



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D., Director
5796 Corporate Avenue
Cypress, California 90630



Gavin Newsom
Governor

Via Electronic Mail

April 8, 2021

Mr. Curt Russell
Topock Project Manager
Pacific Gas and Electric Company
P.O. Box 337
Needles, California 92363

CONDITIONAL APPROVAL OF TW-01 PUMP TEST AT PACIFIC GAS AND ELECTRIC COMPANY (PG&E) TOPOCK COMPRESSOR STATION, NEEDLES, CALIFORNIA (EPA ID CAT080011729)

Dear Mr. Russell,

The Department of Toxic Substances Control (DTSC) has completed the review of the TW-01 Aquifer Test Plan (Test Plan) dated December 23, 2020, revised February 26, 2021 and the responses to comments prepared by PG&E. DTSC concurs with the scope of the Test Plan and the procedures as specified. As part of the review, DTSC notes that the proposed aquifer test will require the installation of a temporary water conveyance pipeline and installation of a power pole with transformer that are not specified in the groundwater remedy final Basis of Design, the Construction / Remedial Action Work Plan, or its associated Operations and Maintenance Plan. DTSC notes that Alignment A as indicated in the Test Plan is the preferred pipeline alignment. As a result, DTSC prepared an addendum to the 2018 Certified Subsequent Environmental Impact Report (SEIR) for the proposed project. Pursuant to the California Environmental Quality Act guidelines, DTSC determined that the Test Plan activities will not cause a new significant impact or substantially increase the severity of a previously identified impact.

Furthermore, based on the completion of the Future Activities Allowance determination attached, DTSC concluded that the temporary power pole and pipeline at the preferred

location is considered a Future Activity Allowance. PG&E must track and record the additional infrastructures in the appropriate remedy construction report as required by the SEIR Mitigation Measure CUL-1a-14. DTSC notes that the Tribes have been notified of the proposed activities. Tribes were invited to a site walk of the proposed activities on January 28, 2021, and the cultural survey of the work area was conducted on January 29, 2021. The initial work plan, response to comments table and the revised work plan were circulated to interested parties and Tribes for input and comment as required by Mitigation Measure CUL-1a-14.

Based on the evaluations conducted and the findings of the SEIR Addendum, DTSC is providing an approval for the proposed Test Plan with the following conditions.

1. PG&E shall continue to implement all SEIR mitigation measures adopted for the groundwater remedy during the implementation of the Test Plan, including, but not limited to, CUL-1a-15 and CUL-1b/c-4a.
2. Since PG&E will be implementing the Test Plan under the permit exemption provision of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) section 121(e)(1), PG&E shall comply with all Applicable or Relevant and Appropriate Requirements (ARARs) as directed by the Department of the Interior (U.S.DOI) as the CERCLA administrating agency.
3. PG&E shall not extend the use of the Interim Measure 3 (IM3) Treatment Plant for pump test water management beyond the anticipated schedule of remedy startup and IM3 layup when Phase I construction is complete. PG&E may use alternative water management methods such as permitted discharge to the evaporation ponds, use as make-up water for the remedy injection, and/or ship off-site for treatment, as long as PG&E follows all applicable local, state and Federal policies, procedures and requirements. PG&E is prohibited from using the test water for dust suppressant.
4. The constant rate pump test shall cease when sufficient information has been gathered or when directed by either DTSC and/or the U.S.DOI.
5. PG&E shall provide monthly data transfer reports with summary of issues encountered and their resolutions. PG&E shall also provide periodic interim data interpretations, and a summary technical memorandum three months after the completion of the aquifer test as stated in Section 4.5.6 of the Test Plan.
6. PG&E shall provide a Test Plan addendum to the agencies for review and comment prior to implementation of the tracer test at MW-68 if there are changes to the Test Plan as a result of the TW-01 pump test and other tracer tests. The

addendum test plan should include any updates on the conceptual site model and/or any changes to the type and quantity of tracer to be used, as well as monitoring locations and frequency for the tracer test if different from information in the current Test Plan.

7. Data from the tracer tests and the pump tests shall be incorporated into subsequent model calibrations if new information is learned from the tests.
8. Due to the interest in understanding the recharge potential from Bat Cave Wash, PG&E shall continue to gather transducer data at selected wells along Bat Cave Wash until DTSC and the U.S.DOI are satisfied with the data collected for that purpose. PG&E shall provide a separate technical memorandum on the recharge findings at the conclusion of the monitoring duration.

If you have any questions regarding this conditional Test Plan approval, please feel free to contact me.

Sincerely,



Aaron Yue
Project Manager
Department of Toxic Substances Control

Enclosure (Future Activities Allowance Determination)

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