | ---       |
|                             |                             | 10/07/08 | 5 - 6          | N           | ND (0.404)           | 21              | 7.8     | 2.4     | ND (0.1)  | ND (1)     | 36      | ---       |

TABLE E-1

## Constituent Concentrations

Solid Waste Management Unit (SWMU) 1 – Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |                       |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|-----------------------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |                       |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date                  | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| SWMU1-WP-5a                 |                             | 10/05/08              | 0 - 0.5        | N           | ND (0.405)           | 19              | 11      | 3.9     | ND (0.1)  | 1          | 35      | ---       |
|                             |                             | 10/05/08              | 2 - 3          | N           | ND (0.408)           | 19              | 9.2     | 2.4     | ND (0.1)  | ND (1)     | 35      | ---       |
|                             |                             | 10/05/08              | 5 - 6          | N           | ND (0.419)           | 53              | 17      | 3.9     | ND (0.1)  | ND (2.1)   | 42      | ---       |
|                             |                             | 10/05/08              | 5 - 6          | FD          | ND (0.42) J          | 58              | 19      | 3.5     | ND (0.1)  | ND (5.2)   | 46      | ---       |
|                             |                             | 10/05/08              | 7 - 8          | N           | ND (0.416)           | 53              | 18      | 4.1     | ND (0.1)  | ND (2.1)   | 41      | ---       |
|                             |                             | 10/05/08              | 9 - 10         | N           | ND (0.421)           | 43              | 21      | 4.2     | ND (0.1)  | ND (2.1)   | 47      | ---       |
|                             |                             | 10/05/08              | 11 - 12        | N           | ND (0.416)           | 36              | 26      | 3.5     | ND (0.1)  | ND (2.1)   | 42      | ---       |
|                             |                             | 10/05/08              | 13 - 14        | N           | ND (0.422)           | 27              | 13      | 3.5     | ND (0.1)  | ND (1)     | 52      | ---       |
| SWMU1-WP-5h                 | SWMU1 PAA #2                | 10/07/08              | 0 - 0.5        | N           | ND (0.43)            | 14              | 12      | 2.7     | ND (0.11) | ND (1.1)   | 31      | ---       |
|                             |                             | 10/07/08 <sup>Θ</sup> | 2 - 3          | N           | ND (0.435)           | 33              | 12      | 4.9     | ND (0.11) | ND (2.1)   | 46      | ---       |
|                             |                             | 10/07/08              | 5              | N           | ND (0.415)           | 23              | 11      | 3.3     | ND (0.1)  | ND (1)     | 40      | ---       |
| SWMU1-WP-6a                 |                             | 10/05/08              | 0 - 0.5        | N           | ND (0.405)           | 32              | 10      | 7.2     | ND (0.1)  | 2.5        | 35      | ---       |
|                             |                             | 10/05/08              | 2 - 3          | N           | ND (0.404)           | 19              | 10      | 2.3     | ND (0.1)  | ND (1)     | 35      | ---       |
|                             |                             | 10/05/08              | 2 - 3          | FD          | ND (0.403)           | 19              | 9.2     | 2.2     | ND (0.1)  | ND (1)     | 33      | ---       |
|                             |                             | 10/05/08              | 5 - 6          | N           | ND (0.413)           | 41              | 19      | 3.2     | ND (0.1)  | ND (2.1)   | 44      | ---       |
|                             |                             | 10/05/08              | 7 - 8          | N           | ND (0.414)           | 35              | 18      | 3.5     | ND (0.1)  | ND (2.1)   | 38      | ---       |
|                             |                             | 10/05/08              | 9 - 10         | N           | ND (0.412)           | 26              | 14      | 2.4     | ND (0.1)  | ND (5.1)   | 39      | ---       |
|                             |                             | 10/05/08              | 11 - 12        | N           | ND (0.411)           | 51              | 17      | 3.1     | ND (0.1)  | 3.6        | 35      | ---       |
|                             |                             | 10/05/08              | 13 - 14        | N           | ND (0.41)            | 60              | 15      | 3.6     | ND (0.1)  | ND (2)     | 43      | ---       |
| SWMU1-WP-6h                 |                             | 10/06/08 <sup>Θ</sup> | 0 - 0.5        | N           | 4.98                 | 130             | 15      | 5.5     | ND (0.1)  | ND (2)     | 87      | ---       |
|                             |                             | 10/06/08              | 2 - 3          | N           | 0.538                | 23              | 61      | 6.6     | ND (0.1)  | ND (1)     | 34      | ---       |
|                             |                             | 10/06/08              | 5 - 6          | N           | ND (0.406)           | 19              | 10      | 2.4     | ND (0.1)  | ND (1)     | 36      | ---       |
|                             |                             | 10/06/08              | 5 - 6          | FD          | ND (0.405)           | 20              | 12      | 2.3     | ND (0.1)  | ND (1)     | 37      | ---       |
|                             |                             | 10/06/08              | 9 - 10         | N           | ND (0.409)           | 41              | 23      | 3.5     | ND (0.11) | ND (1.1)   | 39      | ---       |
| SWMU1-WP-7                  | SWMU1 PAA #2                | 10/06/08              | 0 - 0.5        | N           | 0.566                | 2,600           | 11      | 13      | ND (0.11) | 7.1        | 88      | ---       |
|                             |                             | 10/06/08 <sup>Θ</sup> | 2 - 3          | N           | 18.2                 | 1,200           | 16      | 5.7     | ND (0.11) | 3.4        | 56      | ---       |
|                             |                             | 10/06/08              | 5 - 6          | N           | 6.17                 | 21              | 11      | 2.7     | ND (0.1)  | ND (1)     | 34      | ---       |
|                             |                             | 10/06/08              | 9 - 10         | N           | ND (0.417)           | 23              | 15      | 2.7     | ND (0.11) | ND (1)     | 31      | ---       |

TABLE E-1

## Constituent Concentrations

Solid Waste Management Unit (SWMU) 1 – Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |                       |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|-----------------------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |                       |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date                  | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| SWMU1-WP-8                  | SWMU1 PAA #2                | 10/06/08              | 0 - 0.5        | N           | ND (0.402)           | 35              | 13      | 6.9     | ND (0.1)  | ND (2)     | 47      | ---       |
|                             |                             | 10/06/08              | 2 - 3          | N           | 0.541                | 26              | 10      | 4.1     | ND (0.1)  | ND (2.1)   | 32      | ---       |
|                             |                             | 10/06/08              | 5 - 6          | N           | ND (0.407)           | 19              | 10      | 2.7     | ND (0.1)  | ND (1)     | 38      | ---       |
|                             |                             | 10/06/08              | 9 - 10         | N           | ND (0.411)           | 22              | 9.8     | 2.6     | ND (0.1)  | ND (1)     | 38      | ---       |
| SWMU1-WP-9                  |                             | 09/21/08              | 0 - 0.5        | N           | ND (0.406)           | 26              | 8.2     | 2.9     | ND (0.1)  | 2.1        | 33      | ---       |
|                             |                             | 09/21/08              | 2 - 3          | N           | ND (0.407)           | 34 J            | 15      | 2.3     | ND (0.1)  | 1.2        | 34      | ---       |
|                             |                             | 09/21/08              | 2 - 3          | FD          | ND (0.409)           | 20 J            | 10      | 2.7     | ND (0.1)  | ND (1)     | 34      | ---       |
|                             |                             | 09/21/08              | 5 - 6          | N           | ND (0.416)           | 39              | 15      | 3.2     | ND (0.1)  | ND (2)     | 43      | ---       |
|                             |                             | 09/21/08              | 7 - 8          | N           | ND (0.416)           | 28              | 14      | 3.5     | ND (0.1)  | ND (2.1)   | 45      | ---       |
|                             |                             | 09/21/08              | 9 - 10         | N           | ND (0.411)           | 37              | 15      | 3.3     | ND (0.1)  | ND (2)     | 43      | ---       |
|                             |                             | 09/21/08              | 11 - 12        | N           | ND (0.422)           | 68              | 23      | 4       | ND (0.11) | ND (5.2)   | 56      | ---       |
|                             |                             | 09/21/08              | 13 - 14        | N           | ND (0.423)           | 60              | 22      | 4.9     | ND (0.11) | ND (2.1)   | 52      | ---       |
| SWMU1-WP-10                 | SWMU1 PAA #2                | 10/05/08              | 0 - 0.5        | N           | 6.64                 | 540             | 11      | 8.3     | ND (0.1)  | ND (2.1)   | 56      | ---       |
|                             |                             | 10/05/08 <sup>9</sup> | 2 - 3          | N           | 3.85                 | 1,400           | 18      | 10      | ND (0.1)  | ND (5.2)   | 360     | ---       |
|                             |                             | 10/05/08              | 5 - 6          | N           | 0.494 J              | 50              | 12      | 3.6     | ND (0.11) | ND (2.1)   | 53      | ---       |
|                             |                             | 10/05/08              | 9 - 10         | N           | 2.31                 | 250             | 11      | 5.4     | ND (0.11) | ND (2.1)   | 83      | ---       |
| SWMU1-WP-T3a                |                             | 10/05/08              | 0 - 0.5        | N           | ND (0.41)            | 25              | 11      | 2.8     | ND (0.1)  | ND (1)     | 39      | ---       |
|                             |                             | 10/05/08              | 2 - 3          | N           | ND (0.411)           | 18              | 12      | 2.9     | ND (0.1)  | ND (1)     | 35      | ---       |
|                             |                             | 10/05/08              | 5 - 6          | N           | ND (0.431)           | 26              | 16      | 3.4     | ND (0.11) | ND (1.1)   | 40      | ---       |
|                             |                             | 10/05/08              | 5 - 6          | FD          | ND (0.438)           | 26              | 15      | 3.7     | ND (0.11) | 1.1        | 39      | ---       |
|                             |                             | 10/05/08              | 7 - 8          | N           | ND (0.429)           | 38              | 19      | 4.4     | ND (0.11) | ND (2.1)   | 44      | ---       |
|                             |                             | 10/05/08              | 9 - 10         | N           | ND (0.406)           | 71              | 20      | 3.4     | ND (0.1)  | 6.4        | 42      | ---       |
|                             |                             | 10/05/08              | 11 - 12        | N           | ND (0.42)            | 50              | 17      | 4.5     | ND (0.1)  | ND (2.1)   | 42      | ---       |
|                             |                             | 10/05/08              | 13 - 14        | N           | ND (0.424)           | 62              | 30      | 3.8     | ND (0.11) | ND (5.3)   | 51      | ---       |
| SSB-2                       | SWMU1 PAA #2                | 06/30/97              | 1              | N           | ND (0.05)            | 48.7            | 7.4     | ---     | ---       | ---        | 27.3    | ---       |
|                             |                             | 06/30/97              | 3              | N           | ND (0.05)            | 7.6             | 6.8     | ---     | ---       | ---        | 20.4    | ---       |
|                             |                             | 06/30/97              | 6              | N           | ND (0.05)            | 10.1            | 9.4     | ---     | ---       | ---        | 27      | ---       |
|                             |                             | 06/30/97              | 10             | N           | ND (0.05)            | 9.7             | 11      | 3.1     | ---       | ND (0.2)   | 27.3    | ---       |

TABLE E-1

## Constituent Concentrations

Solid Waste Management Unit (SWMU) 1 – Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|---------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1       | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury | Molybdenum | Zinc    | TEQ Human |
| SSB-3                       |                             | 06/30/97 | 1              | N           | ND (0.05)            | 8.2             | 4.3     | ---     | ---     | ---        | 13.7    | ---       |
|                             |                             | 06/30/97 | 3              | N           | ND (0.05)            | 13.2            | 9.5     | ---     | ---     | ---        | 21.4    | ---       |
|                             |                             | 06/30/97 | 6              | N           | ND (0.05)            | 23.5            | 13.7    | ---     | ---     | ---        | 27.1    | ---       |
|                             |                             | 06/30/97 | 10             | N           | ND (0.05)            | 7.1             | 13.4    | 2.3     | ---     | ND (0.2)   | 19.2    | ---       |
| SSB-4                       | SWMU1 PAA #1                | 06/30/97 | 1              | N           | ND (0.05)            | 10.1            | 3       | ---     | ---     | ---        | 11.9    | ---       |
|                             |                             | 06/30/97 | 3              | N           | ND (0.05)            | 1,520           | 10.3    | ---     | ---     | ---        | 141     | ---       |
|                             |                             | 06/30/97 | 6              | N           | ND (0.05)            | 297             | 12.4    | ---     | ---     | ---        | 130     | ---       |
|                             |                             | 06/30/97 | 10             | N           | ND (0.05)            | 201             | 11.9    | 2.1     | ---     | ND (0.2)   | 188     | ---       |
| SSB-5                       |                             | 06/30/97 | 1              | N           | 0.06                 | 521             | 13.5    | ---     | ---     | ---        | 39.6    | ---       |
|                             |                             | 06/30/97 | 3              | N           | ND (0.05)            | 1,440           | 16      | ---     | ---     | ---        | 128     | ---       |
|                             |                             | 06/30/97 | 6              | N           | ND (0.05)            | 617             | 14.9    | ---     | ---     | ---        | 115     | ---       |
|                             |                             | 06/30/97 | 10             | N           | ND (0.05)            | 31.6            | 7       | 1.75    | ---     | ND (0.2)   | 107     | ---       |
| WP-1                        | SWMU1 PAA #2                | 06/30/97 | 0              | N           | 47.5                 | 2,090           | 3.9     | ---     | ---     | ---        | 44.5    | ---       |
| WP-2                        | SWMU1 PAA #2                | 09/18/97 | 0              | N           | ND (0.5)             | 25.9            | 22.8    | ---     | ---     | ---        | 80.1    | ---       |
| WP-3                        | SWMU1 PAA #2                | 09/18/97 | 0.5            | N           | 11.8                 | 1,290           | 13.2    | ---     | ---     | ---        | 50.3    | ---       |
|                             |                             | 09/18/97 | 2              | N           | 0.41                 | 273             | 18.6    | ---     | ---     | ---        | 50      | ---       |
| WP-4                        | SWMU1 PAA #2                | 09/18/97 | 0              | N           | 1.14                 | 120             | 10.8    | ---     | ---     | ---        | 65.6    | ---       |
| WP-5                        | SWMU1 PAA #2                | 09/18/97 | 0              | N           | 3.51                 | 511             | 16.8    | ---     | ---     | ---        | 50.4    | ---       |
|                             |                             | 09/18/97 | 1              | N           | 6.66                 | 711             | 15.4    | ---     | ---     | ---        | 61.5    | ---       |
|                             |                             | 09/18/97 | 2              | N           | 8.97                 | 421             | 15.8    | ---     | ---     | ---        | 51.9    | ---       |
|                             |                             | 09/18/97 | 3              | N           | 6.1                  | 158             | 10.1    | ---     | ---     | ---        | 22.9    | ---       |
|                             |                             | 09/18/97 | 4              | N           | 10.2                 | 113             | 24.4    | ---     | ---     | ---        | 41.9    | ---       |
| WP-6                        | SWMU1 PAA #2                | 09/18/97 | 0              | N           | 1.64                 | 712             | 21.6    | ---     | ---     | ---        | 57.9    | ---       |
|                             |                             | 09/18/97 | 1              | N           | 9.46                 | 1,030           | 18.2    | ---     | ---     | ---        | 46.5    | ---       |
|                             |                             | 09/18/97 | 2              | N           | 2.29                 | 401             | 11.9    | ---     | ---     | ---        | 210     | ---       |
| WP-Bank1                    | SWMU1 PAA #2                | 11/23/98 | 0              | N           | 5.5                  | 261             | 10.3    | ---     | ---     | ---        | 23.4    | ---       |
| WP-Bank2                    | SWMU1 PAA #2                | 11/23/98 | 0              | N           | 14                   | 909             | 27.2    | ---     | ---     | ---        | 61.8    | ---       |
| BANK-WP                     | SWMU1 PAA #2                | 11/13/98 | Unknown        | N           | ND (0.51)            | 34.4            | 16.3    | ---     | ---     | ---        | 41.3    | ---       |

TABLE E-1

## Constituent Concentrations

Solid Waste Management Unit (SWMU) 1 – Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|---------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1       | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury | Molybdenum | Zinc    | TEQ Human |
| WP-Floor                    | SWMU1 PAA #2                | 11/23/98 | Unknown        | N           | 3.3                  | 317             | 13.9    | ---     | ---     | ---        | 15.9 J  | ---       |
| Bank - b                    | SWMU1 PAA #2                | 11/13/98 | Unknown        | N           | 0.7                  | 20.1            | 15      | ---     | ---     | ---        | 38.2    | ---       |
| T-1                         | SWMU1 PAA #2                | 11/13/98 | Unknown        | N           | ND (0.53)            | 15.9            | 13.1    | ---     | ---     | ---        | 38.6    | ---       |
|                             |                             | 11/13/98 | Unknown        | N           | 2.1                  | 38.8            | 28      | ---     | ---     | ---        | 164     | ---       |
| T-2                         | SWMU1 PAA #2                | 11/13/98 | Unknown        | N           | ND (0.53)            | 21.2            | 12.4    | ---     | ---     | ---        | 44.7    | ---       |
|                             |                             | 11/13/98 | Unknown        | N           | 0.6                  | 44.4            | 14.2    | ---     | ---     | ---        | 43      | ---       |
| T-3-B                       | SWMU1 PAA #2                | 11/13/98 | 0              | N           | 3.1                  | 619             | 19.6    | ---     | ---     | ---        | 673     | ---       |
| P-1                         |                             | 11/13/98 | Unknown        | N           | ND (0.52)            | 12              | 12.7    | ---     | ---     | ---        | 29.4    | ---       |
|                             |                             | 11/13/98 | Unknown        | N           | ND (0.53)            | 17.9            | 16.1    | ---     | ---     | ---        | 40.4    | ---       |
| P-2Soil                     |                             | 11/13/98 | - 3.5          | N           | ND (0.76)            | 33.2            | 6       | ---     | ---     | ---        | 6.4     | ---       |
|                             |                             | 11/13/98 | Unknown        | N           | ND (0.52)            | 15              | 9.7     | ---     | ---     | ---        | 36.1    | ---       |

**Notes:**

Results greater than or equal to the Removal Action Goal are circled.

|        |   |
|--------|---|
| Ø      | white powder sample.  |
| ---    | not analyzed  |
| FD     | field duplicate   |
| ft bgs | feet below ground surface   |
| J      | concentration or reporting limit estimated by laboratory or data validation |
| mg/kg  | milligrams per kilogram   |
| N      | primary sample  |
| ND     | not detected at the listed reporting limit                                  |
| ng/kg  | nanogram per kilogram   |
| TEQ    | dioxin and furans toxicity equivalent quotient                              |



TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |                       |                |             | (mg/kg)              | (mg/kg)         | (mg/kg)  | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|-----------------------|----------------|-------------|----------------------|-----------------|----------|---------|------------|------------|---------|-----------|
|                             |                             |                       |                |             | 3.1                  | 145             | 145      | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date                  | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper   | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC1-BCW1                   |                             | 09/20/08              | 0 - 0.5        | N           | ND (0.401)           | 23              | 11       | 7.5     | ND (0.1)   | ND (1)     | 44      | ---       |
|                             |                             | 09/20/08              | 2 - 3          | N           | ND (0.404)           | 25              | 15       | 2       | ND (0.1)   | ND (1)     | 28      | ---       |
| AOC1-BCW2                   |                             | 10/04/08              | 0 - 0.5        | N           | ND (0.403)           | 21              | 7.6      | 3.7     | ND (0.1)   | ND (1)     | 40      | ---       |
|                             |                             | 10/04/08              | 2 - 3          | N           | ND (0.407)           | 34              | 9.2      | 18      | ND (0.1)   | ND (1)     | 39      | ---       |
|                             |                             | 10/04/08              | 5 - 6          | N           | ND (0.404)           | 35              | 8.8      | 4.4     | ND (0.1)   | 1.5        | 41      | ---       |
|                             |                             | 10/04/08              | 9 - 10         | N           | ND (0.426)           | 20              | 8.1      | 3.8     | ND (0.1)   | ND (1.1)   | 39      | ---       |
| AOC1-BCW3                   |                             | 10/04/08              | 0 - 0.5        | N           | 0.416                | 25              | 11       | 7.3     | ND (0.1)   | ND (1)     | 51      | ---       |
|                             |                             | 10/04/08              | 2 - 3          | N           | ND (0.404)           | 25              | 9.8      | 4       | ND (0.1)   | ND (1)     | 38      | ---       |
|                             |                             | 10/04/08              | 5 - 6          | N           | ND (0.415)           | 23              | 9.6      | 2.2     | ND (0.1)   | ND (2.1)   | 43      | ---       |
|                             |                             | 10/04/08              | 9 - 10         | N           | ND (0.421)           | 21              | 8.5      | 2.2     | ND (0.11)  | ND (1.1)   | 38      | ---       |
|                             |                             | 10/04/08              | 9 - 10         | FD          | ND (0.424)           | 22              | 8.8      | 2.3     | ND (0.11)  | ND (1.1)   | 41      | ---       |
| AOC1-BCW4                   |                             | 10/04/08              | 0 - 0.5        | N           | 1.3                  | 36              | 13       | 9.4     | ND (0.1)   | ND (1)     | 61      | ---       |
|                             |                             | 10/04/08              | 2 - 3          | N           | ND (0.407)           | 24              | 8.3      | 3.6     | ND (0.1)   | ND (1)     | 33      | ---       |
|                             |                             | 10/04/08              | 5 - 6          | N           | ND (0.416)           | 23              | 8.4      | 2.7     | ND (0.1)   | ND (1)     | 45      | ---       |
|                             |                             | 10/04/08              | 9 - 10         | N           | ND (0.426)           | 22              | 7.6      | 2.3     | ND (0.11)  | ND (2.1)   | 42      | ---       |
| AOC1-BCW5                   |                             | 10/04/08              | 0 - 0.5        | N           | 0.445                | 35              | 12       | 6       | ND (0.099) | ND (1)     | 46      | ---       |
|                             |                             | 10/04/08              | 2 - 3          | N           | ND (0.407)           | 31              | 9.6      | 7       | ND (0.1)   | ND (1)     | 42      | ---       |
|                             |                             | 10/04/08              | 5 - 6          | N           | ND (0.42)            | 26              | 8.4      | 2.7     | ND (0.1)   | ND (1)     | 44      | ---       |
|                             |                             | 10/04/08              | 9 - 10         | N           | ND (0.425)           | 22              | ND (7.4) | 3.2     | ND (0.11)  | ND (2.1)   | 40      | ---       |
|                             |                             | 10/04/08              | 9 - 10         | FD          | ND (0.427)           | 24              | ND (7.3) | 3       | ND (0.11)  | ND (2.1)   | 40      | ---       |
| AOC1-BCW6                   |                             | 08/22/08 <sup>‡</sup> | 0 - 0.5        | N           | 2.63                 | 71              | 22       | 23      | ND (0.14)  | ND (2.8)   | 81      | 64        |
|                             |                             | 08/22/08 <sup>‡</sup> | 2 - 3          | N           | ND (0.608)           | 21              | 14       | 8.7     | ND (0.14)  | ND (2.9)   | 50      | 11        |
| AOC1-T1a                    |                             | 10/16/08              | 0 - 0.5        | N           | ND (0.406)           | 19              | 11       | 4.9     | ND (0.1)   | ND (2)     | 38      | ---       |
|                             |                             | 10/16/08              | 2 - 3          | N           | ND (0.404)           | 27              | 8.6      | 3.8     | ND (0.1)   | 2          | 37      | ---       |
|                             |                             | 10/16/08              | 5 - 6          | N           | ND (0.405)           | 26              | 9.5      | 3.4     | ND (0.1)   | 2          | 34      | ---       |
|                             |                             | 10/16/08              | 9 - 10         | N           | ND (0.404)           | 14              | 7.5      | 1.4     | ND (0.1)   | ND (1)     | 32      | ---       |

TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)  | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1        | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury  | Molybdenum | Zinc    | TEQ Human |
| AOC1-T1b                    |                             | 10/16/08 | 0 - 0.5        | N           | ND (0.405)           | 43 J            | 9       | 3.1     | ND (0.1) | ND (1)     | 31      | ---       |
|                             |                             | 10/16/08 | 0 - 0.5        | FD          | ND (0.405)           | 33 J            | 10      | 3.2     | ND (0.1) | ND (1)     | 32      | ---       |
|                             |                             | 10/16/08 | 2 - 3          | N           | ND (1.94)            | 98              | 12      | 3.9     | ND (0.1) | ND (1)     | 67      | ---       |
|                             |                             | 10/16/08 | 5 - 6          | N           | 0.402                | 28              | 9       | 3.2     | ND (0.1) | 1.7        | 31      | ---       |
|                             |                             | 10/16/08 | 9 - 10         | N           | ND (0.402)           | 42              | 11      | 2.6     | ND (0.1) | 5          | 32      | ---       |
| AOC1-T1c                    |                             | 10/16/08 | 0 - 0.5        | N           | 0.601                | 44              | 13      | 7.5     | ND (0.1) | 1.9        | 53      | ---       |
|                             |                             | 10/16/08 | 2 - 3          | N           | 4.77 J               | 140             | 26      | 20 J    | ND (0.1) | 2.5        | 82 J    | ---       |
|                             |                             | 10/16/08 | 2 - 3          | FD          | 3.58 J               | 150             | 29      | 32 J    | ND (0.1) | 2.2        | 110 J   | ---       |
|                             |                             | 10/16/08 | 5 - 6          | N           | 0.446                | 46              | 15      | 5       | ND (0.1) | 3          | 44      | ---       |
|                             |                             | 10/16/08 | 9 - 10         | N           | ND (0.418)           | 20              | 11      | 1.9     | ND (0.1) | ND (1)     | 38      | ---       |
| AOC1-T2a                    |                             | 10/05/08 | 0 - 0.5        | N           | ND (0.403)           | 26              | 10      | 4.8     | ND (0.1) | ND (1)     | 38      | ---       |
|                             |                             | 10/16/08 | 2 - 3          | N           | ND (0.407)           | 28              | 10      | 4       | ND (0.1) | ND (2)     | 42      | ---       |
|                             |                             | 10/16/08 | 5 - 6          | N           | ND (0.405)           | 19              | 8.3     | 2.4     | ND (0.1) | 1.1        | 35      | ---       |
|                             |                             | 10/16/08 | 9 - 10         | N           | ND (0.416)           | 15              | 7.1     | 2.1     | ND (0.1) | ND (1)     | 36      | ---       |
| AOC1-T2b                    | AOC1 PAA #2                 | 10/16/08 | 0 - 0.5        | N           | ND (0.408)           | 26              | 9.3     | 3.2     | ND (0.1) | ND (1)     | 39      | ---       |
|                             |                             | 10/16/08 | 2 - 3          | N           | ND (0.414)           | 26              | 10      | 3       | ND (0.1) | 2.4        | 33      | ---       |
|                             |                             | 10/16/08 | 5 - 6          | N           | ND (0.407)           | 53              | 8.7     | 2.4     | ND (0.1) | 5.5        | 32      | ---       |
|                             |                             | 10/16/08 | 9 - 10         | N           | ND (0.415)           | 18              | 8.5     | 1.8     | ND (0.1) | 1.3        | 33      | ---       |
|                             |                             | 10/16/08 | 9 - 10         | FD          | ND (0.413)           | 18              | 9.6     | 1.6     | ND (0.1) | 1.2        | 35      | ---       |
| AOC1-T2c                    |                             | 10/08/08 | 0 - 0.5        | N           | 1.26                 | 60              | 10      | 5.1     | ND (0.1) | ND (1)     | 44      | ---       |
|                             |                             | 10/08/08 | 2 - 3          | N           | ND (0.416)           | 42              | 11      | 3.3     | ND (0.1) | ND (1)     | 33      | ---       |
|                             |                             | 10/08/08 | 5 - 6          | N           | ND (0.412)           | 22              | 9.1     | 1.8     | ND (0.1) | ND (1)     | 28      | ---       |
|                             |                             | 10/08/08 | 9 - 10         | N           | ND (0.419)           | 24              | 9.7     | 2.6     | ND (0.1) | ND (1)     | 40      | ---       |

TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| AOC1-T2d                    | AOC1 PAA #2                 | 10/07/08 | 0 - 0.5        | N           | ND (0.408)           | 46              | 10      | 2.9     | ND (0.1)  | 2.9        | 36      | ---       |
|                             |                             | 10/07/08 | 2 - 3          | N           | 5.73                 | 970             | 13      | 4.7     | ND (0.1)  | 1.5        | 98      | ---       |
|                             |                             | 10/07/08 | 5 - 6          | N           | 4.34                 | 370             | 11      | 3.9     | ND (0.1)  | 1.1        | 130     | ---       |
|                             |                             | 10/07/08 | 9 - 10         | N           | 2.92                 | 140             | 14      | 3.1     | ND (0.1)  | ND (2.1)   | 68      | ---       |
|                             |                             | 10/07/08 | 19 - 20        | N           | ND (0.423)           | 26              | 9.2     | 3       | ND (0.11) | ND (2.1)   | 45      | ---       |
|                             |                             | 10/07/08 | 29 - 30        | N           | ND (0.424)           | 21              | 8.9     | 2.7     | ND (0.1)  | ND (2.1)   | 37      | ---       |
|                             |                             | 10/07/08 | 29 - 30        | FD          | ND (0.423)           | 24              | ND (11) | 2.2     | ND (0.11) | ND (5.3)   | 36      | ---       |
|                             |                             | 10/07/08 | 39 - 40        | N           | ND (0.431)           | 22              | 11      | 3.6     | ND (0.11) | ND (2.1)   | 42      | ---       |
|                             |                             | 10/07/08 | 49 - 50        | N           | ND (0.425)           | 28              | 10      | 2.1     | ND (0.11) | ND (1.1)   | 38      | ---       |
|                             |                             | 10/08/08 | 59 - 60        | N           | ND (0.406)           | 39              | 9.8     | 2.2     | ND (0.1)  | 4.7        | 32      | ---       |
|                             |                             | 10/08/08 | 69 - 70        | N           | ND (0.435)           | 18              | 9.8     | 2.8     | ND (0.11) | 2.2        | 31      | ---       |
| AOC1-T2e                    |                             | 10/16/08 | 0 - 0.5        | N           | ND (0.405)           | 34              | 9.3     | 3.4     | ND (0.1)  | 2.2        | 36      | ---       |
|                             |                             | 10/16/08 | 2 - 3          | N           | ND (0.408)           | 30              | 8.4     | 3.2     | ND (0.1)  | 1.4        | 30      | ---       |
|                             |                             | 10/16/08 | 2 - 3          | FD          | ND (0.408)           | 32              | 8       | 3.2     | ND (0.1)  | 1.3        | 33      | ---       |
|                             |                             | 10/16/08 | 5 - 6          | N           | ND (0.402)           | 44              | 8.4     | 2.3     | ND (0.1)  | 5.4        | 32      | ---       |
|                             |                             | 10/16/08 | 9 - 10         | N           | ND (0.415)           | 20              | 4.9     | 1.1     | ND (0.1)  | 1.1        | 27      | ---       |
| AOC1-T3a                    |                             | 10/05/08 | 0 - 0.5        | N           | ND (0.403)           | 24              | 11      | 8.4     | ND (0.1)  | ND (1)     | 47      | ---       |
|                             |                             | 10/17/08 | 2 - 3          | N           | ND (0.407)           | 19              | 9       | 4.2     | ND (0.1)  | ND (1)     | 37      | ---       |
|                             |                             | 10/17/08 | 5 - 6          | N           | ND (0.405)           | 23              | 12      | 14      | ND (0.1)  | 1.7        | 39      | ---       |
|                             |                             | 10/17/08 | 9 - 10         | N           | ND (0.406)           | 15              | 10      | 1.9     | ND (0.1)  | ND (1)     | 33      | ---       |
| AOC1-T3b                    |                             | 10/05/08 | 0 - 0.5        | N           | ND (0.402)           | 23              | 8       | 3.1     | ND (0.1)  | ND (1)     | 29      | ---       |
|                             |                             | 10/17/08 | 2 - 3          | N           | 2.77                 | 170             | 13      | 9.1     | ND (0.11) | ND (1)     | 120     | ---       |
|                             |                             | 10/17/08 | 5 - 6          | N           | ND (0.405)           | 46              | 8.6     | 2.3     | ND (0.1)  | 4.6        | 34      | ---       |
|                             |                             | 10/17/08 | 9 - 10         | N           | ND (0.41)            | 17              | 7.7     | 1.7     | ND (0.1)  | 1.1        | 31      | ---       |
|                             |                             | 10/17/08 | 9 - 10         | FD          | ND (0.412)           | 16              | 6.5     | 1.9     | ND (0.1)  | 1.1        | 32      | ---       |
| AOC1-T3c                    |                             | 10/05/08 | 0 - 0.5        | N           | 0.42                 | 27              | 11      | 7       | ND (0.1)  | ND (1)     | 46      | ---       |
|                             |                             | 10/05/08 | 2 - 3          | N           | ND (0.41)            | 30              | 9.7     | 3.4     | ND (0.1)  | ND (1)     | 39      | ---       |
|                             |                             | 10/05/08 | 5 - 6          | N           | 1.65                 | 89              | 12      | 5.8     | ND (0.1)  | 1.4        | 65      | ---       |
|                             |                             | 10/05/08 | 9 - 10         | N           | ND (0.403)           | 19              | 10      | 2.4     | ND (0.1)  | ND (1)     | 36      | ---       |

TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC1-T4a                    |                             | 10/03/08 | 0 - 0.5        | N           | ND (0.402)           | 28              | 11      | 5.5     | ND (0.1)   | ND (1)     | 51      | ---       |
|                             |                             | 10/03/08 | 2 - 3          | N           | ND (0.407)           | 26              | 10      | 4       | ND (0.1)   | ND (1)     | 40      | ---       |
|                             |                             | 10/03/08 | 5 - 6          | N           | ND (0.409)           | 25              | 11      | 3.3     | ND (0.1)   | ND (1)     | 40      | ---       |
|                             |                             | 10/03/08 | 9 - 10         | N           | 0.525                | 26              | 9.6     | 4.3     | ND (0.1)   | ND (1)     | 36      | ---       |
| AOC1-T4b                    |                             | 10/02/08 | 0 - 0.5        | N           | 1.26                 | 21              | 7.5     | 2.6     | ND (0.1)   | ND (1)     | 29      | ---       |
|                             |                             | 10/02/08 | 2 - 3          | N           | ND (0.412)           | 29              | 12      | 8.8 J   | ND (0.1)   | ND (1)     | 46      | ---       |
|                             |                             | 10/02/08 | 2 - 3          | FD          | ND (0.408)           | 28              | 11      | 7 J     | ND (0.1)   | ND (1)     | 50      | ---       |
|                             |                             | 10/02/08 | 5 - 6          | N           | ND (0.419)           | 24              | 9.6     | 3.2     | ND (0.1)   | ND (1)     | 39      | ---       |
|                             |                             | 10/02/08 | 9 - 10         | N           | ND (0.415)           | 19              | 8.8     | 2.4     | ND (0.1)   | ND (1)     | 37      | ---       |
| AOC1-T4c                    |                             | 10/04/08 | 0 - 0.5        | N           | ND (0.403)           | 19              | 22      | 5.9     | ND (0.1)   | ND (1)     | 33      | ---       |
|                             |                             | 10/04/08 | 2 - 3          | N           | 0.816                | 27              | 19      | 14      | ND (0.1)   | ND (1)     | 67      | ---       |
|                             |                             | 10/04/08 | 5 - 6          | N           | 0.868                | 28              | 21      | 19      | ND (0.1)   | 1.3        | 71      | ---       |
|                             |                             | 10/04/08 | 9 - 10         | N           | ND (0.413)           | 27              | 13      | 5.8     | ND (0.1)   | ND (1)     | 47      | ---       |
| AOC1-T5a                    |                             | 10/04/08 | 0 - 0.5        | N           | ND (0.402)           | 21              | 13      | 4       | ND (0.1)   | ND (1)     | 41      | ---       |
|                             |                             | 10/04/08 | 2 - 3          | N           | ND (0.403)           | 39              | 10      | 3.2     | ND (0.099) | ND (1)     | 38      | ---       |
|                             |                             | 10/04/08 | 5 - 6          | N           | ND (0.405)           | 35              | 24      | 3.4     | ND (0.1)   | 2.2        | 38      | ---       |
|                             |                             | 10/04/08 | 9 - 10         | N           | ND (0.411)           | 24              | 11      | 3.6     | ND (0.1)   | ND (1)     | 38      | ---       |
|                             |                             | 10/04/08 | 9 - 10         | FD          | ND (0.409)           | 27              | 11      | 3.1     | ND (0.1)   | ND (1)     | 38      | ---       |
| AOC1-T5b                    |                             | 10/04/08 | 0 - 0.5        | N           | ND (0.402)           | 26              | 11      | 4.9     | ND (0.1)   | ND (1)     | 33      | ---       |
|                             |                             | 10/04/08 | 2 - 3          | N           | 0.452                | 41              | 9.5     | 4.4     | ND (0.1)   | ND (1)     | 38      | ---       |
|                             |                             | 10/04/08 | 5 - 6          | N           | 0.596                | 61              | 9.8     | 4.8     | ND (0.1)   | ND (1)     | 41      | ---       |
|                             |                             | 10/04/08 | 9 - 10         | N           | ND (0.409)           | 23              | 13      | 3.4     | ND (0.1)   | ND (1)     | 41      | ---       |
| AOC1-T5c                    |                             | 10/04/08 | 0 - 0.5        | N           | ND (0.403)           | 15              | 8.8     | 5.8     | ND (0.1)   | ND (1)     | 37      | ---       |
|                             |                             | 10/04/08 | 2 - 3          | N           | 0.875                | 31              | 12      | 7.5     | ND (0.1)   | ND (1)     | 53      | ---       |
|                             |                             | 10/04/08 | 5 - 6          | N           | 0.641                | 36              | 12      | 11      | ND (0.099) | ND (1)     | 49      | ---       |
|                             |                             | 10/04/08 | 9 - 10         | N           | 0.478                | 21              | 9.8     | 3.9     | ND (0.1)   | ND (1)     | 39      | ---       |

TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)  | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1        | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury  | Molybdenum | Zinc    | TEQ Human |
| AOC1-T6a                    |                             | 09/30/08 | 0 - 0.5        | N           | ND (0.402)           | 20              | 11      | 5.6     | ND (0.1) | ND (1)     | 47      | ---       |
|                             |                             | 09/30/08 | 2.5 - 3        | N           | ND (0.408)           | 20              | 8.9     | 5.6     | ND (0.1) | ND (1)     | 36      | ---       |
|                             |                             | 09/30/08 | 2.5 - 3        | FD          | ND (0.407)           | 21              | 8.8     | 5.4     | ND (0.1) | ND (1)     | 40      | ---       |
|                             |                             | 09/30/08 | 5.5 - 6        | N           | ND (0.408)           | 16              | 7.9     | 3.9     | ND (0.1) | ND (1)     | 34      | ---       |
|                             |                             | 09/30/08 | 9.5 - 10       | N           | ND (0.41)            | 20              | 8.7     | 12      | ND (0.1) | ND (1)     | 40      | ---       |
| AOC1-T6b                    |                             | 09/30/08 | 0 - 0.5        | N           | ND (0.401)           | 26              | 9       | 5.5     | ND (0.1) | ND (1)     | 41      | ---       |
|                             |                             | 09/30/08 | 2.5 - 3        | N           | ND (0.404)           | 18              | 7.1     | 4.4     | ND (0.1) | ND (1)     | 29      | ---       |
|                             |                             | 09/30/08 | 5.5 - 6        | N           | ND (0.404)           | 22              | 10      | 3.2     | ND (0.1) | ND (1)     | 36      | ---       |
|                             |                             | 09/30/08 | 9.5 - 10       | N           | ND (0.405)           | 25              | 9.3     | 3.1 J   | ND (0.1) | ND (1)     | 37      | ---       |
|                             |                             | 09/30/08 | 9.5 - 10       | FD          | ND (0.404)           | 27              | 10      | 8.5 J   | ND (0.1) | ND (1)     | 39      | ---       |
| AOC1-T6c                    |                             | 09/30/08 | 0 - 0.5        | N           | ND (0.401)           | 18              | 8.7     | 3.2     | ND (0.1) | ND (1)     | 39      | ---       |
|                             |                             | 09/30/08 | 2.5 - 3        | N           | ND (0.407)           | 26              | 9.7     | 5.1     | ND (0.1) | ND (1)     | 37      | ---       |
|                             |                             | 09/30/08 | 5.5 - 6        | N           | ND (0.406)           | 21              | 9.4     | 2.9     | ND (0.1) | ND (1)     | 37      | ---       |
| AOC4-1                      |                             | 10/14/08 | 0 - 0.5        | N           | 0.49                 | 47              | 16      | 8.5     | ND (0.1) | ND (1)     | 48      | ---       |
|                             |                             | 10/14/08 | 0.5 - 1        | N           | ND (0.404)           | 32              | 13      | 10      | ND (0.1) | ND (1)     | 47      | ---       |
|                             |                             | 10/14/08 | 2 - 3          | N           | ND (0.405)           | 20              | 12      | 17      | ND (0.1) | ND (1)     | 39      | ---       |
| AOC1-1                      | AOC1 PAA #3                 | 01/23/16 | 0 - 0.5        | N           | 12                   | 410             | 14      | 5.4     | ND (0.1) | ND (1)     | 74      | 300       |
|                             |                             | 01/23/16 | 2 - 3          | N           | 4.1                  | 290             | 14      | 4.5     | ND (0.1) | ND (1)     | 74      | 190       |
|                             |                             | 01/23/16 | 5 - 6          | N           | ND (0.2)             | 15              | 9       | 2.6     | ND (0.1) | ND (1)     | 34      | ---       |
|                             |                             | 01/23/16 | 9 - 10         | N           | ND (0.2)             | 17              | 9.6     | 2.1     | ND (0.1) | ND (1)     | 35      | ---       |
|                             |                             | 01/23/16 | 14 - 15        | N           | ND (0.2)             | 18              | 11      | 1.8     | ND (0.1) | ND (1)     | 36      | ---       |
|                             |                             | 01/23/16 | 14 - 15        | FD          | ND (0.2)             | 19              | 12      | 1.9     | ND (0.1) | ND (1)     | 36      | ---       |
|                             |                             | 01/24/16 | 19 - 20        | N           | ND (0.2)             | 18              | 9       | 1.3     | ND (0.1) | ND (1)     | 39      | ---       |
|                             |                             | 01/24/16 | 29 - 30        | N           | ND (0.21)            | 16              | 12      | 2.3     | ND (0.1) | ND (1)     | 41      | ---       |

TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC1-2                      |                             | 01/23/16 | 0 - 0.5        | N           | ND (0.21)            | 20              | 9.1     | 4.2     | ND (0.1)   | ND (1)     | 38      | 1.9       |
|                             |                             | 01/23/16 | 2 - 3          | N           | ND (0.2)             | 18 J            | 9.1     | 1.9     | ND (0.1)   | ND (1)     | 36      | 0.15      |
|                             |                             | 01/23/16 | 5 - 6          | N           | ND (0.2)             | 19              | 11      | 1.8     | ND (0.1)   | ND (1)     | 36      | ---       |
|                             |                             | 01/23/16 | 9 - 10         | N           | ND (0.2)             | 18              | 6.3     | 1       | ND (0.1)   | ND (1)     | 28      | ---       |
|                             |                             | 01/23/16 | 14 - 15        | N           | ND (0.2)             | 13              | 8.1     | 1       | ND (0.1)   | ND (1)     | 34      | ---       |
|                             |                             | 01/23/16 | 19 - 20        | N           | ND (0.2)             | 16 J            | 7.7     | 1.5     | ND (0.1)   | ND (1)     | 35      | ---       |
|                             |                             | 01/23/16 | 20 - 30        | FD          | ND (0.2)             | 13 J            | 8       | 1.3     | ND (0.1)   | ND (1)     | 36      | ---       |
|                             |                             | 01/23/16 | 29 - 30        | N           | ND (0.2)             | 15              | 7.6     | 1.2     | ND (0.1)   | ND (1)     | 31      | ---       |
| AOC1-3                      | AOC1 PAA #3                 | 01/25/16 | 0 - 0.5        | N           | 14                   | 410             | 13      | 3.7     | ND (0.1)   | ND (1)     | 90      | 330       |
|                             |                             | 01/25/16 | 2 - 3          | N           | 3.7                  | 210             | 11      | 3.3     | ND (0.1)   | ND (1)     | 60      | 180       |
|                             |                             | 01/25/16 | 5 - 6          | N           | ND (0.2)             | 24              | 14      | 1.5     | ND (0.1)   | ND (1)     | 39      | 0.8       |
|                             |                             | 01/25/16 | 9 - 10         | N           | ND (0.2)             | 13              | 7.7     | 1.4     | ND (0.1)   | ND (1)     | 32      | 0.52      |
|                             |                             | 01/25/16 | 14 - 15        | N           | ND (0.2)             | 17              | 10      | 1.4     | ND (0.1)   | ND (1)     | 40      | ---       |
|                             |                             | 01/25/16 | 14 - 15        | FD          | ND (0.2)             | 19              | 9.8     | 1.3     | ND (0.1)   | ND (1)     | 43      | ---       |
|                             |                             | 01/25/16 | 19 - 20        | N           | ND (0.2)             | 19              | 11      | 1.6     | ND (0.1)   | ND (1)     | 38      | ---       |
|                             |                             | 01/25/16 | 29 - 30        | N           | ND (0.2)             | 15              | 11      | 2.2     | ND (0.1)   | ND (1)     | 34      | ---       |
|                             |                             | 01/25/16 | 39 - 40        | N           | ND (0.22)            | 22              | 10      | 1.7     | ND (0.11)  | ND (1.1)   | 39      | ---       |
|                             |                             | 01/25/16 | 49 - 50        | N           | ND (0.21)            | 23              | 14      | 2.3     | ND (0.11)  | ND (1.1)   | 42      | ---       |
|                             |                             | 01/25/16 | 59 - 60        | N           | ND (0.21)            | 39              | 14      | 2.2     | ND (0.11)  | ND (1.1)   | 42      | ---       |
|                             |                             | 01/26/16 | 69 - 70        | N           | ND (0.21)            | 20              | 19      | 1.5     | ND (0.1)   | ND (1)     | 38      | ---       |
|                             |                             | 01/26/16 | 79 - 80        | N           | ND (0.21)            | 17              | 13      | 1.3     | ND (0.11)  | ND (1)     | 31      | ---       |
| AOC1-4                      |                             | 01/23/16 | 0 - 0.5        | N           | ND (0.2)             | 13              | 7       | 1.9     | ND (0.1)   | ND (1)     | 35      | 0.92      |
|                             |                             | 01/23/16 | 2 - 3          | N           | ND (0.2)             | 19              | 8.7     | 3       | ND (0.1)   | ND (1)     | 30      | 0.66      |
|                             |                             | 01/23/16 | 5 - 6          | N           | ND (0.2)             | 14              | 10      | 2.9     | ND (0.1)   | ND (1)     | 31      | ---       |
|                             |                             | 01/23/16 | 9 - 10         | N           | ND (0.2)             | 14              | 9.3     | 2.2     | ND (0.1)   | ND (1)     | 33      | ---       |
|                             |                             | 01/23/16 | 14 - 15        | N           | ND (0.2)             | 35              | 9.1     | 2       | ND (0.1)   | ND (1)     | 35      | ---       |
|                             |                             | 01/23/16 | 19 - 20        | N           | ND (0.2)             | 16              | 8.4     | 1.2     | ND (0.1) J | ND (1)     | 37      | ---       |
|                             |                             | 01/23/16 | 19 - 20        | FD          | ND (0.2)             | 21              | 11      | 1.3     | ND (0.1)   | ND (1)     | 43 J    | ---       |
|                             |                             | 01/23/16 | 29 - 30        | N           | ND (0.21)            | 16              | 7.9     | 2.2     | ND (0.1)   | ND (1.1)   | 39      | ---       |

TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| AOC1-5                      |                             | 01/09/17 | 0 - 0.5        | N           | ND (0.21)            | 14              | 7.3     | 1.5     | ND (0.1)  | ND (1)     | 26      | 2.4       |
|                             |                             | 01/09/17 | 2 - 3          | N           | ND (0.21)            | 24              | 8.7     | ND (1)  | ND (0.1)  | ND (1)     | 32      | 0.2       |
|                             |                             | 01/09/17 | 5 - 6          | N           | ND (0.21)            | 19              | 7.9     | 2.1     | ND (0.1)  | ND (1)     | 45      | 8         |
|                             |                             | 01/09/17 | 9 - 10         | N           | ND (0.21)            | 13              | 9.5     | ND (1)  | ND (0.1)  | ND (1)     | 28      | 0.45      |
|                             |                             | 01/09/17 | 14 - 15        | N           | ND (0.21)            | 18              | 8.3     | 1.9     | ND (0.11) | ND (1.1)   | 34      | 0.19      |
| AOC1-6                      |                             | 01/09/17 | 0 - 0.5        | N           | 0.22                 | 23              | 11      | 2.9     | ND (0.1)  | ND (1)     | 34      | 14        |
|                             |                             | 01/09/17 | 2 - 3          | N           | ND (0.21)            | 17              | 6.7     | 1.2     | ND (0.1)  | ND (1)     | 27      | 2.7       |
|                             |                             | 01/09/17 | 5 - 6          | N           | ND (0.21)            | 14              | 8.8     | ND (1)  | ND (0.1)  | ND (1)     | 30      | 0.3       |
|                             |                             | 01/09/17 | 9 - 10         | N           | ND (0.21)            | 21              | 8.3     | 1.5     | ND (0.1)  | ND (1)     | 35      | ND (0.16) |
|                             |                             | 01/09/17 | 14 - 15        | N           | ND (0.21)            | 23              | 7.3     | 1.6     | ND (0.1)  | ND (1)     | 38      | 0.24      |
| AOC16-5                     |                             | 02/20/17 | 0 - 0.5        | N           | 0.56                 | 28 J            | 18 J    | 29 J    | ---       | ND (1)     | 46 J    | 36        |
|                             |                             | 02/20/17 | 0 - 0.5        | FD          | 0.61                 | 22 J            | 11 J    | 3.9 J   | 0.12      | ND (1)     | 36 J    | 23        |
|                             |                             | 02/20/17 | 2 - 3          | N           | ND (0.21)            | 13              | 28      | 1.3     | ND (0.1)  | ND (1)     | 25      | ND (0.44) |
| AOC1-7                      |                             | 01/09/17 | 0 - 0.5        | N           | ND (0.21)            | 14              | 9.4     | 1.6     | ND (0.1)  | ND (1)     | 28 J    | 12        |
|                             |                             | 01/09/17 | 2 - 3          | N           | ND (0.21)            | 20              | 9       | 1.9     | ND (0.1)  | ND (1)     | 35      | 5.8       |
|                             |                             | 01/09/17 | 2 - 3          | FD          | ND (0.21)            | 18              | 7.1     | 1.4     | ND (0.1)  | ND (1)     | 33      | 3.8       |
|                             |                             | 01/09/17 | 5 - 6          | N           | ND (0.21)            | 18              | 6.3     | 1.1     | ND (0.1)  | ND (1)     | 35      | 0.49      |
|                             |                             | 01/09/17 | 9 - 10         | N           | ND (0.21)            | 25              | 8.8     | 1.6     | ND (0.1)  | ND (1)     | 42      | 0.15      |
|                             |                             | 01/09/17 | 14 - 15        | N           | ND (0.21)            | 22              | 9.2     | 1.3     | ND (0.1)  | ND (1)     | 38      | 0.15      |
| AOC1-8                      |                             | 01/05/17 | 0 - 0.5        | N           | ND (0.21)            | 26              | 12      | 4.1     | ND (0.11) | ND (1.1)   | 41      | 5.8       |
|                             |                             | 01/05/17 | 2 - 3          | N           | 0.24                 | 16              | 10      | 12      | ND (0.12) | ND (1.2)   | 40      | 9         |
| AOC1-BCW10                  |                             | 02/04/16 | 0 - 0.5        | N           | ND (0.21)            | 52              | 16      | 11      | ND (0.1)  | ND (1)     | 65      | 110       |
|                             |                             | 02/04/16 | 2 - 3          | N           | 0.42                 | 66              | 15      | 11      | ND (0.1)  | ND (1)     | 63      | 18        |
|                             |                             | 02/04/16 | 5 - 6          | N           | ND (0.2)             | 17              | 9.5     | 1.1     | ND (0.1)  | ND (1)     | 35      | 0.79      |
|                             |                             | 02/04/16 | 9 - 10         | N           | ND (0.21)            | 25 J            | 7.9     | 1.8     | ND (0.11) | ND (1)     | 49      | 0.15      |
|                             |                             | 02/04/16 | 9 - 10         | FD          | ND (0.21)            | 19 J            | 8.2     | 1.9     | ND (0.11) | ND (1.1)   | 44      | 0.089     |



TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg)  | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|----------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36       | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead     | Mercury   | Molybdenum | Zinc    | TEQ Human |
| AOC1-BCW11                  |                             | 02/04/16 | 0 - 0.5        | N           | ND (0.21) J          | 19              | 14      | 8.5      | ND (0.11) | ND (1.1)   | 54      | 10        |
|                             |                             | 02/04/16 | 2 - 3          | N           | 0.36                 | 38              | 15      | 6.3      | ND (0.1)  | ND (1)     | 54      | 19        |
|                             |                             | 02/04/16 | 5 - 6          | N           | 0.5                  | 54              | 16      | 7.3      | ND (0.1)  | ND (1)     | 62      | 52        |
|                             |                             | 02/04/16 | 9 - 10         | N           | ND (0.22)            | 11              | 6       | ND (1.1) | ND (0.11) | ND (1.1)   | 27      | ND (0.19) |
| AOC1-BCW12                  |                             | 02/04/16 | 0 - 0.5        | N           | ND (0.23)            | 29              | 15      | 9.8      | ND (0.11) | ND (1.1)   | 74      | 54        |
|                             |                             | 02/04/16 | 2 - 3          | N           | 0.8                  | 48              | 17      | 10       | ND (0.11) | ND (1.1)   | 58      | 100       |
|                             |                             | 02/04/16 | 5 - 6          | N           | ND (0.21)            | 12              | 6.9     | 2        | ND (0.11) | ND (1.1)   | 30      | 1.5       |
|                             |                             | 02/04/16 | 9 - 10         | N           | ND (0.21)            | 13              | 6.5     | 1.3      | ND (0.11) | ND (1.1)   | 29      | ---       |
| AOC1-BCW13                  |                             | 02/04/16 | 0 - 0.5        | N           | ND (0.21)            | 29              | 16      | 8.7      | ND (0.11) | ND (1.1)   | 62      | 19        |
|                             |                             | 02/04/16 | 2 - 3          | N           | 0.22                 | 22              | 17      | 1.5      | ND (0.11) | ND (1.1)   | 44      | 0.37      |
|                             |                             | 02/04/16 | 5 - 6          | N           | ND (0.22)            | 17              | 11      | 2        | ND (0.11) | ND (1.1)   | 39      | 0.21      |
|                             |                             | 02/04/16 | 9 - 10         | N           | ND (0.22)            | 16              | 6.5     | 1.5      | ND (0.11) | ND (1.1)   | 35      | 0.24      |
| AOC1-BCW14                  |                             | 02/04/16 | 0 - 0.5        | N           | ND (0.21)            | 28              | 12      | 4.7      | ND (0.11) | ND (1.1)   | 49      | 11        |
|                             |                             | 02/04/16 | 2 - 3          | N           | 0.23                 | 15              | 10      | 3.6      | ND (0.1)  | ND (1)     | 34      | 1.7       |
|                             |                             | 02/04/16 | 5 - 6          | N           | ND (0.21)            | 14              | 8.8     | 1.3      | ND (0.1)  | ND (1)     | 34      | ---       |
|                             |                             | 02/04/16 | 9 - 10         | N           | ND (0.21)            | 19              | 22      | 1.2      | ND (0.11) | ND (1.1)   | 29      | ---       |
| AOC1-BCW15                  |                             | 02/04/16 | 0 - 0.5        | N           | ND (0.23)            | 21              | 15      | 9.2      | ND (0.12) | ND (1.2)   | 52      | 9.6       |
|                             |                             | 02/04/16 | 2 - 3          | N           | 0.54                 | 43              | 17      | 9.9      | ND (0.13) | ND (1.2)   | 49      | ---       |
|                             |                             | 02/04/16 | 5 - 6          | N           | ND (0.22)            | 14              | 6.6     | 1.4      | ND (0.11) | ND (1.1)   | 39      | ---       |
|                             |                             | 02/04/16 | 9 - 10         | N           | ND (0.22)            | 16              | 6.9     | ND (1.1) | ND (0.11) | ND (1.1)   | 37      | ---       |
| AOC1-BCW16                  |                             | 02/04/16 | 0 - 0.5        | N           | ND (0.22)            | 30              | 13      | 5.8      | ND (0.11) | ND (1.1)   | 46      | 26        |
|                             |                             | 02/04/16 | 2 - 3          | N           | 0.36                 | 50              | 18      | 12       | ND (0.12) | ND (1.2)   | 51      | 18        |
|                             |                             | 02/04/16 | 5 - 6          | N           | ND (0.21)            | 15              | 8.1     | 1.3      | ND (0.11) | ND (1.1)   | 28      | 3.5       |
|                             |                             | 02/04/16 | 9 - 10         | N           | ND (0.21)            | 10              | 6.2     | ND (1.1) | ND (0.11) | ND (1.1)   | 22      | 0.21      |
| AOC1-BCW17                  |                             | 02/04/16 | 0 - 0.5        | N           | ND (0.23)            | 15              | 13      | 5.1      | ND (0.11) | ND (1.1)   | 36      | 0.42      |
|                             |                             | 02/04/16 | 2 - 3          | N           | ND (0.21)            | 23              | 18      | 1.4      | ND (0.11) | ND (1.1)   | 41      | 0.14      |
|                             |                             | 02/04/16 | 5 - 6          | N           | ND (0.21)            | 18              | 18      | 2        | ND (0.11) | ND (1.1)   | 38      | ---       |
|                             |                             | 02/04/16 | 9 - 10         | N           | ND (0.21)            | 19              | 15      | 1.7      | ND (0.11) | ND (1.1)   | 39      | ---       |

TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg)  | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|----------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36       | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead     | Mercury   | Molybdenum | Zinc    | TEQ Human |
| AOC1-BCW18                  |                             | 02/05/16 | 0 - 0.5        | N           | ND (0.26)            | 46              | 19      | 13       | ND (0.13) | ND (1.3)   | 68      | 29        |
|                             |                             | 02/05/16 | 2 - 3          | N           | ND (0.25)            | 10              | 7       | 3.5      | ND (0.12) | ND (1.2)   | 30      | 0.31      |
|                             |                             | 02/05/16 | 5 - 6          | N           | ND (0.22)            | 9.6             | 6.9     | ND (1.1) | ND (0.11) | ND (1.1)   | 28      | ND (0.13) |
|                             |                             | 02/05/16 | 9 - 10         | N           | ND (0.22)            | 17              | 6       | 1.5      | ND (0.11) | ND (1.1)   | 35      | ND (0.1)  |
| AOC1-BCW19                  |                             | 02/05/16 | 0 - 0.5        | N           | 1.4                  | 58              | 15      | 11       | ND (0.12) | ND (1.2)   | 60      | 210       |
|                             |                             | 02/05/16 | 2 - 3          | N           | ND (0.21)            | 12              | 6.9     | 1.4      | ND (0.1)  | ND (1)     | 27      | ---       |
|                             |                             | 02/05/16 | 5 - 6          | N           | ND (0.21)            | 15              | 6.9     | 1        | ND (0.1)  | ND (1)     | 34      | ---       |
|                             |                             | 02/05/16 | 9 - 10         | N           | ND (0.22)            | 12              | 7.7     | ND (1.1) | ND (0.11) | ND (1.1)   | 31      | ---       |
| AOC1-BCW20                  |                             | 02/05/16 | 0 - 0.5        | N           | ND (0.21)            | 20              | 8.2     | 2.2      | ND (0.1)  | ND (1)     | 38      | 5.6       |
|                             |                             | 02/05/16 | 2 - 3          | N           | ND (0.21)            | 14              | 7.4     | 1.6      | ND (0.11) | ND (1.1)   | 31      | 0.22      |
|                             |                             | 02/05/16 | 5 - 6          | N           | ND (0.22)            | 12              | 8.7     | 1.4      | ND (0.11) | ND (1.1)   | 29      | 0.19      |
|                             |                             | 02/05/16 | 9 - 10         | N           | ND (0.23)            | 22              | 17      | 2.9      | ND (0.11) | ND (1.1)   | 48      | ND (0.12) |
| AOC1-BCW21                  |                             | 02/05/16 | 0 - 0.5        | N           | ND (0.23)            | 42              | 17      | 13       | ND (0.11) | ND (1.1)   | 64      | 42        |
|                             |                             | 02/05/16 | 2 - 3          | N           | ND (0.22)            | 22              | 9.7     | 3.2      | ND (0.11) | ND (1.1)   | 40      | 0.31      |
|                             |                             | 02/05/16 | 5 - 6          | N           | ND (0.22)            | 15              | 13      | 1.6      | ND (0.11) | ND (1.1)   | 33      | ND (0.12) |
|                             |                             | 02/05/16 | 9 - 10         | N           | ND (0.22)            | 19              | 14      | 2        | ND (0.11) | ND (1.1)   | 40      | ND (0.12) |
| AOC1-BCW22                  |                             | 02/05/16 | 0 - 0.5        | N           | ND (0.21)            | 12              | 7       | 6.1      | ND (0.1)  | ND (1)     | 26      | 7         |
|                             |                             | 02/05/16 | 2 - 3          | N           | ND (0.21)            | 20              | 10      | 16       | ND (0.11) | ND (1)     | 43      | ---       |
|                             |                             | 02/05/16 | 5 - 6          | N           | ND (0.21)            | 16              | 7.7     | 4.2      | ND (0.1)  | ND (1)     | 36      | ---       |
|                             |                             | 02/05/16 | 9 - 10         | N           | ND (0.22)            | 15              | 8.8     | ND (1.1) | ND (0.11) | ND (1.1)   | 33      | ---       |
| AOC1-BCW23                  |                             | 02/05/16 | 0 - 0.5        | N           | ND (0.26)            | 38              | 22      | 16       | ND (0.13) | ND (1.3)   | 84      | 21        |
|                             |                             | 02/05/16 | 2 - 3          | N           | ND (0.24)            | 17              | 12      | 6.9      | ND (0.12) | ND (1.2)   | 47      | 0.65      |
|                             |                             | 02/05/16 | 5 - 6          | N           | ND (0.22)            | 11              | 5.7     | 1.7      | ND (0.11) | ND (1.1)   | 24      | ---       |
|                             |                             | 02/05/16 | 9 - 10         | N           | ND (0.22)            | 13              | 7.6     | 1.5      | ND (0.11) | ND (1.1)   | 33      | ---       |
| AOC1-BCW24                  |                             | 02/05/16 | 0 - 0.5        | N           | ND (0.24)            | 30              | 14      | 7.4      | ND (0.12) | ND (1.2)   | 56      | 27        |
|                             |                             | 02/05/16 | 2 - 3          | N           | 0.28                 | 29              | 15      | 8.8      | ND (0.12) | ND (1.2)   | 49      | 26        |
|                             |                             | 02/05/16 | 5 - 6          | N           | ND (0.22)            | 11              | 7.7     | 1.1      | ND (0.11) | ND (1.1)   | 27      | ND (0.18) |
|                             |                             | 02/05/16 | 9 - 10         | N           | ND (0.22)            | 7.9             | 4.9     | 1.3      | ND (0.11) | ND (1.1)   | 21      | ---       |

TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |                       |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg)  | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)    |
|-----------------------------|-----------------------------|-----------------------|----------------|-------------|----------------------|-----------------|---------|----------|-----------|------------|---------|------------|
|                             |                             |                       |                |             | 3.1                  | 145             | 145     | 36       | 1         | 22         | 1,050   | 100        |
| Location                    | Potential Action Area (PAA) | Date                  | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead     | Mercury   | Molybdenum | Zinc    | TEQ Human  |
| AOC1-BCW25                  |                             | 02/05/16              | 0 - 0.5        | N           | ND (0.26)            | 39              | 18      | 11       | ND (0.13) | ND (1.3)   | 69      | 58         |
|                             |                             | 02/05/16              | 2 - 3          | N           | ND (0.26)            | 21              | 14      | 3.8      | ND (0.13) | ND (1.3)   | 42      | 1.9        |
|                             |                             | 02/05/16              | 5 - 6          | N           | ND (0.22)            | 13              | 7.9     | 2.6      | ND (0.11) | ND (1.1)   | 37      | 0.58       |
|                             |                             | 02/05/16              | 9 - 10         | N           | ND (0.22)            | 16              | 14      | 2        | ND (0.11) | ND (1.1)   | 42      | ND (0.067) |
| AOC1-BCW26                  |                             | 02/04/16              | 0 - 0.5        | N           | ND (0.22)            | 35              | 15      | 8.9      | ND (0.11) | ND (1.1)   | 59      | 100        |
|                             |                             | 02/04/16              | 2 - 3          | N           | ND (0.25)            | 12              | 10      | 8.2      | ND (0.13) | ND (1.3)   | 43      | 0.75       |
|                             |                             | 02/04/16              | 5 - 6          | N           | ND (0.21)            | 13              | 11      | 3.6      | ND (0.11) | ND (1.1)   | 33      | ---        |
|                             |                             | 02/04/16              | 9 - 10         | N           | ND (0.24)            | 19              | 25      | 3.1      | ND (0.12) | ND (1.2)   | 40      | ---        |
| AOC1-BCW27                  |                             | 02/05/16              | 0 - 0.5        | N           | ND (0.24)            | 33              | 17      | 17       | ND (0.12) | ND (1.2)   | 59      | 3.9        |
|                             |                             | 02/05/16              | 2 - 3          | N           | ND (0.23)            | 12              | 8.6     | 2        | ND (0.11) | ND (1.1)   | 33      | 0.12       |
|                             |                             | 02/05/16              | 5 - 6          | N           | ND (0.21)            | 9.7             | 9       | 1.3      | ND (0.11) | ND (1.1)   | 29      | 0.13       |
|                             |                             | 02/05/16              | 9 - 10         | N           | ND (0.23)            | 15              | 7.4     | 2.2      | ND (0.11) | ND (1.1)   | 31      | 0.088      |
| AOC1-BCW28                  |                             | 02/05/16              | 0 - 0.5        | N           | 0.3                  | 49              | 19      | 14       | ND (0.12) | ND (1.2)   | 73      | 180        |
|                             |                             | 02/05/16              | 2 - 3          | N           | ND (0.23)            | 18              | 10      | 4.2      | ND (0.11) | ND (1.2)   | 38      | 0.83       |
|                             |                             | 02/05/16              | 5 - 6          | N           | ND (0.22)            | 18              | 8.3     | 1.4      | ND (0.11) | ND (1.1)   | 33      | 0.6        |
|                             |                             | 02/05/16              | 9 - 10         | N           | ND (0.22)            | 18              | 11      | 2.1      | ND (0.11) | ND (1.1)   | 39      | ND (0.11)  |
| AOC1-BCW29                  |                             | 02/04/16              | 0 - 0.5        | N           | ND (0.26)            | 33              | 15      | 8.3      | ND (0.13) | ND (1.3)   | 56      | 84         |
|                             |                             | 02/04/16              | 2 - 3          | N           | ND (0.27)            | 17              | 13      | 5.2      | ND (0.14) | ND (1.4)   | 49      | 0.45       |
|                             |                             | 02/04/16              | 5 - 6          | N           | ND (0.31)            | 27              | 23      | 7.6      | ND (0.15) | ND (1.5)   | 66      | 0.56       |
|                             |                             | 02/04/16              | 9 - 10         | N           | ND (0.24) J          | 11              | 7.1     | ND (1.2) | ND (0.12) | ND (1.2)   | 29      | 0.55       |
| AOC1-BCW30                  |                             | 02/04/16              | 0 - 0.5        | N           | ND (0.24)            | 42              | 18      | 17 J     | ND (0.12) | ND (1.2) J | 61      | 140        |
|                             |                             | 02/04/16              | 2 - 3          | N           | 0.26                 | 14              | 8.7     | 2.7      | ND (0.12) | ND (1.2)   | 28      | 2.2        |
|                             |                             | 02/04/16              | 5 - 6          | N           | ND (0.23)            | 12              | 8.4     | 2.9      | ND (0.12) | ND (1.2)   | 29      | ---        |
|                             |                             | 02/04/16              | 9 - 10         | N           | ND (0.23)            | 8.8             | 7.8     | ND (1.2) | ND (0.12) | ND (1.2)   | 27      | ---        |
| AOC1-BCW31                  |                             | 02/20/17 <sup>‡</sup> | 0 - 0.5        | N           | ---                  | ---             | ---     | ---      | ---       | ---        | ---     | 0.5        |
|                             |                             | 02/20/17 <sup>‡</sup> | 2 - 3          | N           | ---                  | ---             | ---     | ---      | ---       | ---        | ---     | ND (0.078) |
| AOC1-BCW32                  |                             | 02/20/17 <sup>‡</sup> | 0 - 0.5        | N           | ---                  | ---             | ---     | ---      | ---       | ---        | ---     | 1.9        |
|                             |                             | 02/20/17 <sup>‡</sup> | 2 - 3          | N           | ---                  | ---             | ---     | ---      | ---       | ---        | ---     | 0.13       |

TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg)  | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|----------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36       | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead     | Mercury   | Molybdenum | Zinc    | TEQ Human |
| AOC1-BCW7                   |                             | 02/05/16 | 0 - 0.5        | N           | 0.29                 | 18              | 18      | 8        | ND (0.1)  | ND (1)     | 34      | 6.4       |
|                             |                             | 02/05/16 | 2 - 3          | N           | 0.36                 | 20              | 8.4     | 1.7      | ND (0.1)  | ND (1)     | 29      | 3.1       |
|                             |                             | 02/05/16 | 2 - 3          | FD          | 0.28                 | 23              | 7.5     | 1.7      | ND (0.1)  | ND (1)     | 27      | 2.5       |
|                             |                             | 02/05/16 | 5 - 6          | N           | ND (0.21)            | 15              | 6.2     | 2.2      | ND (0.1)  | ND (1)     | 15      | 0.17      |
|                             |                             | 02/05/16 | 9 - 10         | N           | 0.36                 | 24              | 23      | 1.4      | ND (0.1)  | ND (1.1)   | 26      | 0.23      |
|                             |                             | 02/05/16 | 14 - 15        | N           | ND (0.21)            | 19              | 8.4     | 2.4      | ND (0.1)  | ND (1.1)   | 39      | ---       |
|                             |                             | 02/05/16 | 19 - 20        | N           | ND (0.21)            | 20              | 7.2     | 1.8      | ND (0.11) | ND (1)     | 38      | ---       |
|                             |                             | 02/05/16 | 19 - 20        | FD          | ND (0.21)            | 19              | 8.7     | 1.8      | ND (0.1)  | ND (1.1)   | 38      | ---       |
| AOC1-BCW8                   |                             | 02/04/16 | 0 - 0.5        | N           | ND (0.22)            | 21              | 14      | 8.3      | ND (0.11) | ND (1.1)   | 53      | 21        |
|                             |                             | 02/04/16 | 2 - 3          | N           | 0.44                 | 28              | 10      | 4.5      | ND (0.1)  | ND (1)     | 45      | 38        |
|                             |                             | 02/04/16 | 5 - 6          | N           | 0.24                 | 18              | 8.4     | 3.2      | ND (0.1)  | ND (1)     | 35      | 9         |
|                             |                             | 02/04/16 | 9 - 10         | N           | ND (0.21)            | 15 J            | 9.3     | 1.1      | ND (0.11) | ND (1.1)   | 35      | ---       |
|                             |                             | 02/04/16 | 9 - 10         | FD          | ND (0.21)            | 11 J            | 11      | ND (1.1) | ND (0.11) | ND (1.1)   | 37      | ---       |
| AOC1-BCW9                   |                             | 02/04/16 | 0 - 0.5        | N           | ND (0.22)            | 35              | 17      | 9.3      | ND (0.11) | ND (1.1)   | 61      | 29        |
|                             |                             | 02/04/16 | 2 - 3          | N           | 1.2                  | 66              | 16      | 11       | ND (0.11) | ND (1.1)   | 57      | 0.68      |
|                             |                             | 02/04/16 | 5 - 6          | N           | ND (0.21)            | 17              | 9.5     | 3        | ND (0.1)  | ND (1.1)   | 37      | ---       |
|                             |                             | 02/04/16 | 9 - 10         | N           | ND (0.21)            | 13              | 10      | ND (1.1) | ND (0.1)  | ND (1.1)   | 32      | ---       |
| AOC1-T1e                    |                             | 01/11/16 | 0 - 1          | N           | ND (0.21)            | 26              | 13      | 3.3      | ---       | ND (1)     | 37      | 19        |
|                             |                             | 01/11/16 | 2 - 3          | N           | ND (0.21)            | 18              | 10      | 2        | ND (0.1)  | ND (1)     | 40      | 2.6       |
|                             |                             | 01/11/16 | 5 - 6          | N           | ND (0.21)            | 16              | 7.5     | 1.1      | ND (0.1)  | ND (1)     | 30      | 0.27      |
|                             |                             | 01/11/16 | 9 - 10         | N           | ND (0.2)             | 20              | 11      | 1.3      | ND (0.1)  | ND (1)     | 32      | 0.86      |
|                             |                             | 01/11/16 | 9 - 10         | FD          | ND (0.21)            | 17              | 13      | 1.5      | 0.18      | ND (1)     | 32      | ---       |
|                             |                             | 01/11/16 | 14 - 15        | N           | ND (0.22)            | 17              | 11      | 1.3      | 0.16      | ND (1.1)   | 28      | ---       |
| AOC1-T1f                    |                             | 01/12/16 | 0 - 1          | N           | 0.71                 | 49              | 13      | 5.5      | 0.13      | ND (1)     | 41      | 19        |
|                             |                             | 01/12/16 | 2 - 3          | N           | ND (0.21)            | 20              | 7.2     | 1.5      | 0.13      | ND (1)     | 32      | 0.092     |
|                             |                             | 01/12/16 | 5 - 6          | N           | ND (0.21)            | 24              | 11      | 2        | 0.11      | ND (1.1)   | 40      | 0.43      |
|                             |                             | 01/12/16 | 9 - 10         | N           | ND (0.21)            | 18 J            | 9.1     | 1.9      | 0.11      | ND (1)     | 46 J    | 0.43      |
|                             |                             | 01/12/16 | 9 - 10         | FD          | ND (0.21)            | 30 J            | 11      | 2.6      | ND (0.1)  | ND (1)     | 35 J    | ---       |
|                             |                             | 01/12/16 | 14 - 15        | N           | 0.68                 | 29              | 9.2     | 2        | ND (0.1)  | ND (1)     | 34      | ---       |

TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| AOC1-T1g                    |                             | 02/17/17 | 0 - 0.5        | N           | ND (0.2)             | 26              | 12      | 4.1     | ND (0.1)  | ND (1)     | 33      | 6.5       |
|                             |                             | 02/17/17 | 0 - 0.5        | FD          | ND (0.2)             | 24              | 14      | 1.6     | ND (0.1)  | ND (1)     | 36      | 12        |
|                             |                             | 02/17/17 | 2 - 3          | N           | ND (0.21)            | 30              | 13      | ND (1)  | ND (0.1)  | ND (1)     | 32      | 19        |
|                             |                             | 02/17/17 | 5 - 6          | N           | 0.63                 | 23              | 9.2     | 1.1     | ND (0.1)  | ND (1)     | 30      | 6         |
|                             |                             | 02/17/17 | 9 - 10         | N           | ND (0.21)            | 14              | 9.2     | ND (1)  | ND (0.1)  | ND (1)     | 29      | 2.4       |
| AOC1-T2f                    |                             | 12/17/15 | 0 - 1          | N           | 0.22                 | 14              | 12      | 7.9     | ND (0.1)  | 3.2        | 39      | ---       |
|                             |                             | 12/17/15 | 2 - 3          | N           | 0.25                 | 17              | 11      | 3.1     | ND (0.1)  | 8.2        | 40      | ---       |
| AOC1-T2g                    | AOC1 PAA #2                 | 03/03/16 | 9 - 10         | N           | 30                   | 2,100           | 11      | 5.2     | 0.26      | 8.4        | 140     | 130       |
|                             |                             | 03/03/16 | 14 - 15        | N           | 0.77                 | 28              | 8.9     | 2       | 0.16      | ND (1.1)   | 75      | 18        |
|                             |                             | 03/03/16 | 19 - 20        | N           | 0.58                 | 27              | 9.2     | 2       | 0.16      | ND (1.1)   | 53      | 3.6       |
|                             |                             | 03/03/16 | 29 - 30        | N           | 0.25                 | 21              | 9.9     | 2.1     | 0.15      | ND (1.1)   | 50      | ---       |
|                             |                             | 03/03/16 | 39 - 40        | N           | 0.23                 | 19              | 9.2     | 1.8     | 0.14      | ND (1.1)   | 39      | ---       |
|                             |                             | 03/03/16 | 39 - 40        | FD          | ND (0.21)            | 19              | 9.8     | 1.8     | 0.13      | ND (1.1)   | 39      | ---       |
|                             |                             | 03/03/16 | 49 - 50        | N           | ND (0.21)            | 18              | 15      | 1.9     | 0.12      | ND (1.1)   | 37      | ---       |
|                             |                             | 03/03/16 | 59 - 60        | N           | ND (0.21)            | 18              | 13      | 2.1     | 0.15      | ND (1.1)   | 44      | ---       |
|                             |                             | 03/03/16 | 69 - 70        | N           | ND (0.21)            | 15              | 8.4     | 1.4     | 0.11      | ND (1.1)   | 36      | ---       |
| AOC1-T2h                    |                             | 03/04/16 | 0 - 1          | N           | 2.5                  | 100 J           | 9.2 J   | 2.2     | ND (0.1)  | ND (1)     | 39      | 34        |
|                             |                             | 03/04/16 | 2 - 3          | N           | 0.42                 | 24              | 9.9     | 2.2     | ND (0.11) | ND (1.1)   | 45      | 19        |
|                             |                             | 03/04/16 | 5 - 6          | N           | 6.8                  | 200             | 9.8     | 3.4     | ND (0.1)  | ND (1)     | 85      | 1.9       |
|                             |                             | 03/04/16 | 9 - 10         | N           | 0.94                 | 28              | 16      | 1.4     | ND (0.1)  | ND (1)     | 44      | 21        |
|                             |                             | 03/04/16 | 14 - 15        | N           | 0.29                 | 19              | 9       | 1.1     | ND (0.1)  | ND (1)     | 33      | ---       |
|                             |                             | 03/04/16 | 19 - 20        | N           | 0.23                 | 18              | 12      | 1.3     | ND (0.1)  | ND (1.1)   | 41      | ---       |
|                             |                             | 03/04/16 | 29 - 30        | N           | ND (0.21)            | 18              | 8.9     | 1.2     | ND (0.1)  | ND (1)     | 34      | ---       |
|                             |                             | 03/04/16 | 39 - 40        | N           | ND (0.21)            | 17              | 8       | 1.6     | ND (0.1)  | ND (1.1)   | 35      | ---       |

TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC1-T2i                    | AOC1 PAA #2                 | 03/05/16 | 0 - 1          | N           | 0.61                 | 28              | 10      | 2.6     | ND (0.1)   | ND (1)     | 36      | 25        |
|                             |                             | 03/05/16 | 2 - 3          | N           | 0.55                 | 25              | 9.2     | 2.5     | ND (0.1)   | ND (1)     | 34      | 14        |
|                             |                             | 03/05/16 | 5 - 6          | N           | 0.29                 | 16              | 10      | 3.5     | 0.12       | ND (1)     | 40      | 0.91      |
|                             |                             | 03/05/16 | 9 - 10         | N           | 0.31                 | 40              | 12      | 4.8     | ND (0.1)   | ND (1)     | 40      | 32        |
|                             |                             | 03/05/16 | 14 - 15        | N           | 0.28                 | 17              | 9.5     | 1.4     | ND (0.1)   | ND (1)     | 38      | ---       |
|                             |                             | 03/05/16 | 19 - 20        | N           | 0.27                 | 18              | 14      | 1.3     | ND (0.1)   | ND (1)     | 39      | ---       |
| AOC1-T2j                    | AOC1 PAA #2                 | 03/05/16 | 0 - 1          | N           | 0.6                  | 31              | 8.8     | 1.9     | ND (0.1)   | ND (1)     | 40      | 4.8       |
|                             |                             | 03/05/16 | 2 - 3          | N           | 0.38                 | 21              | 9.3     | 2.4     | ND (0.1)   | ND (1)     | 32      | 13        |
|                             |                             | 03/05/16 | 2 - 3          | FD          | 0.39                 | 18              | 10      | 1.7     | ND (0.1)   | ND (1)     | 29      | 6.5       |
|                             |                             | 03/05/16 | 5 - 6          | N           | ND (0.21)            | 18              | 9.2     | 1.4     | 0.11       | ND (1)     | 31      | 4.8       |
|                             |                             | 03/05/16 | 9 - 10         | N           | 0.37                 | 16              | 6.4     | 1.3     | ND (0.1)   | ND (1)     | 33      | 0.71      |
|                             |                             | 03/05/16 | 14 - 15        | N           | 0.26                 | 26              | 12      | 2.1     | ND (0.11)  | ND (1.1)   | 44      | ---       |
|                             |                             | 03/05/16 | 19 - 20        | N           | 0.7                  | 22 J            | 8.8     | 1.7     | ND (0.11)  | ND (1.1)   | 46      | ---       |
|                             |                             | 03/05/16 | 19 - 20        | FD          | 0.64                 | 30 J            | 9.3     | 2       | ND (0.11)  | ND (1.1)   | 45      | ---       |
| AOC1-T5D                    | AOC1 PAA #1                 | 01/12/16 | 0 - 1          | N           | ND (0.2)             | 23              | 8.3     | 6.2     | ND (0.1)   | ND (1)     | 33      | 10        |
|                             |                             | 01/12/16 | 2 - 3          | N           | 2.7                  | 120 J           | 17      | 18      | ND (0.11)  | ND (1.1)   | 100 J   | 830       |
|                             |                             | 01/12/16 | 2 - 3          | FD          | 2.6                  | 69 J            | 14      | 16      | ND (0.1)   | ND (1)     | 72 J    | 1,100     |
|                             |                             | 01/12/16 | 5 - 6          | N           | 2.4                  | 80              | 9.7     | 3.7     | ND (0.1)   | ND (1)     | 42      | 92        |
|                             |                             | 01/12/16 | 9 - 10         | N           | 0.33                 | 23              | 8.3     | 4.8     | ND (0.1)   | ND (1)     | 40      | 21        |
|                             |                             | 01/12/16 | 14 - 15        | N           | 0.92                 | 36              | 8.8     | 4.1     | ND (0.1)   | ND (1)     | 36      | 53        |
|                             |                             | 01/12/16 | 19 - 20        | N           | 0.51                 | 23              | 8.8     | 1.8     | ND (0.099) | ND (1)     | 48      | 32        |
|                             |                             | 01/12/16 | 19 - 20        | FD          | 0.72                 | 22              | 8.8     | 1.8     | ND (0.11)  | ND (1.1)   | 52      | 33        |

TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg)  | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|----------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36       | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead     | Mercury   | Molybdenum | Zinc    | TEQ Human |
| AOC1-T6D                    |                             | 02/09/16 | 0 - 0.5        | N           | ND (0.2) J           | 19              | 7.6     | 2.4      | ND (0.1)  | ND (1)     | 100     | 7.3       |
|                             |                             | 02/09/16 | 2 - 3          | N           | 0.32 J               | 19              | 11      | 1.3      | ND (0.1)  | ND (1)     | 38      | 2.2       |
|                             |                             | 02/09/16 | 5 - 6          | N           | 0.24 J               | 19              | 11      | 1.7      | ND (0.1)  | ND (1)     | 43      | 1.5       |
|                             |                             | 02/09/16 | 9 - 10         | N           | ND (0.21) J          | 16              | 8.8     | 1.4      | ND (0.1)  | ND (1)     | 35      | 0.55      |
|                             |                             | 02/09/16 | 9 - 10         | FD          | ND (0.21) J          | 16              | 9.5     | 1.7      | ND (0.1)  | ND (1)     | 36      | 1.3       |
|                             |                             | 02/09/16 | 14 - 15        | N           | ND (0.21) J          | 16              | 8.3     | 1.2      | ND (0.1)  | ND (1)     | 36      | ---       |
|                             |                             | 02/09/16 | 14 - 15        | FD          | ND (0.2) J           | 19              | 9.9     | 1.7      | ND (0.1)  | ND (1)     | 41      | ---       |
|                             |                             | 02/09/16 | 19 - 20        | N           | ND (0.2) J           | 24              | 10      | 1.2      | ND (0.1)  | ND (1)     | 41      | ---       |
| AOC1-T7                     |                             | 02/19/17 | 0 - 0.5        | N           | ND (0.21)            | 23              | 13      | ND (1.1) | ND (0.1)  | ND (1.1)   | 32      | 5.7       |
|                             |                             | 02/19/17 | 2 - 3          | N           | 0.33                 | 27              | 8.9     | 1.1      | ND (0.1)  | ND (1)     | 35      | 9.8       |
|                             |                             | 02/19/17 | 5 - 6          | N           | 0.43                 | 18              | 8.9     | 7.1      | ND (0.1)  | ND (1)     | 30      | 23        |
|                             |                             | 02/19/17 | 9 - 10         | N           | ND (0.21)            | 17              | 10      | ND (1)   | ND (0.1)  | ND (1)     | 30      | 3.2       |
| AOC1-T8                     |                             | 02/18/17 | 0 - 0.5        | N           | 0.23                 | 43              | 11      | 1.1      | ND (0.1)  | ND (1)     | 34      | 14        |
|                             |                             | 02/18/17 | 2 - 3          | N           | ND (0.21)            | 18              | 17      | 1.1      | ND (0.1)  | ND (1)     | 28      | 13        |
|                             |                             | 02/18/17 | 5 - 6          | N           | ND (0.21)            | 14              | 8.6     | ND (1.1) | ND (0.11) | ND (1.1)   | 36      | 1.7       |
|                             |                             | 02/18/17 | 9 - 10         | N           | 0.22                 | 13 J            | 10      | ND (1)   | ND (0.1)  | ND (1)     | 31      | 1.7       |
|                             |                             | 02/18/17 | 9 - 10         | FD          | ND (0.21)            | 17 J            | 9.2     | ND (1)   | ND (0.1)  | ND (1)     | 27      | 4         |
| AOC4-GB10                   |                             | 02/10/10 | 0 - 0.5        | N           | ND (0.44)            | 35 J            | 16      | 14       | ND (0.11) | ND (1.1)   | 71 J    | 87        |
| AOC4-GB11                   |                             | 02/10/10 | 0 - 0.5        | N           | ND (0.43)            | 31              | 13      | 7.2 J    | ND (0.11) | ND (1.1)   | 46      | 87        |
|                             |                             | 02/10/10 | 0 - 0.5        | FD          | 0.57                 | 29              | 14      | 16 J     | ND (0.11) | ND (1.1)   | 47      | 110       |
| AOC4-GB12                   |                             | 02/10/10 | 0 - 0.5        | N           | ND (0.44)            | 35              | 15      | 5.5      | ND (0.11) | ND (1.1)   | 43      | 21        |



TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|---------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1       | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury | Molybdenum | Zinc    | TEQ Human |
| MW-10                       |                             | 06/27/97 | 1              | N           | ND (0.05)            | 14.2            | 14.1    | ---     | ---     | ---        | 20.9    | ---       |
|                             |                             | 06/27/97 | 3              | N           | ND (0.05)            | 13.4            | 8.3     | ---     | ---     | ---        | 26.6    | ---       |
|                             |                             | 06/27/97 | 6              | N           | ND (0.05)            | 19              | 8.4     | ---     | ---     | ---        | 23.3    | ---       |
|                             |                             | 06/27/97 | 10             | N           | ND (0.05)            | 26.7            | 9.6     | 2.8     | ---     | 0.62       | 30.4    | ---       |
|                             |                             | 06/27/97 | 20             | N           | ND (0.05)            | 14.7            | 7.7     | ---     | ---     | ---        | 27.1    | ---       |
|                             |                             | 06/27/97 | 25             | N           | ND (0.05)            | 16.1            | 10.6    | ---     | ---     | ---        | 34.1    | ---       |
|                             |                             | 06/27/97 | 30             | N           | ND (0.05)            | 13.8            | 9.4     | ---     | ---     | ---        | 31.5    | ---       |
|                             |                             | 06/27/97 | 35             | N           | ---                  | ---             | ---     | 3.6     | ---     | ND (0.2)   | ---     | ---       |
|                             |                             | 06/27/97 | 40             | N           | ND (0.05)            | 14.5            | 9.2     | ---     | ---     | ---        | 29.4    | ---       |
|                             |                             | 06/28/97 | 50             | N           | ND (0.05)            | 14.3            | 8.5     | ---     | ---     | ---        | 31.2    | ---       |
|                             |                             | 06/27/97 | 60             | N           | ND (0.05)            | 9.1             | 6       | ---     | ---     | ---        | 16.3    | ---       |
|                             |                             | 06/27/97 | 70             | N           | ND (0.05)            | 11.7            | 8.8     | 2.2     | ---     | ND (0.2)   | 24.2    | ---       |
|                             |                             | 06/27/97 | 75             | N           | ND (0.05)            | 11.5            | 6.4     | ---     | ---     | ---        | 24.9    | ---       |
|                             |                             | 06/27/97 | 75             | FD          | 0.1                  | 9.6             | 6.97    | ---     | ---     | ---        | 21.6    | ---       |
|                             |                             | 06/27/97 | 82             | N           | ND (0.05)            | 9.9             | 6.3     | 2.3     | ---     | ND (0.2)   | 26.6    | ---       |
| MW-11                       |                             | 06/29/97 | 1              | N           | ND (0.05)            | 12.2            | 7.5     | ---     | ---     | ---        | 24.8    | ---       |
|                             |                             | 06/29/97 | 3              | N           | ND (0.05)            | 31.1            | 6.6     | ---     | ---     | ---        | 29.5    | ---       |
|                             |                             | 06/29/97 | 6              | N           | ND (0.05)            | 26.9            | 5.3     | ---     | ---     | ---        | 23.2    | ---       |
|                             |                             | 06/29/97 | 10             | N           | ND (0.05)            | 13.5            | 8.3     | 6.3     | ---     | 0.32       | 38.5    | ---       |
|                             |                             | 06/29/97 | 20             | N           | ND (0.05)            | 5.9             | 6       | ---     | ---     | ---        | 19.9    | ---       |
|                             |                             | 06/29/97 | 30             | N           | ND (0.05)            | 12.6            | 6.9     | 1.8     | ---     | 0.8        | 28.4    | ---       |
|                             |                             | 06/29/97 | 40             | N           | ND (0.05)            | 9.8             | 9.8     | ---     | ---     | ---        | 28.4    | ---       |
|                             |                             | 06/29/97 | 50             | N           | ND (0.05)            | 13.6            | 6.9     | ---     | ---     | ---        | 29.8    | ---       |
|                             |                             | 06/29/97 | 60             | N           | ND (0.05)            | 9.6             | 5.8     | 3       | ---     | 0.088 J    | 26.2    | ---       |
|                             |                             | 06/29/97 | 60             | FD          | ND (0.05)            | 10              | 5.74    | ---     | ---     | ---        | 19.8    | ---       |
|                             |                             | 06/29/97 | 69             | N           | ND (0.05)            | 16.9            | 13.8    | 5       | ---     | ND (0.2)   | 35.7    | ---       |

TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| MW-13                       |                             | 07/09/97 | 10             | N           | ND (0.05)            | 10.8            | 9.3     | ---     | ---       | ---        | 27.2    | ---       |
|                             |                             | 07/09/97 | 20             | N           | ND (0.05)            | 10.5            | 7.1     | 2.4     | ---       | 0.14 J     | 28.3    | ---       |
|                             |                             | 07/09/97 | 25             | N           | ---                  | ---             | ---     | 2.8     | ---       | ND (0.2)   | ---     | ---       |
|                             |                             | 07/09/97 | 30             | N           | ND (0.05)            | 12.2            | 8.6     | ---     | ---       | ---        | 33.3    | ---       |
|                             |                             | 07/09/97 | 40             | N           | ND (0.05)            | 10.7            | 8.1     | ---     | ---       | ---        | 30.4    | ---       |
|                             |                             | 07/09/97 | 40             | FD          | ND (0.05)            | 6.4             | 5.6     | ---     | ---       | ---        | 17.7    | ---       |
| Old Well-BCW-1              | AOC1 PAA #2                 | 09/11/13 | 7 - 8          | N           | 80                   | 4,200           | 14      | 12 J    | ND (0.11) | 18         | 190     | 350       |
| Old Well-BCW-2              | AOC1 PAA #2                 | 09/11/13 | 4 - 5          | N           | 73                   | 4,400           | 23      | 10      | ND (0.11) | 6.7        | 150     | 230       |
| PA-01                       |                             | 11/09/15 | 0 - 1          | N           | 0.65                 | 20              | 8.5     | 9.3     | ND (0.1)  | ND (1)     | 80      | ---       |
| PA-03                       |                             | 11/09/15 | 0 - 1          | N           | 0.65                 | 26              | 15      | 13      | ND (0.1)  | ND (1)     | 200     | ---       |
| PA-04                       |                             | 11/09/15 | 0 - 1          | N           | 0.69                 | 36              | 14      | 25      | ND (0.1)  | ND (1)     | 56      | ---       |
| PA-14                       |                             | 01/27/16 | 0 - 1          | N           | ND (0.21)            | 20              | 22      | 10      | ND (0.1)  | ND (1)     | 270     | 23        |
| PA-15                       |                             | 01/27/16 | 0 - 1          | N           | 1.1                  | 170             | 26      | 20      | ND (0.1)  | ND (1)     | 120     | 86        |
| PA-16                       |                             | 01/27/16 | 0 - 1          | N           | 1.3                  | 47              | 26      | 8.5     | ND (0.1)  | 1.2        | 64      | 25        |
| SD-14                       |                             | 01/11/16 | 0 - 1          | N           | 0.72                 | 29              | 14      | 13      | ND (0.1)  | ND (1)     | 37      | 190       |
|                             |                             | 01/11/16 | 2 - 3          | N           | 0.63                 | 32              | 7.6     | 16      | ND (0.1)  | ND (1)     | 47      | 83        |
|                             |                             | 01/11/16 | 5 - 6          | N           | 3.1                  | 42              | 64      | 120     | ND (0.11) | 5          | 660     | 40        |
|                             |                             | 01/11/16 | 9 - 10         | N           | 1.1                  | 35              | 7.8     | 1.9     | ND (0.1)  | ND (1)     | 36      | 0.32      |
| SD-15                       |                             | 01/12/16 | 0 - 0.5        | N           | 0.77                 | 19              | 13      | 2.7     | ND (0.11) | ND (1.1)   | 32      | 41        |
|                             |                             | 01/12/16 | 2 - 3          | N           | ND (0.21)            | 25              | 12      | 1.8     | ND (0.11) | ND (1.1)   | 32      | 2         |
|                             |                             | 01/12/16 | 5 - 6          | N           | ND (0.21)            | 21              | 11      | 1.5     | ND (0.11) | ND (1.1)   | 32      | 1.6       |
|                             |                             | 01/12/16 | 9 - 10         | N           | ND (0.21)            | 20              | 9.3     | 2.1     | ND (0.11) | ND (1.1)   | 37      | 0.3       |
| SD-16                       |                             | 01/12/16 | 0 - 0.5        | N           | ND (0.21)            | 16              | 10      | 1.8     | ND (0.1)  | ND (1.1)   | 32      | 0.31      |
|                             |                             | 01/12/16 | 2 - 3          | N           | ND (0.21)            | 19              | 11      | 2.2     | ND (0.1)  | ND (1.1)   | 28      | 0.13      |
|                             |                             | 01/12/16 | 5 - 6          | N           | ND (0.21)            | 24              | 9.3     | 2.4     | ND (0.11) | ND (1)     | 40      | 0.12      |
|                             |                             | 01/12/16 | 9 - 10         | N           | ND (0.21)            | 13              | 6.1     | 1.9     | ND (0.1)  | ND (1)     | 33      | 0.074     |
| SD-17                       |                             | 12/17/15 | 0 - 0.5        | N           | ND (0.2)             | 17              | 15      | 15      | ND (0.1)  | ND (1)     | 60      | ---       |
|                             |                             | 12/17/15 | 2 - 3          | N           | 0.25                 | 18              | 16      | 19      | ND (0.1)  | ND (1)     | 65      | ---       |

TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |                       |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|-----------------------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |                       |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date                  | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| SD-18                       |                             | 12/17/15              | 0 - 0.5        | N           | ND (0.21)            | 32              | 17      | 3.4     | ND (0.11) | ND (1.1)   | 310     | ---       |
| SD-19                       |                             | 01/13/16              | 0 - 0.5        | N           | ND (0.21)            | 30              | 15 J    | 2       | ND (0.1)  | ND (1)     | 33      | ---       |
|                             |                             | 01/13/16              | 0 - 0.5        | FD          | ND (0.21)            | 28              | 11 J    | 2.1     | ND (0.11) | 1.3        | 33      | ---       |
|                             |                             | 01/13/16              | 2 - 3          | N           | ND (0.2)             | 24              | 10      | 2.8     | ND (0.1)  | ND (1)     | 33      | ---       |
|                             |                             | 01/13/16              | 5 - 6          | N           | ND (0.2)             | 14              | 7.9     | 1.5     | ND (0.1)  | ND (1)     | 30      | ---       |
|                             |                             | 01/13/16              | 8 - 8.5        | N           | ND (0.2)             | 15              | 7.8     | 1.8     | 0.12      | ND (1)     | 35      | ---       |
| SD-25                       |                             | 03/10/16              | 0 - 1          | N           | ND (0.21)            | 23              | 15      | 3.1     | 0.1       | ND (1)     | 39      | 4.2       |
| SD-26                       |                             | 03/10/16              | 0 - 1          | N           | 0.32                 | 24              | 21      | 16      | ND (0.1)  | ND (1)     | 220     | 41        |
| SD-OS33                     |                             | 12/20/16              | 1.5 - 2        | N           | 0.36                 | 29              | 12      | 5.2     | ND (0.1)  | ND (1)     | 47      | ---       |
| TCS-4                       | AOC1 PAA #2                 | 03/25/14              | 59 - 60        | N           | 2.2                  | 61 J            | 18 J    | 32 J    | ND (0.1)  | ND (1)     | 30      | 150       |
|                             |                             | 03/25/14              | 113            | N           | ND (0.4)             | 1,700           | 580     | 17      | ND (0.1)  | 35         | 55      | 51        |
| TCS4-E                      | AOC1 PAA #2                 | 03/01/16              | 4 - 5          | N           | 29 J                 | 3,100           | 16 J    | 6.2     | ND (0.1)  | 9.6 J      | 190 J   | 780       |
|                             |                             | 03/01/16              | 4 - 5          | FD          | 50 J                 | 3,400           | 12 J    | 5       | ND (0.11) | 9.1 J      | 120 J   | 870       |
|                             |                             | 03/01/16              | 5 - 6          | N           | 0.99                 | 13              | 8       | ND (1)  | ND (0.1)  | ND (1)     | 31      | 4.6       |
| TCS4-N                      | AOC1 PAA #2                 | 03/01/16              | 4 - 5          | N           | 33                   | 3,400           | 8.7     | 6.9     | ND (0.1)  | 4.9        | 82      | 110       |
|                             |                             | 03/01/16              | 5 - 6          | N           | 39                   | 3,300           | 14      | 6.2     | ND (0.11) | 15         | 130     | 210       |
| TCS4-S                      | AOC1 PAA #2                 | 03/01/16              | 4 - 5          | N           | 30                   | 840             | 9       | 4.5     | ND (0.11) | ND (1.1)   | 120     | 180       |
|                             |                             | 03/01/16              | 5 - 6          | N           | 21                   | 2,200           | 11      | 3.1     | ND (0.11) | 3.4        | 150     | 47        |
| SS-1                        |                             | 06/29/97 <sup>+</sup> | 0.5            | N           | ND (0.05)            | 38.2            | 16.5    | ---     | ---       | ---        | 55      | ---       |
|                             |                             | 06/29/97 <sup>+</sup> | 1.5            | N           | ND (0.05)            | 25.3            | 13.6    | ---     | ---       | ---        | 43.4    | ---       |
| SS-2                        |                             | 06/29/97              | 0.5            | N           | ND (0.05)            | 18.9            | 14.1    | ---     | ---       | ---        | 48.3    | ---       |
|                             |                             | 06/29/97              | 1.5            | N           | ND (0.05)            | 10.2            | 12.9    | ---     | ---       | ---        | 42.2    | ---       |
| SS-3                        |                             | 06/29/97              | 0.5            | N           | ND (0.05)            | ---             | ---     | ---     | ---       | ---        | ---     | ---       |
| SS-4                        |                             | 06/29/97              | 0.5            | N           | ND (0.05)            | ---             | ---     | ---     | ---       | ---        | ---     | ---       |
| SS-5                        |                             | 06/29/97              | 0.5            | N           | ND (0.05)            | ---             | ---     | ---     | ---       | ---        | ---     | ---       |
| SS-6                        |                             | 06/29/97              | 0.5            | N           | ND (0.05)            | ---             | ---     | ---     | ---       | ---        | ---     | ---       |
| SS-7                        |                             | 06/29/97              | 0.5            | N           | ND (0.05)            | ---             | ---     | ---     | ---       | ---        | ---     | ---       |

TABLE E-2

## Constituent Concentrations

Area of Concern (AOC) 1 – Area around Former Percolation Bed

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|---------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1       | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury | Molybdenum | Zinc    | TEQ Human |
| SS-8                        |                             | 06/29/97 | 0.5            | N           | ND (0.05)            | ---             | ---     | ---     | ---     | ---        | ---     | ---       |
| SSB-1                       |                             | 06/25/97 | 1              | N           | ND (0.05)            | 13.7            | 14.9    | ---     | ---     | ---        | 35.7    | ---       |
|                             |                             | 06/25/97 | 3              | N           | ND (0.05)            | 13.6            | 11      | ---     | ---     | ---        | 29.6    | ---       |
|                             |                             | 06/25/97 | 6              | N           | ND (0.05)            | 16.7            | 16.9    | ---     | ---     | ---        | 34.5    | ---       |
|                             |                             | 06/25/97 | 10             | N           | ND (0.05)            | 16.5            | 8.2     | 1.3     | ---     | ND (0.2)   | 31.9    | ---       |
| SSB-6                       |                             | 06/30/97 | 1              | N           | ND (0.05)            | 13.7            | 8.6     | ---     | ---     | ---        | 29.1    | ---       |
|                             |                             | 06/30/97 | 3              | N           | ND (0.05)            | 27.5            | 6.6     | ---     | ---     | ---        | 24.8    | ---       |
|                             |                             | 06/30/97 | 6              | N           | 0.06                 | 467             | 33.8    | ---     | ---     | ---        | 132     | ---       |
|                             |                             | 06/30/97 | 10             | N           | ND (0.05)            | 14.8            | 9.6     | 3.1     | ---     | 0.79       | 33.4    | ---       |
| SSB-7                       |                             | 06/30/97 | 1              | N           | ND (0.05)            | 19.8            | 7.7     | ---     | ---     | ---        | 28.1    | ---       |
|                             |                             | 06/30/97 | 3              | N           | ND (0.05)            | 24.9            | 6.5     | ---     | ---     | ---        | 29.4    | ---       |
|                             |                             | 06/30/97 | 6              | N           | ND (0.05)            | 8.6             | 14.7    | ---     | ---     | ---        | 23      | ---       |
|                             |                             | 06/30/97 | 10             | N           | ND (0.05)            | 8.1             | 5.8     | 1.8     | ---     | ND (0.2)   | 23.4    | ---       |
| SSB-8                       |                             | 07/10/97 | 1              | N           | ND (0.05)            | 53.1            | 15.1    | ---     | ---     | ---        | 38.3    | ---       |
|                             |                             | 07/10/97 | 3              | N           | ND (0.05)            | 13.6            | 14.1    | ---     | ---     | ---        | 35.3    | ---       |
|                             |                             | 07/10/97 | 6              | N           | ND (0.05)            | 15.3            | 7.3     | ---     | ---     | ---        | 33.5    | ---       |
|                             |                             | 07/10/97 | 10             | N           | ND (0.05)            | 17.1            | 10.7    | 2.8     | ---     | 0.071 J    | 35.8    | ---       |
|                             |                             | 07/10/97 | 10             | FD          | ND (0.05)            | 13.7            | 8       | ---     | ---     | ---        | 30      | ---       |
| SSB-9                       |                             | 07/10/97 | 1              | N           | ND (0.05)            | 17.3            | 8.6     | ---     | ---     | ---        | 35.5    | ---       |
|                             |                             | 07/10/97 | 3              | N           | ND (0.05)            | 11              | 6.1     | ---     | ---     | ---        | 31.8    | ---       |
|                             |                             | 07/10/97 | 6              | N           | ND (0.05)            | 9.6             | 6.4     | ---     | ---     | ---        | 25.3    | ---       |
|                             |                             | 07/10/97 | 10             | N           | ND (0.05)            | 15.7            | 7.7     | 3       | ---     | 0.096 J    | 33.1    | ---       |
| XMW-9                       |                             | 06/25/97 | 3              | N           | ND (0.05)            | 18.4            | 12      | ---     | ---     | ---        | 25.8    | ---       |
|                             |                             | 06/25/97 | 10             | N           | ND (0.05)            | 45.7            | 19.7    | 5.7     | ---     | 0.075 J    | 44.2    | ---       |
|                             |                             | 06/25/97 | 10             | FD          | ND (0.05)            | 31.1            | 16.7    | ---     | ---     | ---        | 38.7    | ---       |
|                             |                             | 06/25/97 | 30             | N           | ND (0.05)            | 35.6            | 17.2    | 7.2     | ---     | 0.11 J     | 50.3    | ---       |
|                             |                             | 06/25/97 | 50             | N           | ND (0.05)            | 36.3            | 15.6    | 4.5     | ---     | ND (0.2)   | 54.2    | ---       |
|                             |                             | 06/25/97 | 70             | N           | ND (0.05)            | 6.7             | 170     | 6.1     | ---     | 1.8        | 54.6    | ---       |

**TABLE E-2****Constituent Concentrations**

Area of Concern (AOC) 1 – Area around Former Percolation Bed

*Soil Engineering Evaluation/Cost Analysis**PG&E Topock Compressor Station, Needles, California*

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**Notes:**

Results greater than or equal to the Removal Action Goal are circled.

|        |   |
|--------|---|
| #      | This location is in an area where soil is transitioning into sediment.      |
| ---    | not analyzed  |
| FD     | field duplicate   |
| ft bgs | feet below ground surface   |
| J      | concentration or reporting limit estimated by laboratory or data validation |
| mg/kg  | milligrams per kilogram   |
| N      | primary sample  |
| ND     | not detected at the listed reporting limit                                  |
| ng/kg  | nanogram per kilogram   |
| TEQ    | dioxin and furans toxicity equivalent quotient                              |



TABLE E-3

Constituent Concentrations

AOC 9 – Southeast Fence Line

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC9-1                      |                             | 10/01/08 | 0 - 0.5        | N           | 1.03                 | 23              | 9.1     | 19      | ND (0.1)   | ND (1)     | 46      | ---       |
|                             |                             | 10/01/08 | 2 - 3          | N           | ND (0.478)           | 9.7             | 5       | 4.5     | ND (0.1)   | ND (1)     | 17      | ---       |
| AOC9-2                      |                             | 09/18/08 | 0 - 0.5        | N           | ND (0.401)           | 16              | 11      | 9.6     | ND (0.099) | ND (2)     | 33      | 1.8       |
|                             |                             | 09/18/08 | 2 - 3          | N           | ND (0.406)           | 11              | 5.9     | 4.9     | ND (0.1)   | ND (2)     | 20      | 1.6       |
| AOC9-3                      |                             | 09/18/08 | 0 - 0.5        | N           | ND (0.402)           | 25              | 17      | 9       | ND (0.1)   | ND (2)     | 49      | ---       |
|                             |                             | 09/18/08 | 2 - 3          | N           | ND (0.454)           | 15              | 7.3     | 23      | ND (0.1)   | ND (2)     | 92      | ---       |
| AOC9-4                      |                             | 09/18/08 | 0 - 0.5        | N           | 1.06                 | 22              | 12      | 13      | ND (0.1)   | ND (2)     | 53      | ---       |
|                             |                             | 09/18/08 | 2 - 3          | N           | ND (0.402)           | 19              | 11      | 11      | ND (0.1)   | ND (2)     | 42      | ---       |
| AOC9-5                      |                             | 10/01/08 | 0 - 0.5        | N           | 0.726                | 35              | 19      | 28      | ND (0.1)   | ND (1)     | 100     | ---       |
|                             |                             | 10/01/08 | 2 - 3          | N           | 1                    | 38              | 21      | 25      | 0.27       | ND (2)     | 76      | ---       |
|                             |                             | 10/01/08 | 2 - 3          | FD          | 0.791                | 43              | 19      | 24      | 0.23       | ND (2)     | 85      | ---       |
| AOC9-6                      |                             | 09/18/08 | 0 - 0.5        | N           | 0.789                | 25              | 12      | 23      | 0.14       | ND (2)     | 68      | ---       |
|                             |                             | 09/18/08 | 2 - 3          | N           | ND (0.458)           | 16              | 9.3     | 5       | ND (0.1)   | ND (2.1)   | 31      | ---       |
| AOC9-7                      |                             | 09/18/08 | 0 - 0.5        | N           | 4.37                 | 72              | 14      | 15      | ND (0.1)   | ND (2)     | 120     | ---       |
|                             |                             | 09/18/08 | 2 - 3          | N           | ND (0.411)           | 13              | 6.7     | 20      | ND (0.1)   | ND (1)     | 29      | ---       |
| AOC9-8                      | AOC9 PAA #1                 | 10/01/08 | 0 - 0.5        | N           | 48.6 J               | 230             | 11      | 20      | ND (0.1)   | 1          | 1,000   | ---       |
|                             |                             | 10/01/08 | 2.5 - 3        | N           | 2.41                 | 41              | 13      | 59      | ND (0.1)   | 4.5        | 130     | 81        |
|                             |                             | 10/01/08 | 5.5 - 6        | N           | 1.32                 | 13              | 5.5     | 4.4     | ND (0.1)   | ND (1)     | 21      | ---       |
| AOC9-9                      | AOC9 PAA #1                 | 10/01/08 | 0 - 0.5        | N           | ND (0.404)           | 14              | 8       | 7       | ND (0.1)   | ND (1)     | 34      | ---       |
|                             |                             | 10/01/08 | 2.5 - 3        | N           | ND (0.415)           | 21              | 10      | 3.8     | ND (0.1)   | ND (1)     | 41      | ---       |
|                             |                             | 10/01/08 | 5.5 - 6        | N           | 1.53                 | 28              | 11      | 4.9     | ND (0.1)   | ND (1)     | 53      | ---       |
|                             |                             | 10/01/08 | 5.5 - 6        | FD          | 1.28                 | 27              | 10      | 4.4     | ND (0.1)   | ND (1)     | 50      | ---       |
| AOC9-10                     |                             | 10/01/08 | 0 - 0.5        | N           | 0.418                | 28              | 11      | 18      | ND (0.1)   | ND (1)     | 49      | ---       |
|                             |                             | 10/01/08 | 2 - 3          | N           | 0.494                | 30              | 15      | 15      | 0.11       | ND (2)     | 110     | ---       |
| AOC9-11                     |                             | 09/18/08 | 0 - 0.5        | N           | ND (0.418)           | 18              | 8.5     | 7.7     | 0.13       | ND (2.1)   | 35      | ---       |
|                             |                             | 09/18/08 | 2 - 3          | N           | ND (0.406)           | 20              | 9.7     | 7.1     | ND (0.1)   | ND (2)     | 30      | ---       |
| AOC9-12                     |                             | 10/01/08 | 0 - 0.5        | N           | 0.727                | 34              | 19      | 13      | ND (0.1)   | ND (2)     | 57      | ---       |
|                             |                             | 10/01/08 | 2 - 3          | N           | ND (0.415)           | 40              | 17      | 11      | ND (0.1)   | ND (2.1)   | 50      | ---       |



TABLE E-3

Constituent Concentrations

AOC 9 – Southeast Fence Line

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |                       |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|-----------------------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|-----------|
|                             |                             |                       |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date                  | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC9-13                     |                             | 09/19/08              | 0 - 0.5        | N           | ND (0.404)           | 18              | 13      | 8.3     | ND (0.099) | ND (2)     | 36      | ---       |
|                             |                             | 09/19/08              | 2 - 3          | N           | ND (0.409)           | 23 J            | 9.8     | 10      | ND (0.1)   | ND (2)     | 35      | ---       |
|                             |                             | 09/19/08              | 2 - 3          | FD          | ND (0.41)            | 18 J            | 9.6     | 5.6     | ND (0.1)   | ND (2)     | 32      | ---       |
| AOC9-14                     |                             | 10/02/08 <sup>Q</sup> | 0 - 0.5        | N           | 1.7                  | 31              | 24      | 34      | ND (0.11)  | ND (5.4)   | 81      | ---       |
|                             |                             | 10/02/08              | 2 - 3          | N           | ND (0.412)           | 38              | 17      | 13      | ND (0.1)   | ND (2)     | 61      | ---       |
| AOC9-15                     |                             | 12/06/15              | 0 - 1          | N           | ND (0.21)            | 24 J            | 17 J    | 15 J    | ND (0.11)  | ND (1.1)   | 52      | 59        |
|                             |                             | 12/06/15              | 2 - 3          | N           | 0.58                 | 25              | 14      | 23      | ND (0.1)   | ND (1)     | 46      | 160       |
| AOC9-16                     |                             | 01/13/16              | 0 - 0.5        | N           | 4.4                  | 48              | 11      | 22      | 0.14       | ND (1)     | 69      | 190       |
|                             |                             | 01/13/16              | 2 - 3          | N           | ND (0.2)             | 17              | 18      | 6.8     | 0.11       | ND (1)     | 34      | 7.6       |
|                             |                             | 01/13/16              | 5 - 6          | N           | ND (0.2)             | 14              | 6.3     | 7.1     | ND (0.11)  | ND (1)     | 26      | 13        |
|                             |                             | 01/13/16              | 9 - 10         | N           | ND (0.2)             | 12              | 6.2     | 2.9     | ND (0.1)   | ND (1)     | 21      | ---       |
| AOC9-17                     |                             | 01/10/16              | 9 - 10         | N           | 1.2                  | ---             | ---     | ---     | ---        | ---        | ---     | ---       |
|                             |                             | 01/14/16              | 14 - 15        | N           | ND (0.21)            | ---             | ---     | ---     | ---        | ---        | ---     | ---       |
| AOC9-18                     |                             | 01/10/16              | 5 - 6          | N           | 0.55                 | 25              | 17      | 14      | 0.18       | ND (1)     | 57      | 55        |
|                             |                             | 01/10/16              | 9 - 10         | N           | 0.94                 | 20              | 11      | 28      | 0.75       | ND (1)     | 53      | ---       |
| AOC9-19                     |                             | 01/13/16              | 0 - 0.5        | N           | ---                  | 19              | 9.3     | 9.4     | 0.15       | ND (1)     | 42      | 24        |
|                             |                             | 01/13/16              | 2 - 3          | N           | ---                  | 13              | 15      | 13      | ND (0.1)   | ND (1)     | 35      | 11        |
|                             |                             | 01/13/16              | 5 - 6          | N           | ---                  | 13              | 7.6     | 7.4     | 0.12       | ND (1)     | 33      | 5.9       |
|                             |                             | 01/13/16              | 9 - 10         | N           | ---                  | 17              | 14      | 5.1     | ND (0.1)   | ND (1)     | 29      | ---       |
| AOC9-20                     |                             | 01/13/16              | 0 - 0.5        | N           | ---                  | ---             | ---     | 7.1     | 0.11       | ---        | ---     | 9.8       |
|                             |                             | 01/13/16              | 2 - 3          | N           | ---                  | ---             | ---     | 11      | 0.12       | ---        | ---     | 13        |
|                             |                             | 01/13/16              | 2 - 3          | FD          | ---                  | ---             | ---     | 9.3     | ND (0.1)   | ---        | ---     | ---       |
|                             |                             | 01/13/16              | 5 - 6          | N           | ---                  | ---             | ---     | 47      | 0.16       | ---        | ---     | 35        |
|                             |                             | 01/13/16              | 9 - 10         | N           | ---                  | ---             | ---     | 2.2     | ND (0.1)   | ---        | ---     | ---       |
| AOC9-21                     |                             | 01/08/17              | 0 - 0.5        | N           | ---                  | 34              | 11      | 3.8     | ND (0.1)   | ND (1)     | 47 J    | 110       |
|                             |                             | 01/08/17              | 0 - 0.5        | FD          | ---                  | 33              | 13      | 4       | ND (0.1)   | ND (1.1)   | 45 J    | 110       |
|                             |                             | 01/08/17              | 2 - 3          | N           | ---                  | 48              | 23      | 2.7     | ND (0.1)   | ND (1)     | 44      | 0.47      |
|                             |                             | 01/08/17              | 5 - 6          | N           | ---                  | 57              | 22      | 2.4     | ND (0.1)   | ND (1)     | 42      | ND (0.3)  |

TABLE E-3

Constituent Concentrations

AOC 9 – Southeast Fence Line

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |                       |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|-----------------------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |                       |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date                  | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| AOC9-22                     |                             | 01/04/17              | 0 - 0.5        | N           | ---                  | 30              | 23      | 17      | ND (0.12) | ND (1.2)   | 60      | 28        |
|                             |                             | 01/04/17              | 2 - 3          | N           | ---                  | 62              | 27      | 20      | 0.17      | ND (1)     | 42      | 100       |
|                             |                             | 01/04/17 <sup>Y</sup> | 2.5 - 2.6      | N           | 0.79                 | 64              | 16      | 5.4     | ND (0.14) | ND (1.4)   | 48      | ---       |
|                             |                             | 01/04/17              | 4.5 - 5        | N           | ---                  | 41              | 13      | 6.4     | ND (0.11) | ND (1.1)   | 18      | 4.4       |
| PA-05                       |                             | 11/09/15              | 0 - 1          | N           | 0.42                 | 27              | 16      | 7.4     | ND (0.1)  | ND (1)     | 83      | ---       |
| PA-23                       |                             | 01/27/16              | 0 - 1          | N           | 0.52                 | 8.9             | 6.7     | 5.1     | ND (0.11) | ND (1.1)   | 49      | 26        |
| #4                          | AOC9 PAA #1                 | 04/06/00              | 0 - 3          | N           | 4.2                  | 53.2            | 12.4    | ---     | ---       | ---        | 343     | ---       |
| #5                          | AOC9 PAA #1                 | 04/06/00              | 0 - 3          | N           | 2.7                  | 29              | 13.8    | ---     | ---       | ---        | 64      | ---       |
| #6                          | AOC9 PAA #1                 | 04/06/00              | 0 - 3          | N           | 2.6                  | 33              | 12.4    | ---     | ---       | ---        | 92.7    | ---       |
| #7                          | AOC9 PAA #1                 | 04/06/00              | 0 - 3          | N           | 1.3                  | 32.1            | 15.3    | ---     | ---       | ---        | 68      | ---       |
| #8                          | AOC9 PAA #1                 | 04/06/00              | 0 - 3          | N           | 2.8                  | 28.8            | 12.9    | ---     | ---       | ---        | 61.1    | ---       |
| #9                          | AOC9 PAA #1                 | 04/06/00              | 0 - 3          | N           | 2.7                  | 92.7            | 50.4    | ---     | ---       | ---        | 215     | ---       |
| #10                         | AOC9 PAA #1                 | 04/06/00              | 0 - 3          | N           | 114                  | 398             | 17.9    | ---     | ---       | ---        | 744     | ---       |
| #11                         |                             | 04/06/00              | 0 - 3          | N           | ---                  | ---             | ---     | ---     | ---       | ---        | 80.3    | ---       |
| #12                         |                             | 04/06/00              | 0 - 3          | N           | 0.8                  | 38.3            | 35.6    | ---     | ---       | ---        | ---     | ---       |

**Notes:**

Results greater than or equal to the Removal Action Goal are circled.

|        |   |
|--------|---|
| Θ      | white powder sample.  |
| Y      | debris sample   |
| ---    | not analyzed  |
| FD     | field duplicate   |
| ft bgs | feet below ground surface   |
| J      | concentration or reporting limit estimated by laboratory or data validation |
| mg/kg  | milligrams per kilogram   |
| N      | primary sample  |
| ND     | not detected at the listed reporting limit                                  |
| ng/kg  | nanogram per kilogram   |
| TEQ    | dioxin and furans toxicity equivalent quotient                              |



TABLE E-4

Constituent Concentrations

AOC 10 – East Ravine

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| AOC10-1                     |                             | 10/02/08 | 0 - 0.5        | N           | ND (0.401)           | 6.6             | 4.9     | 9.2     | ND (0.1)  | ND (1)     | 20      | ---       |
|                             |                             | 10/02/08 | 2 - 3          | N           | ND (0.405)           | 7.4             | 5.6     | 5.8     | ND (0.1)  | ND (1)     | 21      | ---       |
|                             |                             | 10/02/08 | 5 - 6          | N           | ND (0.407)           | 7.5             | 5.8     | 5.4     | ND (0.1)  | ND (1)     | 20      | ---       |
|                             |                             | 10/02/08 | 9 - 10         | N           | ND (0.406)           | 6.8             | 5.7     | 4.8     | ND (0.1)  | ND (1)     | 21      | ---       |
| AOC10-10                    |                             | 01/22/16 | 0 - 1          | N           | 0.45                 | 36              | 15      | 4.7     | ND (0.1)  | ND (1)     | 63      | 20        |
|                             |                             | 01/22/16 | 2 - 3          | N           | ND (0.22)            | 27              | 13      | 2       | ND (0.11) | ND (1.1)   | 41      | 0.56      |
|                             |                             | 01/22/16 | 5 - 6          | N           | 0.35                 | 34              | 13      | 2.1     | ND (0.11) | ND (1.1)   | 44      | 0.59      |
|                             |                             | 01/22/16 | 9 - 10         | N           | 0.35                 | 32              | 11      | 2.6     | ND (0.11) | ND (1.1)   | 43      | ---       |
|                             |                             | 01/22/16 | 9 - 10         | FD          | 0.39                 | 31              | 11      | 2.4     | ND (0.11) | ND (1.1)   | 42      | ---       |
| AOC10-11                    |                             | 01/22/16 | 0 - 1          | N           | 0.87                 | 31              | 9.1     | 2.7     | ND (0.1)  | ND (1)     | 40      | 18        |
|                             |                             | 01/22/16 | 0 - 1          | FD          | 0.44                 | 27              | 14      | 2.4     | ND (0.1)  | ND (1)     | 45      | 12        |
|                             |                             | 01/22/16 | 2 - 3          | N           | 0.9                  | 45              | 13      | 2.6     | ND (0.1)  | ND (1)     | 44      | 18        |
|                             |                             | 01/22/16 | 5 - 6          | N           | 1.6                  | 73              | 31      | 2.5     | ND (0.1)  | ND (1)     | 74      | 200       |
|                             |                             | 01/22/16 | 9 - 10         | N           | 0.72                 | 42              | 19      | 2.4     | ND (0.1)  | ND (1)     | 160     | 4.1       |
| AOC10-12                    |                             | 01/22/16 | 0 - 0.5        | N           | 13                   | 460             | 19      | 12      | ND (0.11) | ND (1)     | 56      | 42        |
|                             |                             | 01/22/16 | 2 - 3          | N           | 0.3                  | 25              | 9       | 3.6     | ND (0.1)  | 1.4        | 34      | 19        |
|                             |                             | 01/22/16 | 5 - 6          | N           | 5                    | 130             | 11      | 6       | ND (0.1)  | ND (1)     | 70      | 19        |
|                             |                             | 01/22/16 | 9 - 10         | N           | 0.66                 | 37              | 16      | 2.5     | ND (0.11) | ND (1)     | 47      | ---       |
| AOC10-13                    |                             | 12/03/15 | 0 - 1          | N           | ND (0.21)            | 14              | 13      | 9.8     | ND (0.11) | 1.4        | 39      | ---       |
|                             |                             | 12/03/15 | 0 - 1          | FD          | ND (0.21)            | 16              | 14      | 10      | ND (0.11) | 1.4        | 41      | ---       |
| AOC10-14                    |                             | 12/03/15 | 0 - 1          | N           | ND (0.21)            | 11              | 13      | 5.9     | ND (0.1)  | 1.3        | 29      | ---       |
| AOC10-15                    | AOC10 PAA #3                | 12/15/15 | 0 - 1          | N           | 2.6                  | 67              | 23      | 21      | ND (0.1)  | 14         | 98      | 290       |
|                             |                             | 12/15/15 | 0 - 1          | FD          | 2.6                  | 70              | 27      | 20      | ND (0.1)  | 14         | 110     | 270       |
|                             |                             | 12/15/15 | 2 - 3          | N           | 1.4                  | 41              | 22      | 17 J    | ND (0.1)  | 8.2        | 70 J    | 110       |
|                             |                             | 12/15/15 | 5 - 6          | N           | 1.1                  | 33              | 14      | 7.6     | ND (0.1)  | 4.2        | 100     | 77        |
|                             |                             | 12/15/15 | 9 - 10         | N           | ND (0.21)            | 17              | 11      | 1.5     | ND (0.1)  | ND (1)     | 44      | 2.9       |

TABLE E-4

Constituent Concentrations

AOC 10 – East Ravine

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC10-16                    |                             | 12/15/15 | 0 - 1          | N           | 0.59                 | 21              | 8.9     | 5.9     | ND (0.1)   | ND (1)     | 40      | 1.6       |
|                             |                             | 12/15/15 | 2 - 3          | N           | 0.24                 | 21              | 9.7     | 2.5     | ND (0.1)   | ND (1)     | 44      | 4         |
|                             |                             | 12/15/15 | 5 - 6          | N           | 0.48                 | 21              | 12      | 3.2     | ND (0.1)   | ND (1)     | 40      | 2.6       |
|                             |                             | 12/15/15 | 9 - 10         | N           | ND (0.2)             | 14              | 9.4     | 2.4     | ND (0.1)   | ND (1)     | 38      | 1.6       |
| AOC10-17                    |                             | 12/03/15 | 0 - 1          | N           | ND (0.21)            | 9.7             | 11      | 9.9     | ND (0.1)   | 7.8        | 32      | ---       |
| AOC10-18                    |                             | 12/06/15 | 0 - 1          | N           | ND (0.2)             | 5.6             | 2.8     | 1.9     | ND (0.1)   | ND (1)     | 13      | 1.8       |
|                             |                             | 12/06/15 | 2 - 3          | N           | ND (0.2)             | 5.7             | 4.1     | 1.9     | ND (0.1)   | ND (1)     | 13      | 1.7       |
| AOC10-19                    |                             | 02/24/16 | 0 - 1          | N           | ND (0.2)             | 27              | 14      | 6.7 J   | ND (0.1)   | ND (1)     | 48      | 2.3       |
|                             |                             | 02/24/16 | 2 - 3          | N           | 0.3                  | 34 J            | 18      | 5.8     | ND (0.1)   | ND (1)     | 55      | 4.2       |
|                             |                             | 02/24/16 | 2 - 3          | FD          | ND (0.21)            | 27 J            | 17      | 5.8     | ND (0.1)   | ND (1)     | 52      | ---       |
|                             |                             | 02/24/16 | 5 - 6          | N           | ND (0.21)            | 27              | 17      | 3.8     | ND (0.11)  | ND (1)     | 47      | ---       |
| AOC10-2                     |                             | 10/02/08 | 0 - 0.5        | N           | ND (0.402)           | 4.9             | 4.1     | 5.1     | ND (0.1)   | ND (1)     | 14      | ---       |
|                             |                             | 10/02/08 | 2 - 3          | N           | ND (0.417)           | 17              | 9.4     | 3.4     | ND (0.1)   | ND (1)     | 38      | ---       |
|                             |                             | 10/02/08 | 5 - 6          | N           | ND (0.415)           | 19              | 9.5     | 4.2     | ND (0.1)   | ND (2.1)   | 40      | ---       |
|                             |                             | 10/02/08 | 7 - 8          | N           | ND (0.412)           | 17              | 9       | 3.2     | ND (0.1)   | ND (1)     | 32      | ---       |
| AOC10-20                    | AOC10 PAA #1                | 02/17/16 | 0 - 0.5        | N           | 2,700                | 2,800           | 11      | 6.1     | ND (0.1)   | ND (1)     | 38      | 0.28      |
|                             |                             | 02/25/16 | 2 - 3          | N           | 12                   | 28              | 5       | 2.8     | ND (0.1)   | ND (1)     | 16      | 0.15      |
| AOC10-21                    | AOC10 PAA #1                | 02/25/16 | 0 - 0.5        | N           | 1.4                  | 270             | 3,100   | 920     | 35         | 9.4        | 360     | 53        |
|                             |                             | 02/25/16 | 2 - 3          | N           | 0.2                  | 8.1             | 5       | 2.9     | ND (0.099) | ND (1)     | 16      | 0.22      |
| AOC10-22                    | AOC10 PAA #1                | 02/17/16 | 0 - 0.5        | N           | ND (0.2)             | 35              | 14      | 12      | ND (0.1)   | ND (1)     | 50      | 17        |
|                             |                             | 02/17/16 | 1 - 2          | N           | 0.91                 | 85              | 200     | 38      | ND (0.11)  | 2.7        | 39      | 48        |
|                             |                             | 02/17/16 | 2 - 3          | N           | 0.37                 | 35              | 42      | 17      | ND (0.1)   | ND (1)     | 35      | 25        |
|                             |                             | 02/17/16 | 5 - 6          | N           | ND (0.2)             | 8.6             | 5.1     | 3.4     | ND (0.1)   | ND (1)     | 18      | 0.28      |
| AOC10-23                    | AOC10 PAA #1                | 02/25/16 | 0 - 1          | N           | 1.8                  | 72              | 140     | 30      | 0.24       | ND (1)     | 26      | 1,100     |
|                             |                             | 02/25/16 | 1 - 2          | N           | 2.6                  | 130             | 22      | 22      | ND (0.1)   | ND (1)     | 56      | 8.8       |
|                             |                             | 02/25/16 | 2 - 3          | N           | ND (0.2)             | 5.5             | 4.2     | 2.2     | ND (0.1)   | ND (1)     | 11      | 17        |
| AOC10-24                    | AOC10 PAA #4                | 03/07/16 | 0 - 1          | N           | ---                  | ---             | ---     | ---     | ---        | ---        | ---     | 21        |
|                             |                             | 03/07/16 | 2 - 3          | N           | ---                  | ---             | ---     | ---     | ---        | ---        | ---     | 190       |

TABLE E-4

Constituent Concentrations

AOC 10 – East Ravine

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |                       |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg)  | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|-----------------------|----------------|-------------|----------------------|-----------------|---------|----------|------------|------------|---------|-----------|
|                             |                             |                       |                |             | 3.1                  | 145             | 145     | 36       | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date                  | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead     | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC10-25                    |                             | 01/08/17              | 0 - 0.5        | N           | ND (0.2)             | 15              | 8       | 7.9 J    | ND (0.1)   | ND (1)     | 32      | 0.96      |
|                             |                             | 01/08/17              | 0 - 0.5        | FD          | ND (0.2)             | 18              | 9.5     | 11 J     | ND (0.1)   | ND (1)     | 38      | 4.3       |
|                             |                             | 01/08/17              | 2 - 3          | N           | ND (0.2)             | 31              | 11      | 2.1 J    | ND (0.1)   | 1.4        | 41      | ND (0.35) |
|                             |                             | 01/08/17              | 5 - 6          | N           | ND (0.2)             | 25              | 11      | 1.5      | ND (0.1)   | ND (1)     | 45      | 0.6       |
|                             |                             | 01/08/17              | 9 - 10         | N           | ND (0.2)             | 26              | 13      | 1.5      | ND (0.1)   | ND (1)     | 42      | 0.28      |
| AOC10-26                    | AOC10 PAA #4                | 02/21/17              | 0 - 0.5        | N           | ---                  | ---             | ---     | ---      | ---        | ---        | ---     | 9.5       |
|                             |                             | 02/21/17              | 2 - 3          | N           | ---                  | ---             | ---     | ---      | ---        | ---        | ---     | 80        |
|                             |                             | 02/21/17              | 2 - 3          | FD          | ---                  | ---             | ---     | ---      | ---        | ---        | ---     | 180       |
|                             |                             | 02/21/17 <sup>9</sup> | 2.5 - 2.7      | N           | 9.5                  | 340             | 40      | 18       | 0.15       | ND (1.4)   | 110     | 410       |
|                             |                             | 02/21/17              | 4.5 - 5        | N           | ---                  | ---             | ---     | ---      | ---        | ---        | ---     | 100       |
| AOC10-27                    |                             | 01/04/17              | 0 - 0.5        | N           | ---                  | ---             | ---     | ---      | ---        | ---        | ---     | 13        |
|                             |                             | 01/04/17              | 2 - 3          | N           | ---                  | ---             | ---     | ---      | ---        | ---        | ---     | 13        |
|                             |                             | 01/04/17              | 4 - 5          | N           | ---                  | ---             | ---     | ---      | ---        | ---        | ---     | 1.7       |
| AOC10-3                     |                             | 09/19/08              | 0 - 0.5        | N           | 1.91                 | 62              | 14      | 7.8      | ND (0.1)   | ND (2)     | 40      | ---       |
|                             |                             | 09/19/08              | 0 - 0.5        | FD          | 1.7                  | 64              | 13      | 7.7      | ND (0.1)   | ND (2)     | 41      | ---       |
|                             |                             | 09/19/08              | 2 - 3          | N           | ND (0.412)           | 43              | 14      | ND (5.1) | ND (0.1)   | ND (5.1)   | 47      | ---       |
|                             |                             | 09/19/08              | 5 - 6          | N           | 0.705                | 37              | 16      | 2.9      | ND (0.1)   | ND (5.1)   | 61      | ---       |
|                             |                             | 09/19/08              | 9 - 10         | N           | ND (0.412)           | 28              | 12      | 2.8      | ND (0.1) J | ND (1)     | 50      | ---       |
| AOC10-4                     |                             | 09/19/08              | 0 - 0.5        | N           | 0.55                 | 33              | 14      | 11       | ND (0.1)   | ND (2)     | 52      | ---       |
|                             |                             | 09/19/08              | 2 - 3          | N           | ND (0.409)           | 26              | 16      | 4.4      | ND (0.1)   | ND (2)     | 38      | ---       |
|                             |                             | 09/19/08              | 5 - 6          | N           | ND (0.418)           | 27              | 16      | 3        | ND (0.11)  | ND (5.2)   | 63      | ---       |
|                             |                             | 09/19/08              | 9 - 10         | N           | ND (0.413)           | 18              | 12      | 2.7      | ND (0.1) J | ND (1)     | 48      | ---       |
| AOC10-5                     |                             | 09/19/08              | 0 - 0.5        | N           | 1.01                 | 39              | 27      | 27       | ND (0.1)   | ND (5.1)   | 97      | ---       |
|                             |                             | 09/19/08              | 2 - 3          | N           | 0.48                 | 30              | 21      | 34       | ND (0.1)   | ND (5.1)   | 77      | ---       |
|                             |                             | 09/19/08              | 5 - 6          | N           | ND (0.407)           | 19              | 40      | 6.7      | ND (0.1)   | ND (5.1)   | 80      | ---       |
|                             |                             | 09/19/08              | 5 - 6          | FD          | ND (0.407)           | 18              | 41      | 7.3      | ND (0.1)   | ND (5.1)   | 79      | ---       |
| AOC10-6                     |                             | 09/20/08              | 0 - 0.5        | N           | ND (0.402)           | 24              | 11      | 26       | ND (0.1)   | ND (2)     | 58      | 5.2       |
|                             |                             | 09/20/08              | 2 - 3          | N           | ND (0.404)           | 23              | 9.5     | 4.1      | ND (0.1)   | ND (1)     | 45      | ND (2.3)  |

TABLE E-4

Constituent Concentrations

AOC 10 – East Ravine

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| AOC10-7                     |                             | 09/20/08 | 0 - 0.5        | N           | ND (0.414)           | 22              | 12      | 8.6     | ND (0.1)  | ND (1)     | 54      | ---       |
|                             |                             | 09/20/08 | 2 - 3          | N           | ND (0.406)           | 27              | 12      | 8.1     | ND (0.1)  | 1.1        | 58      | ---       |
|                             |                             | 09/20/08 | 5 - 6          | N           | ND (0.407)           | 33              | 13      | 4.4     | ND (0.1)  | ND (2)     | 58      | ---       |
| AOC10-8                     |                             | 08/22/08 | 0 - 0.5        | N           | ND (0.402)           | 16              | 12      | 15 J    | ND (0.1)  | ND (2)     | 87      | ---       |
|                             |                             | 08/22/08 | 0 - 0.5        | FD          | ND (0.416)           | 18              | 12      | 12 J    | ND (0.1)  | ND (2)     | 75      | ---       |
| AOC10-9                     |                             | 12/07/15 | 0 - 1          | N           | ND (0.2)             | 19              | 12      | 3.2     | ND (0.1)  | ND (1)     | 41      | ---       |
|                             |                             | 12/07/15 | 2 - 3          | N           | ND (0.2)             | 16              | 10      | 2.3     | ND (0.1)  | ND (1)     | 49      | ---       |
| AOC10a-1                    |                             | 10/17/08 | 0 - 0.5        | N           | 8.25                 | 80              | 270 J   | 200 J   | 0.64      | 19         | 1,000 J | ---       |
| AOC10a-2                    |                             | 01/13/16 | 0 - 1          | N           | ND (0.21)            | 13              | 11      | 9.4     | 0.12      | ND (1.1)   | 36      | 17        |
|                             |                             | 01/13/16 | 2 - 3          | N           | ND (0.21)            | 3.6             | 2.9     | 2.1     | ND (0.1)  | ND (1)     | 10      | ND (0.18) |
|                             |                             | 01/13/16 | 5 - 6          | N           | ND (0.21)            | 3.7             | 2.6     | 1.9     | ND (0.1)  | ND (1)     | 9.5     | ---       |
|                             |                             | 01/13/16 | 9 - 10         | N           | ND (0.21)            | 4.6             | 3.6     | 2.4     | ND (0.11) | ND (1.1)   | 12      | ---       |
| AOC10a-3                    |                             | 01/13/16 | 0 - 1          | N           | 5.3                  | 100             | 27      | 4.2     | 0.13      | ND (1)     | 35      | 120       |
|                             |                             | 01/13/16 | 2 - 3          | N           | 1.3                  | 68              | 25      | 22      | 0.21      | 1.4        | 70      | 150       |
|                             |                             | 01/13/16 | 5 - 6          | N           | ND (0.21)            | 45              | 12      | 1.7     | 0.19      | ND (1)     | 34      | 0.48      |
|                             |                             | 01/13/16 | 9 - 10         | N           | ND (0.21)            | 39              | 31      | 2.3     | 0.16      | ND (1)     | 38      | 0.36      |
| AOC10a-4                    |                             | 01/08/17 | 0 - 0.5        | N           | ---                  | 33              | 30      | 4       | ND (0.11) | ND (1.1)   | 41      | 23        |
|                             |                             | 01/08/17 | 2 - 3          | N           | ---                  | 11              | 6.3     | 2.6     | ND (0.1)  | ND (1)     | 20      | 0.33      |
|                             |                             | 01/08/17 | 5 - 6          | N           | ---                  | 11              | 6.9     | 2.5     | ND (0.1)  | ND (1)     | 19      | ---       |
|                             |                             | 01/08/17 | 9 - 10         | N           | ---                  | 47              | 14      | 2.1     | ND (0.1)  | ND (1)     | 41      | ---       |
| AOC10b-1                    |                             | 09/30/08 | 0 - 0.5        | N           | 0.559                | 24              | 9.8     | 8.6     | ND (0.1)  | ND (1)     | 38      | 24        |
|                             |                             | 09/30/08 | 2 - 3          | N           | 1.39                 | 63              | 28      | 8.4 J   | ND (0.1)  | ND (1)     | 110 J   | 200       |
|                             |                             | 09/30/08 | 2 - 3          | FD          | 1.39                 | 61              | 27      | 12 J    | ND (0.1)  | 1.5        | 160 J   | ---       |
|                             |                             | 09/30/08 | 5 - 6          | N           | 0.425                | 20              | 8       | 4.3     | ND (0.1)  | ND (1)     | 39      | 150       |
|                             |                             | 09/30/08 | 9 - 10         | N           | ND (0.407)           | 29              | 10      | 3.7     | ND (0.1)  | ND (2)     | 29      | ---       |



TABLE E-4

Constituent Concentrations

AOC 10 – East Ravine

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| AOC10b-2                    |                             | 09/30/08 | 0 - 0.5        | N           | 0.434                | 29              | 11      | 8.2     | ND (0.1)  | 1.1        | 40      | ---       |
|                             |                             | 09/30/08 | 2 - 3          | N           | 1.05                 | 47              | 15      | 5.2     | ND (0.1)  | 1.1        | 44      | ---       |
|                             |                             | 09/30/08 | 5 - 6          | N           | 0.453                | 29              | 8.8     | 4.2     | ND (0.1)  | 1          | 27      | ---       |
|                             |                             | 09/30/08 | 9 - 10         | N           | 0.759                | 39              | 15      | 3.8     | ND (0.1)  | ND (2)     | 38      | ---       |
| AOC10b-3                    |                             | 09/30/08 | 0 - 0.5        | N           | 27.7                 | 820             | 90      | 24      | ND (0.1)  | 1.5        | 240     | ---       |
|                             |                             | 10/01/08 | 2 - 3          | N           | 1.82                 | 90              | 23      | 5       | ND (0.1)  | ND (1)     | 59      | ---       |
|                             |                             | 10/01/08 | 5 - 6          | N           | 0.429                | 38              | 14      | 3.8     | ND (0.1)  | ND (2.1)   | 40      | ---       |
|                             |                             | 10/01/08 | 5 - 6          | FD          | ND (0.417)           | 36              | 16      | 3.6     | ND (0.1)  | ND (2.1)   | 39      | ---       |
|                             |                             | 10/01/08 | 9 - 10         | N           | ND (0.415)           | 36              | 13      | 3.5     | ND (0.1)  | ND (2.1)   | 44      | ---       |
| AOC10b-4                    |                             | 09/30/08 | 0 - 0.5        | N           | ND (0.401)           | 12              | 5.8     | 41      | ND (0.1)  | ND (1)     | 29      | ---       |
|                             |                             | 09/30/08 | 2 - 3          | N           | ND (0.403)           | 14              | 6.7     | 10      | ND (0.1)  | ND (1)     | 31      | ---       |
|                             |                             | 09/30/08 | 5 - 6          | N           | ND (0.407)           | 20              | 8.9     | 3.4     | ND (0.1)  | ND (1)     | 35      | ---       |
|                             |                             | 09/30/08 | 9 - 10         | N           | ND (0.415)           | 26              | 11      | 2.8     | ND (0.1)  | ND (1)     | 42      | ---       |
| AOC10c-1                    |                             | 10/01/08 | 0 - 0.5        | N           | 1.98                 | 55              | 15      | 7.8     | ND (0.1)  | ND (1)     | 48      | ---       |
|                             |                             | 10/01/08 | 2 - 3          | N           | 27.3                 | 490             | 41      | 18      | ND (0.1)  | 1.2        | 76      | ---       |
|                             |                             | 10/01/08 | 5 - 6          | N           | 4.78                 | 220             | 17      | 5.4     | ND (0.1)  | ND (2)     | 42      | ---       |
|                             |                             | 10/01/08 | 9 - 10         | N           | 1.37                 | 63              | 14      | 3.4     | ND (0.1)  | 1          | 39      | ---       |
| AOC10c-2                    | AOC10 PAA #2                | 10/01/08 | 0 - 0.5        | N           | 1.25                 | 51              | 19      | 12      | ND (0.1)  | ND (2)     | 61      | ---       |
|                             |                             | 10/01/08 | 2 - 3          | N           | 3.77                 | 190             | 37      | 17      | ND (0.1)  | 2.2        | 78      | ---       |
|                             |                             | 10/01/08 | 2 - 3          | FD          | 3.8                  | 180             | 34      | 16      | ND (0.1)  | 1.9        | 75      | ---       |
|                             |                             | 10/01/08 | 5 - 6          | N           | 1.92                 | 110             | 24      | 7       | ND (0.1)  | 1.9        | 51      | ---       |
|                             |                             | 10/01/08 | 9 - 10         | N           | 0.605                | 32              | 13      | 2.7     | ND (0.1)  | ND (1)     | 50      | ---       |
| AOC10c-3                    | AOC10 PAA #2                | 10/02/08 | 0 - 0.5        | N           | 2.56                 | 110             | 42      | 32      | ND (0.1)  | ND (2)     | 140     | ---       |
|                             |                             | 10/02/08 | 2 - 3          | N           | 9.27                 | 690             | 60      | 31      | ND (0.11) | ND (2.1)   | 140     | ---       |
|                             |                             | 10/02/08 | 2 - 3          | FD          | 7.97                 | 660             | 60      | 26      | ND (0.1)  | ND (2.1)   | 140     | ---       |
|                             |                             | 10/02/08 | 5 - 6          | N           | 0.512                | 29              | 9       | 4.5     | ND (0.1)  | ND (1)     | 36      | ---       |
|                             |                             | 10/02/08 | 9 - 10         | N           | ND (0.412)           | 22              | 11      | 2.7     | ND (0.1)  | ND (1)     | 41      | ---       |

TABLE E-4

Constituent Concentrations

AOC 10 – East Ravine

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC10c-4                    | AOC10 PAA #2                | 10/01/08 | 0 - 0.5        | N           | 2.66                 | 120             | 46      | 36      | ND (0.1)   | ND (2.1)   | 150     | 360       |
|                             |                             | 10/01/08 | 2 - 3          | N           | 2.11                 | 90              | 19      | 8.9     | ND (0.1)   | ND (2)     | 52      | 66        |
|                             |                             | 10/01/08 | 5 - 6          | N           | 2.84                 | 27              | 14      | 2.6     | ND (0.1)   | ND (1)     | 47      | 3.1       |
|                             |                             | 10/01/08 | 9 - 10         | N           | 0.436                | 92              | 25      | 13      | ND (0.1)   | ND (2.1)   | 74      | ---       |
| AOC10c-5                    | AOC10 PAA #2                | 10/01/08 | 0 - 0.5        | N           | 2.49                 | 81              | 29      | 15      | ND (0.1)   | ND (2)     | 80      | ---       |
|                             |                             | 10/01/08 | 2 - 3          | N           | 16.4                 | 1,500           | 110     | 47      | ND (0.1)   | 2.9        | 170     | ---       |
|                             |                             | 10/01/08 | 5 - 6          | N           | 1.48                 | 82              | 12      | 4       | ND (0.1)   | ND (2.1)   | 44      | ---       |
|                             |                             | 10/01/08 | 9 - 10         | N           | 0.423                | 47              | 15      | 3       | ND (0.1)   | ND (1)     | 46      | ---       |
| AOC10c-6                    |                             | 01/21/16 | 14 - 15        | N           | 0.54                 | 40              | ---     | ---     | ---        | ---        | ---     | 12        |
|                             |                             | 01/22/16 | 19 - 20        | N           | ND (0.21)            | 31              | ---     | ---     | ---        | ---        | ---     | ---       |
|                             |                             | 01/22/16 | 29 - 30        | N           | ND (0.23)            | 39              | ---     | ---     | ---        | ---        | ---     | ---       |
|                             |                             | 01/22/16 | 49 - 50        | N           | ND (0.26)            | 33              | ---     | ---     | ---        | ---        | ---     | ---       |
|                             |                             | 01/22/16 | 49 - 50        | FD          | ND (0.22)            | 32              | ---     | ---     | ---        | ---        | ---     | ---       |
|                             |                             | 01/22/16 | 59 - 60        | N           | ND (0.21)            | 32              | ---     | ---     | ---        | ---        | ---     | ---       |
| AOC10d-1                    |                             | 09/18/08 | 0 - 0.5        | N           | 0.644                | 49              | 16      | 8.8     | ND (0.1)   | ND (2)     | 58      | ---       |
|                             |                             | 09/18/08 | 2 - 3          | N           | 2.86                 | 150             | 31      | 6.8     | ND (0.1)   | ND (2)     | 76      | ---       |
|                             |                             | 09/18/08 | 5 - 6          | N           | 1.06                 | 66              | 23      | 5.2     | ND (0.11)  | ND (5.2)   | 80      | ---       |
|                             |                             | 09/18/08 | 5 - 6          | FD          | 0.703                | 64              | 23      | 5.3     | ND (0.1)   | ND (5.2)   | 74      | ---       |
|                             |                             | 09/18/08 | 9 - 10         | N           | ND (0.414)           | 23              | 12      | 3.5     | ND (0.1) J | ND (2.1)   | 58      | ---       |
| AOC10d-2                    |                             | 09/17/08 | 0 - 0.5        | N           | ND (0.403)           | 22              | 17      | 21      | ND (0.1)   | ND (2)     | 61      | ---       |
|                             |                             | 09/17/08 | 2 - 3          | N           | 1.16                 | 40              | 14      | 16      | ND (0.1)   | ND (2)     | 54      | ---       |
|                             |                             | 09/17/08 | 5 - 6          | N           | 0.597                | 33              | 16      | 6.2     | ND (0.1)   | ND (5.1)   | 70      | ---       |
|                             |                             | 09/17/08 | 9 - 10         | N           | ND (0.406)           | 22              | 16      | 3.2     | ND (0.1) J | ND (5.1)   | 73      | ---       |
| AOC10d-3                    |                             | 09/17/08 | 0 - 0.5        | N           | ND (0.406)           | 20              | 12      | 22      | ND (0.1)   | ND (2)     | 52      | ---       |
|                             |                             | 09/18/08 | 2 - 3          | N           | 1.91                 | 64              | 18      | 21      | ND (0.1)   | ND (2)     | 61      | ---       |
|                             |                             | 09/18/08 | 5 - 6          | N           | ND (0.407)           | 30              | 18      | 3.3     | ND (0.1)   | ND (5.1)   | 60      | ---       |
|                             |                             | 09/18/08 | 5 - 6          | FD          | ND (0.407)           | 31              | 18      | 5.1     | ND (0.1)   | ND (5.1)   | 59      | ---       |
|                             |                             | 09/18/08 | 9 - 10         | N           | ND (0.408)           | 21              | 11      | 3.6     | ND (0.1) J | ND (2)     | 56      | ---       |

TABLE E-4

Constituent Concentrations

AOC 10 – East Ravine

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |                       |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)     | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|-----------------------|----------------|-------------|----------------------|-----------------|---------|---------|-------------|------------|---------|-----------|
|                             |                             |                       |                |             | 3.1                  | 145             | 145     | 36      | 1           | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date                  | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury     | Molybdenum | Zinc    | TEQ Human |
| AOC10d-4                    | AOC10 PAA #4                | 09/18/08              | 0 - 0.5        | N           | 0.92                 | 29              | 25      | 25      | ND (0.1)    | ND (5.2)   | 85      | ---       |
|                             |                             | 09/18/08              | 2 - 3          | N           | 3.93                 | 130             | 27      | 26      | ND (0.11)   | ND (2.1)   | 81      | ---       |
|                             |                             | 09/18/08              | 5 - 6          | N           | ND (0.415)           | 66              | 21      | 17      | ND (0.1)    | ND (2)     | 64      | ---       |
|                             |                             | 09/18/08              | 9 - 10         | N           | ND (0.41)            | 32              | 16      | 5.2     | ND (0.1) J  | ND (5.1)   | 68      | ---       |
| AOC10d-9                    |                             | 12/15/15              | 0 - 1          | N           | ND (0.2)             | 20              | 8.9     | 20      | ND (0.1)    | ND (1)     | 44      | 1.2       |
|                             |                             | 12/15/15              | 2 - 3          | N           | ND (0.21)            | 20              | 13      | 2.4     | ND (0.1)    | ND (1)     | 48      | 0.2       |
|                             |                             | 12/15/15              | 5 - 6          | N           | ND (0.21)            | 27              | 17      | 2.3     | ND (0.1)    | ND (1.1)   | 49      | 0.36      |
|                             |                             | 12/15/15              | 9 - 10         | N           | ND (0.21)            | 24              | 17      | 2.6     | ND (0.1)    | ND (1)     | 54      | ND (0.14) |
| AOC10-OS1                   |                             | 04/06/11              | 11 - 11.5      | N           | ND (0.4) J           | 43              | ---     | ---     | ---         | 5.9        | ---     | ---       |
| AOC10-OS2                   |                             | 04/06/11              | 5.5 - 6        | N           | 0.78 J               | 44              | ---     | ---     | ---         | 5.8        | ---     | ---       |
| AOC10-OS4                   |                             | 04/06/11              | 6.5 - 7        | N           | ND (0.41) J          | 170             | ---     | ---     | ---         | 13         | ---     | ---       |
| AOC10-XRF-01                |                             | 08/25/08              | 0 - 0.5        | N           | ND (0.404)           | 9.2             | ---     | ---     | ---         | ---        | ---     | ---       |
| AOC10-XRF-02                |                             | 08/25/08              | 0 - 0.5        | N           | ND (0.404)           | 11              | ---     | ---     | ---         | ---        | ---     | ---       |
| AOC10-XRF-03                |                             | 08/25/08              | 0 - 0.5        | N           | ND (0.405)           | 10              | ---     | ---     | ---         | ---        | ---     | ---       |
| AOC10-XRF-10                |                             | 09/21/08              | 3 - 4          | N           | ND (0.416)           | 26              | ---     | ---     | ---         | ---        | ---     | ---       |
| DTSC-AOC10d-1               |                             | 01/18/08 <sup>Q</sup> | 0              | N           | 31.5                 | 652             | 137     | 14.3    | ND (0.0193) | ND (2.5)   | 134     | ---       |
| DTSC-AOC10d-2               |                             | 01/18/08 <sup>Q</sup> | 0              | N           | 6.03                 | 243             | 66.5    | 13.1    | ND (0.0192) | ND (4.89)  | 147     | ---       |
| DTSC-AOC10d-3               |                             | 01/18/08 <sup>Q</sup> | 0              | N           | 4.38                 | 224             | 46.5    | 12      | ND (0.0198) | ND (4.65)  | 197     | ---       |
| MW-57BR                     |                             | 01/14/09              | 3 - 4          | N           | ND (0.16)            | 26              | 11      | 6.7     | ND (0.1)    | ND (2)     | 52      | ---       |
|                             |                             | 01/14/09              | 8 - 9          | N           | ND (0.17)            | 20              | 11      | 2.7     | ND (0.1)    | 1.3        | 46      | ---       |
|                             |                             | 01/14/09              | 8 - 9          | FD          | ND (0.16)            | 22              | 11      | 2.9     | ND (0.1)    | 1.3        | 48      | ---       |
|                             |                             | 01/14/09              | 18 - 19        | N           | ND (0.16)            | 25              | 12      | 4.3     | ND (0.1)    | 3          | 68      | ---       |
| MW-58BR_S                   | AOC10 PAA #2                | 01/29/09              | 1.5 - 2        | N           | 150                  | 4,000           | 300     | 160     | 0.33        | 3.5        | 300     | ---       |
|                             |                             | 01/29/09              | 19 - 20        | N           | 0.43                 | 33              | 24      | 4       | ND (0.11)   | ND (2.1)   | 63      | ---       |
|                             |                             | 01/29/09              | 29 - 30        | N           | ND (0.17)            | 26              | 14      | 3.6     | ND (0.11)   | ND (2.1)   | 64      | ---       |
|                             |                             | 01/29/09              | 39 - 40        | N           | 0.43                 | 35              | 17      | 4.2     | ND (0.11)   | ND (2.1)   | 51      | ---       |
|                             |                             | 01/29/09              | 49 - 50        | N           | ND (0.17)            | 24              | 17      | 3.7     | ND (0.11)   | ND (1.1)   | 46      | ---       |
|                             |                             | 01/29/09              | 59 - 60        | N           | ND (0.18)            | 27              | 58      | 3.4     | ND (0.11)   | ND (1.1)   | 41      | ---       |

TABLE E-4

Constituent Concentrations

AOC 10 – East Ravine

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| PA-06                       |                             | 11/09/15 | 0 - 1          | N           | 0.89                 | 30              | 15      | 5.2     | ND (0.1)   | ND (1)     | 74      | ---       |
| PA-18                       |                             | 01/27/16 | 0 - 1          | N           | 0.28                 | 65              | 64      | 47      | ND (0.1)   | 1.4        | 190     | 280       |
|                             |                             | 01/26/17 | 5 - 6          | N           | ---                  | ---             | ---     | ---     | ---        | ---        | ---     | 14        |
| PA-19                       | AOC10 PAA #1                | 01/27/16 | 0 - 1          | N           | ND (0.46)            | 34              | 160     | 30      | ND (0.12)  | 9.8        | 550     | 220       |
|                             |                             | 01/31/17 | 2 - 3          | N           | ---                  | ---             | ---     | ---     | ---        | ---        | ---     | 0.62      |
|                             |                             | 01/31/17 | 5 - 6          | N           | ---                  | ---             | ---     | ---     | ---        | ---        | ---     | 0.89      |
| PA-20                       | AOC10 PAA #1                | 01/27/16 | 0 - 1          | N           | 0.82 J               | 33              | 11      | 23      | ND (0.1)   | ND (1)     | 84      | 1,600     |
|                             |                             | 01/31/17 | 2 - 3          | N           | ---                  | ---             | ---     | ---     | ---        | ---        | ---     | 53        |
|                             |                             | 01/31/17 | 5 - 6          | N           | ---                  | ---             | ---     | ---     | ---        | ---        | ---     | 130       |
| PA-21                       | AOC10 PAA #1                | 01/27/16 | 0 - 1          | N           | ND (0.2)             | 49              | 26      | 32      | ND (0.1)   | 1.2        | 150     | 580       |
|                             |                             | 01/31/17 | 2 - 3          | N           | ---                  | ---             | ---     | ---     | ---        | ---        | ---     | 14        |
|                             |                             | 01/31/17 | 5 - 6          | N           | ---                  | ---             | ---     | ---     | ---        | ---        | ---     | 73        |
| SD-01                       |                             | 01/13/16 | 0 - 0.5        | N           | 0.24                 | 14              | 29      | 7.6     | ND (0.1)   | ND (1.1)   | 190     | ---       |
|                             |                             | 01/13/16 | 2 - 3          | N           | ND (0.22)            | 36              | 14      | 3.2     | ND (0.11)  | ND (1.1)   | 41      | ---       |
|                             |                             | 01/13/16 | 5 - 6          | N           | ND (0.22)            | 49              | 15      | 2.5     | ND (0.11)  | ND (1.1)   | 43      | ---       |
|                             |                             | 01/13/16 | 9 - 10         | N           | ND (0.21)            | 40              | 12      | 1.9     | ND (0.11)  | ND (1.1)   | 40      | ---       |
| SD-02                       | AOC10 PAA #1                | 11/10/15 | 0 - 1          | N           | 0.66                 | 26              | 16      | 29      | 0.17 J     | ND (1)     | 48      | ---       |
|                             |                             | 11/10/15 | 2 - 3          | N           | 11                   | 280             | 590     | 170     | 3.2        | 9.1        | 300     | ---       |
| SD-03                       | AOC10 PAA #1                | 11/10/15 | 0 - 1          | N           | 0.28                 | 12              | 7.3     | 9.7     | ND (0.099) | ND (1)     | 31      | ---       |
|                             |                             | 11/10/15 | 2 - 3          | N           | ND (0.2)             | 6.4             | 3.4     | 2.5     | ND (0.1)   | ND (1)     | 13      | ---       |
| SD-04                       | AOC10 PAA #1                | 11/10/15 | 0 - 1          | N           | ND (0.2)             | 10              | 5.1     | 2.7     | ND (0.1)   | ND (1)     | 22      | ---       |
|                             |                             | 11/10/15 | 2 - 3          | N           | ND (0.2)             | 8               | 4.4     | 2.5     | ND (0.1)   | ND (1)     | 19      | ---       |
| SD-05                       |                             | 11/10/15 | 0 - 1          | N           | ND (0.2)             | 13 J            | 9.2     | 13 J    | ND (0.1)   | 2.5        | 46      | ---       |
|                             |                             | 11/10/15 | 0 - 1          | FD          | ND (0.2)             | 19 J            | 10      | 37 J    | ND (0.1)   | 1.1        | 42      | ---       |
|                             |                             | 11/10/15 | 2 - 3          | N           | ND (0.21)            | 30              | 12      | 10      | ND (0.1)   | ND (1)     | 41      | ---       |
| SD-06                       |                             | 11/10/15 | 0 - 1          | N           | ND (0.2)             | 17              | 9.4     | 3.9     | ND (0.1)   | ND (1)     | 39      | ---       |
|                             |                             | 11/10/15 | 2 - 3          | N           | ND (0.2)             | 21              | 10      | 4.2     | ND (0.1)   | ND (1)     | 40      | ---       |
|                             |                             | 11/10/15 | 5 - 6          | N           | ND (0.21)            | 20              | 9.5     | 2.8     | ND (0.1)   | ND (1)     | 40      | ---       |

TABLE E-4

Constituent Concentrations

AOC 10 – East Ravine

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)  | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1        | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury  | Molybdenum | Zinc    | TEQ Human |
| SD-21                       |                             | 03/10/16 | 0 - 1          | N           | ND (0.2)             | 21              | 8.7     | 2.4     | ND (0.1) | ND (1)     | 44      | 1.3       |
|                             |                             | 03/10/16 | 2 - 3          | N           | 0.81                 | 31              | 10      | 4.5     | ND (0.1) | ND (1)     | 60      | 3         |
| SD-22                       |                             | 03/09/16 | 0 - 1          | N           | ND (0.21)            | 22              | 13      | 10      | ND (0.1) | ND (1)     | 61      | ---       |
|                             |                             | 03/09/16 | 2 - 3          | N           | ND (0.21)            | 27              | 10      | 4.7     | ND (0.1) | ND (1)     | 49      | ---       |
| Bank 1                      |                             | 03/07/03 | 0              | N           | ND (4)               | 21.5            | 13.7    | ---     | ---      | ---        | 55      | ---       |
| L-1                         |                             | 02/20/03 | 0              | N           | ND (4.1)             | 88.4            | 34.8    | ---     | ---      | ---        | 99.7    | ---       |
|                             |                             | 02/20/03 | 2              | N           | 2.5                  | 217             | 69.6    | ---     | ---      | ---        | 123     | ---       |
| L-2                         | AOC10 PAA #2                | 02/20/03 | 0              | N           | ND (4.7)             | 86.8            | 42.7    | ---     | ---      | ---        | 122     | ---       |
|                             |                             | 02/20/03 | 2              | N           | 13                   | 3,360           | 211     | ---     | ---      | ---        | 278     | ---       |
| L-2-2                       | AOC10 PAA #2                | 03/05/03 | - 2            | N           | 41                   | 1,610           | 139     | ---     | ---      | ---        | 203     | ---       |
| L-2-3                       | AOC10 PAA #2                | 03/05/03 | - 2            | N           | 99                   | 2,740           | 288     | ---     | ---      | ---        | 299     | ---       |
| L-3                         |                             | 02/20/03 | 0              | N           | ND (4.5)             | 28.4            | 22.7    | ---     | ---      | ---        | 74.3    | ---       |
|                             |                             | 02/20/03 | 1              | N           | 1.2 J                | 379             | 79.7    | ---     | ---      | ---        | 252     | ---       |
|                             |                             | 02/20/03 | 1.5            | N           | ND (4)               | 77.7            | 17.2    | ---     | ---      | ---        | 61.9    | ---       |
| L-3-2                       |                             | 03/05/03 | 0 - 0.5        | N           | 9.4                  | 228             | 40.5    | ---     | ---      | ---        | 129     | ---       |
| PS-21                       |                             | 04/13/99 | 0              | N           | 0.9                  | 16.5            | 14.2    | ---     | ---      | ---        | 43.9    | ---       |
|                             |                             | 04/13/99 | 2              | N           | ND (0.51)            | 90              | 12.6    | ---     | ---      | ---        | 59.1    | ---       |
| PS-22                       |                             | 04/13/99 | 0              | N           | ND (0.5)             | 24.7            | 11.4    | ---     | ---      | ---        | 85.3    | ---       |

**TABLE E-4**

## Constituent Concentrations

AOC 10 – East Ravine

*Soil Engineering Evaluation/Cost Analysis**PG&E Topock Compressor Station, Needles, California*

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**Notes:**

Results greater than or equal to the Removal Action Goal are circled.

|        |   |
|--------|---|
| Θ      | white powder sample.  |
| ---    | not analyzed  |
| FD     | field duplicate   |
| ft bgs | feet below ground surface   |
| J      | concentration or reporting limit estimated by laboratory or data validation |
| mg/kg  | milligrams per kilogram   |
| N      | primary sample  |
| ND     | not detected at the listed reporting limit                                  |
| ng/kg  | nanogram per kilogram   |
| TEQ    | dioxin and furans toxicity equivalent quotient                              |

TABLE E-5

Constituent Concentrations

AOC 11 – Topographic Low Areas

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)    |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|------------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100        |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human  |
| AOC11-4-OS6                 |                             | 06/11/14 | 0              | N           | 0.22                 | 18              | 9.2     | 7.2     | ND (0.1)   | ND (1)     | 39      | 7.1        |
| AOC11-4-OS5                 |                             | 06/11/14 | 0              | N           | ND (0.2)             | 21              | 12      | 6.4     | ND (0.1)   | ND (1)     | 43      | 13         |
| AOC11-4-OS4                 |                             | 06/11/14 | 0              | N           | ND (0.2)             | 16              | 9.6     | 3.5     | ND (0.1)   | ND (1)     | 40      | 0.51       |
| AOC11-4-OS3                 |                             | 06/11/14 | 0              | N           | ND (0.2)             | 14              | 8.6     | 5.3     | ND (0.099) | ND (1)     | 35      | 3.3        |
| AOC11-4-OS1                 |                             | 06/11/14 | 0              | N           | ND (0.2)             | 18 J            | 11 J    | 4.2 J   | ND (0.1)   | ND (1) J   | 47 J    | 0.44       |
| AOC11-4-OS4                 |                             | 06/11/14 | 2 - 3          | N           | ND (0.2)             | 14              | 8.6     | 3.2     | ND (0.1)   | ND (1)     | 37      | 0.38       |
| AOC11-4-OS6                 |                             | 06/11/14 | 2 - 3          | N           | ND (0.21)            | 20              | 7.7     | 3.2     | ND (0.11)  | ND (1.1)   | 36      | 1.9        |
| AOC11-4-OS5                 |                             | 06/11/14 | 2 - 3          | N           | ND (0.21)            | 18              | 9.3     | 5.4     | ND (0.1)   | ND (1)     | 36      | 17         |
| AOC11-4-OS3                 |                             | 06/11/14 | 2 - 3          | N           | 0.43                 | 18              | 7.3     | 6.4     | ND (0.1)   | ND (1)     | 30      | 11         |
| AOC11-4-OS1                 |                             | 06/11/14 | 2 - 3          | N           | ND (0.21)            | 16              | 11      | 3.5     | ND (0.11)  | ND (1.1)   | 41      | 0.51       |
| AOC11-4-OS3                 |                             | 06/11/14 | 2 - 3          | FD          | 0.43                 | 17              | 7.7     | 6.2     | ND (0.1)   | ND (1)     | 30      | 11         |
| AOC11-4-OS4                 |                             | 06/11/14 | 5 - 6          | N           | ND (0.21)            | 17              | 10      | 5.5     | ND (0.1)   | ND (1)     | 38      | 2.1        |
| AOC11-4-OS5                 |                             | 06/11/14 | 5 - 6          | FD          | ND (0.21)            | 20              | 8.9     | 5.6     | ND (0.1)   | ND (1)     | 40      | 11         |
| AOC11-1                     |                             | 01/05/16 | 0 - 1          | N           | ND (0.21)            | 11              | 9.7     | 7.8 J   | ND (0.1)   | ND (1)     | 67 J    | 0.24       |
|                             |                             | 01/05/16 | 0 - 1          | FD          | ND (0.21)            | 11              | 8.1     | 5.4 J   | ND (0.1)   | ND (1)     | 50 J    | ---        |
|                             |                             | 01/05/16 | 2 - 3          | N           | ND (0.21)            | 11              | 9.5     | 5.2     | ND (0.1)   | ND (1)     | 32      | ND (0.062) |
|                             |                             | 01/05/16 | 5 - 6          | N           | ND (0.24)            | 18              | 8.1     | 5.3     | ND (0.12)  | ND (1.2)   | 38      | ---        |
|                             |                             | 01/05/16 | 9 - 10         | N           | ND (0.28)            | 15              | 9.2     | 6.1     | ND (0.14)  | ND (1.4)   | 37      | ---        |
| AOC11-2                     |                             | 01/05/16 | 0 - 1          | N           | ND (0.21)            | 21              | 8.7     | 2.4     | ND (0.1)   | ND (1)     | 51      | 0.39       |
|                             |                             | 01/05/16 | 2 - 3          | N           | ND (0.21)            | 21              | 10      | 1.9     | ND (0.1)   | ND (1)     | 44      | 0.15       |
|                             |                             | 01/05/16 | 5 - 6          | N           | ND (0.21)            | 30              | 12      | 2.2     | ND (0.1)   | ND (1)     | 45      | 0.09       |
|                             |                             | 01/05/16 | 9 - 10         | N           | ND (0.21)            | 23 J            | 9.4     | 1.8     | ND (0.11)  | ND (1)     | 45      | ND (0.084) |
|                             |                             | 01/05/16 | 9 - 10         | FD          | ND (0.21)            | 17 J            | 12      | 2.7     | ND (0.1)   | ND (1)     | 46      | ND (0.1)   |
| AOC11-3                     |                             | 01/05/16 | 0 - 1          | N           | ND (0.2)             | 15              | 8       | 2.6     | ND (0.1)   | ND (1)     | 31      | 3.1        |
|                             |                             | 01/05/16 | 2 - 3          | N           | ND (0.21)            | 20              | 10      | 2.3     | ND (0.1)   | ND (1)     | 43      | 0.2        |
|                             |                             | 01/05/16 | 5 - 6          | N           | ND (0.21)            | 20              | 11      | 2.4     | ND (0.1)   | ND (1)     | 38      | 1.6        |
|                             |                             | 01/05/16 | 9 - 10         | N           | ND (0.21)            | 23              | 10      | 2.2     | ND (0.11)  | ND (1.1)   | 45      | 0.36       |
|                             |                             | 01/05/16 | 9 - 10         | FD          | ND (0.21)            | 14              | 7.7     | 1.8     | ND (0.1)   | ND (1.1)   | 34      | 0.23       |



TABLE E-5

## Constituent Concentrations

AOC 11 – Topographic Low Areas

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC11-4                     |                             | 01/05/16 | 0 - 1          | N           | ND (0.2)             | 25              | 9.1     | 4.1     | ND (0.1)   | 1.3        | 33      | 1.2       |
|                             |                             | 01/05/16 | 2 - 3          | N           | 1                    | 16              | 9       | 4.1     | ND (0.1)   | ND (1)     | 33      | 2.6       |
| AOC11-5                     |                             | 02/03/16 | 0 - 0.5        | N           | ND (0.25) J          | 27              | 22      | 14      | ND (0.13)  | ND (1.2)   | 70      | 30        |
|                             |                             | 02/03/16 | 2 - 3          | N           | ND (0.21) J          | 18              | 8.9     | 1.7     | ND (0.11)  | ND (1.1)   | 46      | 0.74      |
|                             |                             | 02/03/16 | 5 - 6          | N           | ND (0.21) J          | 25              | 10      | 1.7     | ND (0.1)   | ND (1)     | 48      | 0.23      |
|                             |                             | 02/03/16 | 9 - 10         | N           | ND (0.2) J           | 21              | 9.3     | 2       | ND (0.1)   | ND (1)     | 56      | 2         |
| AOC11-6                     |                             | 01/06/16 | 0 - 1          | N           | ND (0.22)            | 20              | 12      | 21      | ND (0.11)  | 1.7        | 67      | 0.74      |
|                             |                             | 01/06/16 | 2 - 3          | N           | ND (0.2)             | 20              | 9.5     | 24      | ND (0.1)   | ND (1)     | 62      | 0.46      |
|                             |                             | 01/06/16 | 5 - 6          | N           | ND (0.21)            | 25              | 10      | 2.4     | ND (0.1)   | ND (1)     | 59      | ---       |
|                             |                             | 01/06/16 | 9 - 10         | N           | ND (0.21)            | 14              | 9.1     | 6.1     | ND (0.1)   | ND (1)     | 79      | ---       |
| AOC11-7                     |                             | 01/06/16 | 0 - 1          | N           | ND (0.22)            | 11              | 8       | 220     | ND (0.11)  | ND (1.1)   | 40      | 3.3       |
|                             |                             | 01/06/16 | 2 - 3          | N           | 0.52                 | 15              | 11      | 30      | ND (0.1)   | ND (1)     | 70      | 0.84      |
|                             |                             | 01/06/16 | 5 - 6          | N           | ND (0.2)             | 15              | 7.5     | 8.5     | ND (0.1)   | ND (1)     | 79      | ---       |
| AOC11-8                     |                             | 12/06/15 | 0 - 1          | N           | ND (0.2)             | 12              | 9.3     | 26      | ND (0.1)   | ND (1)     | 43      | 0.91      |
|                             |                             | 12/06/15 | 2 - 3          | N           | ND (0.2)             | 9.6             | 8.1     | 28      | ND (0.1)   | ND (1)     | 45      | 0.63      |
| AOC11-9                     |                             | 12/06/15 | 0 - 1          | N           | ND (0.2)             | 9.6             | 7.5     | 23      | ND (0.1)   | ND (1)     | 61      | 1.1       |
|                             |                             | 12/06/15 | 2 - 3          | N           | ND (0.2)             | 11              | 8.6     | 13      | ND (0.1)   | ND (1)     | 63      | 0.32      |
| AOC11a-1                    |                             | 09/21/08 | 0 - 0.5        | N           | ND (0.403)           | 19              | 12      | 9.9     | ND (0.1)   | ND (2)     | 46      | ---       |
|                             |                             | 09/21/08 | 2 - 3          | N           | ND (0.411)           | 23              | 14      | 20      | ND (0.1)   | ND (2.1)   | 58      | ---       |
|                             |                             | 09/21/08 | 5 - 6          | N           | ND (0.41)            | 22              | 9       | 4.7     | ND (0.1)   | ND (1)     | 44      | ---       |
|                             |                             | 09/21/08 | 9 - 10         | N           | 3                    | 19              | 10      | 9.2     | ND (0.1) J | ND (2)     | 44      | ---       |
| AOC11a-2                    |                             | 09/21/08 | 0 - 0.5        | N           | 0.417                | 32              | 20      | 15      | ND (0.11)  | ND (2.1)   | 75      | ---       |
|                             |                             | 09/21/08 | 2 - 3          | N           | ND (0.413)           | 19              | 10      | 7.7     | ND (0.11)  | ND (2.1)   | 42      | ---       |
|                             |                             | 09/21/08 | 5 - 6          | N           | ND (0.408)           | 25              | 14      | 3.4     | ND (0.1)   | ND (2)     | 56      | ---       |
|                             |                             | 09/21/08 | 9 - 10         | N           | ND (0.412)           | 19              | 6.5     | 2.2     | ND (0.1) J | 1          | 47      | ---       |

TABLE E-5

Constituent Concentrations

AOC 11 – Topographic Low Areas

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC11a-3                    |                             | 09/20/08 | 0 - 0.5        | N           | ND (0.411)           | 22              | 16      | 13      | ND (0.1)   | ND (2)     | 62      | 42        |
|                             |                             | 09/20/08 | 2 - 3          | N           | ND (0.423)           | 24              | 14      | 17      | ND (0.1)   | 2.2        | 63      | 25        |
|                             |                             | 09/20/08 | 2 - 3          | FD          | ND (0.418)           | 24              | 14      | 16      | ND (0.1)   | 2.4        | 61      | ---       |
|                             |                             | 09/20/08 | 5 - 6          | N           | 0.634                | 76              | 15      | 25      | ND (0.1)   | ND (2.1)   | 75      | 150       |
|                             |                             | 09/20/08 | 9 - 10         | N           | ND (0.407)           | 23              | 11      | 2.9     | ND (0.1) J | 1.1        | 48      | 0.4       |
| AOC11a-4                    |                             | 09/20/08 | 0 - 0.5        | N           | ND (0.409)           | 25              | 18      | 17      | ND (0.1)   | ND (2)     | 79      | ---       |
|                             |                             | 09/20/08 | 2 - 3          | N           | ND (0.41)            | 27              | 13      | 8       | ND (0.1)   | ND (2)     | 52      | ---       |
|                             |                             | 09/20/08 | 5 - 6          | N           | ND (0.407) J         | 25              | 11      | 3.7     | ND (0.1)   | ND (2)     | 54      | ---       |
|                             |                             | 09/20/08 | 9 - 10         | N           | ND (0.41)            | 27              | 14      | 3.5     | ND (0.1) J | ND (2)     | 59      | ---       |
| AOC11a-5                    |                             | 09/21/08 | 0 - 0.5        | N           | 0.652                | 32              | 17      | 14      | ND (0.1)   | ND (2.1)   | 71      | 72        |
|                             |                             | 09/21/08 | 2 - 3          | N           | ND (0.412)           | 30              | 12      | 9.4     | ND (0.1)   | 2.5        | 57      | 19        |
|                             |                             | 09/21/08 | 5 - 6          | N           | ND (0.411)           | 18              | 9.2     | 3       | ND (0.1)   | 1.5        | 53      | 0.24      |
|                             |                             | 09/21/08 | 5 - 6          | FD          | ND (0.412)           | 18              | 9.6     | 3.1     | ND (0.1)   | 1.6        | 51      | ---       |
|                             |                             | 09/21/08 | 9 - 10         | N           | ND (0.415)           | 24              | 9.8     | 3.1     | ND (0.1) J | 2.5        | 62      | ND (0.68) |
| AOC11a-SS-1                 |                             | 09/21/08 | 0 - 0.5        | N           | ND (0.402)           | 13              | 9.4     | 5.6     | ND (0.1) J | 1.1        | 54      | 0.63      |
|                             |                             | 09/21/08 | 2 - 3          | N           | ND (0.404)           | 19              | 8.9     | 6       | ND (0.1) J | ND (2)     | 48      | 2.5       |
|                             |                             | 09/21/08 | 5 - 6          | N           | ND (0.408)           | 16              | 7.6     | 3       | ND (0.1) J | ND (1)     | 42      | 0.26      |
|                             |                             | 09/21/08 | 9 - 10         | N           | ND (0.414)           | 13              | 7       | 3       | ND (0.1) J | ND (1)     | 40      | ---       |
| AOC11a-SS-2                 |                             | 09/21/08 | 0 - 0.5        | N           | ND (0.414)           | 15              | 8.1     | 7.1     | ND (0.1) J | ND (1)     | 42      | ---       |
|                             |                             | 09/21/08 | 2 - 3          | N           | ND (0.402)           | 19              | 15      | 5.9     | ND (0.1) J | ND (1)     | 53      | ---       |
| AOC11a-SS-3                 |                             | 09/20/08 | 0 - 0.5        | N           | 0.622                | 29              | 17      | 16      | ND (0.1) J | ND (2)     | 73      | 53        |
|                             |                             | 09/20/08 | 2 - 3          | N           | ND (0.409)           | 27              | 15      | 5.7     | ND (0.1) J | ND (2)     | 57      | ---       |
|                             |                             | 09/20/08 | 5 - 6          | N           | ND (0.412)           | 19              | 9.5     | 3.7     | ND (0.1) J | 1.1        | 46      | 0.28      |
|                             |                             | 09/20/08 | 9 - 10         | N           | ND (0.413)           | 24              | 11      | 3       | ND (0.1) J | 1.4        | 48      | ---       |

TABLE E-5

Constituent Concentrations

AOC 11 – Topographic Low Areas

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC11b-1                    |                             | 09/17/08 | 0 - 0.5        | N           | ND (0.402)           | 27              | 16      | 25      | ND (0.1)   | ND (5)     | 71      | 0.36      |
|                             |                             | 09/17/08 | 0 - 0.5        | FD          | 0.553                | 25              | 15      | 12      | ND (0.1)   | ND (5)     | 68      | ---       |
|                             |                             | 09/17/08 | 2 - 3          | N           | ND (0.404)           | 17              | 7       | 8.2     | ND (0.1)   | ND (2)     | 28      | 2.7       |
|                             |                             | 09/17/08 | 5 - 6          | N           | ND (0.411)           | 21              | 15      | 22      | ND (0.1)   | ND (2)     | 72      | 3.8       |
|                             |                             | 09/17/08 | 9 - 10         | N           | ND (0.411)           | 20              | 13      | 13      | ND (0.1) J | ND (2.1)   | 65      | ---       |
| AOC11b-2                    |                             | 09/17/08 | 0 - 0.5        | N           | 0.645                | 21              | 13      | 45      | ND (0.1)   | ND (2)     | 76      | ---       |
|                             |                             | 09/17/08 | 2 - 3          | N           | ND (0.41)            | 32              | 15      | 7.6     | ND (0.1)   | ND (5.1)   | 74      | ---       |
|                             |                             | 09/17/08 | 5 - 6          | N           | ND (0.411)           | 24              | 14      | 5.9     | ND (0.1)   | ND (5.1)   | 75      | ---       |
|                             |                             | 09/17/08 | 9 - 10         | N           | ND (0.407)           | 24              | 15      | 8.2     | ND (0.1) J | ND (5.1)   | 86      | ---       |
| AOC11c-1                    |                             | 09/21/08 | 0 - 0.5        | N           | ND (0.4)             | 26              | 9.7     | 30      | ND (0.098) | 2.7        | 47      | ---       |
|                             |                             | 09/22/08 | 2 - 3          | N           | 2.03                 | 64              | 20      | 26      | ND (0.11)  | 2.1        | 110     | ---       |
|                             |                             | 09/22/08 | 2 - 3          | FD          | 1.47                 | 63              | 19      | 25      | ND (0.11)  | 2.3        | 110     | ---       |
|                             |                             | 09/22/08 | 5 - 6          | N           | 2.03                 | 64              | 20      | 24      | ND (0.1)   | ND (2.1)   | 110     | ---       |
|                             |                             | 09/22/08 | 9 - 10         | N           | 3.33                 | 130             | 17      | 11      | ND (0.1) J | ND (2)     | 62      | ---       |
| AOC11c-2                    |                             | 09/21/08 | 0 - 0.5        | N           | 0.744                | 26              | 12      | 11      | ND (0.1)   | ND (2)     | 52      | ---       |
|                             |                             | 09/22/08 | 2 - 3          | N           | 2.74                 | 81              | 21      | 28      | ND (0.11)  | 2.7        | 130     | ---       |
|                             |                             | 09/22/08 | 5 - 6          | N           | 1.3                  | 56              | 16      | 18      | ND (0.11)  | ND (2.1)   | 93      | ---       |
|                             |                             | 09/22/08 | 9 - 10         | N           | 2.05                 | 70              | 16      | 10      | ND (0.1) J | ND (2)     | 70      | ---       |
| AOC11C-3                    |                             | 02/03/16 | 14 - 15        | N           | 0.67 J               | 18              | 8.4     | 2.2     | ND (0.1)   | ND (1.1)   | 42      | ---       |
|                             |                             | 02/03/16 | 19 - 20        | N           | ND (0.21) J          | 17              | 9.7     | 1.6     | ND (0.1)   | ND (1)     | 42      | ---       |
|                             |                             | 02/03/16 | 29 - 30        | N           | ND (0.2) J           | 27              | 14      | ND (1)  | ND (0.1)   | ND (1)     | 39      | ---       |
| AOC11c-4                    |                             | 01/28/16 | 0 - 1          | N           | 0.38                 | 16              | 7.4     | 3.1     | ND (0.1)   | ND (1)     | 31      | 18        |
|                             |                             | 01/28/16 | 2 - 3          | N           | ND (0.2)             | 12              | 9.2     | 1.8     | ND (0.1)   | ND (1)     | 34      | 0.93      |
|                             |                             | 01/28/16 | 5 - 6          | N           | ND (0.2)             | 13              | 8.9     | 2.5     | ND (0.1)   | ND (1)     | 62      | 1.6       |
|                             |                             | 01/28/16 | 9 - 10         | N           | ND (0.2)             | 18              | 8.4     | 1.7     | ND (0.1)   | ND (1)     | 67      | ---       |
|                             |                             | 01/28/16 | 9 - 10         | FD          | ND (0.2)             | 16              | 7.7     | 1.5     | ND (0.1)   | ND (1)     | 63      | ---       |
|                             |                             | 02/02/16 | 14 - 15        | N           | 0.25                 | 21              | 7.8     | ND (1)  | ND (0.1)   | ND (1)     | 38      | ---       |
|                             |                             | 02/02/16 | 19 - 20        | N           | ND (0.2)             | 17              | 8.1     | 1.1     | ND (0.1)   | ND (1)     | 37      | ---       |

TABLE E-5

Constituent Concentrations

AOC 11 – Topographic Low Areas

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)     | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1           | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury     | Molybdenum | Zinc    | TEQ Human |
| AOC11c-SS-1                 |                             | 09/21/08 | 0 - 0.5        | N           | ND (0.401)           | 12              | 5.2     | 6.8     | ND (0.1) J  | ND (1)     | 23      | ---       |
|                             |                             | 09/22/08 | 2 - 3          | N           | ND (0.403)           | 16              | 11      | 5.5     | ND (0.1) J  | ND (1)     | 30      | ---       |
|                             |                             | 09/22/08 | 5 - 6          | N           | 1.14                 | 37              | 13      | 11      | ND (0.1) J  | 2.9        | 57      | ---       |
|                             |                             | 09/22/08 | 9 - 10         | N           | ND (0.408)           | 19              | 6.2     | 5       | ND (0.1) J  | ND (2)     | 31      | ---       |
| AOC11c-SS-2                 |                             | 09/22/08 | 0 - 0.5        | N           | ND (0.401)           | 14              | 4.9     | 8       | ND (0.1) J  | ND (1)     | 25      | ---       |
|                             |                             | 09/22/08 | 2 - 3          | N           | ND (0.402)           | 16              | 4.9     | 6.5     | ND (0.1) J  | ND (1)     | 30      | ---       |
|                             |                             | 09/22/08 | 5 - 6          | N           | 7.78                 | 32              | 11      | 8.9     | ND (0.1) J  | ND (1)     | 54      | ---       |
|                             |                             | 09/22/08 | 9 - 10         | N           | 2.06                 | 73              | 30      | 8.6     | ND (0.1) J  | ND (1)     | 290     | ---       |
| AOC11d-1                    |                             | 09/23/08 | 0 - 0.5        | N           | 0.677                | 31              | 19      | 16      | ND (0.1)    | ND (2.1)   | 73      | 7.2       |
|                             |                             | 09/23/08 | 0 - 0.5        | FD          | 0.628                | 33              | 20      | 14      | ND (0.1)    | ND (2)     | 76      | ---       |
|                             |                             | 09/23/08 | 2.5 - 3        | N           | ND (0.414)           | 24              | 12      | 4.8     | ND (0.1)    | 1.2        | 48      | 0.63      |
|                             |                             | 09/23/08 | 5 - 6          | N           | ND (0.416)           | 29              | 12      | 5       | ND (0.1)    | ND (2.1)   | 52      | 0.36      |
|                             |                             | 09/23/08 | 9 - 10         | N           | 0.659                | 28              | 11      | 9.3     | ND (0.1) J  | ND (2.1)   | 49      | ---       |
| AOC11e-1                    | AOC11 PAA #1                | 09/23/08 | 0 - 0.5        | N           | 0.959                | 43              | 10      | 10      | ND (0.098)  | ND (2)     | 54      | 160       |
|                             |                             | 09/23/08 | 2.5 - 3        | N           | 3.19                 | 92              | 41      | 9       | ND (0.1)    | ND (1)     | 170     | 3,200     |
|                             |                             | 09/23/08 | 5.5 - 6        | N           | 0.961                | 48              | 17      | 6.4     | ND (0.1)    | ND (1)     | 59      | ---       |
|                             |                             | 09/23/08 | 9.5 - 10       | N           | 3.2                  | 84              | 31      | 13      | ND (0.1) J  | ND (1)     | 140     | ---       |
| AOC11e-2                    | AOC11 PAA #1                | 09/24/08 | 0 - 0.5        | N           | 1.4                  | 37              | 12      | 28      | ND (0.1)    | 1.1        | 160     | 120       |
|                             |                             | 09/24/08 | 2 - 3          | N           | 3.78                 | 130             | 19      | 11      | ND (0.099)  | 2.6        | 130     | 700       |
|                             |                             | 09/24/08 | 2 - 3          | FD          | 3.51                 | 130             | 18      | 11      | ND (0.11)   | 2.9        | 120     | ---       |
|                             |                             | 09/24/08 | 5 - 6          | N           | 2.25                 | 98              | 30      | 9.6     | ND (0.1)    | 1.3        | 150     | 1,800     |
|                             |                             | 09/24/08 | 9 - 10         | N           | ND (0.436)           | 36              | 19      | 4.6     | ND (0.11) J | ND (2.1)   | 53      | 450       |
| AOC11e-3                    |                             | 01/08/16 | 0 - 1          | N           | 2.3 J                | 16              | 6.3     | 5.9     | ND (0.1)    | ND (1)     | 24      | 7.8       |
|                             |                             | 01/08/16 | 0 - 1          | FD          | 0.44 J               | 17              | 6.5     | 5.5     | ND (0.1)    | ND (1)     | 27      | ---       |
|                             |                             | 01/10/16 | 2 - 3          | N           | ND (0.2)             | 11              | 6.7     | 3.6     | ND (0.1)    | ND (1)     | 21      | 3.3       |
|                             |                             | 01/10/16 | 5 - 6          | N           | ND (0.22)            | 19              | 7.5     | 4.5     | ND (0.11)   | ND (1.1)   | 29      | 1.6       |
|                             |                             | 01/10/16 | 9 - 10         | N           | ND (0.21)            | 12              | 6.9     | 4.4     | ND (0.1)    | ND (1)     | 25      | 2.5       |
|                             |                             | 01/10/16 | 13 - 14        | N           | ND (0.2)             | 11              | 5.9     | 3.3     | ND (0.1)    | ND (1)     | 35      | ---       |

TABLE E-5

Constituent Concentrations

AOC 11 – Topographic Low Areas

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)     | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1           | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury     | Molybdenum | Zinc    | TEQ Human |
| AOC11e-4                    | AOC11 PAA #1                | 01/28/16 | 0 - 1          | N           | 1.2                  | 16              | 7.4     | 4.3     | ND (0.1)    | ND (1)     | 33      | 14        |
|                             |                             | 01/28/16 | 2 - 3          | N           | 2.1                  | 32              | 9       | 7       | ND (0.1)    | ND (1)     | 42      | 940       |
|                             |                             | 01/28/16 | 5 - 6          | N           | 0.74                 | 27              | 22      | 3.5     | ND (0.1)    | ND (1.1)   | 76      | 250       |
|                             |                             | 01/28/16 | 14 - 15        | N           | ND (0.2)             | 17              | 22      | 1.7     | ND (0.1)    | ND (1)     | 35      | ---       |
| AOC11e-5                    | AOC11 PAA #1                | 01/19/16 | 14 - 15        | N           | ND (0.21)            | 34 J            | 21 J    | 2       | ND (0.11)   | ND (1.1)   | 48 J    | ---       |
|                             |                             | 01/19/16 | 19 - 20        | N           | ND (0.21)            | 40              | 16      | 2.4     | ND (0.1)    | 1.5        | 38      | ---       |
|                             |                             | 01/19/16 | 29 - 30        | N           | ND (0.21)            | 18              | 11      | 1.7     | ND (0.1)    | ND (1.1)   | 34      | ---       |
|                             |                             | 01/19/16 | 39 - 40        | N           | ND (0.21)            | 30              | 8.3     | 2       | ND (0.11)   | ND (1.1)   | 38      | ---       |
|                             |                             | 01/20/16 | 49 - 50        | N           | ND (0.21)            | 17              | 11      | 1.4     | ND (0.1)    | ND (1)     | 36      | ---       |
|                             |                             | 01/21/16 | 59 - 60        | N           | ND (0.21)            | 25              | 12      | 2       | ND (0.1)    | ND (1.1)   | 45      | ---       |
|                             |                             | 01/21/16 | 69 - 70        | N           | ND (0.22)            | 24              | 12      | 2.8     | ND (0.11)   | ND (1.1)   | 47      | ---       |
| AOC11e-6                    |                             | 12/03/15 | 0 - 1          | N           | 16                   | 320             | 12      | 8.4     | ND (0.1)    | 1.6        | 37      | 4.5       |
| AOC11e-SS-1                 |                             | 09/23/08 | 0 - 0.5        | N           | 0.698                | 20              | 8.7     | 8.6     | ND (0.1) J  | ND (1)     | 35 J    | ---       |
|                             |                             | 09/23/08 | 2.5 - 3        | N           | ND (0.411)           | 21              | 7.7     | 4.8     | ND (0.1) J  | ND (1)     | 27      | ---       |
|                             |                             | 09/23/08 | 5.5 - 6        | N           | ND (0.407)           | 9.2             | 5.1     | 5.2     | ND (0.1) J  | ND (1)     | 20      | ---       |
|                             |                             | 09/23/08 | 9.5 - 10       | N           | ND (0.407)           | 10              | 10      | 5.4     | ND (0.1) J  | ND (1)     | 19      | ---       |
| AOC11e-SS-2                 |                             | 09/23/08 | 0 - 0.5        | N           | 1.38                 | 28              | 8.1     | 9.5     | ND (0.1) J  | ND (1)     | 39      | ---       |
|                             |                             | 09/23/08 | 2.5 - 3        | N           | 0.438                | 21              | 9.7     | 7.4     | ND (0.1) J  | ND (2)     | 35      | ---       |
|                             |                             | 09/23/08 | 5.5 - 6        | N           | 0.466                | 26              | 10      | 5.1     | ND (0.1) J  | ND (1)     | 39      | ---       |
|                             |                             | 09/23/08 | 5.5 - 6        | FD          | 0.437                | 27              | 9.6     | 5.5     | ND (0.1) J  | ND (1)     | 37      | ---       |
|                             |                             | 09/23/08 | 9.5 - 10       | N           | 0.5                  | 21              | 11      | 3.8     | ND (0.11) J | ND (1.1)   | 37      | ---       |
| AOC11g-OS1                  |                             | 04/06/11 | 8.5 - 9        | N           | ND (0.4) J           | 26              | 11      | 4.1     | ND (0.1) J  | 7.1        | 61      | ---       |
| PA-07                       |                             | 11/09/15 | 0 - 1          | N           | 1.9                  | 66              | 19      | 17      | ND (0.1)    | 1.3        | 170     | ---       |
| PA-09                       |                             | 01/27/16 | 0 - 1          | N           | ND (0.2)             | 21              | 13      | 150     | 0.18        | ND (1)     | 130     | 15        |
| PA-10                       |                             | 01/27/16 | 0 - 1          | N           | 0.95                 | 40              | 24      | 56      | ND (0.1)    | ND (1)     | 190     | 140       |
|                             |                             | 01/26/17 | 2 - 3          | N           | ---                  | ---             | ---     | ---     | ---         | ---        | ---     | 0.38      |
|                             |                             | 01/26/17 | 5 - 6          | N           | ---                  | ---             | ---     | ---     | ---         | ---        | ---     | 0.38      |

TABLE E-5

Constituent Concentrations

AOC 11 – Topographic Low Areas

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| PA-11                       |                             | 01/27/16 | 0 - 1          | N           | 0.35                 | 63              | 23      | 28      | ND (0.1)   | 3.3        | 300     | 120       |
|                             |                             | 01/25/17 | 2 - 3          | N           | ---                  | 10              | 7.1     | 4.7     | ND (0.1)   | ND (1)     | 29      | 2.1       |
|                             |                             | 01/25/17 | 2 - 3          | FD          | ---                  | 10              | 6.9     | 3.7     | ND (0.1)   | ND (1)     | 24      | ---       |
|                             |                             | 01/25/17 | 5 - 6          | N           | ---                  | ---             | ---     | ---     | ---        | ---        | ---     | 82        |
| PA-12                       |                             | 01/27/16 | 0 - 1          | N           | 0.56                 | 50              | 31      | 12      | ND (0.1)   | 3.1        | 130     | 520       |
|                             |                             | 01/25/17 | 2 - 3          | N           | ---                  | 13              | 9.7     | 5.7     | ND (0.1)   | ND (1)     | 37 J    | 1.7       |
|                             |                             | 01/25/17 | 5 - 6          | N           | ---                  | ---             | ---     | ---     | ---        | ---        | ---     | 10        |
| SD-08                       |                             | 11/11/15 | 0 - 1          | N           | ND (0.2)             | 9.2 J           | 6       | 5.3 J   | ND (0.1)   | ND (1)     | 31      | ---       |
|                             |                             | 11/11/15 | 0 - 1          | FD          | 0.26                 | 12 J            | 13      | 6.8 J   | ND (0.1)   | ND (1)     | 37      | ---       |
|                             |                             | 11/11/15 | 2 - 3          | N           | 2.7                  | 34              | 35      | 7.8     | ND (0.1)   | ND (1)     | 97      | ---       |
| SD-09                       |                             | 11/10/15 | 0 - 1          | N           | ND (0.21)            | 11              | 6.4     | 3.8     | ND (0.11)  | ND (1)     | 25      | ---       |
|                             |                             | 11/10/15 | 2 - 3          | N           | ND (0.21)            | 11              | 5.6     | 3.1     | ND (0.1)   | ND (1.1)   | 21      | ---       |
|                             |                             | 11/10/15 | 5 - 6          | N           | ND (0.21)            | 12              | 7.1     | 4.3     | ND (0.1)   | ND (1.1)   | 24      | ---       |
| SD-10                       |                             | 11/10/15 | 0 - 1          | N           | ND (0.2)             | 7.9             | 6.7     | 6.1     | ND (0.1)   | ND (1)     | 36      | ---       |
|                             |                             | 11/10/15 | 2 - 3          | N           | 1.4                  | 27              | 9       | 16      | 0.37       | ND (1)     | 180     | ---       |
| SD-11                       |                             | 12/06/15 | 0 - 0.5        | N           | ND (0.2)             | 38              | 14      | 22      | ND (0.1)   | ND (1)     | 1,100   | ---       |
|                             |                             | 12/06/15 | 2 - 3          | N           | 1                    | 21              | 10      | 6.2     | ND (0.1)   | ND (1)     | 42      | ---       |
| SD-11A                      |                             | 03/07/16 | 0 - 1          | N           | 0.51                 | 110             | 19      | 20      | ND (0.1)   | ND (1)     | 170     | 140       |
|                             |                             | 03/07/16 | 2 - 3          | N           | 0.63                 | 90              | 44      | 36      | ND (0.1)   | ND (1)     | 310     | 130 JPB   |
|                             |                             | 03/07/16 | 5 - 6          | N           | 0.79                 | 23              | 11      | 11      | ND (0.1)   | ND (1)     | 88      | 67        |
| SD-12                       |                             | 11/10/15 | 0 - 1          | N           | ND (0.2)             | 8.1             | 5.1     | 7.2     | ND (0.1)   | ND (1)     | 38      | ---       |
|                             |                             | 11/10/15 | 2 - 3          | N           | 0.51                 | 16              | 8.9     | 4.1     | ND (0.1)   | ND (1)     | 27      | ---       |
| SD-13                       |                             | 11/10/15 | 0 - 1          | N           | 0.92                 | 33              | 7.8     | 3.6     | ND (0.1)   | ND (1)     | 30      | ---       |
|                             |                             | 11/10/15 | 2 - 3          | N           | 0.34                 | 25              | 9.4     | 3       | ND (0.11)  | ND (1.1)   | 40      | ---       |
| SD-20                       |                             | 11/11/15 | 0 - 1          | N           | 0.5                  | 18 J            | 7.1     | 5.3     | ND (0.1)   | ND (1)     | 48 J    | ---       |
|                             |                             | 11/11/15 | 0 - 1          | FD          | 0.61                 | 14 J            | 7.3     | 4.6     | ND (0.099) | ND (1)     | 71 J    | ---       |
|                             |                             | 11/11/15 | 2 - 3          | N           | ND (0.2)             | 8.9             | 4.3     | 2.7     | ND (0.1)   | ND (1)     | 17      | ---       |

TABLE E-5

Constituent Concentrations

AOC 11 – Topographic Low Areas

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| SD-23                       |                             | 03/09/16 | 0 - 1          | N           | 0.27                 | 19              | 11      | 5.6     | ND (0.11) | ND (1.1)   | 87      | 14        |
|                             |                             | 03/09/16 | 2 - 3          | N           | ND (0.22)            | 31              | 14      | 3       | ND (0.11) | ND (1.1)   | 39      | ---       |
| SD-27                       |                             | 02/15/17 | 2 - 3          | N           | ND (0.21)            | 20              | 9       | ND (1)  | ND (0.1)  | ND (1)     | 34      | 0.96      |
| SD-OS37                     |                             | 11/30/16 | 0 - 0.5        | N           | 0.41                 | 35              | 21      | 36      | ND (0.1)  | ND (1)     | 92      | ---       |
|                             |                             | 11/30/16 | 3 - 3.5        | N           | 0.24                 | 16              | 9.4     | 5.4     | ND (0.1)  | 2.7        | 24      | ---       |
|                             |                             | 11/30/16 | 5 - 5.5        | N           | ND (0.2)             | 14              | 7.4     | 3.3     | ND (0.1)  | ND (1)     | 20      | ---       |

**Notes:**

Results greater than or equal to the Removal Action Goal are circled.

|        |  |
|--------|--|
| ---    | not analyzed   |
| FD     | field duplicate  |
| ft bgs | feet below ground surface  |
| J      | concentration or reporting limit estimated by laboratory or data validation                                  |
| JR     | estimated value, one or more input values is "R" qualified   |
| mg/kg  | milligrams per kilogram  |
| N      | primary sample   |
| ND     | not detected at the listed reporting limit   |
| ng/kg  | nanogram per kilogram  |
| R      | The result has been rejected; identification and/or quantitation could not be verified because critical QC s |
| TEQ    | dioxin and furans toxicity equivalent quotient   |



TABLE E-6

Constituent Concentrations

AOC 14 – Railroad Debris Area

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |                       |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg)  | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|-----------------------|----------------|-------------|----------------------|-----------------|---------|----------|------------|------------|---------|-----------|
|                             |                             |                       |                |             | 3.1                  | 145             | 145     | 36       | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date                  | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead     | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC14-1                     |                             | 09/30/08              | 0 - 0.5        | N           | 0.841                | 25              | 11      | 18       | ND (0.1)   | ND (2)     | 70      | ---       |
|                             |                             | 09/30/08              | 2 - 3          | N           | ND (0.412)           | 25              | 8.5     | 8.7      | ND (0.1)   | ND (2)     | 47      | ---       |
|                             |                             | 09/30/08              | 5 - 6          | N           | ND (0.412)           | 27              | 9.5     | 2.3      | ND (0.1)   | 1.6        | 38      | ---       |
|                             |                             | 09/30/08              | 9 - 10         | N           | ND (0.403)           | 17              | 8.2     | 2.7      | ND (0.099) | ND (1)     | 34      | ---       |
|                             |                             | 09/30/08              | 14 - 15        | N           | ND (0.412)           | 18              | 12      | 2.1      | ND (0.1)   | ND (1)     | 34      | ---       |
| AOC14-2                     |                             | 09/30/08              | 0 - 0.5        | N           | 0.768                | 28              | 44      | 18       | ND (0.1)   | ND (2)     | 49      | ---       |
|                             |                             | 09/30/08              | 2 - 3          | N           | 1.04                 | 42              | ND (21) | 7.6      | ND (0.11)  | ND (11)    | 34      | ---       |
|                             |                             | 10/01/08 <sup>Q</sup> | 3 - 3.25       | N           | 2.16                 | 26              | ND (23) | ND (1.1) | ND (0.11)  | ND (11)    | ND (11) | ---       |
|                             |                             | 09/30/08              | 5 - 6          | N           | 1.32                 | 42              | 19      | 21       | ND (0.11)  | ND (5.2)   | 51      | ---       |
|                             |                             | 09/30/08              | 9 - 10         | N           | ND (0.405)           | 21              | 16 J    | 1.8      | ND (0.1)   | ND (1)     | 40      | ---       |
|                             |                             | 09/30/08              | 9 - 10         | FD          | ND (0.404)           | 21              | 11 J    | 1.9      | ND (0.1)   | ND (1)     | 41      | ---       |
|                             |                             | 09/30/08              | 14 - 15        | N           | ND (0.407)           | 15              | 9.1     | 2.1      | ND (0.1)   | ND (1)     | 35      | ---       |
| AOC14-3                     |                             | 10/01/08              | 0 - 0.5        | N           | ND (0.403)           | 31              | 12      | 8.4      | ND (0.1)   | 1.6        | 52      | ---       |
|                             |                             | 10/01/08              | 2 - 3          | N           | ND (0.405)           | 26              | 13      | 6.4      | ND (0.1)   | ND (1)     | 46      | ---       |
|                             |                             | 10/01/08              | 5 - 6          | N           | 0.877                | 32              | 11      | 9        | ND (0.1)   | 2.1        | 40      | ---       |
|                             |                             | 10/01/08              | 9 - 10         | N           | ND (0.404)           | 19              | 7.1     | 2        | ND (0.1)   | ND (1)     | 33      | ---       |
|                             |                             | 10/01/08              | 14 - 15        | N           | ND (0.403)           | 17              | 12      | 2.2      | ND (0.1)   | ND (1)     | 32      | ---       |
| AOC14-4                     |                             | 10/01/08              | 0 - 0.5        | N           | ND (0.402)           | 13              | 7.3     | 7.2      | ND (0.1)   | ND (1)     | 31      | ---       |
|                             |                             | 10/01/08              | 2 - 3          | N           | ND (0.405)           | 16              | 6.2     | 3.5      | ND (0.1)   | 1.5        | 23      | ---       |
|                             |                             | 10/01/08              | 5 - 6          | N           | ND (0.403)           | 16              | 5.3     | 3.5      | ND (0.1)   | 1.5        | 23      | ---       |
|                             |                             | 10/01/08              | 9 - 10         | N           | ND (0.403)           | 8.2             | 2.9     | 2.8      | ND (0.1)   | 1.2        | 16      | ---       |
|                             |                             | 10/01/08              | 9 - 10         | FD          | ND (0.404)           | 8.1             | 2.7     | 2.9      | ND (0.1)   | 1.2        | 16      | ---       |
|                             |                             | 10/01/08              | 14 - 15        | N           | ND (0.406)           | 15              | 7.9     | 2.2      | ND (0.1)   | ND (1)     | 29      | ---       |
| AOC14-5                     |                             | 10/02/08              | 0 - 0.5        | N           | ND (0.403)           | 15              | 9.6     | 5.3      | ND (0.099) | ND (2)     | 35      | ---       |
|                             |                             | 10/02/08              | 2 - 3          | N           | ND (0.405)           | 17              | 16      | 16       | ND (0.1)   | ND (2)     | 46      | ---       |
|                             |                             | 10/02/08              | 5 - 6          | N           | ND (0.404)           | 15              | 7.9     | 2.7      | ND (0.099) | ND (1)     | 35      | ---       |
|                             |                             | 10/02/08              | 9 - 10         | N           | ND (0.403)           | 15              | 9.5     | 2.3      | ND (0.1)   | ND (1)     | 35      | ---       |
|                             |                             | 10/02/08              | 14 - 15        | N           | ND (0.406)           | 16              | 7.3     | 2.2      | ND (0.1)   | ND (1)     | 30      | ---       |

TABLE E-6

Constituent Concentrations

AOC 14 – Railroad Debris Area

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg)  | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|----------|---------|------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145      | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper   | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC14-6                     |                             | 10/02/08 | 0 - 0.5        | N           | ND (0.402)           | 11              | 6.1      | 7.4     | ND (0.1)   | 1.2        | 35      | ---       |
|                             |                             | 10/02/08 | 2 - 3          | N           | ND (0.403)           | 23              | 9.5      | 3.3     | ND (0.1)   | 2.4        | 37      | ---       |
|                             |                             | 10/02/08 | 5 - 6          | N           | ND (0.405)           | 18              | 9.1      | 2.3     | ND (0.099) | ND (1)     | 35      | ---       |
|                             |                             | 10/02/08 | 9 - 10         | N           | ND (0.406)           | 18              | 9.6      | 2.4     | ND (0.1)   | ND (1)     | 39      | ---       |
|                             |                             | 10/02/08 | 9 - 10         | FD          | ND (0.406)           | 18              | 9.7      | 2.3     | ND (0.1)   | ND (1)     | 39      | ---       |
|                             |                             | 10/02/08 | 14 - 15        | N           | ND (0.402)           | 16              | 7.2      | 2.2     | ND (0.1)   | ND (1)     | 28      | ---       |
| AOC14-7                     |                             | 10/02/08 | 0 - 0.5        | N           | ND (0.404)           | 15              | 7.4      | 6.1     | ND (0.099) | ND (1)     | 31      | ---       |
|                             |                             | 10/02/08 | 2 - 3          | N           | ND (0.405)           | 13              | 10       | 7.1     | ND (0.1)   | ND (1)     | 30      | ---       |
|                             |                             | 10/02/08 | 5 - 6          | N           | ND (0.405)           | 18              | 10       | 4.8     | ND (0.1)   | ND (2)     | 35      | ---       |
|                             |                             | 10/02/08 | 9 - 10         | N           | ND (0.404)           | 26              | 14       | 2.9     | ND (0.1)   | ND (1)     | 46      | ---       |
|                             |                             | 10/02/08 | 14 - 15        | N           | ND (0.401)           | 25              | 9.9      | 3.5     | ND (0.1)   | 2.4        | 32      | ---       |
| AOC14-8                     |                             | 10/02/08 | 0 - 0.5        | N           | ND (0.403)           | 12              | 7.9      | 6.4     | ND (0.099) | ND (2)     | 30      | ---       |
|                             |                             | 10/02/08 | 2 - 3          | N           | ND (0.406)           | 15              | 8.8      | 6.8     | ND (0.1)   | ND (2)     | 31      | ---       |
|                             |                             | 10/02/08 | 5 - 6          | N           | ND (0.404)           | 18              | 6.6      | 2.4     | ND (0.1)   | ND (1)     | 39      | ---       |
|                             |                             | 10/02/08 | 9 - 10         | N           | ND (0.404)           | 19              | 12       | 2.7     | ND (0.1)   | ND (1)     | 38      | ---       |
|                             |                             | 10/02/08 | 9 - 10         | FD          | ND (0.404)           | 19              | 10       | 3       | ND (0.1)   | ND (1)     | 39      | ---       |
|                             |                             | 10/02/08 | 14 - 15        | N           | ND (0.413)           | 23 J            | 18       | 3.7     | ND (0.1)   | ND (1)     | 42 J    | ---       |
| AOC14-9                     |                             | 10/01/08 | 0 - 0.5        | N           | ND (0.404)           | 13              | 7.6      | 5.4     | ND (0.1)   | ND (1)     | 28      | ---       |
|                             |                             | 10/01/08 | 2 - 3          | N           | ND (0.407)           | 12              | 7.2      | 6       | ND (0.1)   | ND (2)     | 29      | ---       |
|                             |                             | 10/01/08 | 5 - 6          | N           | ND (0.4)             | 9               | 4.1      | 2.8     | ND (0.1)   | ND (1)     | 13      | ---       |
|                             |                             | 10/01/08 | 9 - 10         | N           | ND (0.405)           | 15              | 7.6      | 3.6     | ND (0.1)   | ND (1)     | 29      | ---       |
|                             |                             | 10/01/08 | 14 - 15        | N           | ND (0.406)           | 13              | 8.2      | 5       | ND (0.1)   | ND (2)     | 32      | ---       |
| AOC14-10                    |                             | 10/01/08 | 0 - 0.5        | N           | ND (0.401)           | 10              | 3.5      | 3.5     | ND (0.1)   | ND (1)     | 14      | ---       |
|                             |                             | 10/01/08 | 2 - 3          | N           | ND (0.401)           | 11              | 3.1      | 2.9     | ND (0.1)   | ND (1)     | 14      | ---       |
|                             |                             | 10/01/08 | 5 - 6          | N           | ND (0.403)           | 12              | 4.6      | 3.4     | ND (0.1)   | ND (1)     | 17      | ---       |
|                             |                             | 10/01/08 | 5 - 6          | FD          | ND (0.402)           | 12              | 4.1      | 3.1     | ND (0.1)   | ND (1)     | 15      | ---       |
|                             |                             | 10/01/08 | 9 - 10         | N           | ND (0.409)           | 11              | 7.1      | 5.9     | ND (0.1)   | ND (1)     | 28      | ---       |
|                             |                             | 10/01/08 | 14 - 15        | N           | ND (0.404)           | 9.8             | ND (8.1) | 2.6     | ND (0.1)   | ND (4)     | 13      | ---       |

TABLE E-6

Constituent Concentrations

AOC 14 – Railroad Debris Area

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC14-11                    |                             | 10/01/08 | 5 - 6          | N           | ND (0.406)           | 15              | 7.3     | 4.2     | ND (0.1)   | 1          | 28      | ---       |
|                             |                             | 10/01/08 | 9 - 10         | N           | ND (0.405)           | 18              | 13      | 2       | ND (0.1)   | ND (1)     | 37      | ---       |
|                             |                             | 10/01/08 | 14 - 15        | N           | ND (0.41)            | 20              | 9       | 3       | ND (0.1)   | ND (1)     | 39      | ---       |
| AOC14-12                    |                             | 09/30/08 | 5 - 6          | N           | ND (0.406)           | 27              | 8.4     | 3.2     | ND (0.1)   | 2.4        | 36      | ---       |
|                             |                             | 09/30/08 | 9 - 10         | N           | ND (0.405)           | 17              | 7.7     | 3       | ND (0.1)   | ND (1)     | 37      | ---       |
|                             |                             | 09/30/08 | 14 - 15        | N           | ND (0.401)           | 20              | 9.8     | 2.8     | ND (0.1)   | 1.2        | 35      | ---       |
| AOC14-13                    |                             | 09/30/08 | 5 - 6          | N           | ND (0.405)           | 22              | 11      | 3.6     | ND (0.099) | 2          | 30      | ---       |
|                             |                             | 09/30/08 | 9 - 10         | N           | ND (0.405)           | 16              | 7.2     | 2.1     | ND (0.1)   | ND (1)     | 34      | ---       |
|                             |                             | 09/30/08 | 14 - 15        | N           | ND (0.409)           | 16              | 11      | 2.2     | ND (0.1)   | ND (1)     | 33      | ---       |
|                             |                             | 09/30/08 | 14 - 15        | FD          | ND (0.409)           | 16              | 13      | 2.4     | ND (0.1)   | ND (1)     | 33      | ---       |
| AOC14-14E                   |                             | 02/18/16 | 0 - 1          | N           | 0.27                 | 16              | 11      | 7.2     | ND (0.1)   | ND (1)     | 44      | 4.6       |
|                             |                             | 02/18/16 | 2 - 3          | N           | 0.25                 | 30              | 13      | 3       | ND (0.1)   | ND (1)     | 42      | 14        |
|                             |                             | 02/18/16 | 2 - 3          | FD          | 0.35                 | 26              | 10      | 3.5     | ND (0.1)   | ND (1)     | 43      | 12        |
|                             |                             | 02/18/16 | 5 - 5.5        | N           | 0.8                  | 27              | 9.8     | 2.1     | ND (0.1)   | ND (1)     | 38      | 32        |
|                             |                             | 02/18/16 | 6 - 7          | N           | ND (0.2)             | 19              | 9.9     | 2.1     | ND (0.1)   | ND (1)     | 38      | 2.5       |
|                             |                             | 02/18/16 | 9 - 10         | N           | ND (0.2)             | 20              | 8       | 2.6     | ND (0.1)   | ND (1)     | 39      | 6.6       |
| AOC14-14W                   | AOC14 PAA #1                | 02/16/16 | 0 - 1          | N           | 0.33                 | 16              | 12      | 15      | ND (0.1)   | ND (1)     | 65      | 3.5       |
|                             |                             | 02/16/16 | 2 - 3          | N           | ND (0.2)             | 13              | 12      | 3.4     | ND (0.1)   | ND (1)     | 32      | 1.1       |
|                             |                             | 02/16/16 | 5 - 5.5        | N           | 6.7                  | 420             | 170     | 160     | 0.22       | 4.5        | 310     | 480       |
|                             |                             | 02/16/16 | 6 - 7          | N           | 2.7                  | 65              | 80      | 70      | ND (0.1)   | 2.8        | 260     | 27        |
|                             |                             | 02/16/16 | 9 - 10         | N           | 0.66                 | 15              | 9.7     | 2.6     | ND (0.1)   | ND (1)     | 34      | 6         |
| AOC14-15                    | AOC14 PAA #1                | 02/18/16 | 0 - 1          | N           | ND (0.2)             | 14              | 11      | 2.2     | ND (0.1)   | ND (1)     | 36      | 3         |
|                             |                             | 02/18/16 | 2 - 3          | N           | 0.21                 | 16              | 12      | 4.6     | ND (0.1)   | ND (1)     | 40      | 6.1       |
|                             |                             | 02/18/16 | 5 - 6          | N           | ND (0.2)             | 11              | 9.7     | 3.1     | ND (0.1)   | ND (1)     | 34      | 4.4       |
|                             |                             | 02/18/16 | 7 - 8          | N           | ND (0.2)             | 16              | 8.9     | 2.5     | ND (0.1)   | ND (1)     | 33      | 0.59      |

TABLE E-6

Constituent Concentrations

AOC 14 – Railroad Debris Area

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)  | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1        | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury  | Molybdenum | Zinc    | TEQ Human |
| AOC14-16E                   |                             | 02/23/16 | 0 - 1          | N           | 0.26                 | 20              | 9.6     | 5.9     | ND (0.1) | ND (1)     | 62      | 8.2       |
|                             |                             | 02/23/16 | 2 - 3          | N           | ND (0.21)            | 12              | 9       | 3       | ND (0.1) | ND (1)     | 33      | 3.8       |
|                             |                             | 02/23/16 | 5 - 6          | N           | 0.22                 | 12              | 6.7     | 3       | ND (0.1) | ND (1)     | 30      | 1.3       |
|                             |                             | 02/23/16 | 9 - 10         | N           | ND (0.21)            | 15              | 9       | 1.6     | ND (0.1) | ND (1)     | 31      | 0.13      |
| AOC14-16W                   | AOC14 PAA #1                | 02/22/16 | 0 - 1          | N           | ND (0.2)             | 13              | 7.3     | 2.7     | 0.41     | ND (1)     | 27      | 0.22      |
|                             |                             | 02/22/16 | 2 - 3          | N           | 20                   | 360             | 1,300   | 110     | 180      | 63         | 110     | 8.2       |
|                             |                             | 02/22/16 | 5 - 6          | N           | 3                    | 50              | 100     | 28      | 72       | 14         | 61      | 1.3       |
|                             |                             | 02/22/16 | 7 - 8          | N           | 0.96                 | 23              | 35      | 14      | 17       | ND (1)     | 45      | 2.3       |
|                             |                             | 02/22/16 | 9 - 10         | N           | ND (0.2)             | 13              | 8.7     | 2.3     | ND (0.1) | ND (1)     | 31      | 0.11      |
|                             |                             | 02/22/16 | 9 - 10         | FD          | ND (0.2)             | 13              | 7.1     | 1.6     | ND (0.1) | ND (1)     | 30      | 0.074     |
| AOC14-17E                   |                             | 02/24/16 | 9 - 10         | N           | ND (0.2)             | 11              | 7.8     | 2.7     | ND (0.1) | ND (1)     | 31      | 0.075     |
| AOC14-17W                   |                             | 02/24/16 | 0 - 1          | N           | ND (0.2)             | 9               | 4.7     | 3.9     | ND (0.1) | ND (1)     | 21      | 0.44      |
|                             |                             | 02/24/16 | 1 - 2          | N           | ND (0.2)             | 12              | 9.2     | 8.5     | ND (0.1) | ND (1)     | 26      | 0.97      |
|                             |                             | 02/24/16 | 2 - 3          | N           | ND (0.2)             | 13              | 7.7     | 3.7     | ND (0.1) | ND (1)     | 29      | 0.4       |
|                             |                             | 02/24/16 | 5 - 6          | N           | ND (0.2)             | 12              | 10      | 3.4     | ND (0.1) | ND (1)     | 24      | 0.096     |
|                             |                             | 02/24/16 | 9 - 10         | N           | ND (0.2)             | 12              | 8.6     | 2.6     | ND (0.1) | ND (1)     | 29      | 0.11      |
| AOC14-18                    |                             | 02/17/16 | 0 - 1          | N           | ND (0.2)             | 14              | 13      | 14      | ND (0.1) | ND (1)     | 41      | ---       |
|                             |                             | 02/17/16 | 2 - 3          | N           | ND (0.21)            | 13              | 12      | 3.5     | ND (0.1) | ND (1)     | 34      | ---       |
|                             |                             | 02/17/16 | 5 - 6          | N           | ND (0.21)            | 13              | 12      | 4.4     | ND (0.1) | 3          | 36      | ---       |
| AOC14-19                    | AOC14 PAA #1                | 02/17/16 | 2 - 3          | N           | ND (0.21)            | 380 J           | 1,800   | 1,600 J | ND (0.1) | 16         | 2,000 J | 140       |
|                             |                             | 02/17/16 | 3 - 4          | N           | ND (0.21)            | 13              | 19      | 6.3     | ND (0.1) | ND (1)     | 41      | 1.2       |
| AOC14-20                    |                             | 04/26/17 | 0 - 0.5        | N           | ND (0.2)             | 14              | 9       | 5.6     | ND (0.1) | ND (1)     | 37      | 0.36      |
|                             |                             | 04/26/17 | 2 - 3          | N           | ND (0.2)             | 12              | 7.1     | 3.4     | ND (0.1) | ND (1)     | 31      | 0.29      |
|                             |                             | 04/26/17 | 5 - 6          | N           | ND (0.2)             | 14              | 11      | 2.6     | ND (0.1) | ND (1)     | 29      | 0.4       |
|                             |                             | 04/26/17 | 8 - 9          | N           | ND (0.2)             | 9.9             | 6.5     | 1.1     | ND (0.1) | ND (1)     | 24      | 0.35      |

TABLE E-6

Constituent Concentrations

AOC 14 – Railroad Debris Area

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)  | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1        | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury  | Molybdenum | Zinc    | TEQ Human |
| AOC14-21                    |                             | 04/26/17 | 0 - 0.5        | N           | ND (0.2)             | 15              | 10      | 11      | ND (0.1) | ND (1)     | 41      | 0.85      |
|                             |                             | 04/26/17 | 2 - 3          | N           | ND (0.2)             | 15              | 11      | 9.4     | ND (0.1) | ND (1)     | 45      | 2.9       |
|                             |                             | 04/26/17 | 2 - 3          | FD          | ND (0.2)             | 17              | 12      | 9.8     | ND (0.1) | ND (1)     | 44      | 3.2       |
|                             |                             | 04/26/17 | 5 - 6          | N           | ND (0.2)             | 13              | 40      | 1.4     | ND (0.1) | ND (1)     | 39      | ND (0.19) |
|                             |                             | 04/26/17 | 9 - 10         | N           | ND (0.2)             | 14              | 8.1     | 2       | ND (0.1) | ND (1)     | 30      | 0.22      |
| AOC14-SS-1                  | AOC14 PAA #1                | 10/01/08 | 0 - 0.5        | N           | ND (0.405)           | 15              | 9.4     | 7.2     | ND (0.1) | ND (1)     | 34      | ---       |
|                             |                             | 10/01/08 | 2 - 3          | N           | 0.456                | 22              | 15      | 11      | 0.25     | ND (2)     | 32      | ---       |
|                             |                             | 10/01/08 | 5 - 6          | N           | ND (0.406)           | 18              | 15      | 4.8     | ND (0.1) | ND (2)     | 35      | ---       |
|                             |                             | 10/01/08 | 9 - 10         | N           | ND (0.402)           | 17              | 7.4     | 1.6     | ND (0.1) | ND (1)     | 33      | ---       |
|                             |                             | 10/01/08 | 14 - 15        | N           | ND (0.406)           | 13              | 9       | 2.6     | ND (0.1) | ND (1)     | 31      | ---       |
| AOC14-SS-2                  |                             | 10/01/08 | 0 - 0.5        | N           | ND (0.403)           | 14              | 8.8     | 4.8     | ND (0.1) | 1.1        | 27      | ---       |
|                             |                             | 10/01/08 | 2 - 3          | N           | ND (0.407)           | 14              | 7.6     | 5.5     | ND (0.1) | ND (2)     | 29      | ---       |
|                             |                             | 10/01/08 | 5 - 6          | N           | ND (0.405)           | 10              | 6.5     | 5.5     | ND (0.1) | ND (2)     | 25      | ---       |
|                             |                             | 10/01/08 | 9 - 10         | N           | ND (0.407)           | 9.5             | 6.7     | 5.3     | ND (0.1) | ND (1)     | 24      | ---       |
|                             |                             | 10/01/08 | 14 - 15        | N           | ND (0.404)           | 17              | 9.6     | 3       | ND (0.1) | ND (1)     | 32      | ---       |
|                             |                             | 10/01/08 | 14 - 15        | FD          | ND (0.405)           | 18              | 9.6     | 3       | ND (0.1) | ND (1)     | 33      | ---       |
| AOC14-SS-3                  |                             | 10/02/08 | 0 - 0.5        | N           | ND (0.401)           | 17              | 11      | 3.8     | ND (0.1) | ND (1)     | 35      | ---       |
|                             |                             | 10/02/08 | 2 - 3          | N           | ND (0.402)           | 18              | 9.5     | 2.7     | ND (0.1) | ND (1)     | 36      | ---       |
|                             |                             | 10/02/08 | 5 - 6          | N           | ND (0.403)           | 12              | 6.7     | 2       | ND (0.1) | ND (1)     | 29      | ---       |
|                             |                             | 10/02/08 | 9 - 10         | N           | ND (0.404)           | 16              | 8.4     | 2.2     | ND (0.1) | ND (1)     | 32      | ---       |
|                             |                             | 10/02/08 | 14 - 15        | N           | ND (0.404)           | 17              | 9.5     | 2.4     | ND (0.1) | ND (1)     | 35      | ---       |
| AOC14-SS-4                  |                             | 10/02/08 | 0 - 0.5        | N           | ND (0.402)           | 15              | 8.1     | 5.1     | ND (0.1) | ND (1)     | 31      | ---       |
|                             |                             | 10/02/08 | 2 - 3          | N           | ND (0.401)           | 14              | 6.9     | 10      | ND (0.1) | ND (1)     | 27      | ---       |
|                             |                             | 10/02/08 | 5 - 6          | N           | ND (0.403)           | 16              | 6.4     | 11      | ND (0.1) | 1.5        | 27      | ---       |
|                             |                             | 10/02/08 | 9 - 10         | N           | ND (0.404)           | 16              | 11      | 2.3     | ND (0.1) | ND (1)     | 32      | ---       |
|                             |                             | 10/02/08 | 14 - 15        | N           | ND (0.405)           | 17              | 11      | 3       | ND (0.1) | ND (1)     | 37      | ---       |
|                             |                             | 10/02/08 | 14 - 15        | FD          | ND (0.405)           | 17              | 8.5     | 1.6     | ND (0.1) | ND (1)     | 34      | ---       |
| S1-20                       |                             | 11/01/98 | 3              | N           | 0.7                  | 31.8            | 15.7    | ---     | ---      | ---        | 49.4    | ---       |

TABLE E-6

Constituent Concentrations

AOC 14 – Railroad Debris Area

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |                       |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)   | (ng/kg)   |
|-----------------------------|-----------------------------|-----------------------|----------------|-------------|----------------------|-----------------|---------|---------|---------|------------|-----------|-----------|
|                             |                             |                       |                |             | 3.1                  | 145             | 145     | 36      | 1       | 22         | 1,050     | 100       |
| Location                    | Potential Action Area (PAA) | Date                  | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury | Molybdenum | Zinc      | TEQ Human |
| S2-6                        |                             | 11/01/98 <sup>Θ</sup> | 3              | N           | 12                   | 45.5            | 1.8     | ---     | ---     | ---        | 14.5      | ---       |
|                             |                             | 11/01/98              | 5              | N           | 1.8                  | 39.9            | 9.7     | ---     | ---     | ---        | 35.7      | ---       |
| S2-62                       |                             | 11/01/98 <sup>Θ</sup> | 2              | N           | 1                    | 32              | 4.1     | ---     | ---     | ---        | 8.4       | ---       |
|                             |                             | 11/01/98 <sup>Β</sup> | 3              | N           | ---                  | 72.7            | 22.2    | 7.9     | 0.046 J | 0.86 J     | ND (29.3) | ---       |
|                             |                             | 11/01/98              | 4              | N           | ND (0.5)             | 21.9            | 11.5    | ---     | ---     | ---        | 39.8      | ---       |
| S2-130                      |                             | 11/01/98              | 1              | N           | ND (0.5)             | 22.1            | 10.6    | ---     | ---     | ---        | 34.5      | ---       |
| S3-15                       |                             | 11/01/98              | 2              | N           | ND (0.5)             | 13.8            | 9.4     | ---     | ---     | ---        | 24.1      | ---       |
|                             |                             | 11/01/98              | 4              | N           | ND (0.5)             | 12.1            | 11      | ---     | ---     | ---        | 29.2      | ---       |
| S3-72                       |                             | 11/01/98 <sup>Θ</sup> | 1              | N           | ND (0.5)             | 18.7            | 6.7     | ---     | ---     | ---        | 27        | ---       |
|                             |                             | 11/01/98              | 2              | N           | ND (0.5)             | 11.3            | 8       | ---     | ---     | ---        | 28.9      | ---       |
| S3-120                      |                             | 11/01/98              | 1              | N           | ND (0.5)             | 12.1            | 4.2     | ---     | ---     | ---        | 18        | ---       |
| S4-4                        |                             | 11/01/98 <sup>Θ</sup> | 4              | N           | 15.4                 | 23.4            | 3.2     | ---     | ---     | ---        | 1.9       | ---       |
|                             |                             | 11/01/98              | 6              | N           | 1                    | 13.7            | 10.3    | ---     | ---     | ---        | 32.6      | ---       |
| S4-95                       |                             | 11/01/98 <sup>Θ</sup> | 2              | N           | ND (0.5)             | 10.3            | 2.5     | ---     | ---     | ---        | 4.3       | ---       |
|                             |                             | 11/01/98              | 3              | N           | ND (0.5)             | 14.9            | 8.3     | ---     | ---     | ---        | 27        | ---       |
| S4-160                      |                             | 11/01/98              | 2              | N           | 0.5                  | 25              | 11.8    | ---     | ---     | ---        | 38.2      | ---       |
| S8-23                       |                             | 11/01/98 <sup>Β</sup> | 3              | N           | ---                  | 28.7            | 14.3    | 12.5    | 0.092 J | 0.42 J     | 57        | ---       |
| S8-30                       |                             | 11/01/98              | 3              | N           | 0.5                  | 12.8            | 10.8    | ---     | ---     | ---        | 40.9      | ---       |
| GS-1                        |                             | 11/01/98 <sup>Θ</sup> | 0              | N           | 0.59                 | 33.7            | 2.2     | ---     | ---     | ---        | 31.3      | ---       |
| GS-2                        |                             | 11/01/98 <sup>Θ</sup> | 0              | N           | ND (0.5)             | 21.9            | 8.2     | ---     | ---     | ---        | 32.7      | ---       |
| RR-1                        |                             | 02/02/00              | 0              | N           | ND (0.5)             | 23.4            | 15.6    | ---     | ---     | ---        | 44        | ---       |
| RR-2                        |                             | 02/02/00              | 0              | N           | ND (0.5)             | 16.1            | 13.8    | ---     | ---     | ---        | 37.5      | ---       |
| RR-3                        |                             | 02/02/00              | 0              | N           | ND (0.5)             | 18.3            | 11.6    | ---     | ---     | ---        | 35        | ---       |
| RR-4                        |                             | 02/02/00 <sup>Θ</sup> | 0              | N           | 0.6                  | 19.4            | 19.2    | ---     | ---     | ---        | 27.1      | ---       |
| RR-5                        |                             | 02/02/00              | 0              | N           | 5.8                  | 39.5            | 7.1     | ---     | ---     | ---        | 34.1      | ---       |
| RR-6                        |                             | 02/02/00              | 0              | N           | 4.8                  | 74.9            | 7.5     | ---     | ---     | ---        | 243       | ---       |
| RR-7                        |                             | 02/02/00 <sup>Θ</sup> | 0              | N           | ND (0.51)            | 28.6            | 9.7     | ---     | ---     | ---        | 35.1      | ---       |

TABLE E-6

Constituent Concentrations

AOC 14 – Railroad Debris Area

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |                       |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|-----------------------|----------------|-------------|----------------------|-----------------|---------|---------|---------|------------|---------|-----------|
|                             |                             |                       |                |             | 3.1                  | 145             | 145     | 36      | 1       | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date                  | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury | Molybdenum | Zinc    | TEQ Human |
| RR-8                        |                             | 02/02/00              | 0              | N           | ND (0.51)            | 28.9            | 9.9     | ---     | ---     | ---        | 29.8    | ---       |
| RR-9                        |                             | 02/02/00 <sup>Θ</sup> | 0              | N           | 2.7                  | 19.6            | 27.9    | ---     | ---     | ---        | 15.4    | ---       |
| RR-10                       |                             | 02/02/00              | 0              | N           | ND (0.51)            | 18.8            | 12.9    | ---     | ---     | ---        | 36.3    | ---       |
| RR-11                       |                             | 02/02/00              | 0              | N           | ND (0.51)            | 18.1            | 20.2    | ---     | ---     | ---        | 47.5    | ---       |
| RR-12                       |                             | 02/02/00 <sup>Θ</sup> | 0              | N           | ND (0.5)             | 17.5            | 3.8     | ---     | ---     | ---        | 11.3    | ---       |

**Notes:**

Results greater than or equal to the Removal Action Goal are circled.

|        |   |
|--------|---|
| Θ      | white powder sample.  |
| β      | black sandy material  |
| ---    | not analyzed  |
| FD     | field duplicate   |
| ft bgs | feet below ground surface   |
| J      | concentration or reporting limit estimated by laboratory or data validation |
| mg/kg  | milligrams per kilogram   |
| N      | primary sample  |
| ND     | not detected at the listed reporting limit                                  |
| ng/kg  | nanogram per kilogram   |
| TEQ    | dioxin and furans toxicity equivalent quotient                              |





TABLE E-7

Constituent Concentrations

AOC 27 – MW-24 Bench

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)   | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|-----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1         | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury   | Molybdenum | Zinc    | TEQ Human |
| 24soil-01                   |                             | 01/31/08 | 2.5 - 3        | N           | ND (0.4)             | 15              | 7.2     | 6.4     | ND (0.1)  | 0.63       | 16      | ---       |
| 24soil-02                   |                             | 01/31/08 | 2.5 - 3        | N           | ND (0.4)             | 15              | 9.1     | 8.7     | ND (0.1)  | 0.7        | 17      | ---       |
| AOC27-1                     |                             | 03/18/16 | 0 - 1          | N           | 0.35                 | 17              | 11      | 28      | ND (0.1)  | ND (1)     | 37      | ---       |
|                             |                             | 03/18/16 | 2 - 3          | N           | ND (0.2)             | 11              | 12      | 5.4     | ND (0.1)  | ND (1)     | 31      | 0.12      |
|                             |                             | 03/18/16 | 5 - 6          | N           | ND (0.2)             | 17              | 11      | 2.9     | ND (0.1)  | ND (1)     | 31      | ---       |
|                             |                             | 03/18/16 | 9 - 10         | N           | ND (0.2)             | 13              | 8.6     | 1.9     | ND (0.1)  | ND (1)     | 29      | ---       |
| AOC27-18                    |                             | 03/17/16 | 0 - 1          | N           | 0.3                  | 15              | 8.3     | 5.7     | ND (0.1)  | ND (1)     | 26      | 9.3       |
|                             |                             | 03/17/16 | 2 - 3          | N           | 0.36                 | 22              | 9.7     | 8.4     | ND (0.1)  | ND (1)     | 31      | 7.6       |
|                             |                             | 03/17/16 | 5 - 6          | N           | ND (0.21)            | 11              | 7.4     | 6.9     | ND (0.1)  | ND (1)     | 27      | 6.8       |
|                             |                             | 03/17/16 | 9 - 10         | N           | 1.2                  | 22              | 6.8     | 7.1     | ND (0.1)  | ND (1)     | 47      | ---       |
| AOC27-18E                   |                             | 03/17/16 | 4 - 5          | N           | ND (0.2)             | 11              | 6.6     | 10      | ND (0.1)  | ND (1)     | 250     | 11        |
| AOC27-2                     |                             | 03/18/16 | 0 - 1          | N           | 0.2                  | 13              | 5.6     | 3.8     | ND (0.1)  | ND (1)     | 24      | 0.84      |
|                             |                             | 03/18/16 | 2 - 3          | N           | 0.28                 | 16              | 8.1     | 5.7     | ND (0.1)  | ND (1)     | 24      | 0.83      |
|                             |                             | 03/18/16 | 5 - 6          | N           | ND (0.2)             | 11              | 8.5     | 4.9     | ND (0.1)  | ND (1)     | 30      | ---       |
|                             |                             | 03/18/16 | 9 - 10         | N           | ND (0.2)             | 14              | 9.3     | 3.3     | ND (0.1)  | ND (1)     | 32      | ---       |
| AOC27-20                    |                             | 03/01/16 | 0 - 1          | N           | ND (0.2)             | 17              | 9.2     | 8.4     | ND (0.1)  | ND (1)     | 38      | 19        |
|                             |                             | 03/01/16 | 2 - 3          | N           | ND (0.21)            | 19              | 11      | 4.6     | ND (0.1)  | ND (1)     | 42      | 5.8       |
|                             |                             | 03/01/16 | 2 - 3          | FD          | ND (0.21)            | 18              | 9.7     | 3.6     | ND (0.11) | ND (1.1)   | 42      | ---       |
|                             |                             | 03/01/16 | 5 - 6          | N           | 0.29                 | 20              | 27      | 15      | 0.13      | ND (1)     | 74      | 10        |
|                             |                             | 03/01/16 | 9 - 10         | N           | ND (0.21)            | 20              | 11      | 2.7     | ND (0.1)  | ND (1)     | 41      | ---       |
| AOC27-24                    |                             | 03/18/16 | 0 - 1          | N           | 0.36                 | 29              | 12      | 6.2     | ND (0.1)  | ND (1)     | 37      | ---       |
|                             |                             | 03/18/16 | 2 - 3          | N           | ND (0.2)             | 19              | 9.4     | 3.6     | ND (0.1)  | ND (1)     | 33      | ---       |
|                             |                             | 03/18/16 | 5 - 6          | N           | ND (0.2)             | 14              | 11      | 4.1     | ND (0.1)  | ND (1)     | 30      | ---       |
|                             |                             | 03/18/16 | 9 - 10         | N           | ND (0.2)             | 20              | 14      | 3       | ND (0.1)  | ND (1)     | 34      | ---       |
| AOC27-24SW                  |                             | 03/18/16 | 0 - 1          | N           | ND (0.2)             | 15              | 13      | 4.3     | ND (0.1)  | ND (1)     | 32      | ---       |
|                             |                             | 03/18/16 | 2 - 3          | N           | 0.34                 | 17              | 8.9     | 7       | ND (0.1)  | ND (1)     | 29      | ---       |
|                             |                             | 03/18/16 | 5 - 6          | N           | ND (0.2)             | 20              | 11      | 2.9     | ND (0.1)  | ND (1)     | 33      | ---       |
|                             |                             | 03/18/16 | 9 - 10         | N           | ND (0.2)             | 12              | 9.3     | 1.9     | ND (0.1)  | ND (1)     | 29      | ---       |

TABLE E-7

Constituent Concentrations

AOC 27 – MW-24 Bench

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)    | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|------------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1          | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury    | Molybdenum | Zinc    | TEQ Human |
| AOC27-27                    |                             | 03/02/16 | 0 - 1          | N           | ND (0.2)             | 22              | 11      | 5.5     | 0.12       | ND (1)     | 38      | ---       |
|                             |                             | 03/02/16 | 2 - 3          | N           | ND (0.21)            | 16              | 8.2     | 3.8     | 0.1        | ND (1)     | 38      | ---       |
| AOC27-36                    |                             | 03/17/16 | 0 - 1          | N           | ND (0.21)            | 14              | 11      | 6       | ND (0.1)   | ND (1)     | 59 J    | ---       |
|                             |                             | 03/17/16 | 2 - 3          | N           | ND (0.21)            | 14              | 7       | 4.3     | ND (0.11)  | ND (1)     | 24      | ---       |
|                             |                             | 03/17/16 | 5 - 6          | N           | ND (0.22)            | 16              | 8.8     | 3.7     | ND (0.11)  | ND (1.1)   | 29      | ---       |
|                             |                             | 03/17/16 | 9.6 - 10       | N           | ND (0.22)            | 13              | 11      | 6.5     | ND (0.11)  | ND (1.1)   | 34      | ---       |
| AOC27-4                     |                             | 03/17/16 | 0 - 1          | N           | 0.23                 | 16              | 7.5     | 7.3     | ND (0.1)   | ND (1)     | 31      | 20        |
|                             |                             | 03/17/16 | 0 - 1          | FD          | 0.28                 | 16              | 8.9     | 6.6     | ND (0.1)   | ND (1)     | 31      | 26        |
|                             |                             | 03/17/16 | 2 - 3          | N           | ND (0.2)             | 13              | 9.5     | 5.9     | ND (0.1)   | ND (1)     | 27      | 2.8       |
|                             |                             | 03/17/16 | 5 - 6          | N           | ND (0.2)             | 14              | 8.1     | 2       | ND (0.099) | ND (1)     | 28      | ND (0.34) |
| AOC27-5                     |                             | 03/17/16 | 0 - 1          | N           | 0.31                 | 15              | 7.6     | 7       | ND (0.1)   | ND (1)     | 48      | ---       |
|                             |                             | 03/17/16 | 2 - 3          | N           | 0.48                 | 21              | 14      | 38      | ND (0.1)   | ND (1)     | 500     | 18        |
|                             |                             | 03/17/16 | 5 - 6          | N           | ND (0.2)             | 15              | 9.2     | 2.4     | ND (0.099) | ND (1)     | 32      | 0.2       |
|                             |                             | 03/17/16 | 9 - 10         | N           | ND (0.2)             | 13              | 8.6     | 2.5     | ND (0.1)   | ND (1)     | 33      | ---       |
| AOC27-50                    |                             | 03/02/16 | 0 - 1          | N           | 0.3                  | 25              | 25      | 73      | 0.13       | ND (1)     | 250     | 12        |
|                             |                             | 03/02/16 | 2 - 3          | N           | 1.3                  | 50 J            | 100 J   | 190 J   | 0.47       | 4.7 J      | 330 J   | 57        |
|                             |                             | 03/02/16 | 5 - 6          | N           | ND (0.21)            | 18              | 7.9     | 2.1     | 0.13       | ND (1)     | 39      | 0.41      |
|                             |                             | 03/02/16 | 9 - 10         | N           | ND (0.21)            | 18              | 9.1     | 2.1     | 0.12       | ND (1)     | 38      | ---       |
| AOC27-51                    |                             | 02/17/17 | 0 - 0.5        | N           | ND (0.21)            | 20              | 36      | 19      | ND (0.1)   | ND (1)     | 1,200   | 9.2       |
|                             |                             | 02/17/17 | 2 - 3          | N           | ND (0.2)             | 10              | 7.4     | 1.4     | ND (0.1)   | ND (1)     | 28      | 0.65      |
|                             |                             | 02/17/17 | 5 - 6          | N           | ND (0.2)             | 13              | 8.3     | ND (1)  | ND (0.1)   | ND (1)     | 30      | 0.15      |
| AOC27-6                     | AOC27 PAA #1                | 02/29/16 | 0 - 1          | N           | 0.87 J               | 43              | 500     | 630     | 0.51       | 8.3        | 700     | 120       |
|                             |                             | 02/29/16 | 2 - 3          | N           | 4.8                  | 24              | 76      | 37      | 0.26       | ND (1)     | 130     | 32        |
|                             |                             | 02/29/16 | 5 - 6          | N           | ND (0.21)            | 39              | 18      | 51      | 0.14       | ND (1)     | 92      | 6.9       |
| AOC27-7                     | AOC27 PAA #1                | 02/29/16 | 0 - 1          | N           | 2.7                  | 150             | 580     | 170     | 0.32       | 11         | 420     | 110       |
|                             |                             | 02/29/16 | 2 - 3          | N           | 4                    | 290             | 1,000   | 570     | 0.95       | 26         | 1,300   | 230       |
|                             |                             | 03/01/16 | 5 - 6          | N           | 0.5                  | 16              | 9.8     | 2.6     | ND (0.1)   | ND (1)     | 38      | 4.3       |

TABLE E-7

Constituent Concentrations

AOC 27 – MW-24 Bench

Soil Engineering Evaluation/Cost Analysis

PG&amp;E Topock Compressor Station, Needles, California

| Removal Action Goal (RAG) : |                             |          |                |             | (mg/kg)              | (mg/kg)         | (mg/kg) | (mg/kg) | (mg/kg)  | (mg/kg)    | (mg/kg) | (ng/kg)   |
|-----------------------------|-----------------------------|----------|----------------|-------------|----------------------|-----------------|---------|---------|----------|------------|---------|-----------|
|                             |                             |          |                |             | 3.1                  | 145             | 145     | 36      | 1        | 22         | 1,050   | 100       |
| Location                    | Potential Action Area (PAA) | Date     | Depth (ft bgs) | Sample Type | Chromium, Hexavalent | Chromium, total | Copper  | Lead    | Mercury  | Molybdenum | Zinc    | TEQ Human |
| AOC27-8                     | AOC27 PAA #1                | 03/01/16 | 1 - 2          | N           | 0.49                 | 20              | 29      | 24      | 0.17     | ND (1)     | 93      | 33        |
|                             |                             | 03/01/16 | 5 - 6          | N           | ND (0.2)             | 17              | 15      | 6.1     | ND (0.1) | ND (1)     | 45      | 2.8       |
| AOC27-9                     |                             | 03/08/16 | 0 - 1          | N           | ND (0.2)             | 13              | 8.2     | 2.5     | ND (0.1) | ND (1)     | 30 J    | 5.3       |
|                             |                             | 03/08/16 | 0 - 1          | FD          | ND (0.2)             | 14              | 14      | 5.9     | ND (0.1) | ND (1)     | 38 J    | ---       |
|                             |                             | 03/08/16 | 2 - 3          | N           | ND (0.2)             | 14              | 8.3     | 3.7     | ND (0.1) | ND (1)     | 35      | 2         |
|                             |                             | 03/08/16 | 5 - 6          | N           | ND (0.2)             | 15              | 11      | 2.7     | ND (0.1) | ND (1)     | 36      | 1         |
|                             |                             | 03/08/16 | 9 - 10         | N           | ND (0.2)             | 11              | 7.8     | 1.6     | ND (0.1) | ND (1)     | 28      | ---       |
| PA-13                       |                             | 01/27/16 | 0 - 1          | N           | 0.26                 | 15              | 12      | 5.8     | ND (0.1) | ND (1)     | 45      | ---       |

**Notes:**

Results greater than or equal to the Removal Action Goal are circled.

|        |   |
|--------|---|
| ---    | not analyzed  |
| FD     | field duplicate   |
| ft bgs | feet below ground surface   |
| J      | concentration or reporting limit estimated by laboratory or data validation |
| mg/kg  | milligrams per kilogram   |
| N      | primary sample  |
| ND     | not detected at the listed reporting limit                                  |
| ng/kg  | nanogram per kilogram   |
| TEQ    | dioxin and furans toxicity equivalent quotient                              |





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >11 to 15 ft bgs
- >16 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Hexavalent Chromium  
Removal Action Goal 3.1 mg/kg



Figure E-1a  
Hexavalent Chromium  
Soil Sample Results  
AOC 1 North  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California



**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Approximate Location of Stormwater
- Piping Below Ground
- Approximate Location of Stormwater
- Piping Above Ground

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >11 to 15 ft bgs
- >16 ft bgs

**Factor of Exceedance (FOE)**

- FOE <=1

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Total Chromium  
Removal Action Goal 145 mg/kg

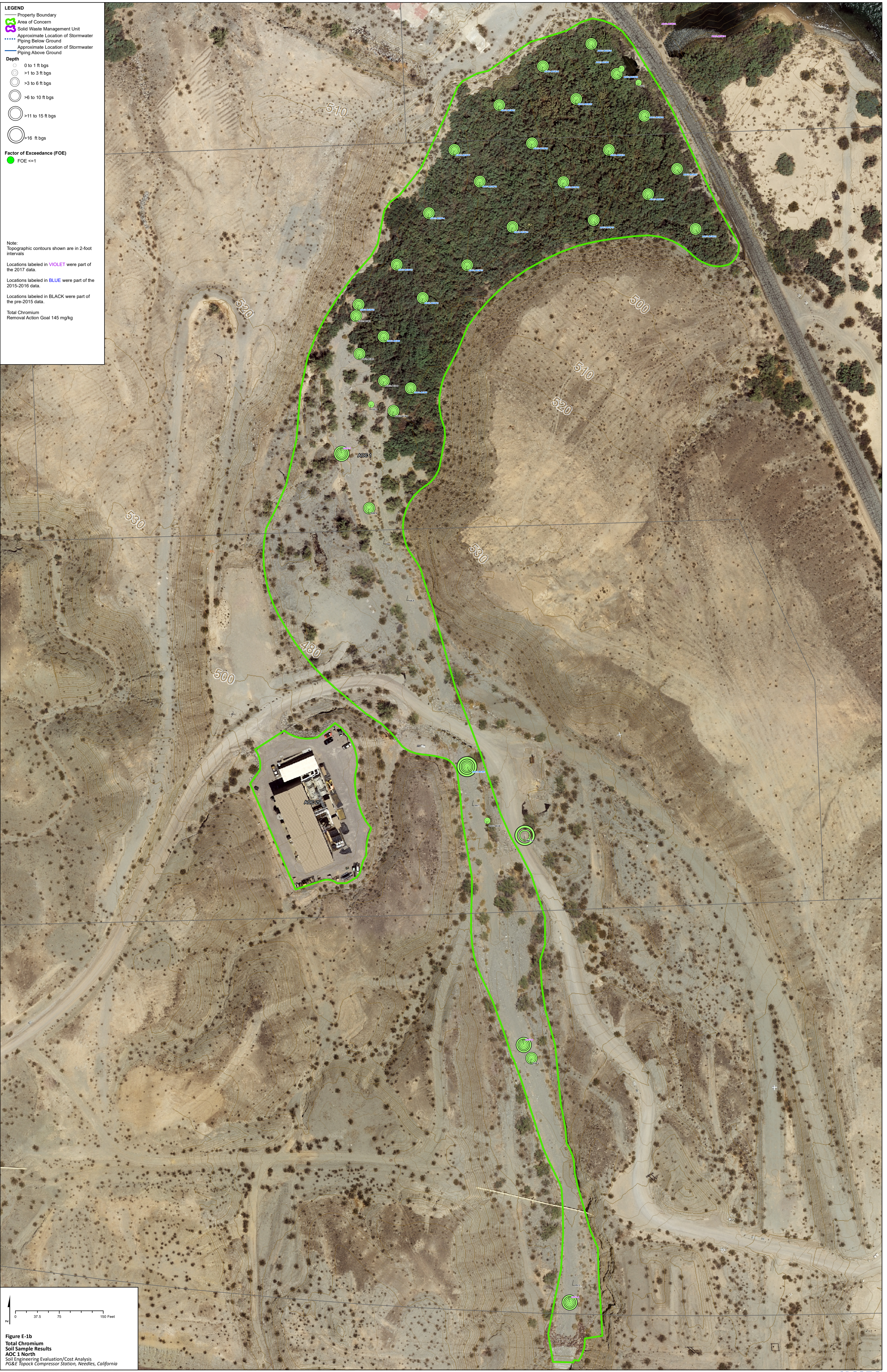


Figure E-1b  
Total Chromium  
Soil Sample Results  
AOC 1 North  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California



**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Approximate Location of Stormwater
- Piping Below Ground
- Approximate Location of Stormwater
- Piping Above Ground

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >11 to 15 ft bgs
- >16 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Copper  
Removal Action Goal 145 mg/kg

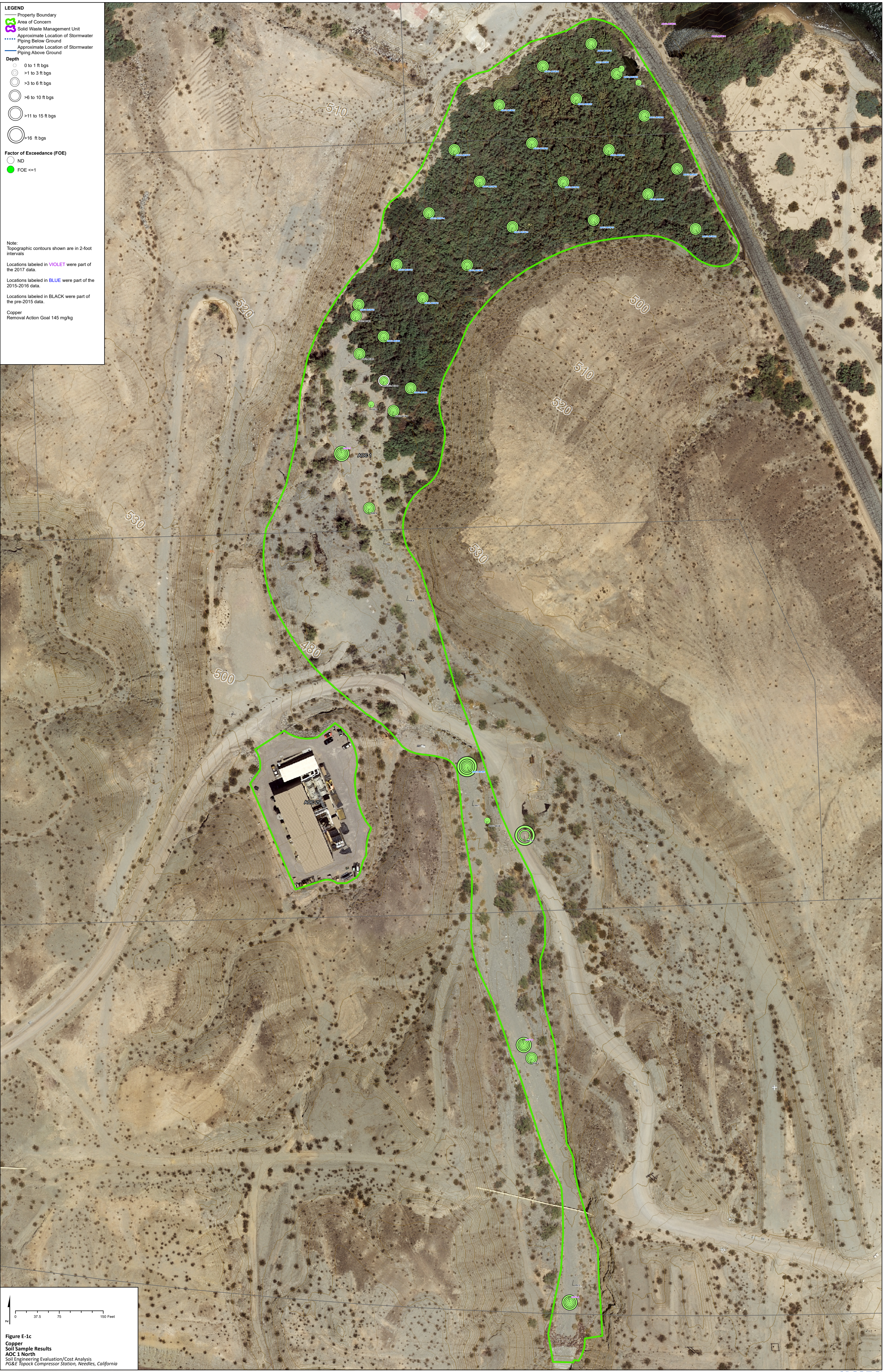


Figure E-1c  
Copper  
Soil Sample Results  
AOC 1 North  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California



**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Approximate Location of Stormwater
- Piping Below Ground
- Approximate Location of Stormwater
- Piping Above Ground

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >11 to 15 ft bgs
- >16 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Lead  
Removal Action Goal 36 mg/kg



Figure E-1d  
Lead  
Soil Sample Results  
AOC 1 North  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California



**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >11 to 15 ft bgs
- >16 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1
- 1>FOE<=10

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Human Dioxins and Furans Toxicity Equivalency Quotient (TEQ)  
Removal Action Goal 100 ng/kg



Figure E-1e  
Human Dioxins and Furans TEQ  
Soil Sample Results  
AOC 1 North  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California



**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >11 to 15 ft bgs
- >16 ft bgs

**Factor of Exceedance (FOE)**

- ND

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Mercury  
Removal Action Goal 1 mg/kg



Figure E-1f  
Mercury  
Soil Sample Results  
AOC 1 North  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California



**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Approximate Location of Stormwater
- Piping Below Ground
- Approximate Location of Stormwater
- Piping Above Ground

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >11 to 15 ft bgs
- >16 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Molybdenum  
Removal Action Goal 22 mg/kg



Figure E-1g  
Molybdenum  
Soil Sample Results  
AOC 1 North  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

\\rockadefiles\ge\_share\ENB\000\_Proj\PP\CB\Topock\MapFiles\2019\EECA\SoilResults\_AOC1-SW\001\_EECA.mxd



**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >11 to 15 ft bgs
- >16 ft bgs

**Factor of Exceedance (FOE)**

- FOE <=1

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Zinc  
Removal Action Goal 1,050 mg/kg

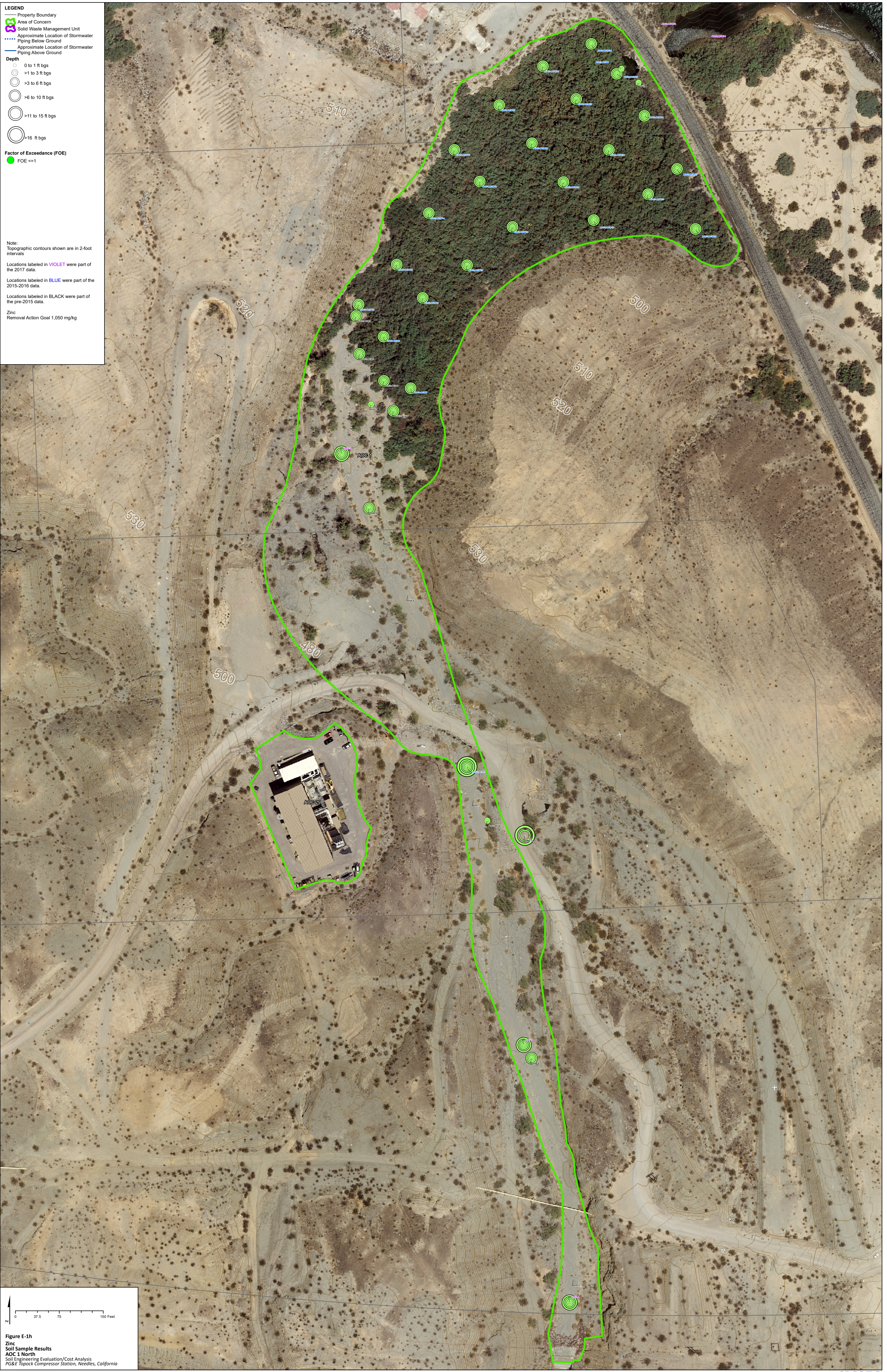


Figure E-1h  
Zinc  
Soil Sample Results  
AOC 1 North  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

\\rockadefiles\ge\_share\ENB000\_Proy\PPC\Topock\MapFiles\2019\EECA\SoilResults\_AOC1-SW\001\_EECA.mxd



**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater
- Piping Below Ground
- Approximate Location of Stormwater
- Piping Above Ground
- Topock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >11 to 15 ft bgs
- >16 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1
- 1>FOE<=10
- 10>FOE<=100

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Hexavalent Chromium  
Removal Action Goal 3.1 mg/kg



Figure E-2a  
Hexavalent Chromium  
Soil Sample Results  
AOC 1 South and SWMU 1  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California



**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater
- Piping Below Ground
- Approximate Location of Stormwater
- Piping Above Ground
- Toprock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >11 to 15 ft bgs
- >16 ft bgs

**Factor of Exceedance (FOE)**

- FOE <=1
- 1>FOE<=10
- 10>FOE<=100

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Total Chromium  
Removal Action Goal 145 mg/kg

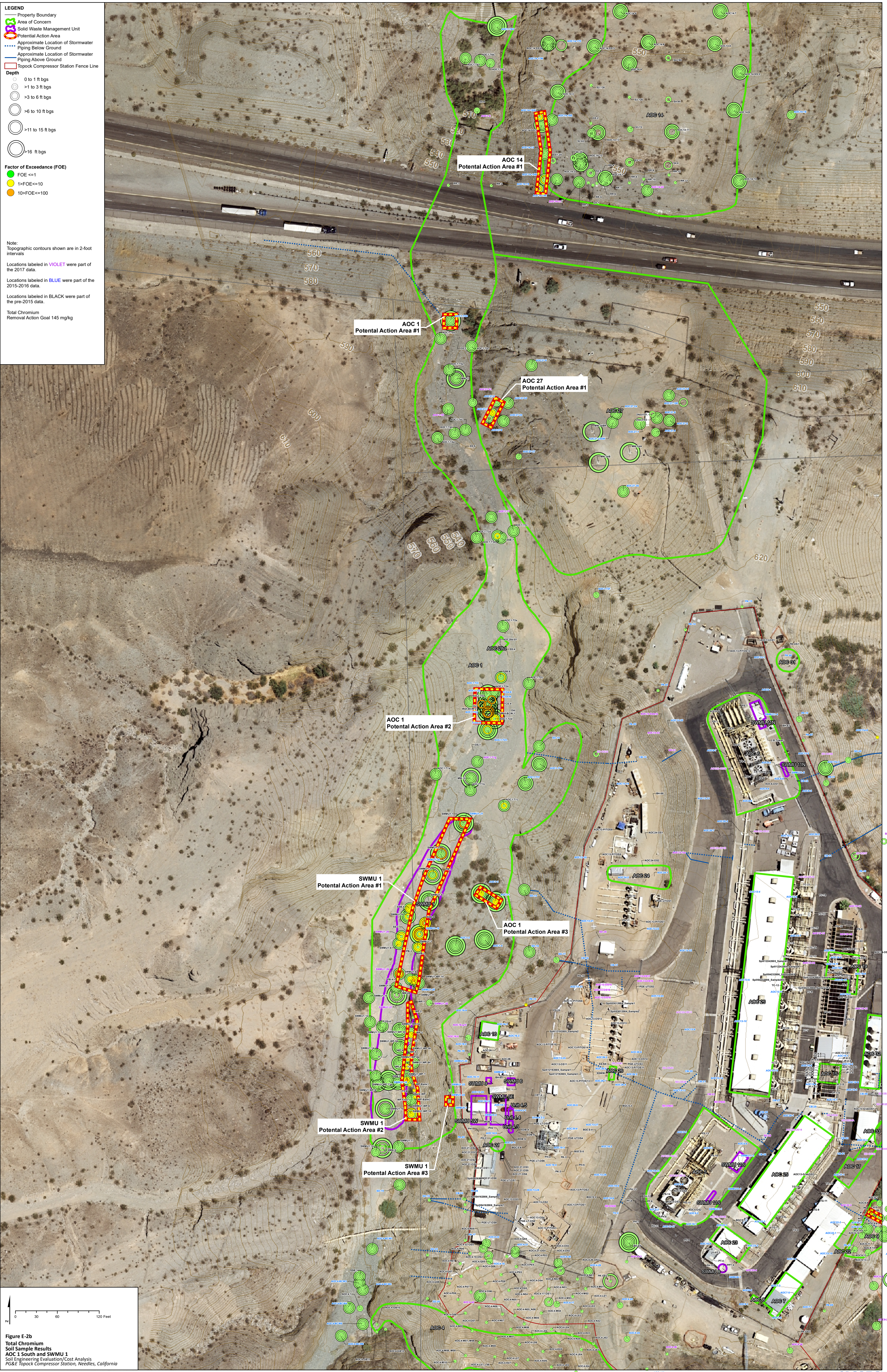
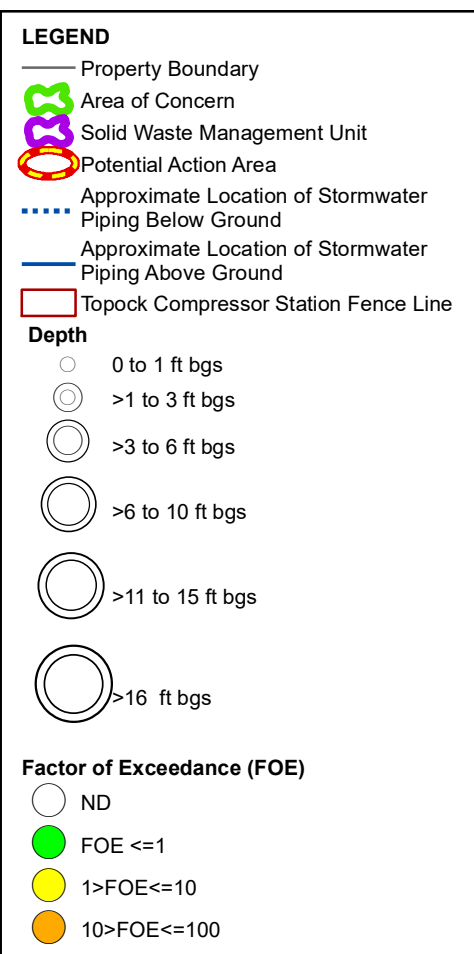


Figure E-2b  
Total Chromium  
Soil Sample Results  
AOC 1 South and SWMU 1  
Soil Engineering Evaluation/Cost Analysis  
PG&E Toprock Compressor Station, Needles, California





Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Copper  
Removal Action Goal 145 mg/kg



Figure E-2c  
Copper  
Soil Sample Results  
AOC 1 South and SWMU 1  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California



**LEGEND**

Property Boundary  
Area of Concern  
Solid Waste Management Unit  
Potential Action Area  
Approximate Location of Stormwater Piping Below Ground  
Approximate Location of Stormwater Piping Above Ground  
Topock Compressor Station Fence Line

**Depth**

0 to 1 ft bgs  
>1 to 3 ft bgs  
>3 to 6 ft bgs  
>6 to 10 ft bgs  
>11 to 15 ft bgs  
>16 ft bgs

**Factor of Exceedance (FOE)**

ND  
FOE <=1  
1>FOE<=10  
10>FOE<=100

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Lead  
Removal Action Goal 36 mg/kg



Figure E-2d  
Lead  
Soil Sample Results  
AOC 1 South and SWMU 1  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California



**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater
- Piping Below Ground
- Approximate Location of Stormwater
- Piping Above Ground
- Topock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >11 to 15 ft bgs
- >16 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1
- 1>FOE<=10
- 10>FOE<=100
- 100<FOE

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Human Dioxins and Furans Toxicity Equivalency Quotient (TEQ)  
Removal Action Goal 100 ng/kg





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater
- Piping Below Ground
- Approximate Location of Stormwater
- Piping Above Ground
- Topock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >11 to 15 ft bgs
- >16 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1
- 10>FOE<=100
- 100<FOE

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Mercury  
Removal Action Goal 1 mg/kg



Figure E-2f  
Mercury  
Soil Sample Results  
AOC 1 South and SWMU 1  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California



**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >11 to 15 ft bgs
- >16 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1
- 1>FOE<=10

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Molybdenum  
Removal Action Goal 22 mg/kg



Figure E-2g  
Molybdenum  
Soil Sample Results  
AOC 1 South and SWMU 1  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California



**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater
- Piping Below Ground
- Approximate Location of Stormwater
- Piping Above Ground
- Toprock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >11 to 15 ft bgs
- >16 ft bgs

**Factor of Exceedance (FOE)**

- FOE <=1
- 1>FOE<=10

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Zinc  
Removal Action Goal 1.050 mg/kg

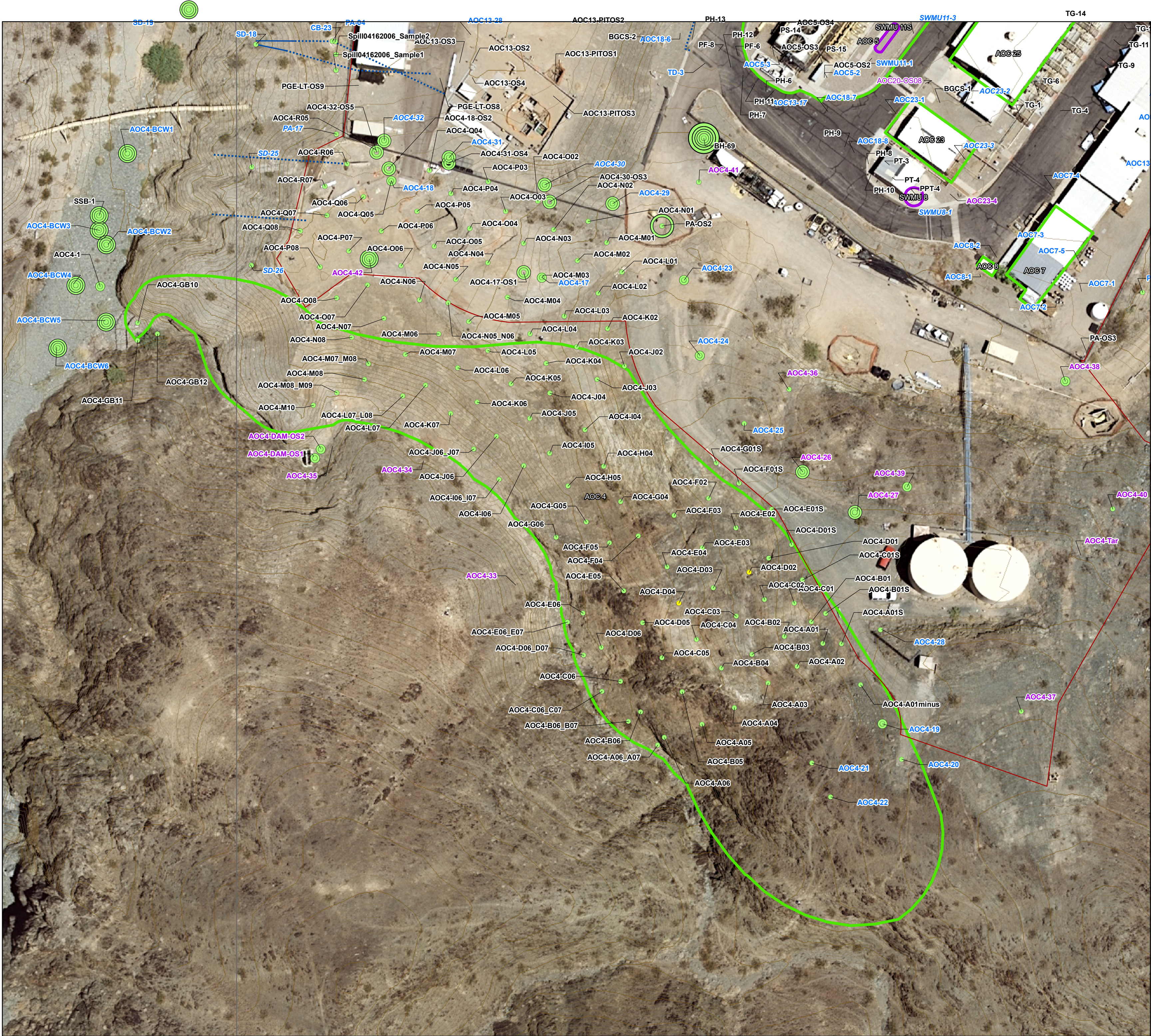


Figure E-2h  
Zinc  
Soil Sample Results  
AOC 1 South and SWMU 1  
Soil Engineering Evaluation/Cost Analysis  
PG&E Toprock Compressor Station, Needles, California









- LEGEND**
- Property Boundary
  - Area of Concern
  - Solid Waste Management Unit
  - Approximate Location of Stormwater Piping Below Ground
  - Approximate Location of Stormwater Piping Above Ground
  - Topock Compressor Station Fence Line

- Depth**
- 0 to 1 ft bgs
  - >1 to 3 ft bgs
  - >3 to 6 ft bgs
  - >6 to 10 ft bgs
  - >11 to 15 ft bgs
  - >16 ft bgs
- Factor of Exceedance (FOE)**
- FOE <=1
  - 1>FOE<=10

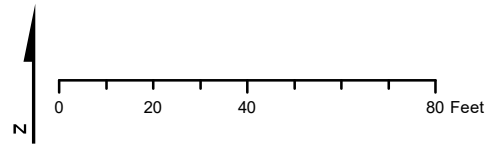
Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Total Chromium  
Removal Action Goal 145 mg/kg



**Figure E-3b**  
**Total Chromium**  
**Soil Sample Results**  
**AOC 4**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





- LEGEND**
- Property Boundary
  - Area of Concern
  - Solid Waste Management Unit
  - Approximate Location of Stormwater Piping Below Ground
  - Approximate Location of Stormwater Piping Above Ground
  - Topock Compressor Station Fence Line

- Depth**
- 0 to 1 ft bgs
  - >1 to 3 ft bgs
  - >3 to 6 ft bgs
  - >6 to 10 ft bgs
  - >11 to 15 ft bgs
  - >16 ft bgs
- Factor of Exceedance (FOE)**
- FOE <=1
  - 1>FOE<=10

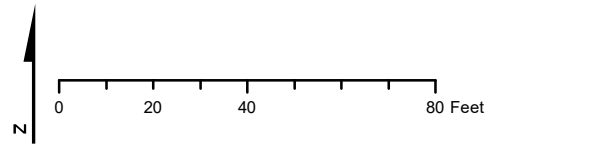
Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Copper  
Removal Action Goal 145 mg/kg

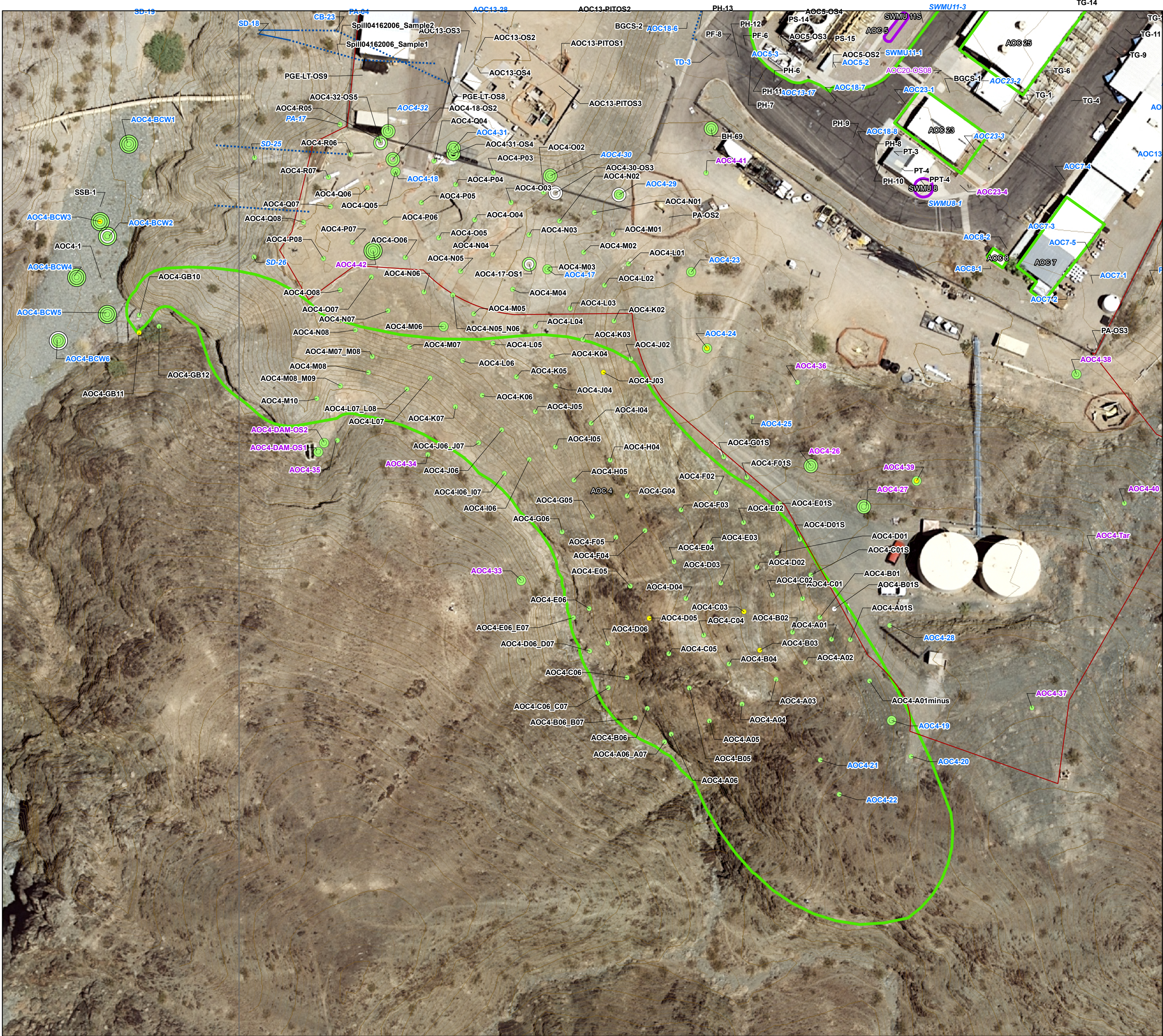


**Figure E-3c**  
**Copper**  
**Soil Sample Results**  
**AOC 4**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California









**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

| Depth            | Factor of Exceedance (FOE) |
|------------------|----------------------------|
| 0 to 1 ft bgs    | ND                         |
| >1 to 3 ft bgs   | FOE <=1                    |
| >3 to 6 ft bgs   | 1>FOE<=10                  |
| >6 to 10 ft bgs  |                            |
| >11 to 15 ft bgs |                            |
| >16 ft bgs       |                            |

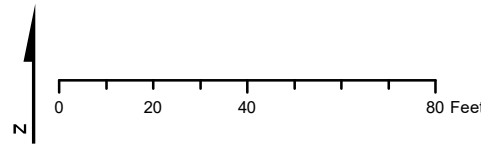
Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Human Dioxins and Furans Toxicity Equivalency Quotient (TEQ)  
Removal Action Goal 100 ng/kg



**Figure E-3e**  
**Human Dioxins and Furans TEQ**  
**Soil Sample Results**  
**AOC 4**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





- LEGEND**
- Property Boundary
  - Area of Concern
  - Solid Waste Management Unit
  - Approximate Location of Stormwater Piping Below Ground
  - Approximate Location of Stormwater Piping Above Ground
  - Topock Compressor Station Fence Line

- Depth**
- 0 to 1 ft bgs
  - >1 to 3 ft bgs
  - >3 to 6 ft bgs
  - >6 to 10 ft bgs
  - >11 to 15 ft bgs
  - >16 ft bgs
- Factor of Exceedance (FOE)**
- ND
  - FOE <=1

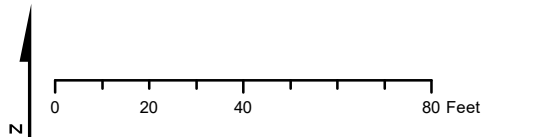
Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Mercury  
Removal Action Goal 1 mg/kg



**Figure E-3f**  
**Mercury**  
**Soil Sample Results**  
**AOC 4**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

| Depth            | Factor of Exceedance (FOE) |
|------------------|----------------------------|
| 0 to 1 ft bgs    | ND                         |
| >1 to 3 ft bgs   | FOE <=1                    |
| >3 to 6 ft bgs   |                            |
| >6 to 10 ft bgs  |                            |
| >11 to 15 ft bgs |                            |
| >16 ft bgs       |                            |

Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Molybdenum  
Removal Action Goal 22 mg/kg

**Figure E-3g**  
**Molybdenum**  
**Soil Sample Results**  
**AOC 4**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >11 to 15 ft bgs
- >16 ft bgs

**Factor of Exceedance (FOE)**

- FOE <=1

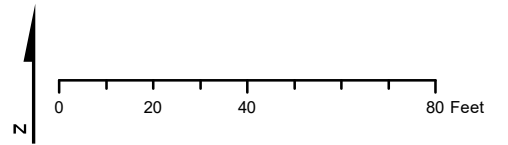
Note:  
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Zinc  
Removal Action Goal 1,050 mg/kg



**Figure E-3h**  
**Zinc**  
**Soil Sample Results**  
**AOC 4**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

| Depth            | Factor of Exceedance (FOE) |
|------------------|----------------------------|
| 0 to 1 ft bgs    | ND                         |
| >1 to 3 ft bgs   | FOE <=1                    |
| >3 to 6 ft bgs   | 1>FOE<=10                  |
| >6 to 10 ft bgs  | 10>FOE<=100                |
| >10 to 15 ft bgs |                            |
| >15 ft bgs       |                            |

Note:  
Topographic contours shown are in 2-foot intervals

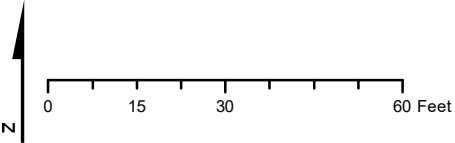
The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

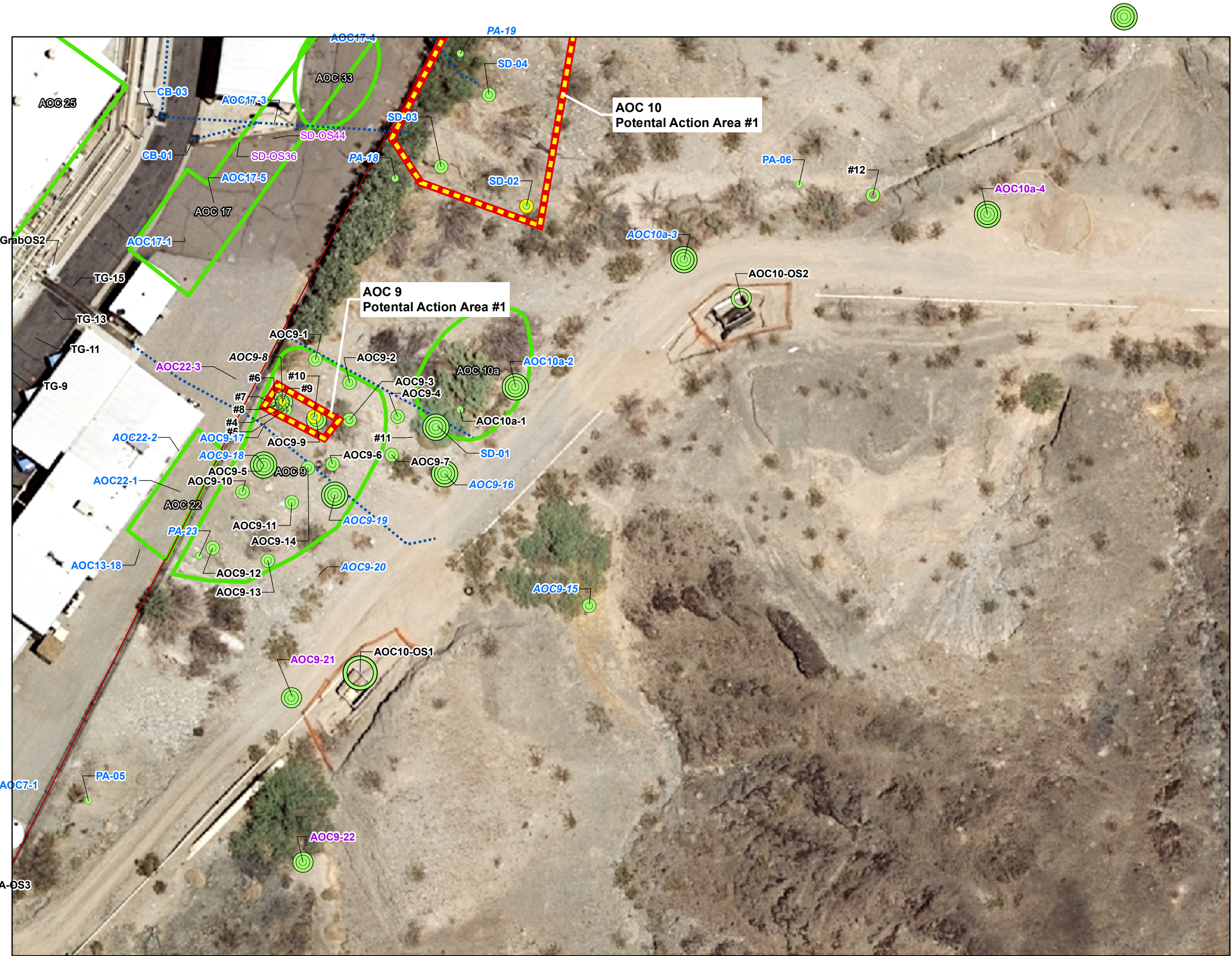
Locations labeled in **BLACK** were part of the pre-2015 data.

Hexavalent Chromium  
Removal Action Goal 3.1 mg/kg



**Figure E-4a**  
**Hexavalent Chromium**  
**Soil Sample Results**  
**AOC 9**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





LEGEND

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

| Depth |                  | Factor of Exceedance (FOE) |           |
|-------|------------------|----------------------------|-----------|
|       | 0 to 1 ft bgs    |                            | FOE <=1   |
|       | >1 to 3 ft bgs   |                            | 1>FOE<=10 |
|       | >3 to 6 ft bgs   |                            |           |
|       | >6 to 10 ft bgs  |                            |           |
|       | >10 to 15 ft bgs |                            |           |
|       | >15 ft bgs       |                            |           |

Note:  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Total Chromium  
Removal Action Goal 145 mg/kg

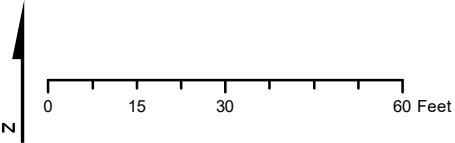
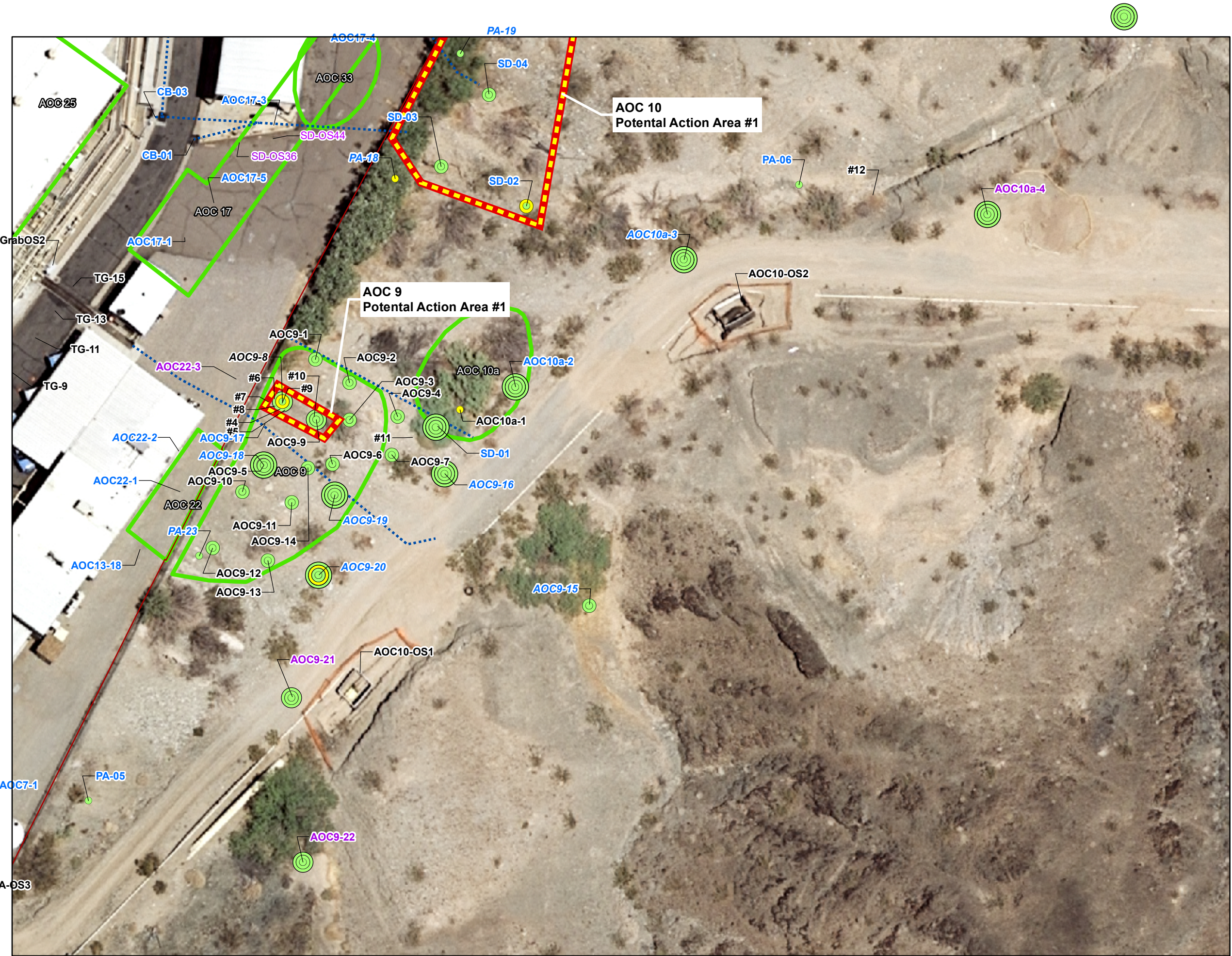


Figure E-4b  
Total Chromium  
Soil Sample Results  
AOC 9  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California









**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

| Depth              | Factor of Exceedance (FOE) |
|--------------------|----------------------------|
| ○ 0 to 1 ft bgs    | ● FOE <=1                  |
| ○ >1 to 3 ft bgs   | ● 1>FOE<=10                |
| ○ >3 to 6 ft bgs   |                            |
| ○ >6 to 10 ft bgs  |                            |
| ○ >10 to 15 ft bgs |                            |
| ○ >15 ft bgs       |                            |

Note:  
Topographic contours shown are in 2-foot intervals

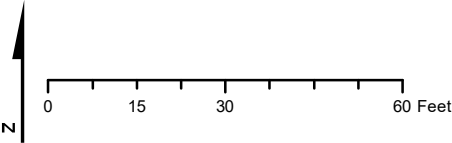
The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

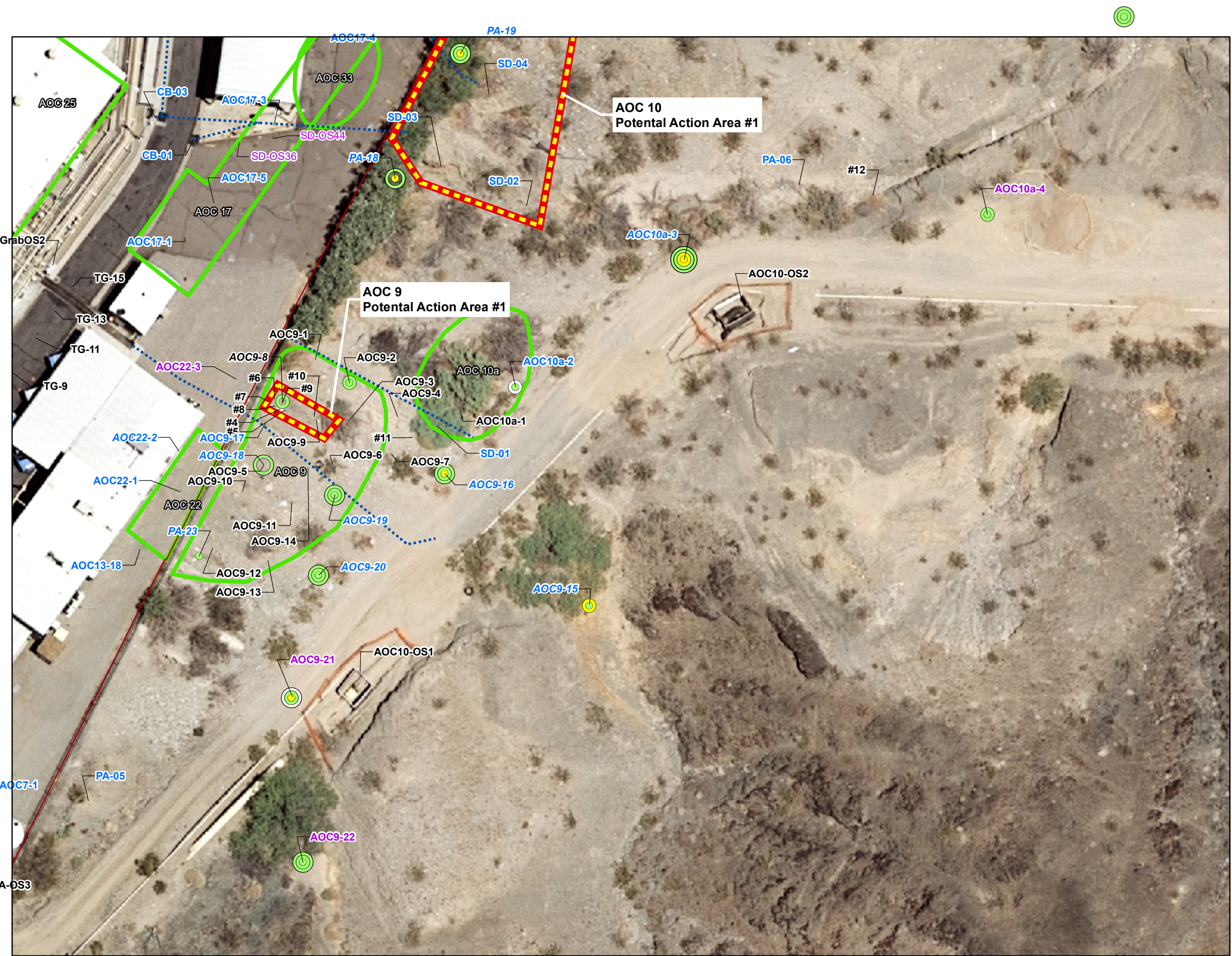
Locations labeled in **BLACK** were part of the pre-2015 data.

Lead  
Removal Action Goal 36 mg/kg



**Figure E-4d**  
**Lead**  
**Soil Sample Results**  
**AOC 9**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

| Depth            | Factor of Exceedance (FOE) |
|------------------|----------------------------|
| 0 to 1 ft bgs    | ND                         |
| >1 to 3 ft bgs   | FOE <=1                    |
| >3 to 6 ft bgs   | 1 > FOE <=10               |
| >6 to 10 ft bgs  |                            |
| >10 to 15 ft bgs |                            |
| >15 ft bgs       |                            |

Note:  
Topographic contours shown are in 2-foot intervals

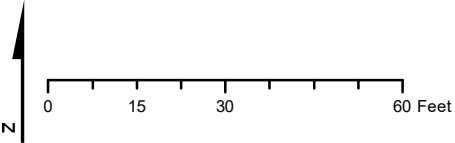
The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Human Dioxins and Furans Toxicity Equivalency Quotient (TEQ)  
Removal Action Goal 100 ng/kg



**Figure E-4e**  
**Human Dioxins and Furans TEQ**  
**Soil Sample Results**  
**AOC 9**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

| Depth              | Factor of Exceedance (FOE) |
|--------------------|----------------------------|
| ○ 0 to 1 ft bgs    | ○ ND                       |
| ○ >1 to 3 ft bgs   | ● FOE <=1                  |
| ○ >3 to 6 ft bgs   | ● 1>FOE<=10                |
| ○ >6 to 10 ft bgs  |                            |
| ○ >10 to 15 ft bgs |                            |
| ○ >15 ft bgs       |                            |

Note:  
Topographic contours shown are in 2-foot intervals

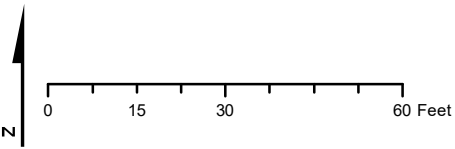
The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Mercury  
Removal Action Goal 1 mg/kg



**Figure E-4f**  
**Mercury**  
**Soil Sample Results**  
**AOC 9**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

| Depth            | Factor of Exceedance (FOE) |
|------------------|----------------------------|
| 0 to 1 ft bgs    | ND                         |
| >1 to 3 ft bgs   | FOE <=1                    |
| >3 to 6 ft bgs   |                            |
| >6 to 10 ft bgs  |                            |
| >10 to 15 ft bgs |                            |
| >15 ft bgs       |                            |

Note:  
Topographic contours shown are in 2-foot intervals

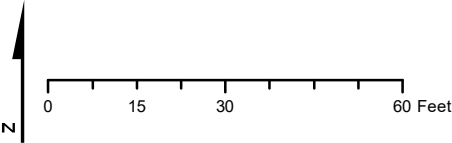
The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

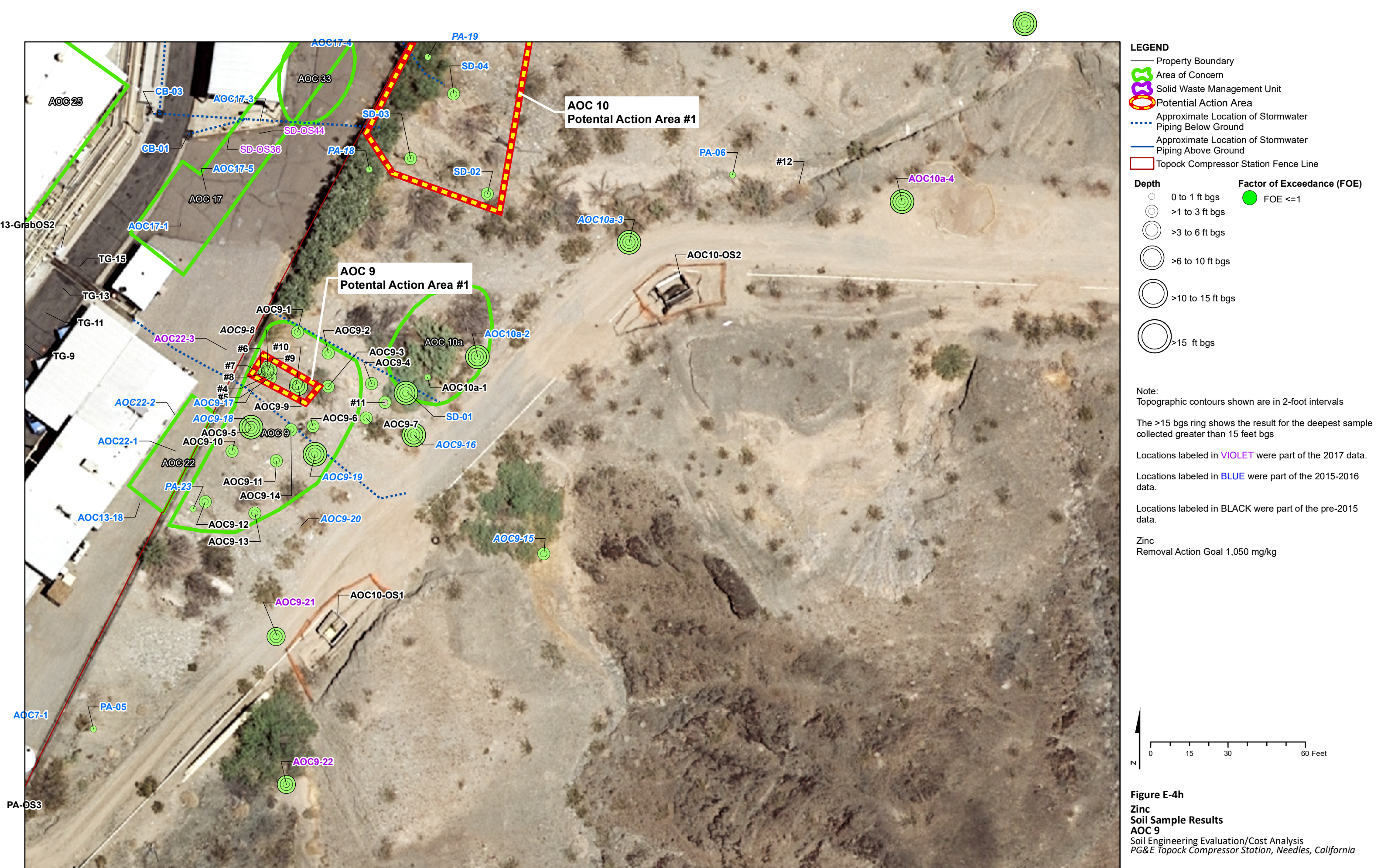
Locations labeled in **BLACK** were part of the pre-2015 data.

Molybdenum  
Removal Action Goal 22 mg/kg



**Figure E-4g**  
**Molybdenum**  
**Soil Sample Results**  
**AOC 9**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California









**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >10 to 15 ft bgs
- >15 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE<=1
- 1<FOE<=10
- 10<FOE<=100
- 100<FOE

**Note:**  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Hexavalent Chromium  
Removal Action Goal 3.1 mg/kg

**Figure E-5a**  
**Hexavalent Chromium**  
**Soil Sample Results**  
**AOC 10**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >10 to 15 ft bgs
- >15 ft bgs

**Factor of Exceedance (FOE)**

- FOE ≤ 1
- 1 > FOE ≤ 10
- 10 > FOE ≤ 100

Note:  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Total Chromium  
Removal Action Goal 145 mg/kg

**Figure E-5b**  
**Total Chromium**  
**Soil Sample Results**  
**AOC 10**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California









**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >10 to 15 ft bgs
- >15 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE<=1
- 1>FOE<=10
- 10>FOE<=100

**Note:**  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Lead  
Removal Action Goal 36 mg/kg

**Figure E-5d**  
**Lead**  
**Soil Sample Results**  
**AOC 10**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >10 to 15 ft bgs
- >15 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE<=1
- 1>FOE<=10
- 10>FOE<=100

**Note:**  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Human Dioxins and Furans Toxicity Equivalency Quotient (TEQ)  
Removal Action Goal 100 ng/kg

**Figure E-5e**  
**Human Dioxins and Furans TEQ**  
**Soil Sample Results**  
**AOC 10**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





Figure E-5f  
Mercury  
Soil Sample Results  
AOC 10  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California











**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >10 to 15 ft bgs
- >15 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1
- 1>FOE<=10
- 10>FOE<=100

Note:  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

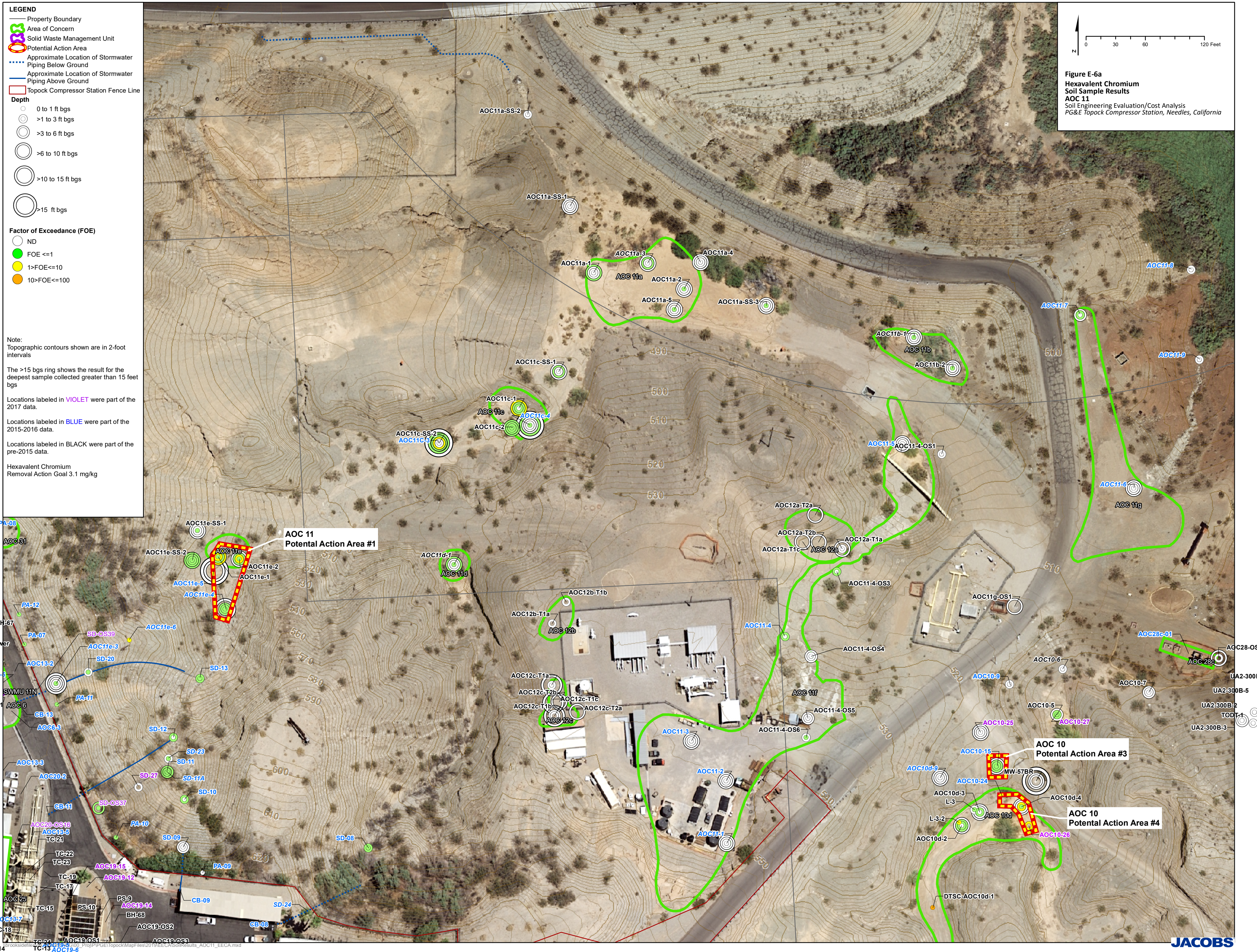
Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Hexavalent Chromium  
Removal Action Goal 3.1 mg/kg

**Figure E-6a**  
**Hexavalent Chromium**  
**Soil Sample Results**  
**AOC 11**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >10 to 15 ft bgs
- >15 ft bgs

**Factor of Exceedance (FOE)**

- FOE <=1
- 1>FOE<=10

Note:  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

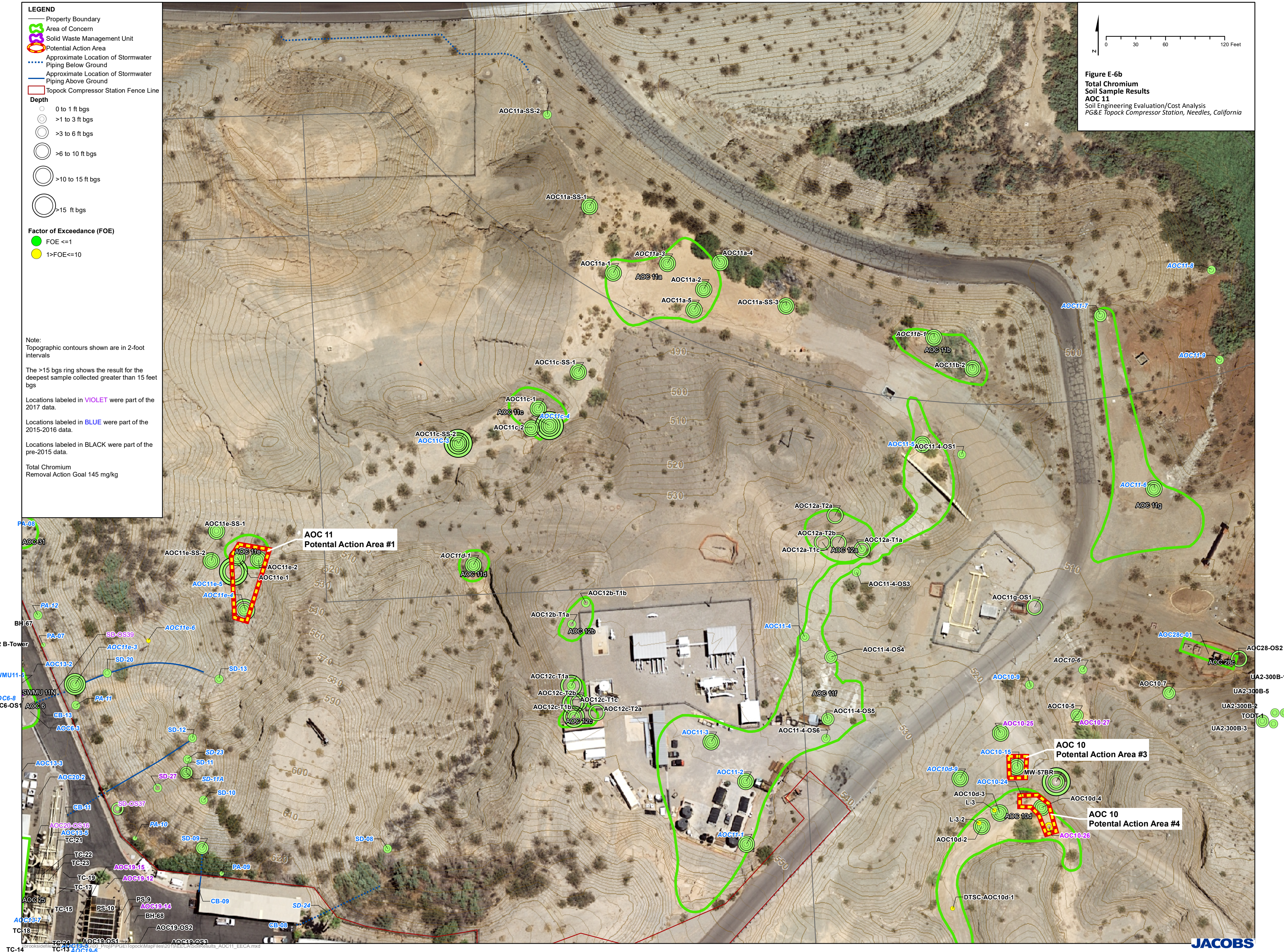
Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Total Chromium  
Removal Action Goal 145 mg/kg

Figure E-6b  
Total Chromium  
Soil Sample Results  
AOC 11  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >10 to 15 ft bgs
- >15 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1

Note:  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

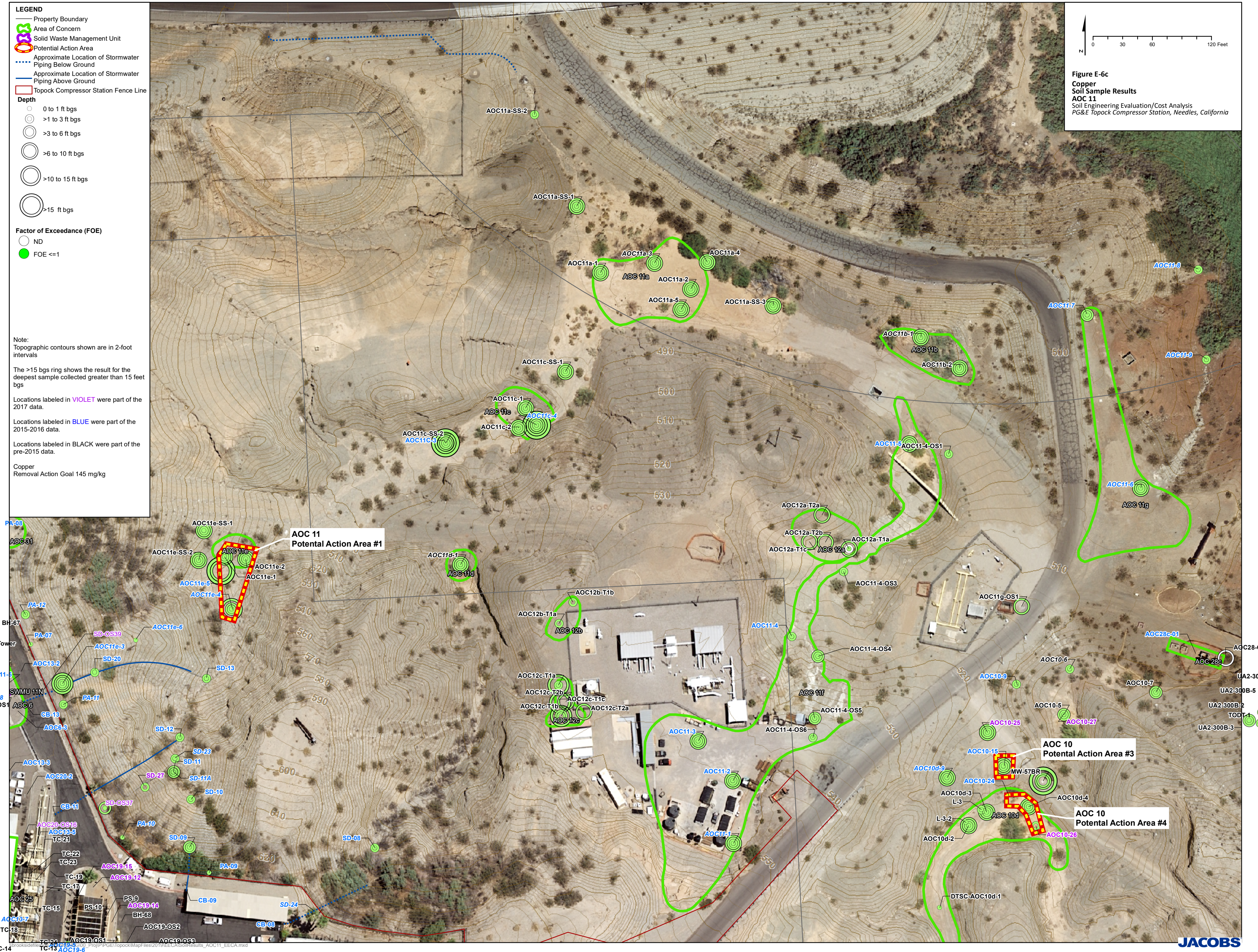
Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Copper  
Removal Action Goal 145 mg/kg

**Figure E-6c**  
**Copper**  
**Soil Sample Results**  
**AOC 11**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >10 to 15 ft bgs
- >15 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1
- 1>FOE<=10

Note:  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

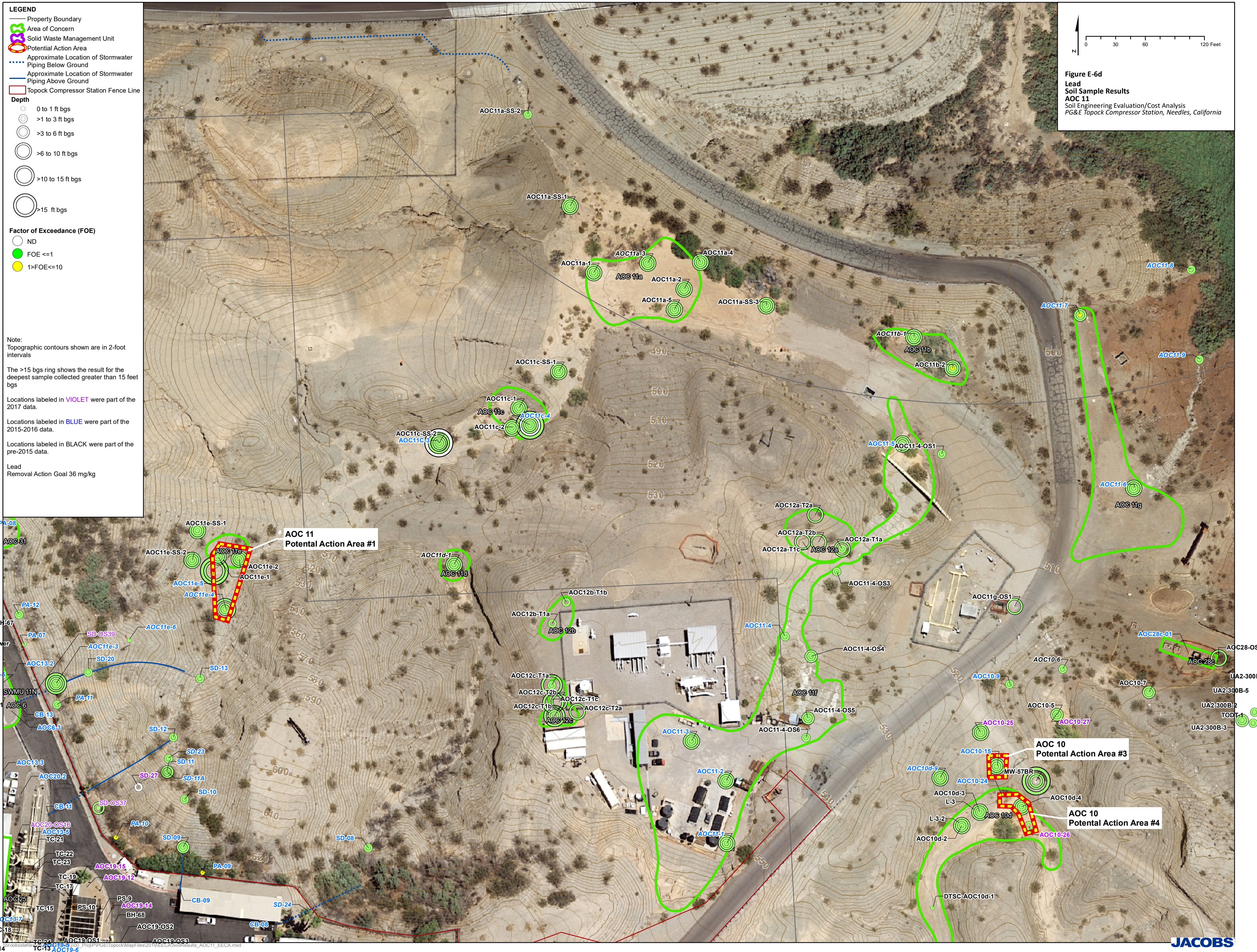
Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Lead  
Removal Action Goal 36 mg/kg

**Figure E-6d**  
**Lead**  
**Soil Sample Results**  
**AOC 11**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California









**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >10 to 15 ft bgs
- >15 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1

Note:  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Mercury  
Removal Action Goal 1 mg/kg

**Figure E-6f**  
**Mercury**  
**Soil Sample Results**  
**AOC 11**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Topock Compressor Station Fence Line

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >10 to 15 ft bgs
- >15 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1

Note:  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Molybdenum  
Removal Action Goal 22 mg/kg

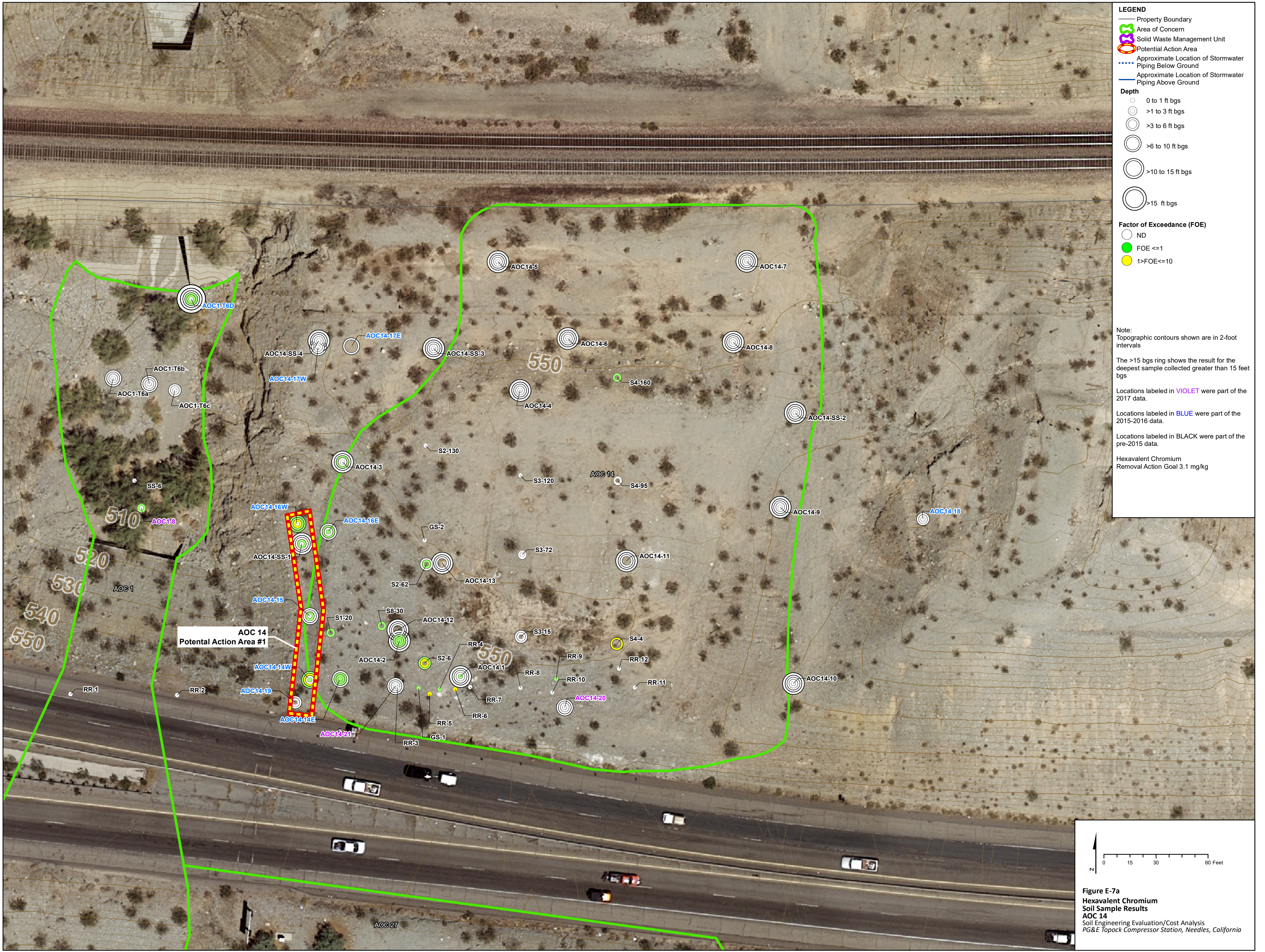
**Figure E-6g**  
**Molybdenum**  
**Soil Sample Results**  
**AOC 11**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California











- LEGEND**
- Property Boundary
  - Area of Concern
  - Solid Waste Management Unit
  - Potential Action Area
  - Approximate Location of Stormwater Piping Below Ground
  - Approximate Location of Stormwater Piping Above Ground

- Depth**
- 0 to 1 ft bgs
  - >1 to 3 ft bgs
  - >3 to 6 ft bgs
  - >6 to 10 ft bgs
  - >10 to 15 ft bgs
  - >15 ft bgs

- Factor of Exceedance (FOE)**
- ND
  - FOE <=1
  - 1>FOE<=10

**Note:**  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

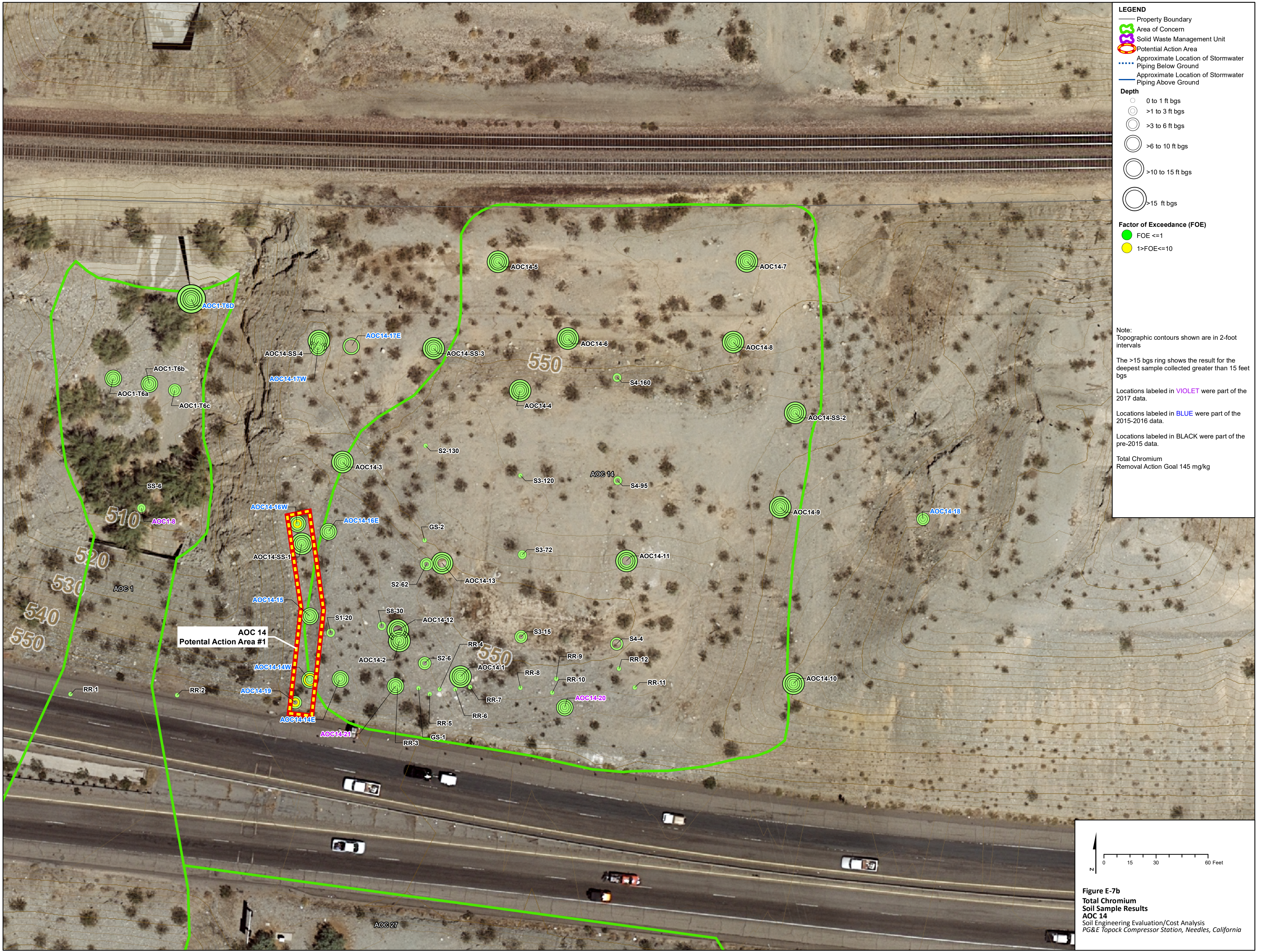
Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

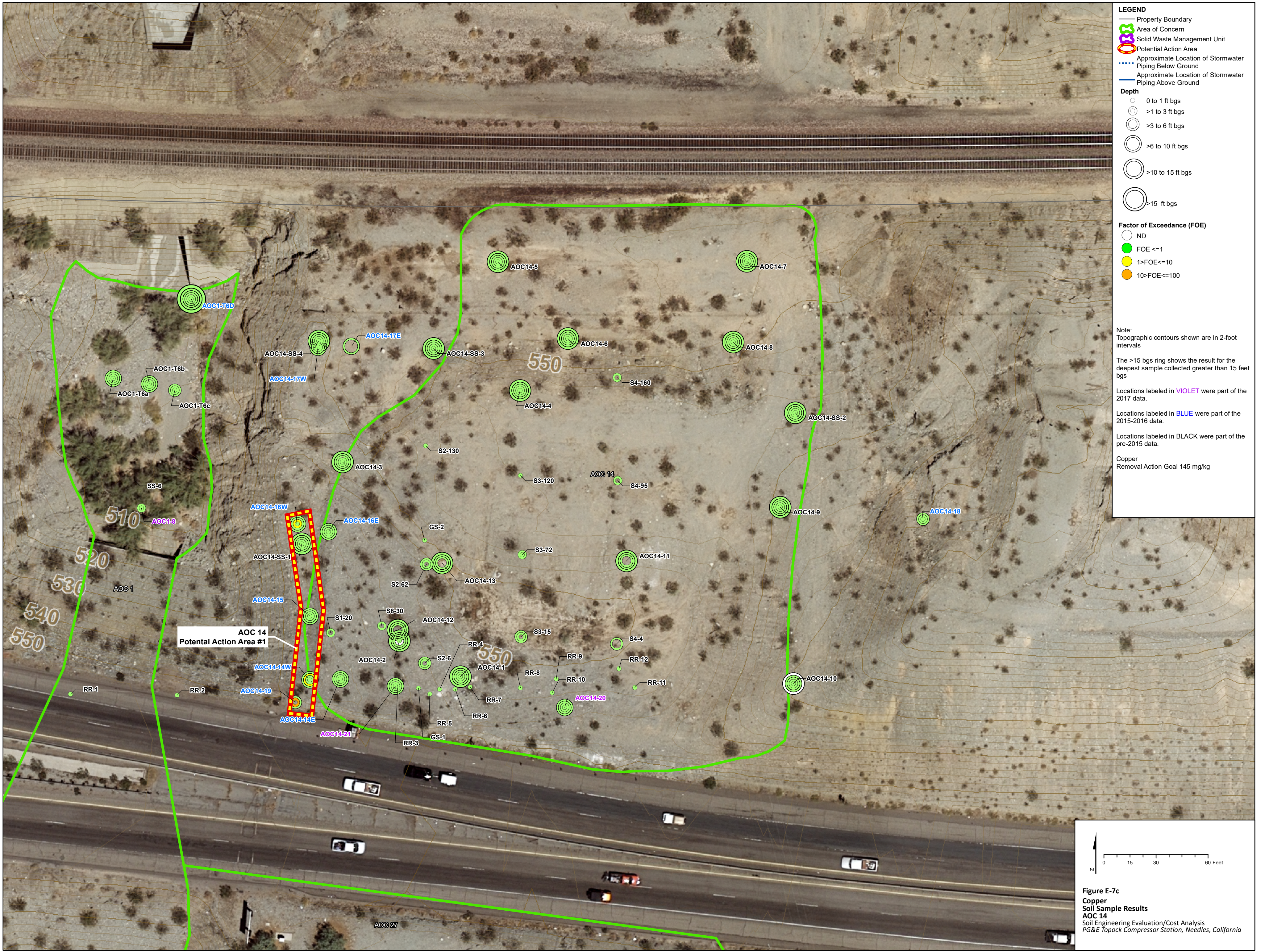
Hexavalent Chromium Removal Action Goal 3.1 mg/kg

**Figure E-7a**  
**Hexavalent Chromium**  
**Soil Sample Results**  
**AOC 14**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California









**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >10 to 15 ft bgs
- >15 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1
- 1>FOE<=10
- 10>FOE<=100

**Note:**  
Topographic contours shown are in 2-foot intervals.

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

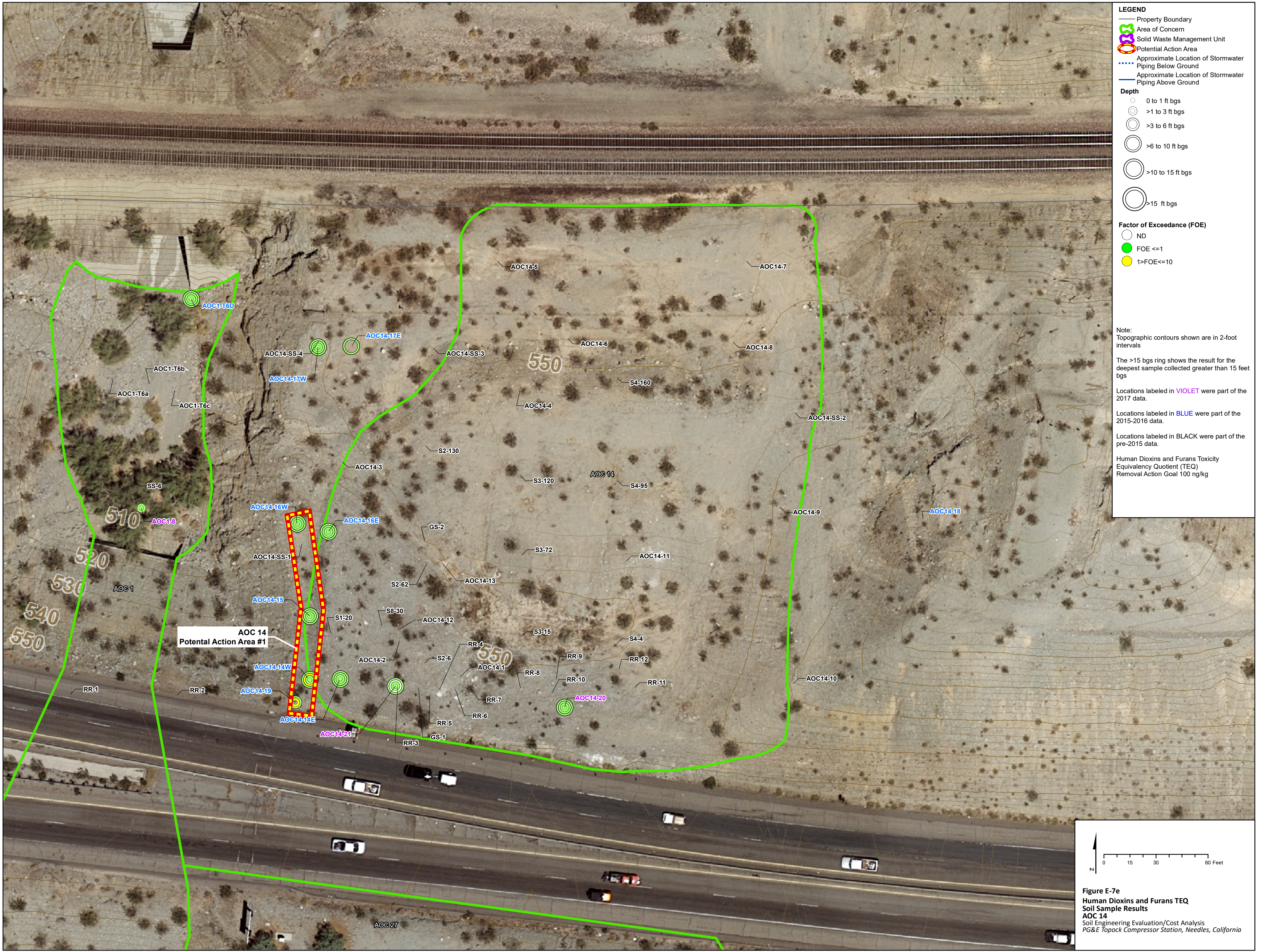
Copper Removal Action Goal 145 mg/kg

**Figure E-7c**  
**Copper**  
**Soil Sample Results**  
**AOC 14**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California









**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >10 to 15 ft bgs
- >15 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1
- 1>FOE<=10

**Note:**  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

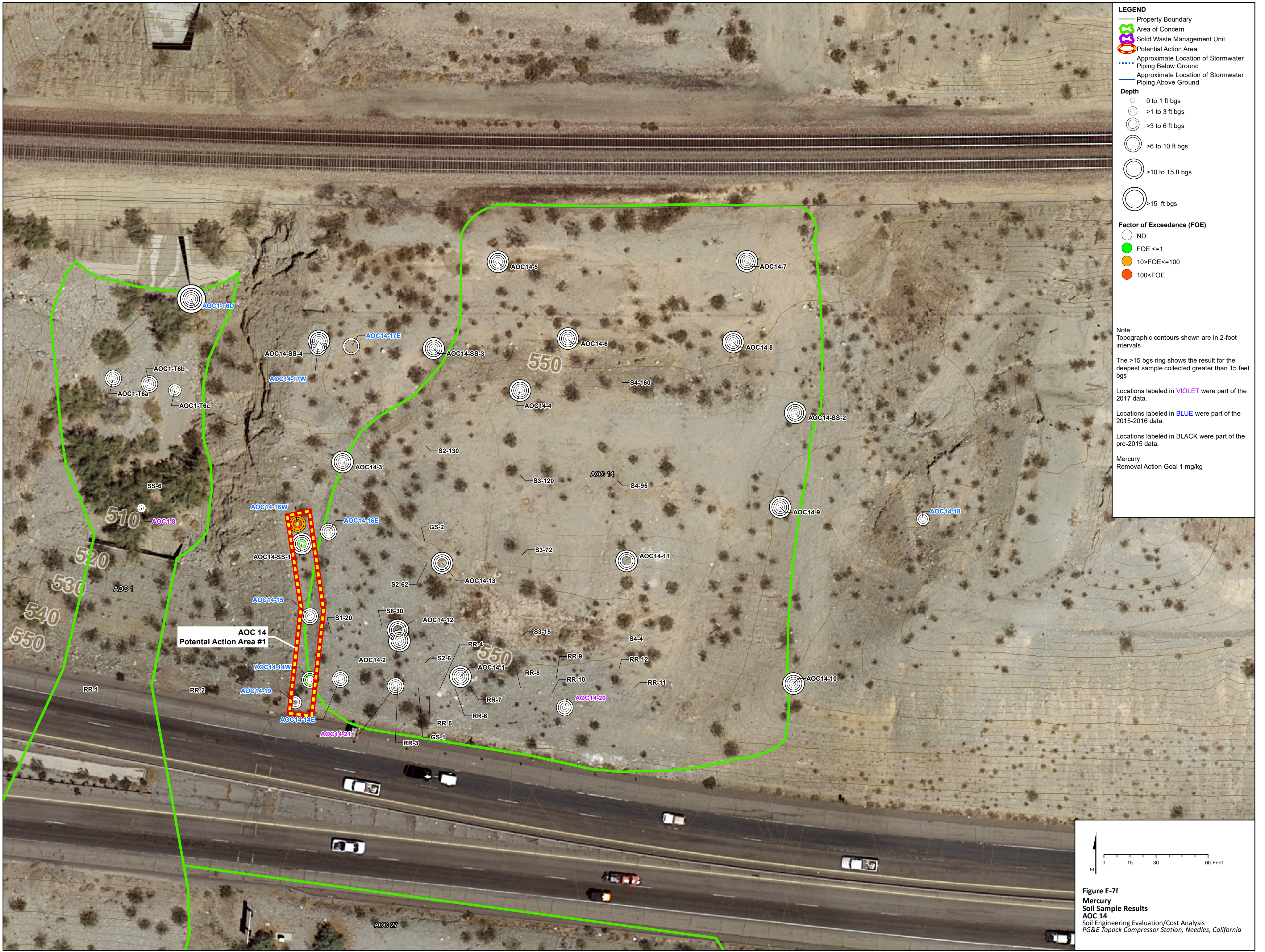
Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Human Dioxins and Furans Toxicity Equivalency Quotient (TEQ)  
Removal Action Goal 100 ng/kg

**Figure E-7e**  
**Human Dioxins and Furans TEQ**  
**Soil Sample Results**  
**AOC 14**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >10 to 15 ft bgs
- >15 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1
- 10>FOE<=100
- 100<FOE

**Note:**  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

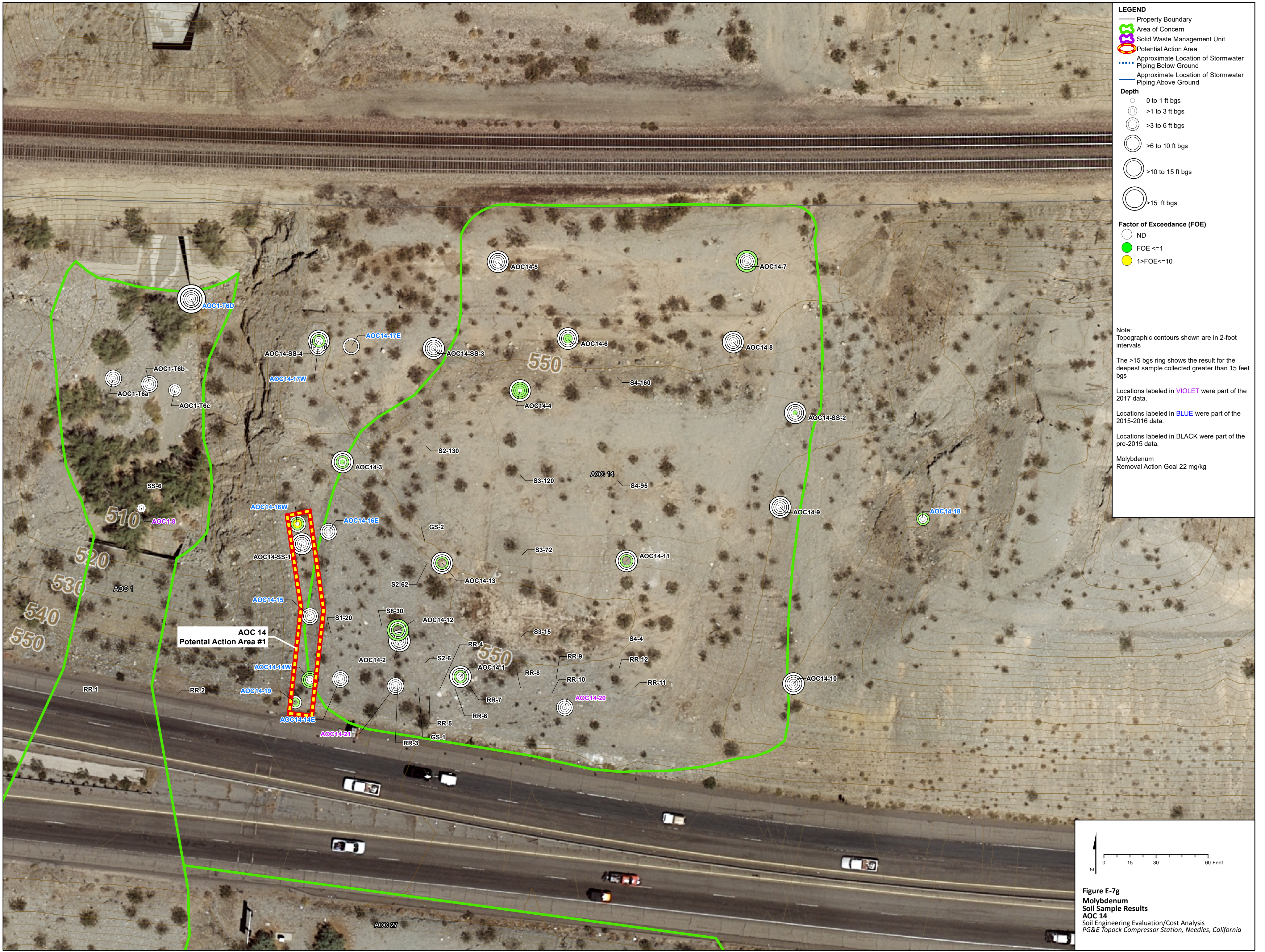
Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Mercury Removal Action Goal 1 mg/kg

**Figure E-7f**  
**Mercury**  
**Soil Sample Results**  
**AOC 14**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >10 to 15 ft bgs
- >15 ft bgs

**Factor of Exceedance (FOE)**

- ND
- FOE <=1
- 1>FOE<=10

**Note:**  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

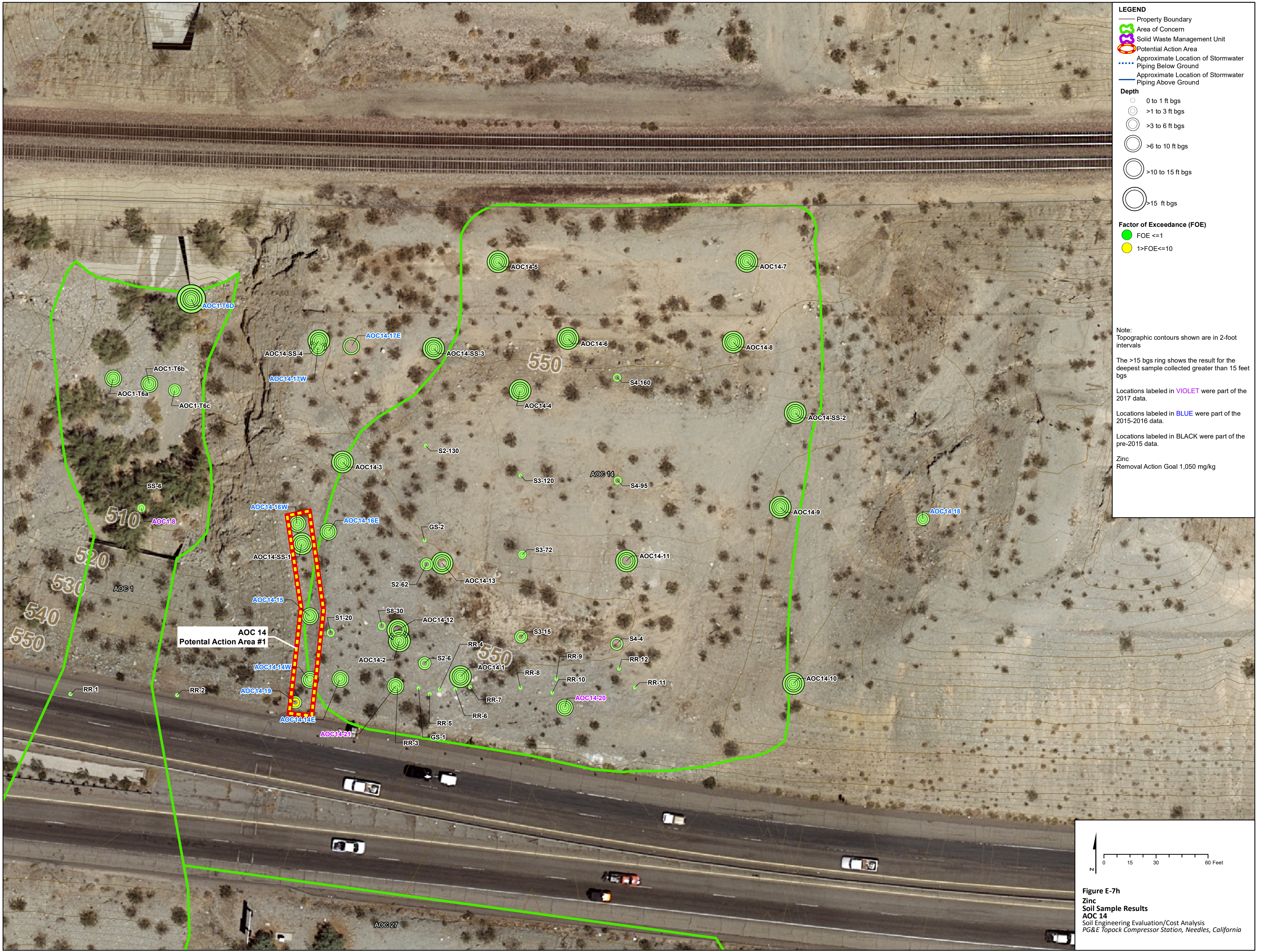
Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Molybdenum  
Removal Action Goal 22 mg/kg

**Figure E-7g**  
**Molybdenum**  
**Soil Sample Results**  
**AOC 14**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Solid Waste Management Unit
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground

**Depth**

- 0 to 1 ft bgs
- >1 to 3 ft bgs
- >3 to 6 ft bgs
- >6 to 10 ft bgs
- >10 to 15 ft bgs
- >15 ft bgs

**Factor of Exceedance (FOE)**

- FOE <=1
- 1>FOE<=10

**Note:**  
Topographic contours shown are in 2-foot intervals

The >15 bgs ring shows the result for the deepest sample collected greater than 15 feet bgs

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

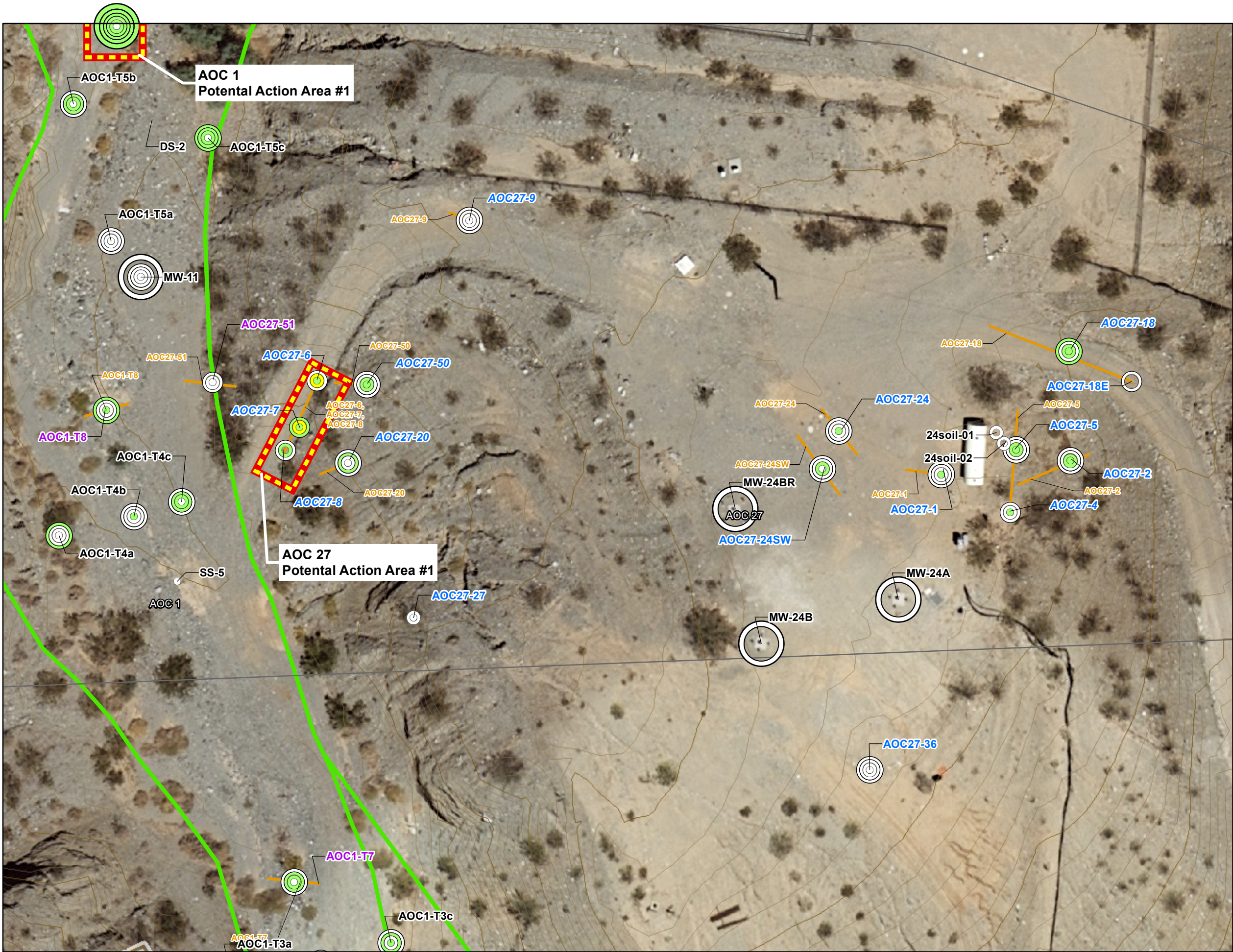
Locations labeled in **BLACK** were part of the pre-2015 data.

Zinc  
Removal Action Goal 1,050 mg/kg

**Figure E-7h**  
**Zinc**  
**Soil Sample Results**  
**AOC 14**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California

0 15 30 60 Feet





**LEGEND**

- Property Boundary
- Area of Concern
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Soil Trench

| Depth            | Factor of Exceedance (FOE) |
|------------------|----------------------------|
| 0 to 1 ft bgs    | ND                         |
| >1 to 3 ft bgs   | FOE <=1                    |
| >3 to 6 ft bgs   | 1>FOE<=10                  |
| >6 to 10 ft bgs  |                            |
| >11 to 15 ft bgs |                            |
| >16 ft bgs       |                            |

Note:

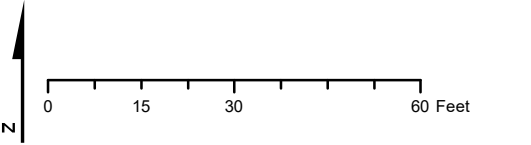
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

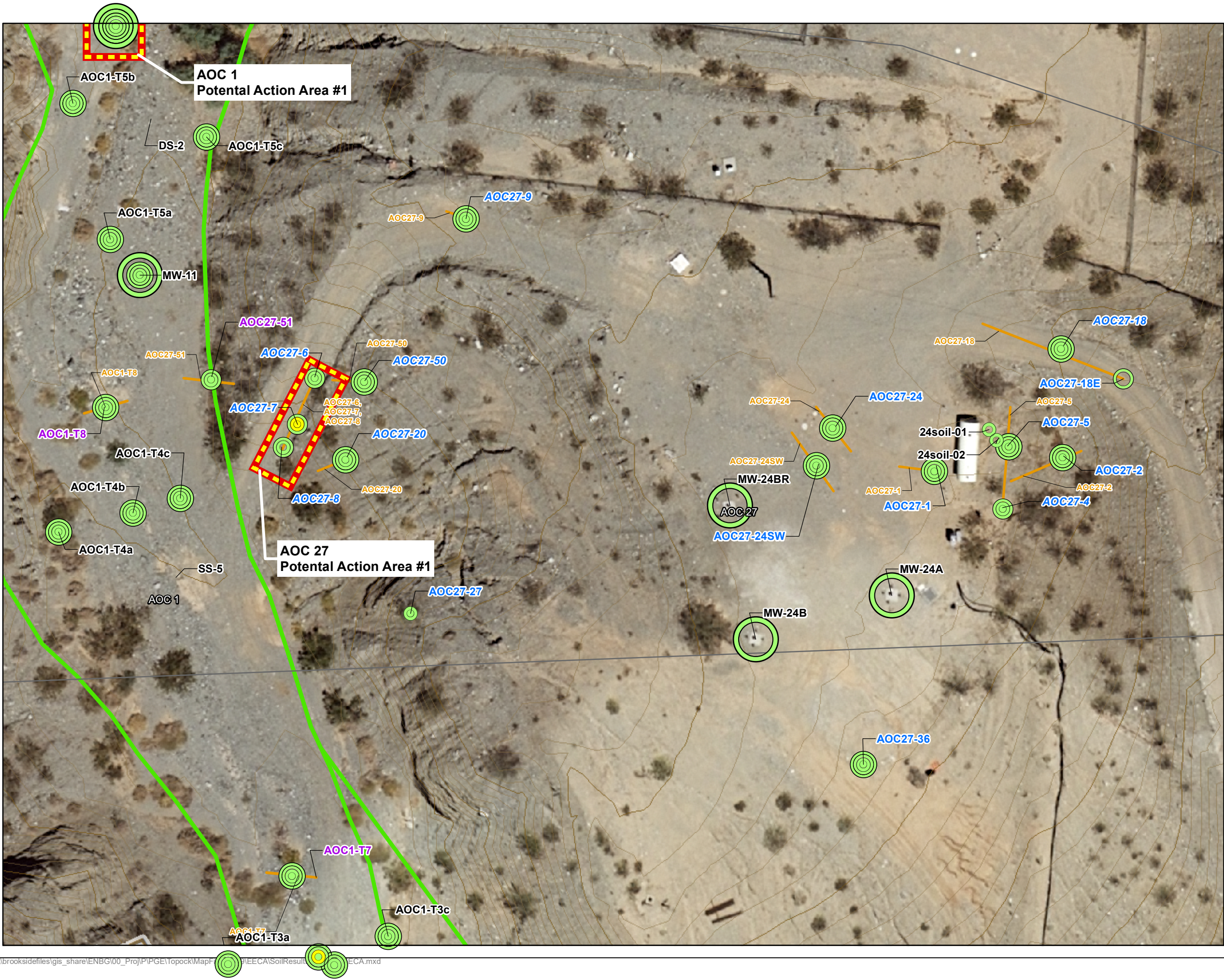
Locations labeled in **BLACK** were part of the pre-2015 data.

Hexavalent Chromium  
Removal Action Goal 3.1 mg/kg



**Figure E-8a**  
**Hexavalent Chromium**  
**Soil Sample Results**  
**AOC 27**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Soil Trench

| Depth            | Factor of Exceedance (FOE) |
|------------------|----------------------------|
| 0 to 1 ft bgs    | FOE <=1                    |
| >1 to 3 ft bgs   | 1>FOE<=10                  |
| >3 to 6 ft bgs   |                            |
| >6 to 10 ft bgs  |                            |
| >11 to 15 ft bgs |                            |
| >16 ft bgs       |                            |

Note:

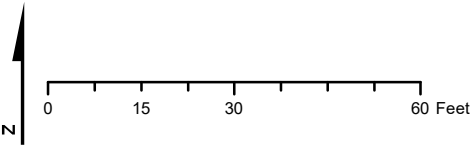
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

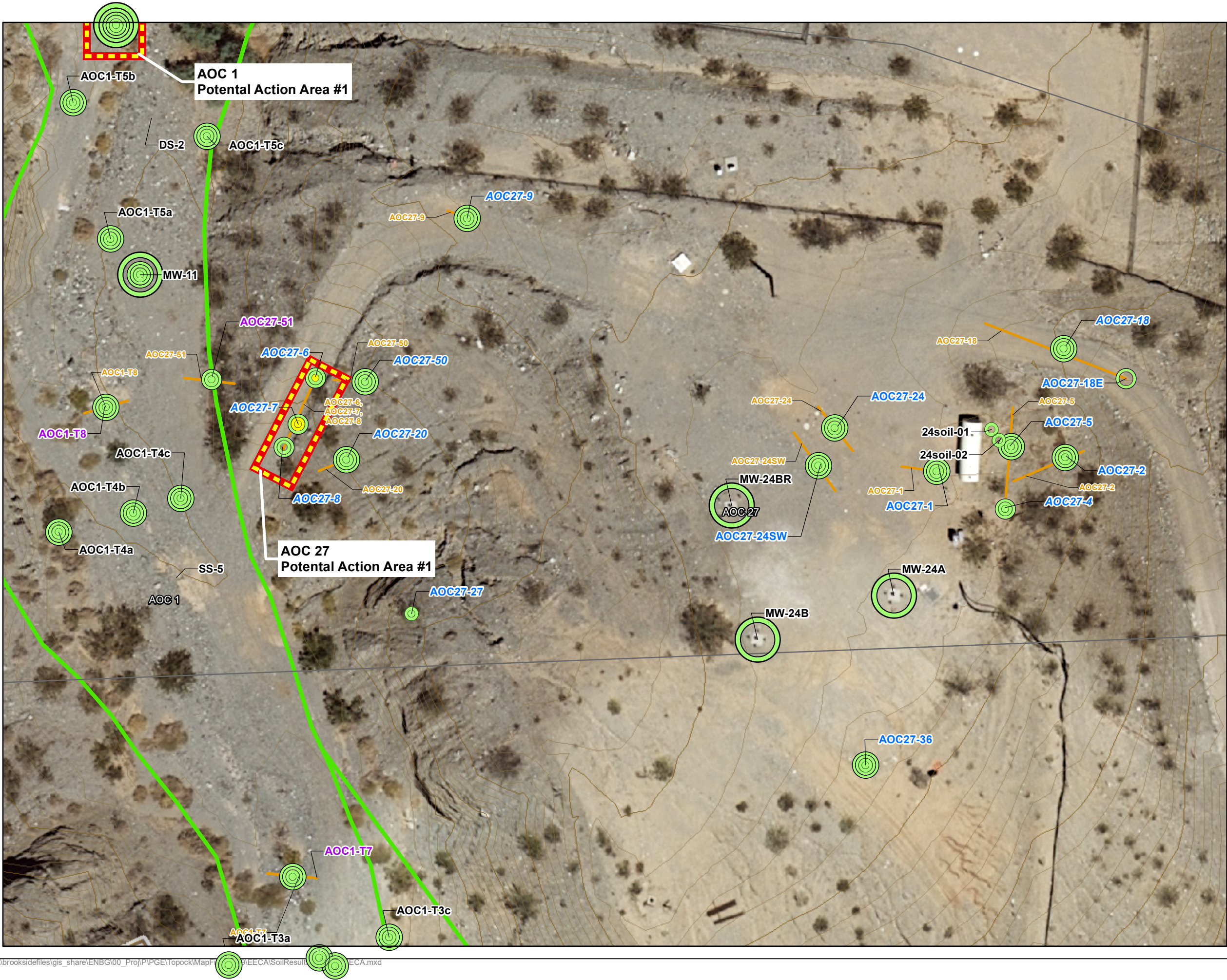
Locations labeled in **BLACK** were part of the pre-2015 data.

Total Chromium  
Removal Action Goal 145 mg/kg



**Figure E-8b**  
**Total Chromium**  
**Soil Sample Results**  
**AOC 27**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
  - Area of Concern
  - Potential Action Area
  - Approximate Location of Stormwater Piping Below Ground
  - Approximate Location of Stormwater Piping Above Ground
  - Soil Trench
- Depth**
- 0 to 1 ft bgs
  - >1 to 3 ft bgs
  - >3 to 6 ft bgs
  - >6 to 10 ft bgs
  - >11 to 15 ft bgs
  - >16 ft bgs
- Factor of Exceedance (FOE)**
- FOE <=1
  - 1>FOE<=10

Note:

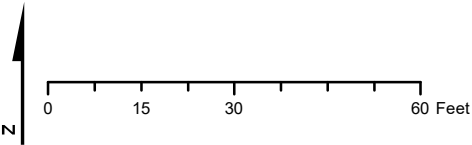
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

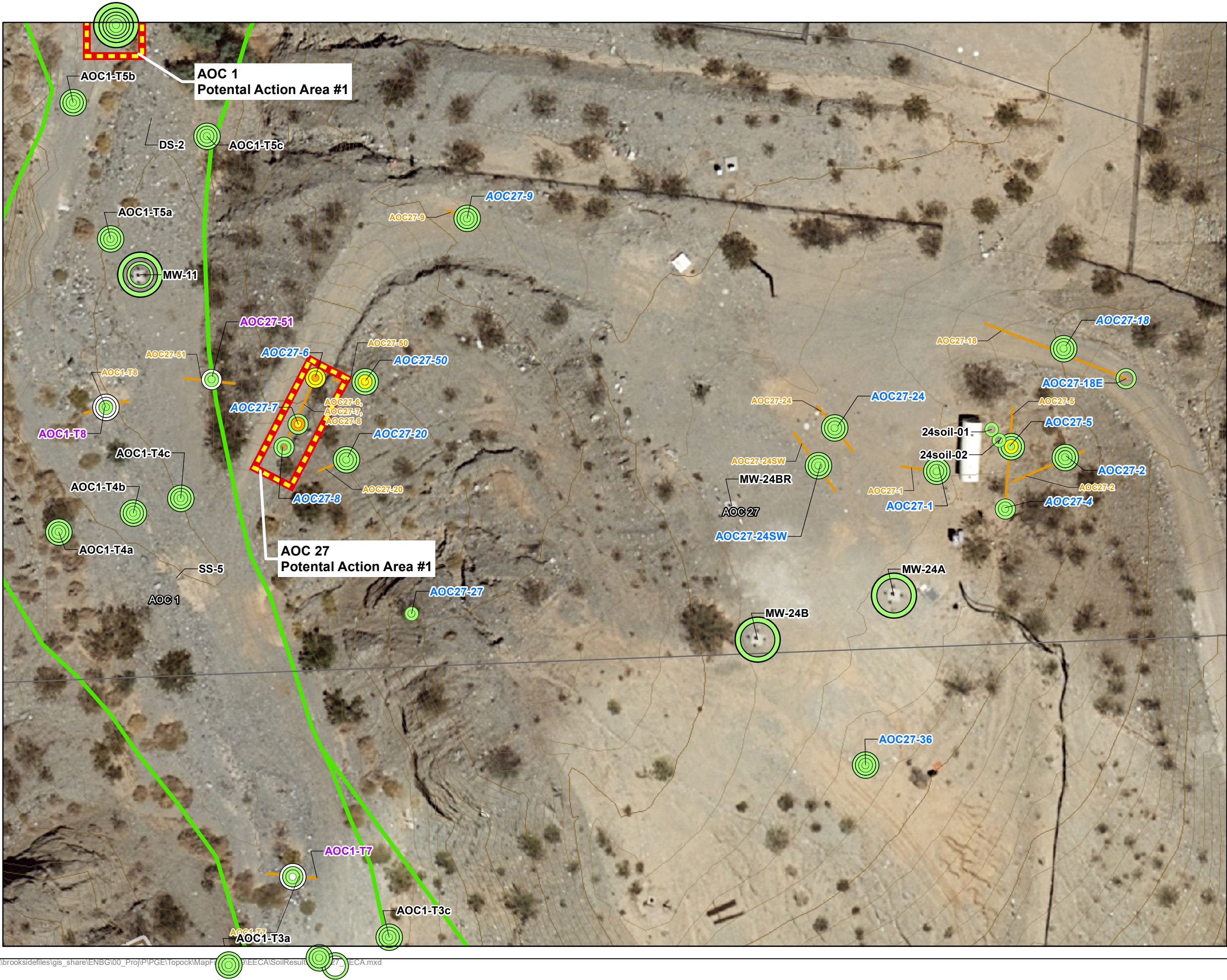
Locations labeled in **BLACK** were part of the pre-2015 data.

Copper  
Removal Action Goal 145 mg/kg



**Figure E-8c**  
**Copper**  
**Soil Sample Results**  
**AOC 27**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Soil Trench

| Depth            | Factor of Exceedance (FOE) |
|------------------|----------------------------|
| 0 to 1 ft bgs    | ND                         |
| >1 to 3 ft bgs   | FOE <=1                    |
| >3 to 6 ft bgs   | 1>FOE<=10                  |
| >6 to 10 ft bgs  | 10>FOE<=100                |
| >11 to 15 ft bgs |                            |
| >16 ft bgs       |                            |

Note:

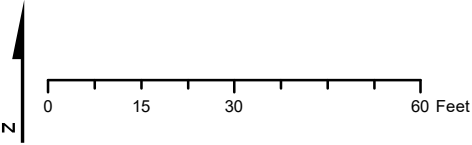
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

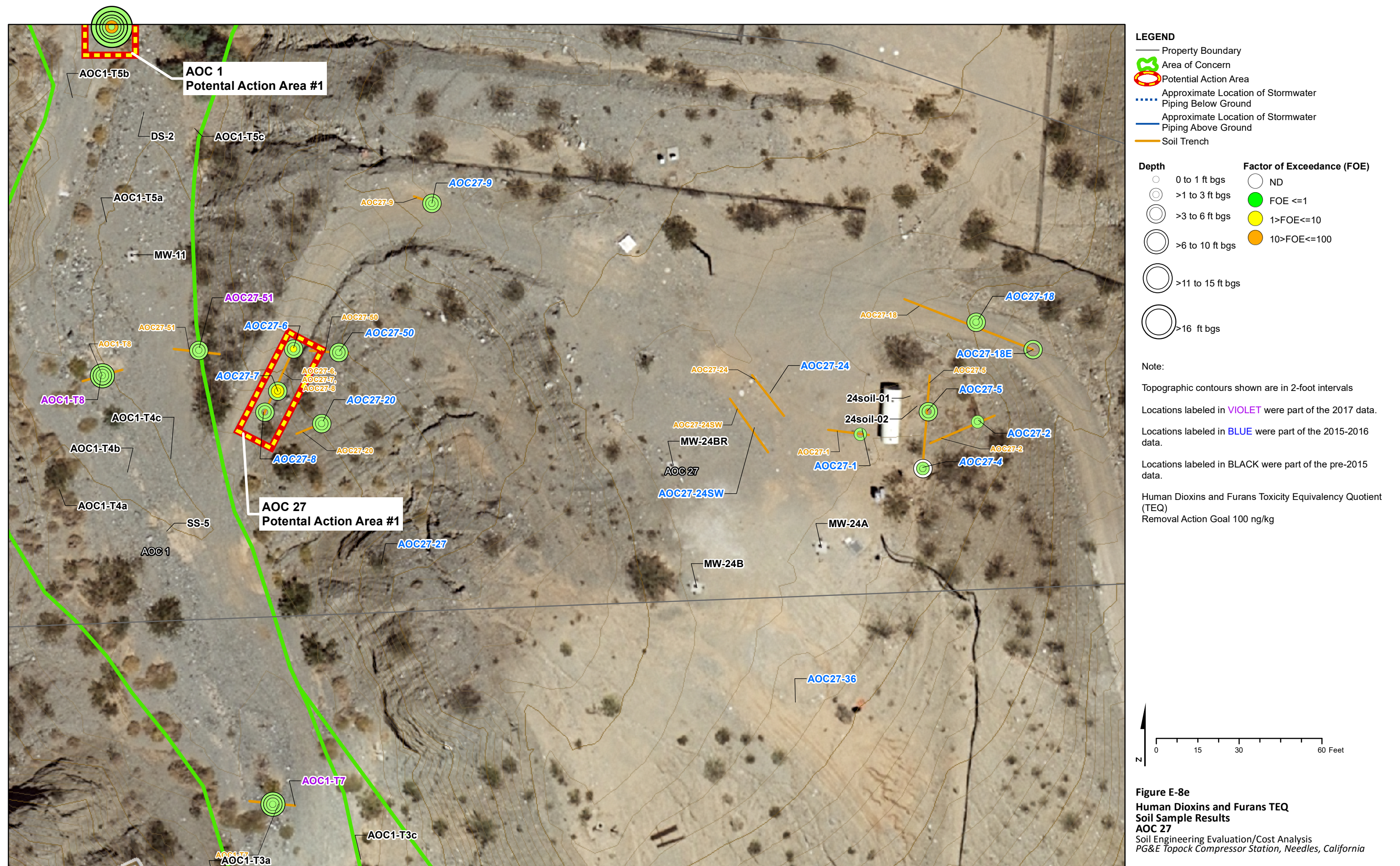
Locations labeled in **BLACK** were part of the pre-2015 data.

Lead Removal Action Goal 36 mg/kg

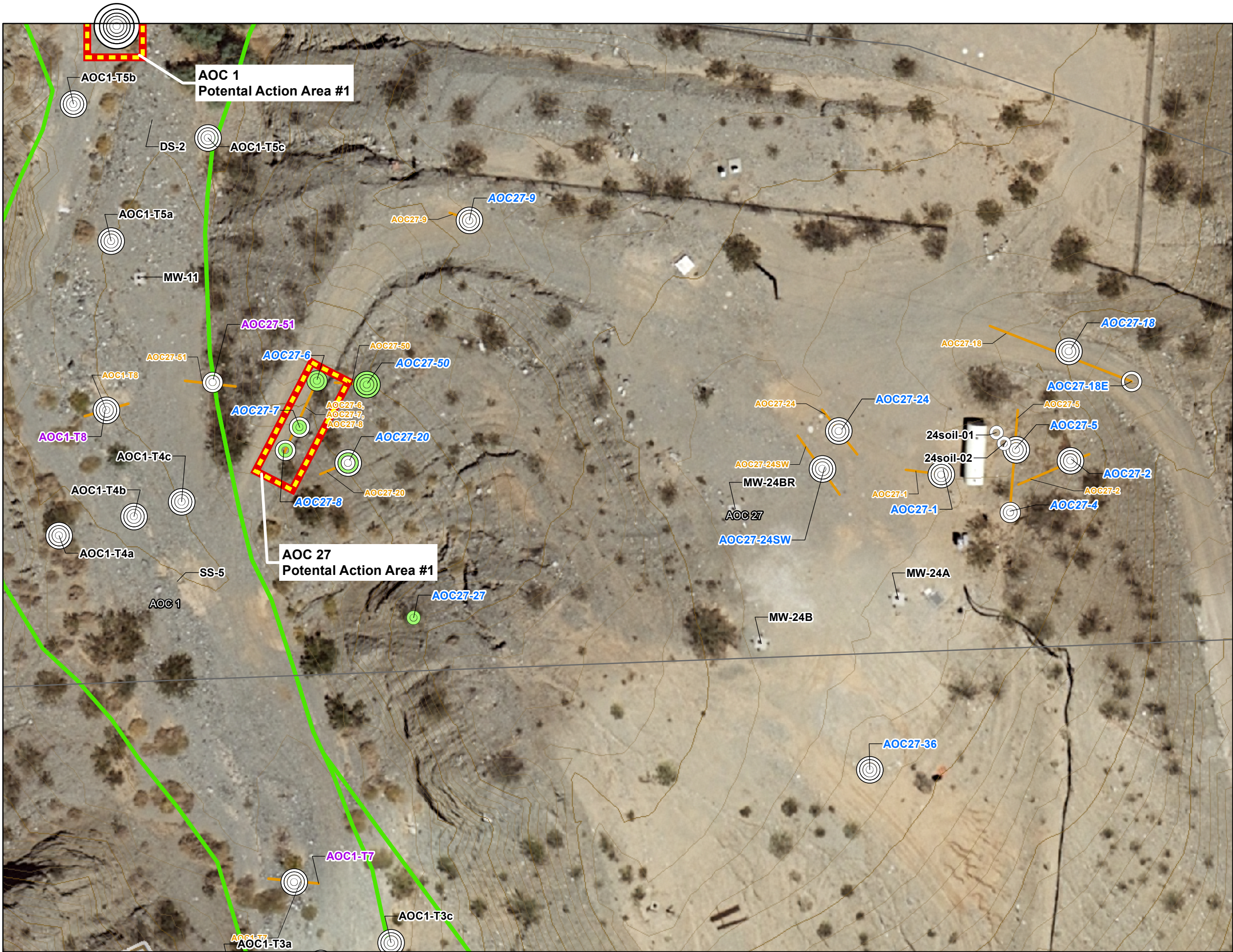


**Figure E-8d**  
**Lead**  
**Soil Sample Results**  
**AOC 27**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California









**LEGEND**

- Property Boundary
  - Area of Concern
  - Potential Action Area
  - Approximate Location of Stormwater Piping Below Ground
  - Approximate Location of Stormwater Piping Above Ground
  - Soil Trench
- | Depth            | Factor of Exceedance (FOE) |
|------------------|----------------------------|
| 0 to 1 ft bgs    | ND                         |
| >1 to 3 ft bgs   | FOE <=1                    |
| >3 to 6 ft bgs   |                            |
| >6 to 10 ft bgs  |                            |
| >11 to 15 ft bgs |                            |
| >16 ft bgs       |                            |

Note:

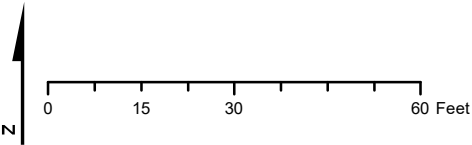
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

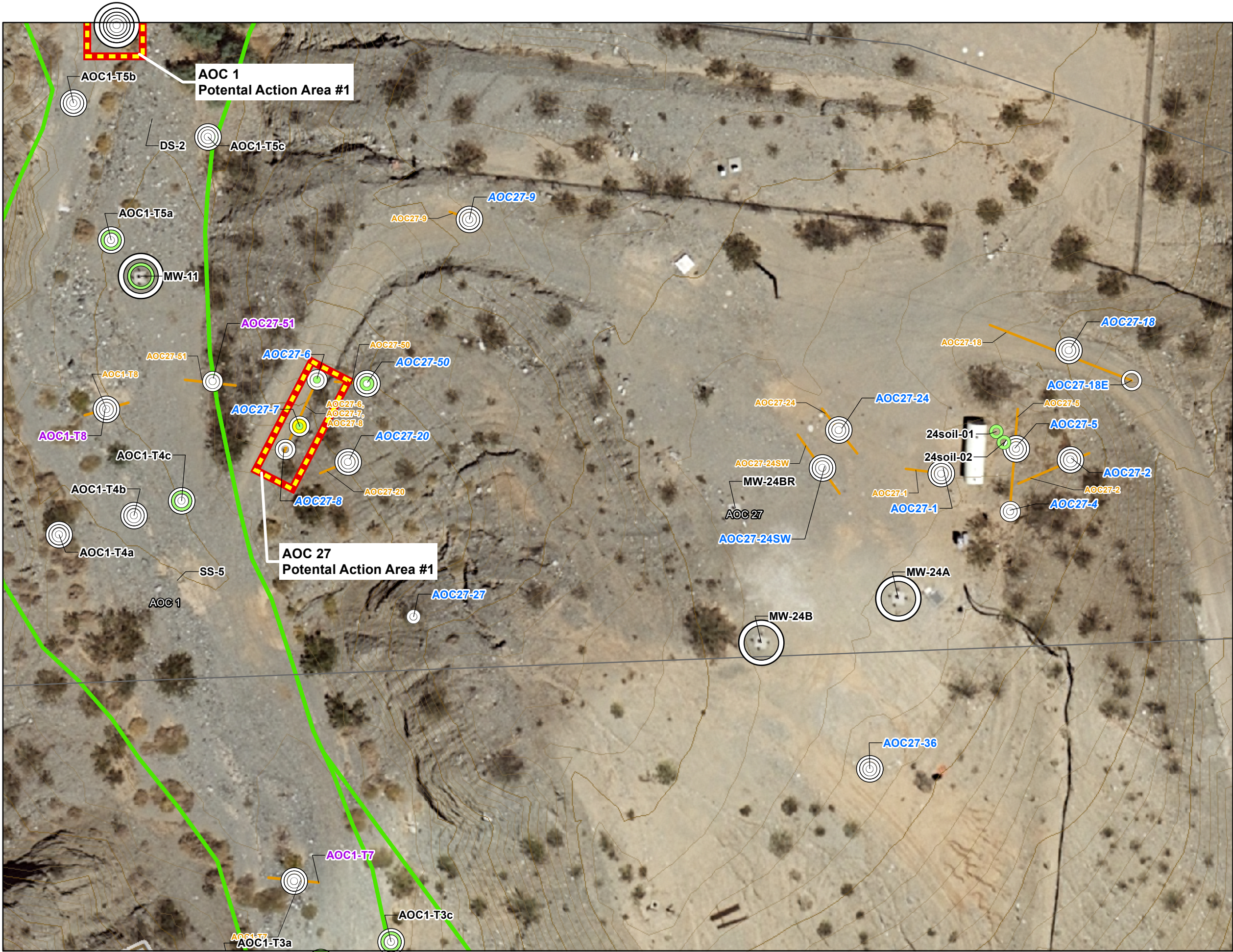
Locations labeled in **BLACK** were part of the pre-2015 data.

Mercury  
Removal Action Goal 1 mg/kg



**Figure E-8f**  
**Mercury**  
**Soil Sample Results**  
**AOC 27**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California





**LEGEND**

- Property Boundary
- Area of Concern
- Potential Action Area
- Approximate Location of Stormwater Piping Below Ground
- Approximate Location of Stormwater Piping Above Ground
- Soil Trench

| Depth            | Factor of Exceedance (FOE) |
|------------------|----------------------------|
| 0 to 1 ft bgs    | ND                         |
| >1 to 3 ft bgs   | FOE <=1                    |
| >3 to 6 ft bgs   | 1>FOE<=10                  |
| >6 to 10 ft bgs  |                            |
| >11 to 15 ft bgs |                            |
| >16 ft bgs       |                            |

Note:

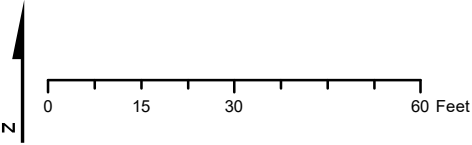
Topographic contours shown are in 2-foot intervals

Locations labeled in **VIOLET** were part of the 2017 data.

Locations labeled in **BLUE** were part of the 2015-2016 data.

Locations labeled in **BLACK** were part of the pre-2015 data.

Molybdenum  
Removal Action Goal 22 mg/kg



**Figure E-8g**  
**Molybdenum**  
**Soil Sample Results**  
**AOC 27**  
Soil Engineering Evaluation/Cost Analysis  
PG&E Topock Compressor Station, Needles, California







**Appendix F**  
**Treatability Study Results, Laboratory Data**  
**Packages, and Data Validation Reports**







November 8, 2019

**Email Delivery**

Mr. Keith Sheets  
Senior Project Manager  
Jacobs Engineering Group  
2020 SW 4th Avenue  
Portland, OR 97201

Subject: Soil Remediation Study, Report  
Hazen Project 12661  
Report and Appendices A–G

Dear Mr. Sheets:

Jacobs Engineering Group contracted with Hazen Research, Inc. to conduct a bench-scale evaluation of remediation techniques for mitigating dioxin and heavy metals contamination in arid soils. Hazen and Jacobs exchanged information about this evaluation through a series of teleconferences, and Hazen prepared a scope of work and a cost estimate for the work envisioned by Jacobs. That scope of work, which includes a cost estimate, is in Appendix A.

This report presents the results of experiments, size distribution measurements, and analyses conducted on 14 nominally 35 kg soil samples provided by Jacobs.

**SOIL SAMPLES**

Fourteen 5 gal buckets composed of seven paired buckets were received at Hazen on May 10, 2019, and logged in to Hazen's sample tracking system (Appendix B) and registered in Hazen's treatability sample inventory. Following log-in, the samples were opened, inspected, and photographed. Figure 1 shows the buckets during opening, and Figure 2 illustrates the particle size range observed in the samples. The maximum particle size of the as-received samples was approximately 3 in.





**Figure 1. Opening the Soil Sample Shipping Buckets**



**Figure 2. Appearance and Size Range of Typical Soil Sample**



In accordance with the scope of work, the contents of each set of paired buckets were weighed, combined, and blended. The seven blended samples were logged in and assigned Hazen tracking numbers of 55197-1 through -7. These IDs correspond with Jacobs's sample IDs of EECA 1A/1B through 7A/7B.

After consulting with Jacobs, each sample was first scalped at  $\frac{3}{4}$  in. to remove cobbles that likely contained lower levels of contaminants and that were too large for bench-scale thermal processing experiments. The minus  $\frac{3}{4}$  in. soil was dry sieved at  $\frac{1}{4}$  in. (at as-received moisture content), and representative splits were sieved at 4, 10, 30, 35, 70, 100, and 200 US mesh to measure the particle size distribution. All mesh sizes in this report are US mesh. Table 1 summarizes the coarse distribution for the seven soil samples, and Table 2 summarizes the particle size distribution of the minus  $\frac{1}{4}$  in. soil. Appendix C contains the data reports for the sizing measurements.

**Table 1. Summary of Particle Size Distribution, Entire Sample**

| Fractional Size, in.             | Direct Retained, % |         |         |         |         |         |         |
|----------------------------------|--------------------|---------|---------|---------|---------|---------|---------|
|                                  | 55197-1            | 55197-2 | 55197-3 | 55197-4 | 55197-5 | 55197-6 | 55197-7 |
| $> \frac{3}{4}$                  | 12.3               | 20.8    | 21.2    | 17.8    | 29.9    | 26.1    | 11.0    |
| $\frac{3}{4} \times \frac{1}{4}$ | 26.8               | 35.3    | 32.5    | 30.6    | 13.4    | 13.2    | 27.2    |
| $< \frac{1}{4}$                  | 60.9               | 43.9    | 46.4    | 51.6    | 56.8    | 60.7    | 61.8    |

**Table 2. Summary of Particle Size Distribution, Minus  $\frac{1}{4}$  in. Soil**

| Retain Size |               | Cumulative Retained, % |         |         |         |         |         |         |
|-------------|---------------|------------------------|---------|---------|---------|---------|---------|---------|
| Mesh        | $\mu\text{m}$ | 55197-1                | 55197-2 | 55197-3 | 55197-4 | 55197-5 | 55197-6 | 55197-7 |
| 4           | 4,760         | 5.8                    | 6.8     | 6.9     | 7.4     | 5.4     | 5.3     | 4.7     |
| 10          | 2,000         | 35.9                   | 43.8    | 43.8    | 45.4    | 33.8    | 34.2    | 29.9    |
| 30          | 595           | 75.9                   | 85.2    | 80.9    | 86.7    | 72.3    | 75.0    | 63.3    |
| 35          | 500           | 80.8                   | 88.7    | 84.5    | 90.2    | 77.1    | 79.7    | 68.3    |
| 70          | 210           | 95.3                   | 98.0    | 96.6    | 98.2    | 93.9    | 95.1    | 92.6    |
| 100         | 149           | 97.1                   | 98.8    | 97.9    | 98.8    | 96.3    | 97.3    | 95.9    |
| 200         | 74            | 98.8                   | 99.5    | 98.9    | 99.3    | 98.8    | 99.1    | 99.0    |
| -200        | -74           | 100.0                  | 100.0   | 100.0   | 100.0   | 100.0   | 100.0   | 100.0   |

Because of the small quantity of material reporting to the fine fractions in the sieve analysis of minus  $\frac{1}{4}$  in. soil, Jacobs requested that separate, larger splits of minus  $\frac{1}{4}$  in. soil be wet sieved at 200 mesh for Samples 55197-3 and 55197-7. Table 3 summarizes the results of those measurements.



**Table 3. Wet Sieving Results at 200 Mesh for Selected Samples**

| Size,<br>mesh     | 55197-3     |             | 55197-7     |             |
|-------------------|-------------|-------------|-------------|-------------|
|                   | Mass,<br>kg | Weight<br>% | Mass,<br>kg | Weight<br>% |
| < 1/4 in. × > 200 | 1,813.6     | 95.0        | 1,700.1     | 89.2        |
| < 200             | 94.7        | 5.0         | 206.1       | 10.8        |
| Total             | 1,908.3     |             | 1,906.2     |             |

Selected finer fractions (1/4 in. by 4 mesh, 4 by 70 mesh, 70 by 200 mesh, and less than 200 mesh) were analyzed for total chromium, hexavalent chromium, and zinc by Asset Laboratories (Las Vegas, Nevada). Table 4 summarizes the results, and Appendix D contains the analytical report.

Jacobs requested bulk density measurements on two of the seven composite samples, 55197-3 and -7. Hazen used 0.5 ft<sup>3</sup> cells to measure loose and packed bulk density values for these samples. Table 5 reports those results.



**Table 4. Summary of Size Fraction Analyses<sup>a</sup>**

| <b>Sample ID</b> | <b>Chromium, total, mg/kg</b> |                         |                           |                      |
|------------------|-------------------------------|-------------------------|---------------------------|----------------------|
|                  | <b>1/4 in. × 4 Mesh</b>       | <b>4 Mesh × 70 Mesh</b> | <b>70 Mesh × 200 Mesh</b> | <b>&lt; 200 Mesh</b> |
| 55197-1          | 500                           | 2,100                   | 3,200                     | 4,700                |
| 55197-2          | 110                           | 140                     | 190                       | 330                  |
| 55197-3          | 1,000                         | 1,600                   | 2,600                     | 7,400                |
| 55197-4          | 700                           | 710                     | 1,600                     | 3,100                |
| 55197-5          | 340                           | 1,300                   | 1,300                     | 2,500                |
| 55197-6          | 410                           | 790                     | 1,100                     | 3,300                |
| 55197-7          | 210                           | 1,800                   | 2,500                     | 4,600                |

| <b>Sample ID</b> | <b>Chromium VI, mg/kg</b> |                         |                           |                      |
|------------------|---------------------------|-------------------------|---------------------------|----------------------|
|                  | <b>1/4 in. × 4 Mesh</b>   | <b>4 Mesh × 70 Mesh</b> | <b>70 Mesh × 200 Mesh</b> | <b>&lt; 200 Mesh</b> |
| 55197-1          | 8.0                       | 17                      | 19                        | 21                   |
| 55197-2          | 0.66                      | 3.9                     | 5.2                       | 4.6                  |
| 55197-3          | 8.1                       | 17                      | 25                        | 57                   |
| 55197-4          | 6.7                       | 10                      | 13                        | 27                   |
| 55197-5          | 3.8                       | 16                      | 17                        | 29                   |
| 55197-6          | 7.4                       | 17                      | 20                        | 42                   |
| 55197-7          | 5.3                       | 22                      | 28                        | 49                   |

| <b>Sample ID</b> | <b>Zinc, mg/kg</b>      |                         |                           |                      |
|------------------|-------------------------|-------------------------|---------------------------|----------------------|
|                  | <b>1/4 in. × 4 Mesh</b> | <b>4 Mesh × 70 Mesh</b> | <b>70 Mesh × 200 Mesh</b> | <b>&lt; 200 Mesh</b> |
| 55197-1          | 54                      | 110                     | 160                       | 170                  |
| 55197-2          | 42                      | 41                      | 44                        | 59                   |
| 55197-3          | 90                      | 110                     | 150                       | 330                  |
| 55197-4          | 110                     | 99                      | 220                       | 290                  |
| 55197-5          | 59                      | 100                     | 110                       | 150                  |
| 55197-6          | 71                      | 95                      | 120                       | 280                  |
| 55197-7          | 59                      | 190                     | 240                       | 410                  |

<sup>a</sup>Analyses were conducted or coordinated by Asset Laboratories.



**Table 5. Bulk Density Data**

| Sample ID | Bulk Density        |        |                   |        |
|-----------|---------------------|--------|-------------------|--------|
|           | lbs/ft <sup>3</sup> |        | kg/m <sup>3</sup> |        |
|           | Loose               | Packed | Loose             | Packed |
| 55197-3   | 115                 | 133    | 1,846             | 2,126  |
| 55197-7   | 113                 | 131    | 1,805             | 2,105  |

Jacobs also requested measuring the volume percent of the minus  $\frac{1}{4}$  in. material in the total sample for both Samples 55197-3 and -7. A bulk density cell was filled with the entire particle size range of each sample; the cell then was emptied and the contents were sieved at  $\frac{1}{4}$  in. The minus  $\frac{1}{4}$  in. material was replaced in the cell, tapped several times, and leveled. The height of the soil in the cell was measured and the volume was calculated and used to determine the fraction volume percent. Those data are reported in Table 6.

**Table 6. Volume Fraction Data, Minus  $\frac{1}{4}$  in.**

| Sample ID | Volume Fraction,<br>minus $\frac{1}{4}$ in., % |
|-----------|--|
| 55197-3   | 52   |
| 55197-7   | 69   |

Representative splits of the minus  $\frac{1}{4}$  in. material from each of the seven samples were submitted to Asset Laboratories for US Environmental Protection Agency Method 8290 analysis. Table 7 summarizes the results (totals), and Appendix E contains the full analytical report.



**Table 7. Summary of Dioxin Compounds Analyses<sup>a</sup> Minus 1/4 in.**

| Sample ID                                       |       | 55197-1 | 55197-2 | 55197-3 | 55197-4 | 55197-5 | 55197-6 | 55197-7 |
|---|-------|---------|---------|---------|---------|---------|---------|---------|
| Dioxin Compounds <sup>b</sup> (Totals)<br>ng/kg | TCDF  | 45      | 1       | 220     | 36      | 66      | 14      | 26      |
|   | TCDD  | 7       | 0       | 20      | 4       | 3       | 3       | 4       |
|   | PeCDF | 490     | 15      | 3,400   | 360     | 700     | 280     | 500     |
|   | PeCDD | 84      | 1       | 430     | 63      | 66      | 56      | 95      |
|   | HxCDF | 1,700   | 45      | 9,400   | 840     | 2,200   | 1,800   | 3,900   |
|   | HxCDD | 1,200   | 58      | 7,000   | 760     | 1,200   | 1,300   | 2,900   |
|   | HpCDF | 4,000   | 97      | 21,000  | 1,100   | 4,700   | 9,000   | 31,000  |
|   | HpCDD | 18,000  | 990     | 120,000 | 9,600   | 16,000  | 23,000  | 70,000  |
|   | OCDF  | 3,200   | 95      | 10,000  | 890     | 2,700   | 11,000  | 32,000  |
|   | OCDD  | 200,000 | 7,400   | 910,000 | 97,000  | 160,000 | 160,000 | 430,000 |

<sup>a</sup>The analyses were conducted or coordinated by Asset Laboratories.

<sup>b</sup>The abbreviations shown were used by the analytical laboratory to denote families of dioxin and furan compounds.

#### DIOXIN AND CHROMIUM TREATMENT: SOIL WASHING EXPERIMENTS

The scope of work specified batch, bench-scale thermal processing experiments to evaluate dioxin mitigation. Discussions with Jacobs resulted in a change in scope, specifically, eliminating thermal processing as an option. The decision considered complexities associated with onsite setup and operation of a suitable thermal device. Such a device would require significant site preparation, a high-volume natural gas supply, and possibly off-gas treatment equipment to ensure all contaminants were captured. Additionally, because dioxin thermal destruction requires strongly oxidizing high temperature combustion, there was concern that the trivalent chromium present in the soils could oxidize to hexavalent chromium. Finally, the thermally treated solids would require soil washing to remove heavy metal contaminants that were thought to be unaffected by the thermal treatment.

Because soil washing was indicated for metals removal, the revised scope prescribed soil washing experiments to evaluate removing both metals and dioxin. Hazen assembled batch washing vessels designed to roughly model the action of a trommel. The vessels were 1-gal plastic bottles, each fitted with two 1 in. polyethylene baffles that ran the length of the vessel. These vessels were rotated on rubber rollers as shown in Figure 3.





**Figure 3. Batch Trommel Soil Washing Equipment Setup**

In consultation with Jacobs, the experiment design was four experiments using the most contaminated sample, 55197-3. Minus  $\frac{1}{4}$  in. material was used. Two baseline or control experiments used plain water as the wash solution, and two experiments used strong dosages (11.8 g/kg, dry solids basis) of Union Carbide Triton X-100 surfactant. The solids concentration in the slurry was 30% by weight, and the slurries were agitated on the rollers for 15 min each. After agitation, the vessel contents were wet sieved to separate the solids by size for analysis. Each pair of experiments (water, Triton X-100) was sieved at 35 and 70 mesh (500 and 210  $\mu\text{m}$ , respectively). The oversized solids were dried at 50°C overnight. The undersized slurry was filtered to recover the solids, which were also dried at 50°C overnight. Figures 4 and 5 show examples of the oversized and undersized solids, respectively.





**Figure 4. Example of Washed Oversized Solids**





**Figure 5. Example of Washed and Filtered Undersized Solids**

Representative samples of the dried oversized and undersized washed solids were sent to Asset Laboratories for metals and dioxin compound analysis to evaluate the washing efficiency. Appendix F contains the data reports for these experiments. Appendix G contains Asset Laboratories' metals and dioxin analytical reports. Table 8 summarizes the results for metallic contaminants, and Table 9 summarizes the analytical results for and distribution of dioxin compounds.



**Table 8. Summary of Trommel Soil Washing Experimental Data, Metals**

| Sample ID | Aqueous Phase | Sieve Size     | Sample ID | Weight Percent | Analysis, mg/kg |     |                  | Distribution, <sup>a</sup> % |      |                  |
|-----------|---------------|----------------|-----------|----------------|-----------------|-----|------------------|------------------------------|------|------------------|
|           |               |                |           |                | Cr              | Zn  | Cr <sup>VI</sup> | Cr                           | Zn   | Cr <sup>VI</sup> |
| 55197-03  | --            | Minus 1/4 in.  | Feed      | --             | 1,644           | 112 | 17               |                              |      |                  |
| 3973-51   | Triton        | 35<br>(500 µm) | Oversize  | 82.9           | 540             | 71  | 3.8              | 27.1                         | 52.4 | 18.5             |
|           |               |                | Undersize | 17.1           | 4,000           | 210 | 21               | 41.5                         | 32.0 | 21.1             |
| 3973-52   | Water         | 35<br>(500 µm) | Oversize  | 82.4           | 540             | 63  | 4.1              | 26.8                         | 46.0 | 47.8             |
|           |               |                | Undersize | 17.6           | 2,900           | 160 | 21               | 30.8                         | 24.9 | 52.2             |
| 3973-53   | Triton        | 70<br>(210 µm) | Oversize  | 91.3           | 630             | 70  | 5.2              | 35.2                         | 73.9 | 66.2             |
|           |               |                | Undersize | 8.7            | 5,900           | 260 | 28               | 31.3                         | 26.1 | 33.8             |
| 3973-54   | Water         | 70<br>(210 µm) | Oversize  | 91.1           | 720             | 84  | 6.4              | 39.9                         | 78.3 | 75.8             |
|           |               |                | Undersize | 8.9            | 5,300           | 240 | 21               | 28.5                         | 21.7 | 24.2             |

<sup>a</sup>Distribution values for each analyte do not total 100%, presumably because of analytical error and/or dissolution of the metal in the solution.







Table 9. Summary of Trommel Soil Washing Experimental Data, Dioxin Compounds (totals)

| Experiment or Sample ID:<br>Washing Solution:<br>Washed Solids Cut, Mesh: |       | 3973-51<br>Triton X-100<br>35 (500 µm) |           |                              |           | 3973-52<br>Water<br>35 (500 µm) |           |                              |           | 3973-53<br>Triton X-100<br>70 (210 µm) |           |                              |           | 3973-54<br>Water<br>70 (210 µm) |           |                              |           | Site Soil Sample<br>EECA 3A/3B<br>55197-3 |
|---|-------|--|-----------|------------------------------|-----------|---------------------------------|-----------|------------------------------|-----------|--|-----------|------------------------------|-----------|---------------------------------|-----------|------------------------------|-----------|---|
|   |       | Analysis, ng/kg                        |           | Distribution, <sup>a</sup> % |           | Analysis, ng/kg                 |           | Distribution, <sup>a</sup> % |           | Analysis, ng/kg                        |           | Distribution, <sup>a</sup> % |           | Analysis, ng/kg                 |           | Distribution, <sup>a</sup> % |           | Analysis, ng/kg                           |
|   |       | Oversize                               | Undersize | Oversize                     | Undersize | Oversize                        | Undersize | Oversize                     | Undersize | Oversize                               | Undersize | Oversize                     | Undersize | Oversize                        | Undersize | Oversize                     | Undersize | <1/4 in.                                  |
| Dioxin Compounds <sup>b</sup> (Totals)                                    | TCDF  | 17                                     | 640       | 6                            | 50        | 69                              | 1,200     | 26                           | 95        | 25                                     | 1,300     | 10                           | 52        | 17                              | 1,900     | 7                            | 76        | 220                                       |
|   | TCDD  | nd                                     | 68        | 0                            | 58        | 5                               | 140       | 18                           | 122       | 1                                      | 160       | 4                            | 70        | 3                               | 210       | 13                           | 93        | 20  |
|   | PeCDF | 210                                    | 8,400     | 5                            | 42        | 680                             | 16,000    | 16                           | 82        | 320                                    | 17,000    | 9                            | 44        | 230                             | 26,000    | 6                            | 68        | 3,400                                     |
|   | PeCDD | 33                                     | 1,400     | 6                            | 56        | 82                              | 2,400     | 16                           | 97        | 62                                     | 2,800     | 13                           | 57        | 41                              | 4,100     | 9                            | 84        | 430                                       |
|   | HxCDF | 710                                    | 32,000    | 6                            | 58        | 1,500                           | 53,000    | 13                           | 98        | 1,000                                  | 66,000    | 10                           | 61        | 830                             | 93,000    | 8                            | 88        | 9,400                                     |
|   | HxCDD | 630                                    | 26,000    | 7                            | 63        | 960                             | 44,000    | 11                           | 110       | 970                                    | 54,000    | 13                           | 67        | 700                             | 74,000    | 9                            | 94        | 7,000                                     |
|   | HpCDF | 1,600                                  | 79,000    | 6                            | 64        | 2,000                           | 120,000   | 8                            | 100       | 2,200                                  | 190,000   | 10                           | 79        | 1,800                           | 230,000   | 8                            | 97        | 21,000                                    |
|   | HpCDD | 7,700                                  | 550,000   | 5                            | 78        | 9,100                           | 550,000   | 6                            | 80        | 12,000                                 | 950,000   | 9                            | 69        | 8,100                           | 660,000   | 6                            | 49        | 120,000                                   |
|   | OCDF  | 1,200                                  | 140,000   | 10                           | 239       | 1,100                           | 130,000   | 9                            | 227       | 1,400                                  | 290,000   | 13                           | 253       | 1,200                           | 380,000   | 11                           | 336       | 10,000                                    |
|   | OCDD  | 70,000                                 | 5,300,000 | 6                            | 99        | 77,000                          | 5,800,000 | 7                            | 111       | 120,000                                | 7,800,000 | 12                           | 75        | 80,000                          | 7,400,000 | 8                            | 72        | 910,000                                   |

nd = not detected  
<sup>a</sup>Distribution values greater than 100% indicate analytical discrepancy. For oversize plus undersize values less than 100%, the balance is assumed to have reported to the aqueous phase, or indicates analytical discrepancy.  
<sup>b</sup>The abbreviations shown were used by the analytical laboratory to denote families of dioxin and furan compounds.







The data show that metals and dioxin compounds concentrated in the undersized fraction for all four experiments, as expected. For the metals and the dioxin compounds, the use of Triton X-100 surfactant did not appear to significantly affect the distribution of contaminants when compared with the baseline using water.

After reviewing these results, Jacobs elected to end this phase of the treatability study.

Thank you for the opportunity to conduct this work. Please contact me with any questions that arise during your review of the information.

Regards,

A handwritten signature in black ink, appearing to read 'R. Lee Schwartz', with a stylized, cursive script.

R. Lee Schwartz  
Project Manager

RLS/lch

xc: Tom Broderick, Hazen Research, Inc.



## **APPENDIX A**

### **Hazen Scope of Work and Cost Estimate**



Keith,

Thank you for requesting a preliminary cost estimate from Hazen for bench-scale evaluation of dioxin- and metals-contaminated soil remediation techniques. Based on our email exchange over the past week or so, I put together a scope of work to serve as the basis of the estimate.

Jacobs will obtain 7 soil samples in 14 nominally 5-gallon pails, 2 pails per each unique sample. The particle size distribution may range from cobble size to fine sand. The soil samples are contaminated with both dioxin and regulated metals. Hazen will receive these samples, log them into its internal sample logging system and assign unique identification numbers, and enter the samples and quantities into the treatability sample logging system.

After the samples are opened, Hazen will observe all recommended exposure prevention techniques including engineering controls for dust and vapor, and PPE including APRs, nitrile gloves, Tyvek suits, etc.

Each pair of buckets will be opened, photographed, then blended to create a single sample. This procedure will result in seven composite samples for subsequent study. If the top size of the samples is larger than a size specified by Jacobs, each sample will be scalped at the specified with the minus fraction advanced to subsequent study. The oversized material will be reserved for alternative study and/or return to Jacobs.

The seven undersized scalped samples will be split down using cone-and-quarter or riffle splitter techniques to obtain seven representative head samples. These will be containerized, packaged and shipped to Asset Laboratories for dioxin and metals analysis (metals TBD). The results of analysis will guide the selection of the two samples with the highest concentration of contaminants.

The two selected samples will be sieved, either in their entirety or by obtaining a representative sample of each, to measure the particle size distribution. The bottom sieve size will be 53  $\mu\text{m}$ . The size distribution of the minus 53  $\mu\text{m}$  solids optionally can be obtained using Hazen's laser diffractometer.

The selected samples will be scalped at a size specified by Jacobs, and the over- and under-sized material will be split down to obtain representative head samples. These two sample pairs (undersized and oversized) will be containerized and sent for dioxin and metals (TBD) analysis by Asset Laboratories.

Six thermal treatment experiments will be conducted on the bulk selected samples (2), the oversized selected samples (2), and the undersized selected samples (2). Hazen will consult with Jacobs to confirm the type and conditions of the thermal treatment. Treated samples will be analyzed for dioxin and metals (TBD) by Asset Laboratories.

The two selected samples will be scalped at a size specified by Jacobs; the oversized solids will be used in soil washing studies. Hazen proposes to utilize a batch, bench-scale attrition cell for these experiments.



Attrition cell operation involves high-rpm stirring of a dense slurry using aggressive impellers in a vessel providing a high ratio of prop diameter to vessel diameter. Two experiments for each sample (2) are proposed: one using hot tap water as the lixiviant, and one using Dow Triton X-100 (nonionic organic surfactant) in water at an arbitrary dosage. The experiments using tap water will provide baseline data for comparison purposes. Although many potentially effective surfactants are available, the two experiment types proposed should indicate the potential for dioxin and metals removal using this technique. Because Hazen conducts projects on a time-and-materials basis, the scope readily can be increased based on the results of experimentation.

The attritioned slurry samples will be filtered and washed with hot water or dilute surfactant solution as appropriate. The washed solids will be dried at low temperature in a vented oven. Dried solids and filtrate/wash samples will be analyzed for dioxin and metals, and the removal efficiencies of each experiment will be calculated.

A data packet including procedural data, photographs, analytical results, and experiment data reports will be prepared and issued to Jacobs following completion of the program. All samples, and experiment products must be returned to Jacobs at the conclusion of the work.

The preliminary estimated cost of the work described above is \$37,800 including a 15% contingency; the estimated charges are itemized in Table 1. Note that analytical work will be subcontracted and therefore is shown as a direct cost.

**Table 1. Summary of Estimated Costs  
Hazen Proposal 2019-129**

| Task Description  | Task # | Estimated Costs, \$US |            |         |           |
|---|--------|-----------------------|------------|---------|-----------|
|   |        | Labor                 | Analytical | Directs | Sub-total |
| Receive and log in samples, initiate treatability study     | 1      | 700                   | 0          | 0       | 700       |
| Scalp and composite bucket pairs, prepare head samples      | 2      | 1,100                 | 0          | 0       | 1,100     |
| Submit head samples for SW846 Method 8290, metals           | 3      | 400                   | 0          | 5,600   | 6,000     |
| Select 2 composites; conduct PSD; analyze minus 3/8"        | 4      | 700                   | 0          | 1,700   | 2,400     |
| Thermal treatment (TBD); 2 composites; analysis by 8290     |        |                       |            |         |           |
| Bulk sample, analyze treated solids for metals, by 8290     | 5      | 1,700                 | 0          | 1,700   | 3,400     |
| Minus 3/8", analyze treated solids for metals, by 8290      | 6      | 1,700                 | 0          | 1,700   | 3,400     |
| Plus 3/8", analyze treated solids for metals, by 8290       | 7      | 1,700                 | 0          | 1,700   | 3,400     |
| Soil washing experiments on coarse-grained solids, analysis | 8      | 2,500                 | 0          | 6,400   | 8,900     |
| Data reduction, prepare data package                        | 9      | 3,500                 | 0          | 0       | 3,500     |
| Sub-total:  |        | 14,000                | 0          | 18,800  | 32,800    |
| Contingency, 15%:   |        |                       |            |         | 5,000     |
| Total estimated cost:                                       |        |                       |            |         | 37,800    |

The work is estimated to require 8 weeks to complete. Figure 1 illustrates the projected schedule. Note that the schedule is quite aggressive, and allows 2 weeks for analysis of experiment products, including shipping times.



| Task Description  | Task # | Week |   |   |   |   |   |   |   |
|---|--------|------|---|---|---|---|---|---|---|
|   |        | 1    | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
| Receive and log in samples, initiate treatability study     | 1      |      |   |   |   |   |   |   |   |
| Scalp and composite bucket pairs, prepare head samples      | 2      |      |   |   |   |   |   |   |   |
| Submit head samples for SW846 Method 8290, metals           | 3      |      |   |   |   |   |   |   |   |
| Select 2 composites; conduct PSD; analyze minus 3/8"        | 4      |      |   |   |   |   |   |   |   |
| Thermal treatment (TBD); 2 composites; analysis by 8290     |        |      |   |   |   |   |   |   |   |
| Bulk sample, analyze treated solids for metals, by 8290     | 5      |      |   |   |   |   |   |   |   |
| Minus 3/8", analyze treated solids for metals, by 8290      | 6      |      |   |   |   |   |   |   |   |
| Plus 3/8", analyze treated solids for metals, by 8290       | 7      |      |   |   |   |   |   |   |   |
| Soil washing experiments on coarse-grained solids, analysis | 8      |      |   |   |   |   |   |   |   |
| Data reduction, prepare data package                        | 9      |      |   |   |   |   |   |   |   |

Work can begin upon execution of a contractual agreement and receipt of the samples and an initial deposit of \$7,500. Hazen's Professional Services Agreement, a simple time and materials contract, may be used if it is agreeable to Jacobs.



## **APPENDIX B**

### **Hazen Sample Log-In**





## Sample Received

|                                    |  |
|------------------------------------|--|
| HRI Number: 55197                  | Description: dioxin contaminated soil w/heavy metals |
| Project Number: 12661              | Entered by Employee: Benton, Gary                    |
| Proposal Number:                   | Date Received: 5/10/2019                             |
| Project Manager: Schwartz, Robert  | Sample Physical State: Solid                         |
| Client: Jacobs Engineering/Arcadis | Sample Container Type: Bucket                        |
| Client Rep:                        | Total No of Samples: 7                               |
| Rep Contact Info:                  | Approx Wt. of Sample: > 100 lb                       |
| Via:                               | Treatability Study (Yes/No): Yes                     |
| HRI Comments:                      |  |

## Hazards

|                          |  |
|--------------------------|--|
| Dust (Yes/No): Yes       | Flammable (Yes/No): No                               |
| Radioactive (Yes/No): No | Coorosive (Yes/No): No                               |
| Toxic (Yes/No): No       | Other Hazard (Yes/No): yes Description: dioxin/furan |
| Unknown (Yes/No): No     | Non-Hazardous (Yes/No): No                           |

| UniqueID     | HRI Sample | Split | Sub Split | SampleID or Description | Container Type | Physical State | Sample Net Wt. | Net Wt. Units |
|--------------|------------|-------|-----------|-------------------------|----------------|----------------|----------------|---------------|
| 2019I-000367 | 55197-0001 |       |           | EECA 1A/1B              | Bucket         | Solid          | 68.6           | kg            |
| 2019I-000368 | 55197-0002 |       |           | EECA 2A/2B              | Bucket         | Solid          | 71.8           | kg            |
| 2019I-000369 | 55197-0003 |       |           | EECA 3A/3B              | Bucket         | Solid          | 73.9           | kg            |
| 2019I-001048 | 55197-0003 | 001   |           | EECA 3A/3B              | Bucket         | Solid          | 400            | g             |
| 2019I-001049 | 55197-0003 | 002   |           | EECA 3A/3B              | Bucket         | Solid          | 400            | g             |
| 2019I-001050 | 55197-0003 | 003   |           | EECA 3A/3B              | Bucket         | Solid          | 400            | g             |
| 2019I-001051 | 55197-0003 | 004   |           | EECA 3A/3B              | Bucket         | Solid          | 400            | g             |
| 2019I-000370 | 55197-0004 |       |           | ECCA 4A/4B              | Bucket         | Solid          | 71.3           | kg            |
| 2019I-000371 | 55197-0005 |       |           | ECCA 5A/5B              | Bucket         | Solid          | 72.1           | kg            |





## Sample Received

| UniqueID     | HRI Sample | Split | Sub Split | SampleID or Description | Container Type | Physical State | Sample Net Wt. | Net Wt. Units |
|--------------|------------|-------|-----------|-------------------------|----------------|----------------|----------------|---------------|
| 2019I-000372 | 55197-0006 |       |           | ECCA 6A/6B              | Bucket         | Solid          | 69.8           | kg            |
| 2019I-000373 | 55197-0007 |       |           | ECCA 7A/7B              | Bucket         | Solid          | 71             | kg            |



## **APPENDIX C**

### **Sample 55197-1 through -7 Particle Size Distribution Measurement Reports**



# Particle Size Distribution

## Hazen Project 12661

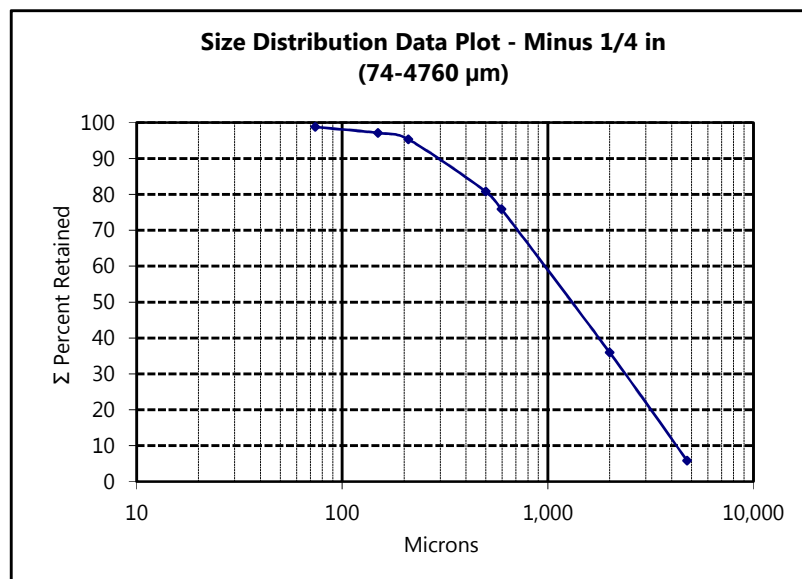
**Sample ID: 55197-1**

Procedure: The sample was dry-screened at each sieve size listed.

| Fractional<br>Size, in | Direct   |          |
|------------------------|----------|----------|
|                        | Mass, kg | Weight % |
| >3/4                   | 8.02     | 12.3     |
| 3/4 x 1/4              | 17.4     | 26.8     |
| <1/4                   | 39.62    | 60.9     |
| Total:                 | 65.04    | 100      |

### US Standard Sieve Data

| Minus 1/4-in Split |         |           |           |                     |          | Entire Sample Basis |                   |
|--------------------|---------|-----------|-----------|---------------------|----------|---------------------|-------------------|
| Retain Size        |         | Direct    |           | Cumulative Weight % |          | Direct              |                   |
|                    |         | Weight, g | Weight, % | Passing             | Retained | Mass, <1/4 in, kg   | Weight, % <1/4 in |
| mesh               | microns |           |           |                     |          |                     |                   |
| 4                  | 4760    | 59.7      | 5.8       | 94.2                | 5.8      | 2.32                | 3.6               |
| 10                 | 2000    | 307.4     | 30.1      | 64.1                | 35.9     | 11.93               | 18.3              |
| 30                 | 595     | 408.2     | 40.0      | 24.1                | 75.9     | 15.84               | 24.3              |
| 35                 | 500     | 49.4      | 4.8       | 19.2                | 80.8     | 1.92                | 2.9               |
| 70                 | 210     | 148.6     | 14.6      | 4.7                 | 95.3     | 5.77                | 8.9               |
| 100                | 149     | 18.4      | 1.8       | 2.9                 | 97.1     | 0.71                | 1.1               |
| 200                | 74      | 17.1      | 1.7       | 1.2                 | 98.8     | 0.66                | 1.0               |
| -200               | -74     | 12.4      | 1.2       | 0.0                 | 100.0    | 0.48                | 0.7               |
|                    |         | 1021.2    | 100.0     |                     |          | 39.62               | 60.9              |





# Particle Size Distribution

## Hazen Project 12661

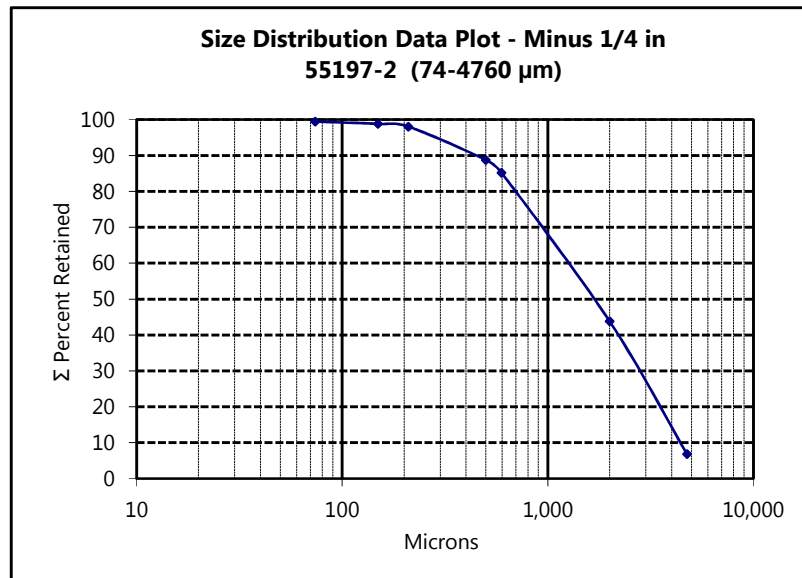
**Sample ID: 55197-2**

Procedure: The sample was dry-screened at each sieve size listed.

| Fractional<br>Size, in | Direct   |          |
|------------------------|----------|----------|
|                        | Mass, kg | Weight % |
| >3/4                   | 14.18    | 20.8     |
| 3/4 x 1/4              | 24.1     | 35.3     |
| <1/4                   | 29.94    | 43.9     |
| Total:                 | 68.22    | 100      |

### US Standard Sieve Data

| Minus 1/4-in Split |         |           |           |                     |          | Entire Sample Basis |                   |
|--------------------|---------|-----------|-----------|---------------------|----------|---------------------|-------------------|
| Retain Size        |         | Direct    |           | Cumulative Weight % |          | Direct              |                   |
|                    |         | Weight, g | Weight, % | Passing             | Retained | Mass, <1/4 in, kg   | Weight, % <1/4 in |
| mesh               | microns |           |           |                     |          |                     |                   |
| 4                  | 4760    | 70.1      | 6.8       | 93.2                | 6.8      | 2.05                | 3.0               |
| 10                 | 2000    | 379.2     | 36.9      | 56.2                | 43.8     | 11.06               | 16.2              |
| 30                 | 595     | 424.9     | 41.4      | 14.8                | 85.2     | 12.40               | 18.2              |
| 35                 | 500     | 36.6      | 3.6       | 11.3                | 88.7     | 1.07                | 1.6               |
| 70                 | 210     | 95.3      | 9.3       | 2.0                 | 98.0     | 2.78                | 4.1               |
| 100                | 149     | 8.0       | 0.8       | 1.2                 | 98.8     | 0.23                | 0.3               |
| 200                | 74      | 6.6       | 0.6       | 0.5                 | 99.5     | 0.19                | 0.3               |
| -200               | -74     | 5.6       | 0.5       | 0.0                 | 100.0    | 0.16                | 0.2               |
|                    |         | 1026.3    | 100.0     |                     |          | 29.94               | 43.9              |





# **Particle Size Distribution** **Hazen Project 12661**

**Sample ID: 55197-3**

Procedure: The sample was dry-screened at each sieve size listed.

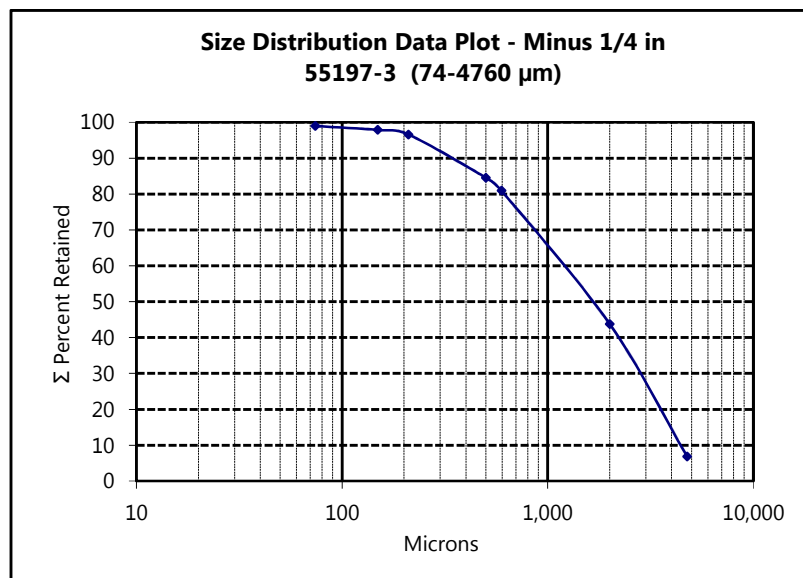
The sample was wet-screened at each sieve size listed.

| Fractional<br>Size, in | Direct   |          |
|------------------------|----------|----------|
|                        | Mass, kg | Weight % |
| >3/4                   | 14.8     | 21.2     |
| 3/4 x 1/4              | 22.7     | 32.5     |
| <1/4                   | 32.42    | 46.4     |
| Total:                 | 69.92    | 100      |

| Minus 1/4" | Direct   |          |
|------------|----------|----------|
|            | Mass, kg | Weight % |
| >200       | 1813.6   | 95.0     |
| <200       | 94.7     | 5.0      |
|            | 1908.3   |          |

## **US Standard Sieve Data**

| Minus 1/4-in Split |         |           |           |                     |          | Entire Sample Basis |                   |
|--------------------|---------|-----------|-----------|---------------------|----------|---------------------|-------------------|
| Retain Size        |         | Direct    |           | Cumulative Weight % |          | Direct              |                   |
|                    |         | Weight, g | Weight, % | Passing             | Retained | Mass, <1/4 in, kg   | Weight, % <1/4 in |
| mesh               | microns |           |           |                     |          |                     |                   |
| 4                  | 4760    | 69.4      | 6.9       | 93.1                | 6.9      | 2.23                | 3.2               |
| 10                 | 2000    | 373.1     | 36.9      | 56.2                | 43.8     | 11.96               | 17.1              |
| 30                 | 595     | 375.5     | 37.1      | 19.1                | 80.9     | 12.04               | 17.2              |
| 35                 | 500     | 36.7      | 3.6       | 15.5                | 84.5     | 1.18                | 1.7               |
| 70                 | 210     | 121.7     | 12.0      | 3.4                 | 96.6     | 3.90                | 5.6               |
| 100                | 149     | 12.9      | 1.3       | 2.1                 | 97.9     | 0.41                | 0.6               |
| 200                | 74      | 10.9      | 1.1       | 1.1                 | 98.9     | 0.35                | 0.5               |
| -200               | -74     | 10.8      | 1.1       | 0.0                 | 100.0    | 0.35                | 0.5               |
|                    |         | 1011.0    | 100.0     |                     |          | 32.42               | 46.4              |





# Particle Size Distribution

## Hazen Project 12661

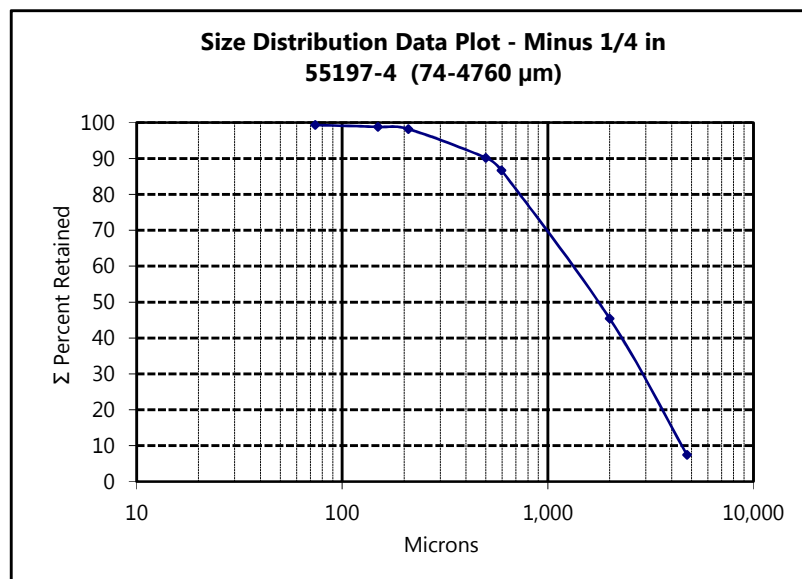
**Sample ID: 55197-4**

Procedure: The sample was dry-screened at each sieve size listed.

| Fractional<br>Size, in | Direct   |          |
|------------------------|----------|----------|
|                        | Mass, kg | Weight % |
| >3/4                   | 12.02    | 17.8     |
| 3/4 x 1/4              | 20.68    | 30.6     |
| <1/4                   | 34.84    | 51.6     |
| Total:                 | 67.54    | 100      |

### US Standard Sieve Data

| Minus 1/4-in Split |         |           |           |                     |          | Entire Sample Basis |                   |
|--------------------|---------|-----------|-----------|---------------------|----------|---------------------|-------------------|
| Retain Size        |         | Direct    |           | Cumulative Weight % |          | Direct              |                   |
|                    |         | Weight, g | Weight, % | Passing             | Retained | Mass, <1/4 in, kg   | Weight, % <1/4 in |
| mesh               | microns |           |           |                     |          |                     |                   |
| 4                  | 4760    | 74.5      | 7.4       | 92.6                | 7.4      | 2.59                | 3.8               |
| 10                 | 2000    | 379.9     | 38.0      | 54.6                | 45.4     | 13.23               | 19.6              |
| 30                 | 595     | 413.0     | 41.3      | 13.3                | 86.7     | 14.38               | 21.3              |
| 35                 | 500     | 34.7      | 3.5       | 9.8                 | 90.2     | 1.21                | 1.8               |
| 70                 | 210     | 80.5      | 8.0       | 1.8                 | 98.2     | 2.80                | 4.2               |
| 100                | 149     | 5.9       | 0.6       | 1.2                 | 98.8     | 0.21                | 0.3               |
| 200                | 74      | 5.2       | 0.5       | 0.7                 | 99.3     | 0.18                | 0.3               |
| -200               | -74     | 6.8       | 0.7       | 0.0                 | 100.0    | 0.24                | 0.4               |
|                    |         | 1000.5    | 100.0     |                     |          | 34.84               | 51.6              |





# Particle Size Distribution

## Hazen Project 12661

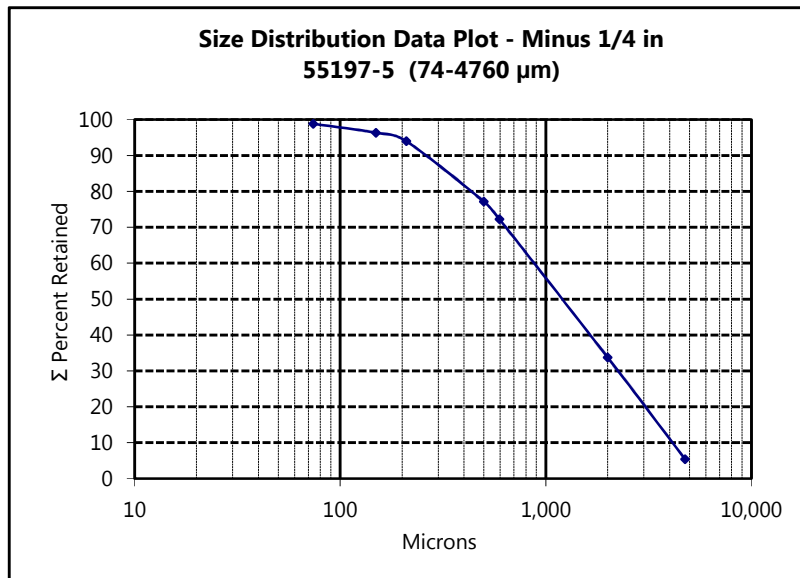
**Sample ID: 55197-5**

Procedure: The sample was dry-screened at each sieve size listed.

| Fractional<br>Size, in | Direct   |          |
|------------------------|----------|----------|
|                        | Mass, kg | Weight % |
| >3/4                   | 20.34    | 29.9     |
| 3/4 x 1/4              | 9.12     | 13.4     |
| <1/4                   | 38.66    | 56.8     |
| Total:                 | 68.12    | 100      |

### US Standard Sieve Data

| Minus 1/4-in Split |         |           |           |                     |          | Entire Sample Basis |                   |
|--------------------|---------|-----------|-----------|---------------------|----------|---------------------|-------------------|
| Retain Size        |         | Direct    |           | Cumulative Weight % |          | Direct              |                   |
|                    |         | Weight, g | Weight, % | Passing             | Retained | Mass, <1/4 in, kg   | Weight, % <1/4 in |
| mesh               | microns |           |           |                     |          |                     |                   |
| 4                  | 4760    | 54.1      | 5.4       | 94.6                | 5.4      | 2.10                | 3.1               |
| 10                 | 2000    | 282.9     | 28.3      | 66.2                | 33.8     | 10.96               | 16.1              |
| 30                 | 595     | 384.3     | 38.5      | 27.7                | 72.3     | 14.88               | 21.8              |
| 35                 | 500     | 48.6      | 4.9       | 22.9                | 77.1     | 1.88                | 2.8               |
| 70                 | 210     | 168.0     | 16.8      | 6.1                 | 93.9     | 6.51                | 9.6               |
| 100                | 149     | 23.9      | 2.4       | 3.7                 | 96.3     | 0.93                | 1.4               |
| 200                | 74      | 24.6      | 2.5       | 1.2                 | 98.8     | 0.95                | 1.4               |
| -200               | -74     | 11.9      | 1.2       | 0.0                 | 100.0    | 0.46                | 0.7               |
|                    |         | 998.3     | 100.0     |                     |          | 38.66               | 56.8              |





# Particle Size Distribution

## Hazen Project 12661

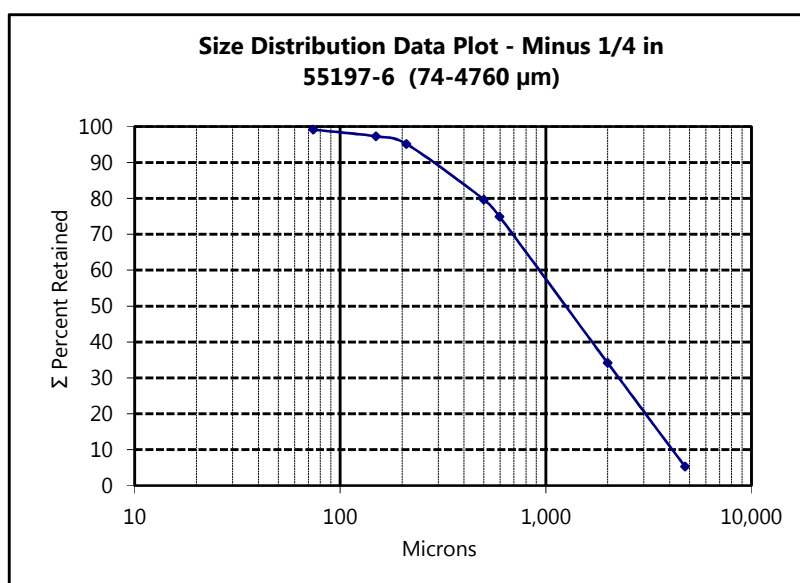
**Sample ID: 55197-6**

Procedure: The sample was dry-screened at each sieve size listed.

| Fractional<br>Size, in | Direct   |          |
|------------------------|----------|----------|
|                        | Mass, kg | Weight % |
| >3/4                   | 17.32    | 26.1     |
| 3/4 x 1/4              | 8.72     | 13.2     |
| <1/4                   | 40.24    | 60.7     |
| Total:                 | 66.28    | 100      |

### US Standard Sieve Data

| Minus 1/4-in Split |         |           |           |                     |          | Entire Sample Basis |                   |
|--------------------|---------|-----------|-----------|---------------------|----------|---------------------|-------------------|
| Retain Size        |         | Direct    |           | Cumulative Weight % |          | Direct              |                   |
|                    |         | Weight, g | Weight, % | Passing             | Retained | Mass, <1/4 in, kg   | Weight, % <1/4 in |
| mesh               | microns |           |           |                     |          |                     |                   |
| 4                  | 4760    | 54.4      | 5.3       | 94.7                | 5.3      | 2.12                | 3.2               |
| 10                 | 2000    | 298.3     | 28.9      | 65.8                | 34.2     | 11.63               | 17.5              |
| 30                 | 595     | 421.1     | 40.8      | 25.0                | 75.0     | 16.41               | 24.8              |
| 35                 | 500     | 48.7      | 4.7       | 20.3                | 79.7     | 1.90                | 2.9               |
| 70                 | 210     | 159.6     | 15.5      | 4.9                 | 95.1     | 6.22                | 9.4               |
| 100                | 149     | 22.3      | 2.2       | 2.7                 | 97.3     | 0.87                | 1.3               |
| 200                | 74      | 19.1      | 1.9       | 0.9                 | 99.1     | 0.74                | 1.1               |
| -200               | -74     | 8.8       | 0.9       | 0.0                 | 100.0    | 0.34                | 0.5               |
|                    |         | 1032.3    | 100.0     |                     |          | 40.24               | 60.7              |





# Particle Size Distribution

## Hazen Project 12661

**Sample ID: 55197-7**

Procedure: The sample was dry-screened at each sieve size listed.

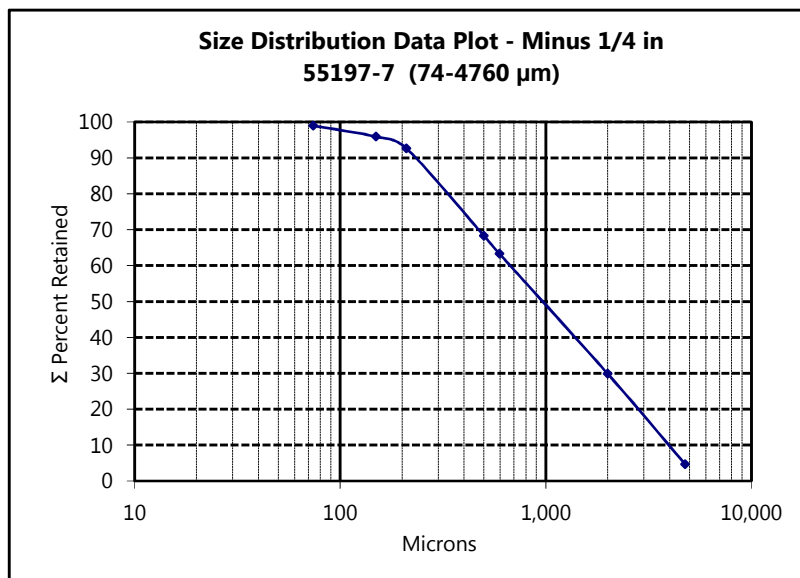
The sample was wet-screened at each sieve size listed.

| Fractional<br>Size, in | Direct   |          |
|------------------------|----------|----------|
|                        | Mass, kg | Weight % |
| >3/4                   | 7.46     | 11.0     |
| 3/4 x 1/4              | 18.38    | 27.2     |
| <1/4                   | 41.76    | 61.8     |
| Total:                 | 67.6     | 100      |

| Minus 1/4" | Direct   |          |
|------------|----------|----------|
|            | Mass, kg | Weight % |
| >200       | 1700.1   | 89.2     |
| <200       | 206.1    | 10.8     |
|            | 1906.2   |          |

### US Standard Sieve Data

| Minus 1/4-in Split |         |           |           |                     |          | Entire Sample Basis |                   |
|--------------------|---------|-----------|-----------|---------------------|----------|---------------------|-------------------|
| Retain Size        |         | Direct    |           | Cumulative Weight % |          | Direct              |                   |
|                    |         | Weight, g | Weight, % | Passing             | Retained | Mass, <1/4 in, kg   | Weight, % <1/4 in |
| mesh               | microns |           |           |                     |          |                     |                   |
| 4                  | 4760    | 46.2      | 4.7       | 95.3                | 4.7      | 1.95                | 2.9               |
| 10                 | 2000    | 248.9     | 25.2      | 70.1                | 29.9     | 10.52               | 15.6              |
| 30                 | 595     | 330.1     | 33.4      | 36.7                | 63.3     | 13.96               | 20.6              |
| 35                 | 500     | 49.4      | 5.0       | 31.7                | 68.3     | 2.09                | 3.1               |
| 70                 | 210     | 240.3     | 24.3      | 7.4                 | 92.6     | 10.16               | 15.0              |
| 100                | 149     | 32.3      | 3.3       | 4.1                 | 95.9     | 1.37                | 2.0               |
| 200                | 74      | 30.1      | 3.0       | 1.0                 | 99.0     | 1.27                | 1.9               |
| -200               | -74     | 10.3      | 1.0       | 0.0                 | 100.0    | 0.44                | 0.6               |
|                    |         | 987.6     | 100.0     |                     |          | 41.76               | 61.8              |





## **APPENDIX D**

### **Size Fraction Metals Analysis, Asset Laboratories**



The files for Appendix D are submitted electronically with this report.



## **APPENDIX E**

### **Dioxin Analysis: Minus $\frac{1}{4}$ in. Samples Provided by Jacobs**



The files for Appendix E are submitted electronically with this report.



## **APPENDIX F**

### **Soil Washing Experiments: Data Reports**



12661

**Batch Trommel Soil Washing Experiment Data**

Date: 7/16/19

NB &amp; page 3973-51

**Triton X-100 35m Cut**

By: KM, RLS

**Objective:** To evaluate soil washing using a trommel as a means of removing contaminants from soil.**Procedure**

1. Obtain 400 g splits of minus 1/4" soil sample from Sample Prep.
2. Make up 10% Triton X-100 surfactant.
3. Weigh out 2 splits and record the weights and identification on 2 leach sheets.
4. Add DI H<sub>2</sub>O and (optionally) Triton X-100 mixture in quantities specified to trommel vessel.
5. Cap vessel and place on rolls, agitate for 15 minutes.
6. Wet screen the slurry at **35 mesh**; dry plus size material at 50°C.
7. Flocculate and filter the minus fraction; wash filter cake with warm water 3X.
8. Containerize dried samples, ship all samples to contract laboratory.

|        |                           |                    |                |     |       |                    |
|--------|---------------------------|--------------------|----------------|-----|-------|--------------------|
| 399.56 | g,                        | HRI#55197-03 -1/4" | <u>Targets</u> |     | 30    | % Solids           |
| 3.71   | % moisture                |                    | 933            | 886 | 886   | g DI H2O           |
| 384.74 | g dry solids (calculated) |                    | 0              | 47  | 47.07 | g 10% Triton X-100 |

**Products****Metals Analysis, mg/kg**

| NB-page-# | Time, min | Description | Mass, g | Wt % | Cr   | Zn  | Cr <sup>VI</sup> |
|-----------|-----------|-------------|---------|------|------|-----|------------------|
| 55197-3   |           | Feed Solids | 384.74  |      | 1644 | 112 | 17               |
| 3973-51-2 | 15        | Oversize    | 317.85  | 82.9 | 540  | 71  | 3.8              |
| 3973-51-3 | 15        | Undersize   | 65.70   | 17.1 | 4000 | 210 | 21               |

Total: 383.55

Accountability, %: 99.7

**Analyte Mass, mg****Analyte Mass Dist'n, %**

|           |    |             |  | Cr <sup>T</sup> | Zn    | Cr <sup>VI</sup> | Cr <sup>T</sup> | Zn   | Cr <sup>VI</sup> |
|-----------|----|-------------|--|-----------------|-------|------------------|-----------------|------|------------------|
| 55197-3   |    | Feed Solids |  | 632.51          | 43.09 | 6.54             | 100             | 100  | 100              |
|           | 15 | Aqueous     |  | 198.1           | 6.7   | 4.0              | 31.3            | 15.6 | 60.4             |
| 3973-51-2 | 15 | Oversize    |  | 171.64          | 22.57 | 1.21             | 27.1            | 52.4 | 18.5             |
| 3973-51-3 | 15 | Undersize   |  | 262.80          | 13.80 | 1.38             | 41.5            | 32.0 | 21.1             |

Values in italics are calculated. Size fraction solids total: 434.44 36.36 2.59

**Dioxin Analysis, ng/kg**

|               | TCDF | TCDD | PeCDF | PeCDD | HxCDF  | HxCDD  | HpCDF  | HpCDD   | OCDF    | OCDD      |
|---------------|------|------|-------|-------|--------|--------|--------|---------|---------|-----------|
| 55197-3       | 220  | 20   | 3,400 | 430   | 9,400  | 7,000  | 21,000 | 120,000 | 10,000  | 910,000   |
| 3973-51-2 O'S | 17   | ND   | 210   | 33    | 710    | 630    | 1,600  | 7,700   | 1,200   | 70,000    |
| 3973-51-3 U'S | 640  | 68   | 8,400 | 1,400 | 32,000 | 26,000 | 79,000 | 550,000 | 140,000 | 5,300,000 |

**Analyte Mass, ng**

|                  |    |   |       |     |       |       |       |        |        |         |
|------------------|----|---|-------|-----|-------|-------|-------|--------|--------|---------|
| 55197-3          | 85 | 8 | 1,308 | 165 | 3,617 | 2,693 | 8,079 | 46,168 | 3,847  | 350,110 |
| Aqueous (calc'd) | 37 | 3 | 689   | 63  | 1,288 | 785   | 2,381 | 7,586  | -5,732 | -20,349 |
| 3973-51-2 O'S    | 5  | 0 | 67    | 10  | 226   | 200   | 509   | 2,447  | 381    | 22,250  |
| 3973-51-3 U'S    | 42 | 4 | 552   | 92  | 2,102 | 1,708 | 5,190 | 36,135 | 9,198  | 348,210 |
| Total, solids:   | 47 | 4 | 619   | 102 | 2,328 | 1,908 | 5,699 | 38,582 | 9,579  | 370,460 |

**Analyte Mass Distribution, %**

|               |    |    |    |    |    |    |    |    |      |    |
|---------------|----|----|----|----|----|----|----|----|------|----|
| Aqueous       | 44 | 42 | 53 | 38 | 36 | 29 | 29 | 16 | -149 | -6 |
| 3973-51-2 O'S | 6  | 0  | 5  | 6  | 6  | 7  | 6  | 5  | 10   | 6  |
| 3973-51-3 U'S | 50 | 58 | 42 | 56 | 58 | 63 | 64 | 78 | 239  | 99 |

**Notes**

Triton caused foaming. Sieving was rapid, efficient.



12661

NB &amp; page

3973-52

**Batch Trommel Soil Washing Experiment Data****Water 35m Cut**

Date: 7/16/19

By: KM, RLS

**Objective:** To evaluate soil washing using a trommel as a means of removing contaminants from soil.**Procedure**

1. Obtain 400 g splits of minus 1/4" soil sample from Sample Prep.
2. Make up 10% Triton X-100 surfactant.
3. Weigh out 2 splits and record the weights and identification on 2 leach sheets.
4. Add DI H<sub>2</sub>O and (optionally) Triton X-100 mixture in quantities specified to trommel vessel.
5. Cap vessel and place on rolls, agitate for 15 minutes.
6. Wet screen the slurry at **35 mesh**; dry plus size material at 50°C.
7. Flocculate and filter the minus fraction; wash filter cake with warm water 3X.
8. Containerize dried samples, ship all samples to contract laboratory.

|        |                           |       |          |       |         |     |                           |
|--------|---------------------------|-------|----------|-------|---------|-----|---------------------------|
| 398.93 | g,                        | HRI#: | 55197-03 | -1/4" | Targets | 30  | % Solids                  |
| 3.71   | % moisture                |       |          |       | 933     | 933 | 933 g DI H <sub>2</sub> O |
| 384.13 | g dry solids (calculated) |       |          |       | 0       | 0   | 0 g 10% Triton X-100      |

**Products****Metals Analysis, mg/kg**

| NB-page-# | Time, min | Description | Mass, g | Wt % | Cr   | Zn  | Cr <sup>VI</sup> |
|-----------|-----------|-------------|---------|------|------|-----|------------------|
| 55197-3   |           | Feed Solids | 384.13  |      | 1644 | 112 | 17               |
| 3973-52-2 | 15        | Oversize    | 313.99  | 82.4 | 540  | 63  | 4.1              |
| 3973-52-3 | 15        | Undersize   | 67.02   | 17.6 | 2900 | 160 | 21               |

Total: 381.01

Accountability, %: 99.2

**Analyte Mass, mg****Analyte Mass Dist'n, %**

|           |    |             |  |  | Cr <sup>T</sup> | Zn    | Cr <sup>VI</sup> | Cr <sup>T</sup> | Zn   | Cr <sup>VI</sup> |
|-----------|----|-------------|--|--|-----------------|-------|------------------|-----------------|------|------------------|
| 55197-3   |    | Feed Solids |  |  | 631.51          | 43.02 | 6.53             | 100             | 100  | 100              |
|           | 15 | Aqueous     |  |  | 267.6           | 12.5  | 3.8              | 42.4            | 29.1 | 58.7             |
| 3973-52-2 | 15 | Oversize    |  |  | 169.55          | 19.78 | 1.29             | 26.8            | 46.0 | 47.8             |
| 3973-52-3 | 15 | Undersize   |  |  | 194.36          | 10.72 | 1.41             | 30.8            | 24.9 | 52.2             |

Values shown in italics are calculated. Size fraction solids total: 363.91 30.50 2.69

**Dioxin Analysis, ng/kg**

|               | TCDF  | TCDD | PeCDF  | PeCDD | HxCDF  | HxCDD  | HpCDF   | HpCDD   | OCDF    | OCDD      |
|---------------|-------|------|--------|-------|--------|--------|---------|---------|---------|-----------|
| 55197-3       | 220   | 20   | 3,400  | 430   | 9,400  | 7,000  | 21,000  | 120,000 | 10,000  | 910,000   |
| 3973-52-2 O'S | 69    | 5    | 680    | 82    | 1,500  | 960    | 2,000   | 9,100   | 1,100   | 77,000    |
| 3973-52-3 U'S | 1,200 | 140  | 16,000 | 2,400 | 53,000 | 44,000 | 120,000 | 550,000 | 130,000 | 5,800,000 |

**Analyte Mass, ng**

|                  |     |    |       |     |       |       |       |        |        |         |
|------------------|-----|----|-------|-----|-------|-------|-------|--------|--------|---------|
| 55197-3          | 85  | 8  | 1,306 | 165 | 3,611 | 2,689 | 8,067 | 46,096 | 3,841  | 349,558 |
| Aqueous (calc'd) | -18 | -3 | 20    | -21 | -412  | -561  | -604  | 6,377  | -5,217 | -63,335 |
| 3973-52-2 O'S    | 22  | 1  | 214   | 26  | 471   | 301   | 628   | 2,857  | 345    | 24,177  |
| 3973-52-3 U'S    | 80  | 9  | 1,072 | 161 | 3,552 | 2,949 | 8,042 | 36,861 | 8,713  | 388,716 |
| Total, solids:   | 102 | 11 | 1,286 | 187 | 4,023 | 3,250 | 8,670 | 39,718 | 9,058  | 412,893 |

**Analyte Mass Distribution, %**

|               |     |     |    |     |     |     |     |    |      |     |
|---------------|-----|-----|----|-----|-----|-----|-----|----|------|-----|
| Aqueous       | -21 | -41 | 2  | -13 | -11 | -21 | -7  | 14 | -136 | -18 |
| 3973-52-2 O'S | 26  | 18  | 16 | 16  | 13  | 11  | 8   | 6  | 9    | 7   |
| 3973-52-3 U'S | 95  | 122 | 82 | 97  | 98  | 110 | 100 | 80 | 227  | 111 |

**Notes**

Sieving was rapid, efficient



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NB &amp; page 3973-53

**Batch Trommel Soil Washing Experiment Data**  
**Triton X-100 70m Cut**

Date: 7/16/19

By: KM, RLS

**Objective:** To evaluate soil washing using a trommel as a means of removing contaminants from soil.

**Procedure**

1. Obtain 400 g splits of minus 1/4" soil sample from Sample Prep.
2. Make up 10% Triton X-100 surfactant.
3. Weigh out 2 splits and record the weights and identification on 2 leach sheets.
4. Add DI H<sub>2</sub>O and (optionally) Triton X-100 mixture in quantities specified to trommel vessel.
5. Cap vessel and place on rolls, agitate for 15 minutes.
6. Wet screen the slurry at **70 mesh**; dry plus size material at 50°C.
7. Flocculate and filter the minus fraction; wash filter cake with warm water 3X.
8. Containerize dried samples, ship all samples to contract laboratory.

|        |                           |                      |                |       |                       |
|--------|---------------------------|----------------------|----------------|-------|-----------------------|
| 399.79 | g,                        | HRI#: 55197-03 -1/4" | <u>Targets</u> | 30    | % Solids              |
| 3.71   | % moisture                |                      | 933 886        | 886   | g DI H <sub>2</sub> O |
| 384.96 | g dry solids (calculated) |                      | 0 47           | 47.05 | g 10% Triton X-100    |

**Products****Metals Analysis, mg/kg**

| NB-page-# | Time, min | Description | Mass, g | Wt % | Cr   | Zn  | Cr <sup>VI</sup> |
|-----------|-----------|-------------|---------|------|------|-----|------------------|
| 55197-3   |           | Feed Solids | 384.96  |      | 1644 | 112 | 17               |
| 3973-53-2 | 15        | Oversize    | 354.01  | 91.3 | 630  | 70  | 5.2              |
| 3973-53-3 | 15        | Undersize   | 33.60   | 8.7  | 5900 | 260 | 28               |

Total: 387.61

Accountability, %: 100.7

**Analyte Mass, mg****Analyte Mass Dist'n, %**

|           |    |             |  |  | Cr <sup>T</sup> | Zn    | Cr <sup>VI</sup> | Cr <sup>T</sup> | Zn   | Cr <sup>VI</sup> |
|-----------|----|-------------|--|--|-----------------|-------|------------------|-----------------|------|------------------|
| 55197-3   |    | Feed Solids |  |  | 632.87          | 43.12 | 6.54             | 100             | 100  | 100              |
|           | 15 | Aqueous     |  |  | 211.6           | 9.6   | 3.8              | 33.4            | 22.3 | 57.5             |
| 3973-53-2 | 15 | Oversize    |  |  | 223.03          | 24.78 | 1.84             | 35.2            | 73.9 | 66.2             |
| 3973-53-3 | 15 | Undersize   |  |  | 198.24          | 8.74  | 0.94             | 31.3            | 26.1 | 33.8             |

Values in italics are calculated.

Size fraction solids total: 421.27 33.52 2.78

**Dioxin Analysis, ng/kg**

|               | TCDF  | TCDD | PeCDF  | PeCDD | HxCDF  | HxCDD  | HpCDF   | HpCDD   | OCDF    | OCDD      |
|---------------|-------|------|--------|-------|--------|--------|---------|---------|---------|-----------|
| 55197-3       | 220   | 20   | 3,400  | 430   | 9,400  | 7,000  | 21,000  | 120,000 | 10,000  | 910,000   |
| 3973-53-2 O'S | 25    | 1    | 320    | 62    | 1,000  | 970    | 2,200   | 12,000  | 1,400   | 120,000   |
| 3973-53-3 U'S | 1,300 | 160  | 17,000 | 2,800 | 66,000 | 54,000 | 190,000 | 950,000 | 290,000 | 7,800,000 |

**Analyte Mass, ng**

|                  |    |   |       |     |       |       |       |        |        |         |
|------------------|----|---|-------|-----|-------|-------|-------|--------|--------|---------|
| 55197-3          | 85 | 8 | 1,309 | 166 | 3,619 | 2,695 | 8,084 | 46,195 | 3,850  | 350,312 |
| Aqueous (calc'd) | 32 | 2 | 624   | 50  | 1,047 | 537   | 921   | 10,027 | -6,390 | 45,750  |
| 3973-53-2 O'S    | 9  | 0 | 113   | 22  | 354   | 343   | 779   | 4,248  | 496    | 42,481  |
| 3973-53-3 U'S    | 44 | 5 | 571   | 94  | 2,218 | 1,814 | 6,384 | 31,920 | 9,744  | 262,080 |
| Total, solids:   | 53 | 6 | 684   | 116 | 2,572 | 2,158 | 7,163 | 36,168 | 10,240 | 304,561 |

**Analyte Mass Distribution, %**

|               |    |    |    |    |    |    |    |    |      |    |
|---------------|----|----|----|----|----|----|----|----|------|----|
| Aqueous       | 38 | 27 | 48 | 30 | 29 | 20 | 11 | 22 | -166 | 13 |
| 3973-53-2 O'S | 10 | 4  | 9  | 13 | 10 | 13 | 10 | 9  | 13   | 12 |
| 3973-53-3 U'S | 52 | 70 | 44 | 57 | 61 | 67 | 79 | 69 | 253  | 75 |

**Notes**

Triton caused foaming



12661

NB &amp; page

3973-54

**Batch Trommel Soil Washing Experiment Data****Water 70m Cut**

Date: 7/16/19

By: KM, RLS

**Objective:** To evaluate soil washing using a trommel as a means of removing contaminants from soil.**Procedure**

1. Obtain 400 g splits of minus 1/4" soil sample from Sample Prep.
2. Make up 10% Triton X-100 surfactant.
3. Weigh out 2 splits and record the weights and identification on 2 leach sheets.
4. Add DI H<sub>2</sub>O and (optionally) Triton X-100 mixture in quantities specified to trommel vessel.
5. Cap vessel and place on rolls, agitate for 15 minutes.
6. Wet screen the slurry at **70 mesh**; dry plus size material at 50°C.
7. Flocculate and filter the minus fraction; wash filter cake with warm water 3X.
8. Containerize dried samples, ship all samples to contract laboratory.

|        |                           |       |          |       |         |     |                           |
|--------|---------------------------|-------|----------|-------|---------|-----|---------------------------|
| 399.67 | g,                        | HRI#: | 55197-03 | -1/4" | Targets | 30  | % Solids                  |
| 3.71   | % moisture                |       |          |       | 933     | 933 | 933 g DI H <sub>2</sub> O |
| 384.84 | g dry solids (calculated) |       |          |       | 0       | 0   | 0 g 10% Triton X-100      |

**Products****Metals Analysis, mg/kg**

| NB-page-# | Time, min | Description | Mass, g | Wt % | Cr   | Zn  | Cr <sup>VI</sup> |
|-----------|-----------|-------------|---------|------|------|-----|------------------|
| 55197-3   |           | Feed Solids | 384.84  |      | 1644 | 112 | 17               |
| 3973-54-2 | 15        | Oversize    | 350.69  | 91.1 | 720  | 84  | 6.4              |
| 3973-54-3 | 15        | Undersize   | 34.07   | 8.9  | 5300 | 240 | 21               |

Total: 384.76

Accountability, %: 100.0

**Analyte Mass, mg****Analyte Mass Dist'n, %**

|           |    |             |  |  | Cr <sup>T</sup> | Zn    | Cr <sup>VI</sup> | Cr <sup>T</sup> | Zn   | Cr <sup>VI</sup> |
|-----------|----|-------------|--|--|-----------------|-------|------------------|-----------------|------|------------------|
| 55197-3   |    | Feed Solids |  |  | 632.68          | 43.10 | 6.54             | 100             | 100  | 100              |
|           | 15 | Aqueous     |  |  | 199.6           | 5.5   | 3.6              | 31.6            | 12.7 | 54.8             |
| 3973-54-2 | 15 | Oversize    |  |  | 252.50          | 29.46 | 2.24             | 39.9            | 78.3 | 75.8             |
| 3973-54-3 | 15 | Undersize   |  |  | 180.57          | 8.18  | 0.72             | 28.5            | 21.7 | 24.2             |

Values in italics are calculated.

Size fraction solids total: 433.07 37.63 2.96

**Dioxin Analysis, ng/kg**

|               | TCDF  | TCDD | PeCDF  | PeCDD | HxCDF  | HxCDD  | HpCDF   | HpCDD   | OCDF    | OCDD      |
|---------------|-------|------|--------|-------|--------|--------|---------|---------|---------|-----------|
| 55197-3       | 220   | 20   | 3,400  | 430   | 9,400  | 7,000  | 21,000  | 120,000 | 10,000  | 910,000   |
| 3973-54-2 O'S | 17    | 3    | 230    | 41    | 830    | 700    | 1,800   | 8,100   | 1,200   | 80,000    |
| 3973-54-3 U'S | 1,900 | 210  | 26,000 | 4,100 | 93,000 | 74,000 | 230,000 | 660,000 | 380,000 | 7,400,000 |

**Analyte Mass, ng**

|                  |    |   |       |     |       |       |       |        |        |         |
|------------------|----|---|-------|-----|-------|-------|-------|--------|--------|---------|
| 55197-3          | 85 | 8 | 1,308 | 165 | 3,618 | 2,694 | 8,082 | 46,181 | 3,848  | 350,206 |
| Aqueous (calc'd) | 14 | 0 | 342   | 11  | 158   | -73   | -386  | 20,854 | -9,519 | 70,033  |
| 3973-54-2 O'S    | 6  | 1 | 81    | 14  | 291   | 245   | 631   | 2,841  | 421    | 28,055  |
| 3973-54-3 U'S    | 65 | 7 | 886   | 140 | 3,169 | 2,521 | 7,836 | 22,486 | 12,947 | 252,118 |
| Total, solids:   | 71 | 8 | 966   | 154 | 3,460 | 2,767 | 8,467 | 25,327 | 13,367 | 280,173 |

**Analyte Mass Distribution, %**

|               |    |    |    |    |    |    |    |    |      |    |
|---------------|----|----|----|----|----|----|----|----|------|----|
| Aqueous       | 17 | -6 | 26 | 7  | 4  | -3 | -5 | 45 | -247 | 20 |
| 3973-54-2 O'S | 7  | 13 | 6  | 9  | 8  | 9  | 8  | 6  | 11   | 8  |
| 3973-54-3 U'S | 76 | 93 | 68 | 84 | 88 | 94 | 97 | 49 | 336  | 72 |

**Notes**

Sieving was rapid, efficient



## **APPENDIX G**

### **Dioxin Analysis: Soil Washing Experiment Products Pace Laboratories**



The files for Appendix G are submitted electronically with this report.







## **Appendix G**

### **Cost Evaluation**









**Soil Engineering Evaluation/Cost Analysis,  
PG&E Topock Compressor Station,  
Needles, California**

**Basis of Estimate**

Draft

May 29, 2020

Pacific Gas & Electric Company









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**Attachment**

A Cost Estimate Detail

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## Basis of Estimate

### 1. Purpose of Estimate

The purpose of this Construction Cost Estimate is to establish an Engineer's opinion of probable construction cost at 30% Construction Plan Development for the analysis of contractor bids.

### 2. General Project Description

Project scope includes excavating areas of concern (AOCs), waste transport and disposal, backfill, and site restoration.

### 3. Overall Costs

Table 1 is a summary breakdown of the costs. The Contract Costs shown exclude Owner Contingency and any owner costs associated with the supervision, inspection and overhead (SIOH) of the project.

**Table 1. Summary of Costs**

*PG&E Topock Compressor Station – Needles, CA*

| Alternative | Low Range (-30%) | Estimated Costs <sup>a</sup> | High Range (+50%) |
|-------------|------------------|------------------------------|-------------------|
| Alt 1       | \$0              | <b>\$0</b>                   | \$0               |
| Alt 2       | \$3,779,000      | <b>\$5,398,000</b>           | \$8,097,000       |
| Alt 3       | \$3,266,000      | <b>\$4,660,000</b>           | \$6,999,000       |
| Alt 4       | \$3,655,000      | <b>\$5,220,000</b>           | \$7,833,000       |

<sup>a</sup> See Attachment A for cost estimate details. This estimate is valid for 120 days.

### 4. Scope of Work

This project consists of the excavation, transportation and disposal of contaminated soil, backfill, and site restoration. There are four proposed alternatives:

#### Alternative 1:

1. No remedial action taken.

#### Alternative 2:

1. Premobilization
  - Remedial design
  - Contractor submittals
  - Performance and payment bond
2. Mobilization / Site Setup
  - Mobilization
  - Site setup / erosion controls
  - Construct stockpile staging area
  - Fence removal
  - Pre-excavation survey
  - Utility locate
3. Excavation
  - Excavate, haul, and stockpile
  - Analytical testing
  - Post-excavation survey
  - Traffic control



4. Transportation and disposal
  - Load waste material
  - Transport and dispose material
  - Waste profile sampling
5. Backfill / restoration / demobilization
  - Clean fill analytical confirmation
  - Backfill – imported and locally sourced
  - Traffic control
  - Post-backfill survey
  - Fence replacement
  - Seeding and grounds restoration
  - Demobilization
6. Final construction completion report
7. Construction management support
  - Dust monitoring
  - Field staff, supplies, per diem, vehicle, and field office
8. Project Management

**Alternative 3:**

1. Premobilization
  - Remedial design
  - Contractor submittals
  - Performance and payment bond
2. Mobilization / Site Setup
  - Mobilization
  - Site setup / erosion controls
  - Construct stockpile staging area
  - Fence removal
  - Pre-excavation survey
  - Utility locate
3. Excavation
  - Excavate, haul, and stockpile
  - Analytical testing
  - Post-excavation survey
  - Traffic control
4. Transportation and disposal
  - Load waste material
  - Transport and dispose material
  - Waste profile sampling
5. Screening
  - Spill control berm
  - Dust control
  - Screen excavated material for separation
6. Backfill / restoration / demobilization
  - Clean fill analytical confirmation
  - Backfill – imported and locally sourced
  - Traffic control
  - Post-backfill survey
  - Fence replacement
  - Seeding and grounds restoration
  - Demobilization
7. Final construction completion report



8. Construction management support
  - Dust monitoring
  - Field staff, supplies, per diem, vehicle, and field office
  - Project Management

**Alternative 4:**

1. Premobilization
  - Remedial design
  - Contractor submittals
  - Performance and payment bond
2. Mobilization / Site Setup
  - Mobilization
  - Site setup / erosion controls
  - Construct stockpile staging area
  - Fence removal
  - Pre-excavation survey
  - Utility locate
3. Excavation
  - Excavate, haul, and stockpile
  - Analytical testing
  - Post-excavation survey
  - Traffic control
4. Transportation and disposal
  - Load waste material
  - Transport and dispose material
  - Waste profile sampling
5. Screening
  - Spill control berm
  - Dust control
  - Temporary water line
  - Screen excavated material for separation
  - Rinse material for site reuse
  - Transport rinsate back to ponds after use
6. Backfill / restoration / demobilization
  - Clean fill analytical confirmation
  - Backfill – imported and reuse from screening/washing
  - Traffic control
  - Post-backfill survey
  - Fence replacement
  - Seeding and grounds restoration
  - Demobilization
7. Final construction completion report
8. Construction management support
  - Dust monitoring
  - Field staff, supplies, per diem, vehicle, and field office
  - Project Management

**5. Markups**

The markups summarized in Table 2 are based upon general assumptions about how the project will be contracted. Actual markup percentages may vary from those shown here, and are the responsibility of the bidding contractor.



**Table 2. Contractor Markups***PG&E Topock Compressor Station – Needles, CA*

| Markup Category | Percentage |
|-----------------|------------|
| Indirect        | 20.00%     |
| Contingency     | 20.00%     |
| Fee             | 8.00%      |

## 6. Escalation Rate

This estimate does not include escalation.

## 7. Estimate Classification

This is not an offer for construction and/or project execution. This AACE Classification Class 4 cost estimate is assumed to represent the actual total installed cost within the range of -30 percent to +50 percent (% based on AACE Class 4, which is recommended for estimates at the 30% design level) of the cost indicated. It would appear prudent that internal budget allowances account for the highest cost indicated by this range as well as other site specific allowances. The cost estimate has been prepared for guidance in project evaluation and implementation from the information available at the time of the estimate. The final costs of the project will depend on actual labor and material costs, competitive market conditions, implementation schedule, and other variable factors. As a result, the final project costs will vary from the estimates presented herein. Because of this, project feasibility and funding needs must be carefully reviewed prior to making specific financial decisions to help ensure proper project evaluation and adequate funding.

## 8. Estimate Methodology

Parts of this cost estimate are considered a bottom rolled up type estimate with cost items and breakdown of Labor, Materials and Equipment. Vendor resources such as quotes and internet sources were incorporated where applicable.

## 9. Cost Resources

The following is a list of the various cost resources used in the development of the cost estimate:

- R.S. Means, 2016
- HCSS estimating software
- Vendor quotes
- Internet research if applicable
- CH2M and Jacobs Historical Data and similar project costs
- Estimator judgment

## 10. Labor Costs

The HCSS database is fixed at the U.S. National Average.

## 11. Taxes

A 7.75% tax is applied to material and equipment.



## **12. Major Assumptions**

The estimate is based on the assumptions that the work will be done on a competitive bid basis, the contractor will have a reasonable amount of time to complete the work, and all work can be performed without schedule disruptions.

General assumptions for the scope of work include:

- No costs for temporary security have been included in this estimate.
- No salvage value has been included for any materials removed or demolished on the project.
- It is appropriate to dispose of excavated waste at a disposal site in Beatty, NV and they have capacity to accommodate generated waste.

This estimate should be evaluated for market changes after 120 days beyond the issue date. It is assumed that much of the materials and equipment will be provided by local general, electrical, mechanical, and plumbing contractors.

It is assumed that the work is performed under a 50-hour work week. Additionally, it is assumed that all materials and labor are readily available and that the contractor has reasonable and unlimited access to the work areas.

## **13. Allowances**

No allowances were included in this cost estimate for known work that is not sufficiently detailed at this time.

## **14. Excluded Costs**

The cost estimate excludes the following costs:

- Non-construction or soft costs for design, services during construction, land, legal and owner administration costs
- Material Adjustment allowances above and beyond what is included at the time of the cost estimate







## **Attachment A**

### **Cost Estimate Detail**







| <b>Cost Estimate Details Summary</b><br><b>Soil Engineering Evaluation/Cost Analysis, PG&amp;E Topock Compressor Station</b> |  |   |  |  |
|--|--|---|--|--|
| <b>Cost Type</b>   | <b>Alternative 1:<br/>No Remediation</b> | <b>Alternative 2:<br/>Excavation and Offsite<br/>Disposal</b> | <b>Alternative 3:<br/>Excavate, Screen to 3/8",<br/>50% reused as Backfill,<br/>50% Offsite Disposal</b> | <b>Alternative 4:<br/>Excavate, Screen to 3/8",<br/>50% reused as Backfill<br/>after Rinse, 50% Offsite<br/>Disposal</b> |
| Total Capital Cost   | \$0                                      | \$5,398,000   | \$4,666,000  | \$5,222,000  |
| <b>Estimated Range of Costs (Class 4)</b>  | From                                     | From  | From   | From   |
| -30%   | \$0                                      | \$3,779,000   | \$3,266,000  | \$3,655,000  |
|  | To                                       | To  | To   | To   |
| +50%   | \$0                                      | \$8,097,000   | \$6,999,000  | \$7,833,000  |

This is not an offer for construction and/or project execution.

These AACE Classification Class 4 cost estimates are assumed to represent the actual total installed cost within the range of -30 percent to +50 percent (% based on AACE) of the cost indicated. It would appear prudent that internal budget allowances account for the highest cost indicated by this range as well as other site specific allowances. The cost estimate has been prepared for guidance in project evaluation and implementation from the information available at the time of the estimate. The final costs of the project will depend on actual labor and material costs, competitive market conditions, implementation schedule, and other variable factors. As a result, the final project costs will vary from the estimates presented herein. Because of this, project feasibility and funding needs must be carefully reviewed prior to making specific financial decisions to help ensure proper project evaluation and adequate funding.

Cost resources in this estimate includes vendor quotes, RS Means, and estimator's judgment based on previous projects.







**Alternative 2: Excavation and Offsite Disposal**
**COST ESTIMATE SUMMARY**

**Site:** Topock, CA  
**Location:** Topock, CA  
**Phase:**  
**Base Year:** 2020  
**Date:**

**Description:** Excavate and haul to staging area, offsite disposal

**CAPITAL COSTS:**

| DESCRIPTION   | QTY   | UNIT | UNIT COST   | TOTAL              | NOTES  |
|---|-------|------|-------------|--------------------|--|
| <b>1 Premobilization</b>                              |       |      |             |                    |  |
| Remedial Design                                       | 1     | LS   | \$100,000   | \$100,000          |  |
| Contractor Submittals                                 | 1     | LS   | \$10,000    | \$10,000           |  |
| Performance and Payment Bond                          | 2%    |      | \$1,152,760 | \$23,055           | construction costs only - excludes T&D                                 |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$133,055</b>   |  |
| <b>2 Mobilization/Site Setup</b>                      |       |      |             |                    |  |
| Mobilization  | 1     | EA   | \$118,900   | \$118,900          | includes travel costs  |
| Site Setup/Erosion Controls                           | 1     | LS   | \$29,300    | \$29,300           |  |
| Construct Stockpile Staging Area                      | 1     | LS   | \$16,400    | \$16,400           |  |
| Fence Removal   | 407   | LF   | \$10        | \$4,070            |  |
| Surveying   | 2     | DY   | \$3,800     | \$7,600            | Establish excavation areas   |
| Utility Locate  | 2     | DY   | \$1,800     | \$3,600            |  |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$179,870</b>   |  |
| <b>3 Excavation</b>                                   |       |      |             |                    |  |
| AOC1, AOC 9, AOC 11, AOC14, AOC27, SWMU 1             |       |      |             |                    |  |
| Excavate and Haul to Staging Area                     | 5,154 | CY   | \$37        | \$190,684          | assumed 3 - 5 cy trucks to haul to stockpile area - 576 bcy/shift      |
| Stockpile Management                                  | 5,154 | CY   | \$9         | \$46,383           |  |
| AOC10   |       |      |             |                    |  |
| Excavate and Haul to Staging Area                     | 2,360 | CY   | \$58        | \$136,854          |  |
| Stockpile Management                                  | 2,360 | CY   | \$15        | \$35,393           |  |
| Special Excavator Areas (AOC 10-1, AOC 9-1, SWMU 1-3) | 1,142 | CY   | \$6         | \$7,412            | Additional cost factor to excavation, steep area.                      |
| Drop-off, Assembly, Disassembly, Pick-up              | 1     | LS   | \$53,412    | \$53,412           |  |
| Analytical - Confirmation Samples                     |       |      |             |                    | Includes 15% QC  |
| Metals  | 137   | EA   | \$91        | \$12,467           | SW6010B/SW7471A  |
| Dioxin  | 137   | EA   | \$607.25    | \$83,193           | SW846 8290   |
| Shipping Samples                                      | 18    | EA   | \$125       | \$2,250            |  |
| Shoring SWMU 1-2                                      | 5,600 | SF   | \$20        | \$109,256          |  |
| Surveying   | 5     | DY   | \$3,800     | \$19,000           | Post excavation survey   |
| Traffic Control                                       | 5     | DY   | \$5,156     | \$25,780           | North Side of I-40   |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$722,085</b>   |  |
| <b>4 Transportation and Disposal</b>                  |       |      |             |                    |  |
| Load Trucks for Offsite Disposal                      | 7,513 | CY   | \$10        | \$75,132           | assumed 20 loads/day for offsite disposal                              |
| Analytical - Waste Profile                            | 30    | EA   | \$750       | \$22,540           | Assumed 1 per 250 CY   |
| T&D - Non Haz Soil                                    | 7,889 | TN   | \$200       | \$1,577,800        | assumed 70% (\$300/cy)   |
| T&D - Haz Soil  | 3,381 | TN   | \$283.33    | \$957,939          | assumed 30% (\$425/cy)   |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$2,633,410</b> |  |
| <b>5 Backfill/Restoration/Demobilization</b>          |       |      |             |                    |  |
| Analytical - Clean Fill                               | 3     | EA   | \$645       | \$1,935            | assumed 1 per 1,000 cy   |
| Backfill - Import                                     | 1,278 | CY   | \$73        | \$93,260           |  |
| Backfill - Local Source                               | 6,236 | CY   | \$11        | \$67,283           |  |
| Traffic Control                                       | 3     | DY   | \$4,349     | \$13,047           | North Side of I-40   |
| Surveying   | 5     | DY   | \$3,800     | \$19,000           | post backfill survey   |
| Fence Replacement                                     | 407   | LF   | \$40        | \$16,280           |  |
| Seeding/Restoration                                   | 1     | LS   | \$15,000    | \$15,000           | allowance  |
| Demobilization  | 1     | LS   | \$25,000    | \$25,000           | allowance  |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$250,804</b>   |  |
| <b>6 Final Construction Completion Report</b>         |       |      |             |                    |  |
| Final Construction Completion Report                  | 1     | LS   | \$50,000    | \$50,000           |  |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$50,000</b>    |  |
| <b>7 Construction Management Support</b>              |       |      |             |                    |  |
| Construction Manager                                  | 864   | HR   | \$135       | \$116,640          | 4 month field duration (50 hr work week). Includes travel time to site |
| Field Technician                                      | 864   | HR   | \$90        | \$77,760           |  |
| Real Time Dust Monitor                                | 12    | MTH  | \$400       | \$4,800            | PDR-1000 dust monitor x 3 ea   |
| Setup Fixed Monitoring Station                        | 1     | LS   | \$2,500     | \$2,500            |  |
| Monitoring System Rental (3 ea)                       | 4     | MTH  | \$3,000     | \$12,000           |  |
| Pickup Rental   | 8     | MTH  | \$1,500     | \$12,000           | 2 ea   |
| Temporary Field Office                                | 4     | MTH  | \$5,000     | \$20,000           | temporary field office, sanitation, field supplies                     |
| Per Diem - Lodging                                    | 240   | DY   | \$102       | \$24,480           |  |
| Per Diem - Meals                                      | 240   | DY   | \$61        | \$14,640           |  |
| Daily Field Supplies                                  | 80    | DY   | \$75        | \$6,000            |  |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$290,820</b>   |  |
| <b>8 Project Management</b>                           |       |      |             |                    | Assumed 14 mths from design to Final Construction Completion Report    |
| Project Manager                                       | 1,120 | HR   | \$175       | \$196,000          |  |
| Subcontract Administrator                             | 80    | HR   | \$92        | \$7,360            |  |
| Administrative  | 560   | HR   | \$62        | \$34,720           |  |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$238,080</b>   |  |
| <b>TOTAL</b>  |       |      |             | <b>\$4,498,125</b> |  |
| Contingency   | 20%   |      | \$4,498,125 | \$899,600          | Scope and bid contingency  |
| <b>Total Capital Costs</b>                            |       |      |             | <b>\$5,397,725</b> |  |







**Alternative 3: Excavation, Screen and Offsite Disposal**
**COST ESTIMATE SUMMARY**

**Site:** Topock, CA  
**Location:** Topock, CA  
**Phase:**  
**Base Year:** 2020  
**Date:**

**Description:** Excavate, Screen to 3/8", 50% reused as Backfill, 50% Offsite Disposal. Screening excludes all AOC 10 areas. AOC 10 areas for offsite disposal without processing.

**CAPITAL COSTS:**

| DESCRIPTION   | QTY   | UNIT | UNIT COST   | TOTAL              | NOTES  |
|---|-------|------|-------------|--------------------|--|
| 1 Premobilization                                     |       |      |             |                    |  |
| Remedial Design                                       | 1     | LS   | \$100,000   | \$100,000          |  |
| Contractor Submittals                                 | 1     | LS   | \$10,000    | \$10,000           |  |
| Performance and Payment Bond                          | 2%    |      | \$1,373,126 | \$27,463           | construction costs only - excludes T&D                                 |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$137,463</b>   |  |
| 2 Mobilization/Site Setup                             |       |      |             |                    |  |
| Mobilization  | 1     | EA   | \$118,900   | \$118,900          | includes travel costs  |
| Site Setup/Erosion Controls                           | 1     | LS   | \$29,300    | \$29,300           |  |
| Construct Stockpile Staging Area                      | 1     | LS   | \$16,400    | \$16,400           |  |
| Temporary K-Rail                                      | 200   | LF   | \$30        | \$6,000            |  |
| Fence Removal   | 407   | LF   | \$10        | \$4,070            |  |
| Surveying   | 2     | DY   | \$3,800     | \$7,600            | Establish excavation areas   |
| Utility Locate  | 2     | DY   | \$1,800     | \$3,600            |  |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$185,870</b>   |  |
| 3 Excavation  |       |      |             |                    |  |
| AOC1, AOC 9, AOC 11, AOC14, AOC27, SWMU 1             |       |      |             |                    |  |
| Excavate and Haul to Staging Area                     | 5,154 | CY   | \$37        | \$190,684          | assumed 4 - 10 cy trucks to haul to stockpile area - 576               |
| Stockpile Management                                  | 5,154 | CY   | \$9         | \$46,383           | bey/shift  |
| AOC10   |       |      |             |                    |  |
| Excavate and Haul to Staging Area                     | 2,360 | CY   | \$58        | \$136,854          |  |
| Stockpile Management                                  | 2,360 | CY   | \$15        | \$35,393           |  |
| Special Excavator Areas (AOC 10-1, AOC 9-1, SWMU 1-3) | 1,142 | CY   | \$6         | \$7,412            | Additional cost factor to excavation, steep area.                      |
| Drop-off, Assembly, Disassembly, Pick-up              | 1     | LS   | \$53,412    | \$53,412           |  |
| Analytical - Confirmation Samples                     |       |      |             |                    |  |
| Metals  | 137   | EA   | \$91        | \$12,467           | SW6010B/SW7471A  |
| Dioxin  | 137   | EA   | \$607.25    | \$83,193           | SW846 8290   |
| Shipping Samples                                      | 18    | EA   | \$125       | \$2,250            |  |
| Shoring SWMU 1-2                                      | 5,600 | SF   | \$20        | \$109,256          |  |
| Surveying   | 5     | DY   | \$3,800     | \$19,000           | Post excavation survey   |
| Traffic Control                                       | 5     | DY   | \$5,156     | \$25,780           | North Side of I-40   |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$722,085</b>   |  |
| 4 Transportation and Disposal                         |       |      |             |                    | AOC10 (2,404 cy) + 5,000 cy from other areas                           |
| Load Trucks for Offsite Disposal                      | 4,936 | CY   | \$10        | \$49,364           | assumed 20 loads/day for offsite disposal                              |
| Analytical - Waste Profile                            | 20    | EA   | \$750       | \$14,809           | Assumed 1 per 250 CY   |
| T&D - Non Haz Soil                                    | 5,183 | TN   | \$200       | \$1,036,600        | assumed 70% (\$300/cy)   |
| T&D - Haz Soil  | 2,221 | TN   | \$283.33    | \$629,276          | assumed 30% (\$425/cy)   |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$1,730,049</b> |  |
| 5 Screening   |       |      |             |                    |  |
| Mob/Setup Screening Plan                              | 1     | LS   | \$47,531    | \$47,531           |  |
| Spill Prevention Berm Construction                    | 600   | LF   | \$4         | \$2,538            | Pushing local material to build. Assumed 150'x150' area                |
| Dust Control  | 13    | Day  | \$1,078     | \$14,061           | Water truck, filled using nearby hose station.                         |
| Screening   | 5,154 | CY   | \$11        | \$56,690           |  |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$120,820</b>   |  |
| 6 Backfill/Restoration/Demobilization                 |       |      |             |                    |  |
| Analytical - Clean Fill                               | 3     | EA   | \$645       | \$1,935            | assumed 1 per 1,000 cy   |
| Backfill - Screened Material                          | 2,577 | CY   | \$53        | \$136,571          |  |
| Backfill - Import                                     | 1,278 | CY   | \$65        | \$83,039           |  |
| Backfill - Local                                      | 3,659 | CY   | \$11        | \$39,479           |  |
| Traffic Control - Backfill                            | 3     | DY   | \$4,349     | \$13,047           | North Side of I-40   |
| Surveying   | 5     | DY   | \$3,800     | \$19,000           | post backfill survey   |
| Fence Replacement                                     | 407   | LF   | \$40        | \$16,280           |  |
| Seeding/Restoration                                   | 1     | LS   | \$15,000    | \$15,000           | allowance  |
| Demobilization  | 1     | LS   | \$20,000    | \$20,000           | allowance  |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$344,351</b>   |  |
| 7 Final Construction Completion Report                |       |      |             |                    |  |
| Final Construction Completion Report                  | 1     | LS   | \$50,000    | \$50,000           |  |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$50,000</b>    |  |
| 8 Construction Management Support                     |       |      |             |                    |  |
| Construction Manager                                  | 1,064 | HR   | \$135       | \$143,640          | 5 month field duration (50 hr work week). Includes travel time to site |
| Field Technician                                      | 1,064 | HR   | \$90        | \$95,760           |  |
| Real Time Dust Monitor                                | 15    | MTH  | \$400       | \$6,000            | PDR-1000 dust monitor x 3 ea   |
| Setup Fixed Monitoring Station                        | 1     | LS   | \$2,500     | \$2,500            |  |
| Monitoring System Rental (3 ea)                       | 5     | MTH  | \$3,000     | \$15,000           |  |
| Pickup Rental   | 10    | MTH  | \$1,500     | \$15,000           | 2 ea   |
| Temporary Field Office                                | 5     | MTH  | \$5,000     | \$25,000           | temporary field office, sanitation, field supplies                     |
| Per Diem - Lodging                                    | 300   | DY   | \$102       | \$30,600           |  |
| Per Diem - Meals                                      | 300   | DY   | \$61        | \$18,300           |  |
| Daily Field Supplies                                  | 100   | DY   | \$75        | \$7,500            |  |
| <b>SUBTOTAL</b>                                       |       |      |             | <b>\$359,300</b>   |  |



| Alternative 3: Excavation, Screen and Offsite Disposal |          |    |             |  | COST ESTIMATE SUMMARY   |                           |
|--|----------|----|-------------|--|---|---------------------------|
| 9 Project Management                                   |          |    |             |  | Assumed 14 mths from design to Final Construction Completion Report |                           |
| Project Manager  | 1,120    | HR | \$175       |  | \$196,000   |                           |
| Subcontract Administrator                              | 80       | HR | \$92        |  | \$7,360   |                           |
| Administrative   | 560      | HR | \$62        |  | \$34,720  |                           |
|  | SUBTOTAL |    |             |  | \$238,080   |                           |
|  | TOTAL    |    |             |  | \$3,888,017   |                           |
| Contingency  | 20%      |    | \$3,888,017 |  | \$777,600   | Scope and bid contingency |
| Total Capital Costs                                    |          |    |             |  | \$4,665,617   |                           |



**Alternative 4: Excavation, Screen, Wash and Offsite Disposal**
**COST ESTIMATE SUMMARY**

|                   |            |                     |  |  |  |
|-------------------|------------|---------------------|--|--|--|
| <b>Site:</b>      |            | <b>Description:</b> | Excavate, Screen to 3/8", 50% reused as Backfill after Rinse, 50% Offsite Disposal. Screening excludes all AOC 10 areas. AOC 10 areas for offsite disposal without processing. |  |  |
| <b>Location:</b>  | Topock, CA |                     |  |  |  |
| <b>Phase:</b>     |            |                     |  |  |  |
| <b>Base Year:</b> | 2020       |                     |  |  |  |
| <b>Date:</b>      |            |                     |  |  |  |

**CAPITAL COSTS:**

| DESCRIPTION   | QTY   | UNIT | UNIT COST   | TOTAL       | NOTES  |
|---|-------|------|-------------|-------------|--|
| 1 Premobilization                                     |       |      |             |             |  |
| Remedial Design                                       | 1     | LS   | \$100,000   | \$100,000   |  |
| Contractor Submittals                                 | 1     | LS   | \$10,000    | \$10,000    |  |
| Performance and Payment Bond                          | 2%    |      | \$1,827,884 | \$36,558    | construction costs only - excludes T&D   |
| SUBTOTAL  |       |      |             | \$146,558   |  |
| 2 Mobilization/Site Setup                             |       |      |             |             |  |
| Mobilization  | 1     | EA   | \$118,900   | \$118,900   | includes travel costs  |
| Site Setup/Erosion Controls                           | 1     | LS   | \$29,300    | \$29,300    |  |
| Construct Stockpile Staging Area                      | 1     | LS   | \$16,400    | \$16,400    |  |
| Temporary K-Rail                                      | 200   | LF   | \$30        | \$6,000     |  |
| Fence Removal   | 407   | LF   | \$10        | \$4,070     |  |
| Surveying   | 2     | DY   | \$3,800     | \$7,600     | Establish excavation areas   |
| Utility Locate  | 2     | DY   | \$1,800     | \$3,600     |  |
| SUBTOTAL  |       |      |             | \$185,870   |  |
| 3 Excavation  |       |      |             |             |  |
| AOC1, AOC 9, AOC 11, AOC14, AOC27, SWMU 1             |       |      |             |             |  |
| Excavate and Haul to Staging Area                     | 5,154 | CY   | \$37        | \$190,684   | assumed 4 - 10 cy trucks to haul to stockpile area - 576 bey/shift   |
| Stockpile Management                                  | 5,154 | CY   | \$9         | \$46,383    |  |
| AOC10   |       |      |             |             |  |
| Excavate and Haul to Staging Area                     | 2,360 | CY   | \$58        | \$136,854   |  |
| Stockpile Management                                  | 2,360 | CY   | \$15        | \$35,393    |  |
| Special Excavator Areas (AOC 10-1, AOC 9-1, SWMU 1-3) | 1,142 | CY   | \$6         | \$7,412     | Additional cost factor to excavation, steep area.  |
| Drop-off, Assembly, Disassembly, Pick-up              | 1     | LS   | \$53,412    | \$53,412    |  |
| Analytical - Confirmation Samples                     |       |      |             |             |  |
| Metals  | 137   | EA   | \$91        | \$12,467    | SW6010B/SW7471A  |
| Dioxin  | 137   | EA   | \$607.25    | \$83,193    | SW846 8290   |
| Shipping Samples                                      | 18    | EA   | \$125       | \$2,250     |  |
| Shoring SWMU 1-2                                      | 5,600 | SF   | \$20        | \$109,256   |  |
| Surveying   | 5     | DY   | \$3,800     | \$19,000    | Post excavation survey   |
| Traffic Control                                       | 5     | DY   | \$5,156     | \$25,780    | North Side of I-40   |
| SUBTOTAL  |       |      |             | \$722,085   |  |
| 4 Transportation and Disposal                         |       |      |             |             | AOC10 (2,404 cy) + 5,000 cy from other areas   |
| Load Trucks for Offsite Disposal                      | 4,936 | CY   | \$10        | \$49,364    | assumed 20 loads/day for offsite disposal  |
| Analytical - Waste Profile                            | 20    | EA   | \$750       | \$14,809    | Assumed 1 per 250 CY   |
| T&D - Non Haz Soil                                    | 5,183 | TN   | \$200       | \$1,036,600 | assumed 70% (\$300/cy)   |
| T&D - Haz Soil  | 2,221 | TN   | \$283.33    | \$629,276   | assumed 30% (\$425/cy)   |
| SUBTOTAL  |       |      |             | \$1,730,049 |  |
| 5 Screening   |       |      |             |             |  |
| Mob/Setup Screening/Wash Plan                         | 1     | LS   | \$111,000   | \$111,000   | construct temp pipeline to deliver rinsate water to processing area  |
| Spill Prevention Berm Construction                    | 600   | LF   | \$4         | \$2,538     | Pushing local material to build. Assumed 150'x150' area  |
| Dust Control  | 13    | Day  | \$1,078     | \$14,061    | Water truck, filled using nearby hose station.   |
| Screening   | 5,154 | CY   | \$11        | \$57,514    |  |
| Rinsing Screened Material                             | 2,577 | CY   | \$84        | \$215,164   | Only rinsing material used for backfill on site. Assumed 300 gal/water/cy for rinsing cycle. One time use only and not recirculated. Rinse then contain in frac tanks prior to transport to ponds. Approx. 38,652 gal of water per day. 20 total days = approx 128 cy/dy |
| Manage Rinse Water                                    | 1     | LS   | \$175,300   | \$175,300   | 2,577 cy x 300 gal/cy = 773,044 gal  |
| SUBTOTAL  |       |      |             | \$575,577   |  |
| 6 Backfill/Restoration/Demobilization                 |       |      |             |             |  |
| Analytical - Clean Fill                               | 3     | EA   | \$645       | \$1,935     | assumed 1 per 1,000 cy   |
| Backfill - Screened Material                          | 2,577 | CY   | \$53        | \$136,571   |  |
| Backfill - Import                                     | 1,278 | CY   | \$65        | \$83,039    |  |
| Backfill - Local                                      | 3,659 | CY   | \$11        | \$39,479    |  |
| Traffic Control                                       | 3     | DY   | \$4,349     | \$13,047    | North Side of I-40   |
| Surveying   | 5     | DY   | \$3,800     | \$19,000    | post backfill survey   |
| Fence Replacement                                     | 407   | LF   | \$40        | \$16,280    |  |
| Seeding/Restoration                                   | 1     | LS   | \$15,000    | \$15,000    | allowance  |
| Demobilization  | 1     | LS   | \$20,000    | \$20,000    |  |
| SUBTOTAL  |       |      |             | \$344,351   |  |
| 7 Final Construction Completion Report                |       |      |             |             |  |
| Final Construction Completion Report                  | 1     | LS   | \$50,000    | \$50,000    |  |
| SUBTOTAL  |       |      |             | \$50,000    |  |



**Alternative 4: Excavation, Screen, Wash and Offsite Disposal****COST ESTIMATE SUMMARY**

## 8 Construction Management Support

|                                 |       |     |         |                  |  |
|---------------------------------|-------|-----|---------|------------------|--|
| Construction Manager            | 1,064 | HR  | \$135   | \$143,640        | 5 month field duration (50 hr work week). Includes travel time to site |
| Field Technician                | 1,064 | HR  | \$90    | \$95,760         |  |
| Real Time Dust Monitor          | 15    | MTH | \$400   | \$6,000          | PDR-1000 dust monitor x 3 ea   |
| Setup Fixed Monitoring Station  | 1     | LS  | \$2,500 | \$2,500          |  |
| Monitoring System Rental (3 ea) | 5     | MTH | \$3,000 | \$15,000         |  |
| Pickup Rental                   | 10    | MTH | \$1,500 | \$15,000         | 2 ea   |
| Temporary Field Office          | 5     | MTH | \$5,000 | \$25,000         | temporary field office, sanitation, field supplies                     |
| Per Diem - Lodging              | 300   | DY  | \$102   | \$30,600         |  |
| Per Diem - Meals                | 300   | DY  | \$61    | \$18,300         |  |
| Daily Field Supplies            | 100   | DY  | \$75    | \$7,500          |  |
|                                 |       |     |         | <u>\$359,300</u> |  |

SUBTOTAL

## 9 Project Management

Assumed 14 mths from design to Final Construction Completion Report

|                           |       |    |       |                  |
|---------------------------|-------|----|-------|------------------|
| Project Manager           | 1,120 | HR | \$175 | \$196,000        |
| Subcontract Administrator | 80    | HR | \$92  | \$7,360          |
| Administrative            | 560   | HR | \$62  | \$34,720         |
|                           |       |    |       | <u>\$238,080</u> |

SUBTOTAL

**TOTAL****\$4,351,870**

|             |     |             |           |                           |
|-------------|-----|-------------|-----------|---------------------------|
| Contingency | 20% | \$4,351,870 | \$870,400 | Scope and bid contingency |
|-------------|-----|-------------|-----------|---------------------------|

**Total Capital Costs****\$5,222,270**