PG&E Topock Compressor Station – Responses to Comments on the Soil Non-Time-Critical Removal Action Work Plan

PG&E Topock Compressor Station, Needles, California

Comment Number	Agency/ Stakeholder[a]	Unique Comment ID (if applicable)[b]	Section/ Page	Reference Text	Soil Non-Time-Critical Removal Action Work Plan Comment *(Please provide sufficient detail, include specifically what you are looking for)*	PG&E Response	DTSC Response	DOI Response	Tribes Response	Final Resolution
1	FMIT-1	N.A.	Cover Letter	N.A.	1. The Fort Mojave Indian Tribe requests that the DOI abandon the EECA and adhere to the ongoing RI/RFI. Throughout the EE/CA project development, the Tribe has been negotiating in "good faith" with the Department of interior (DOI) regarding the Pacific Gas and Electric Company's Soil Engineering Evaluation Cost Analysis (EE/CA) for the Topock Remediation Project. Therefore, the Tribe has been very clear in 3 points: • The EE/CA is redundant with the soil cleanup that is currently ongoing under the RI/RFI process that all agencies, tribes, and stakeholders have been working on for many years. • The EE/CA represents significant intrusion, damage, and destruction of the sacred Topock site on our ancestral lands and should not be performed. In addition, the EE/CA is being conducted without any evaluation of potential impacts to the cultural property. • Throughout the Remediation Project history, there are many examples of DOI disproportionally favoring its role as land manager over its role as solicitor for tribal concerns at this culturally-sensitive location. This situation has worsened with the recent DOI directive to conduct a Soil Engineering Evaluation Cost Analysis (EE/CA). With this directive, and the subsequent reports and consultations associated with the EE/CA process, the Tribe has concluded that DOI has failed its trust responsibility to the Tribe.			The Department of the Interior, US Fish and Wildlife Service, the Bureau of Land Management, and the US Bureau of Reclamation (collectively "DOI") appreciate the continued involvement of the Tribes in the Topock Remediation Project. DOI addresses each point below. Bullet 1: Under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the removal action and remedial action process are integrated. Decisions made regarding an early action must be consistent with any long-term action that may eventually be required. The removal action selected in the October 2021 Action Memorandum, excavation and ex-situ treatment with mechanical separation, is consistent with any potential long-term remediation. CERCLA and the National Contingency Plan (40CFR 300.415) define removal actions to include "the cleanup or removal of released hazardous substances from the environment, such actions as may necessarily be taken in the event of the threat of release of hazardous substances into the environment, such actions as may be necessary to monitor, assess, and evaluate the release or threat of release of hazardous substances, the disposal of removed material, or the taking of such other actions as may be necessary to prevent, minimize, or mitigate damage to the public health or welfare or to the environment, which may otherwise result from a release or threat of release." (EPA540-R-93-057) The Action Memorandum and work plan identify Applicable or Relevant and Appropriate Requirements (ARARs) and other documents and guidance To Be Considered (TBC). The Programmatic Agreement (PA) and the Cultural and Historic Properties Management Plan (CHPMP) are TBCs and identify how the ARARs are implemented at the site. The Cultural and Historical Property Treatment Plan is considered a TBC and identifies many mitigation measures that will be implemented as part of the removal action. The Tribes may request a consultation meeting to provide input on additional mitigation measures for implementation of the Removal Action Work Plan. Bullet 2: The Federal agencies have considered Tribal interests in the Engineering Evaluation/Cost Analysis (EE/CA) by only targeting areas of contamination that are considered significant sources rather than a site wide, point by point cleanup, thereby reducing the overall impact to the Site. Additionally, the selected alternative reduces the amount of soil removed from the Site, a factor which the Tribes have emphasized as important throughout the cleanup process. Bullet 3: DOI appreciates the Tribes perspective. The DOI Tribal Trust responsibilities on Federal land include protecting cultural and natural resources and		

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								ensuring access as identified in the Topock Tribal Access Plan while avoiding, to the extent practicable, adversely affecting the physical integrity of the Topock Traditional Cultural Property. DOI also has a responsibility as Federal land managers to conserve, protect and enhance fish, wildlife, plants, and their habitats in the Havasu National Wildlife Refuge and to protect the Colorado River. DOI believes that the focused removal action identified in the Action Memorandum and compliance with the ARARs and TBCs detailed in the work plan achieve a balance in addressing these responsibilities.		
2	Quechan-1	N.A.	Cover Letter	N.A.	1. The Fort Mojave Indian Tribe requests that the DOI abandon the EECA and adhere to the ongoing RI/RFI. Throughout the EE/CA project development, the Tribe has been negotiating in "good faith" with the Department of interior (DOI) regarding the Pacific Gas and Electric Company's Soil Engineering Evaluation Cost Analysis (EE/CA) for the Topock Remediation Project. Therefore, the Tribe has been very clear in 3 points: • The EE/CA is redundant with the soil cleanup that is currently ongoing under the RI/RFI process that all agencies, tribes, and stakeholders have been working on for many years. • The EE/CA represents significant intrusion, damage, and destruction of the sacred Topock site on our ancestral lands and should not be performed. In addition, the EE/CA is being conducted without any evaluation of potential impacts to the cultural property. • Throughout the Remediation Project history, there are many examples of DOI disproportionally favoring its role as land manager over its role as solicitor for tribal concerns at this culturally-sensitive location. This situation has worsened with the recent DOI directive to conduct a Soil Engineering Evaluation Cost Analysis (EE/CA). With this directive, and the subsequent reports and consultations associated with the EE/CA process, the Tribe has concluded that DOI has failed its trust responsibility to the Tribe.			The Department of the Interior, US Fish and Wildlife Service, the Bureau of Land Management, and the US Bureau of Reclamation (collectively “DOI”) appreciate the continued involvement of the Tribes in the Topock Remediation Project. DOI addresses each point below. Bullet 1: Under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the removal action and remedial action process are integrated. Decisions made regarding an early action must be consistent with any long-term action that may eventually be required. The removal action selected in the October 2021 Action Memorandum, excavation and ex-situ treatment with mechanical separation, is consistent with any potential long-term remediation. CERCLA and the National Contingency Plan (40CFR 300.415) define removal actions to include "the cleanup or removal of released hazardous substances from the environment, such actions as may necessarily be taken in the event of the threat of release of hazardous substances into the environment, such actions as may be necessary to monitor, assess, and evaluate the release or threat of release of hazardous substances, the disposal of removed material, or the taking of such other actions as may be necessary to prevent, minimize, or mitigate damage to the public health or welfare or to the environment, which may otherwise result from a release or threat of release.” (EPA540-R-93-057) The Action Memorandum and work plan identify Applicable or Relevant and Appropriate Requirements (ARARs) and other documents and guidance To Be Considered (TBC). The Programmatic Agreement (PA) and the Cultural and Historic Properties Management Plan (CHPMP) are TBCs and identify how the ARARs are implemented at the site. The Cultural and Historical Property Treatment Plan is considered a TBC and identifies many mitigation measures that will be implemented as part of the removal action. The Tribes may request a consultation meeting to provide input on additional mitigation measures for implementation of the Removal Action Work Plan. Bullet 2: The Federal agencies have considered Tribal interests in the Engineering Evaluation/Cost Analysis (EE/CA) by only		

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3	Cocopah-1	N.A.	Cover Letter	N.A.	1. The Fort Mojave Indian Tribe requests that the DOI abandon the EECA and adhere to the ongoing RI/RFI. Throughout the EE/CA project development, the Tribe has been negotiating in "good faith" with the Department of interior (DOI) regarding the Pacific Gas and Electric Company's Soil Engineering Evaluation Cost Analysis (EE/CA) for the Topock Remediation Project. Therefore, the Tribe has been very clear in 3 points: • The EE/CA is redundant with the soil cleanup that is currently ongoing under the RI/RFI process that all agencies, tribes, and stakeholders have been working on for many years. • The EE/CA represents significant intrusion, damage, and destruction of the sacred Topock site on our ancestral lands and should not be performed. In addition, the EE/CA is being conducted without any evaluation of potential impacts to the cultural property. • Throughout the Remediation Project history, there are many examples of DOI disproportionally favoring its role as land manager over its role as solicitor for tribal concerns at this culturally-sensitive location. This situation has worsened with the recent DOI directive to conduct a Soil Engineering Evaluation Cost Analysis (EE/CA). With this directive, and the subsequent reports and consultations associated with the EE/CA process, the Tribe has concluded that DOI has failed its trust responsibility to the Tribe.			The Department of the Interior, US Fish and Wildlife Service, the Bureau of Land Management, and the US Bureau of Reclamation (collectively “DOI”) appreciate the continued involvement of the Tribes in the Topock Remediation Project. DOI addresses each point below. Bullet 1: Under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the removal action and remedial action process are integrated. Decisions made regarding an early action must be consistent with any long-term action that may eventually be required. The removal action selected in the October 2021 Action Memorandum, excavation and ex-situ treatment with mechanical separation, is consistent with any potential long-term remediation. CERCLA and the National Contingency Plan (40CFR 300.415) define removal actions to include "the cleanup or removal of released hazardous substances from the environment, such actions as may necessarily be taken in the event of the threat of release of hazardous substances into the environment, such actions as may be necessary to monitor, assess, and evaluate the release or threat of release of hazardous substances, the disposal of removed material, or the taking of such other actions as may be necessary to prevent, minimize, or mitigate damage to the public health or welfare or to the environment, which may otherwise result from a release or threat of release.” (EPA540-R-93-057) The Action Memorandum and work plan identify Applicable or Relevant and Appropriate Requirements (ARARs) and other documents and guidance To Be Considered (TBC). The Programmatic Agreement (PA) and the Cultural and Historic Properties Management Plan (CHPMP) are TBCs and identify how the		

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								ARARs are implemented at the site. The Cultural and Historical Property Treatment Plan is considered a TBC and identifies many mitigation measures that will be implemented as part of the removal action. The Tribes may request a consultation meeting to provide input on additional mitigation measures for implementation of the Removal Action Work Plan. Bullet 2: The Federal agencies have considered Tribal interests in the Engineering Evaluation/Cost Analysis (EE/CA) by only targeting areas of contamination that are considered significant sources rather than a site wide, point by point cleanup, thereby reducing the overall impact to the Site. Additionally, the selected alternative reduces the amount of soil removed from the Site, a factor which the Tribes have emphasized as important throughout the cleanup process. Bullet 3: DOI appreciates the Tribes perspective. The DOI Tribal Trust responsibilities on Federal land include protecting cultural and natural resources and ensuring access as identified in the Topock Tribal Access Plan while avoiding, to the extent practicable, adversely affecting the physical integrity of the Topock Traditional Cultural Property. DOI also has a responsibility as Federal land managers to conserve, protect and enhance fish, wildlife, plants, and their habitats in the Havasu National Wildlife Refuge and to protect the Colorado River. DOI believes that the focused removal action identified in the Action Memorandum and compliance with the ARARs and TBCs detailed in the work plan achieve a balance in addressing these responsibilities.		
4	FMIT-2	N.A.	Cover Letter	N.A.	2. The FMIT has participated in good faith in this project, but DOI has not seriously considered or incorporated Tribal comments. Regardless of the 3 points above, the Tribe has made a point to provide clear and focused comments on both the technical and administrative aspects of the EE/CA. However, the ongoing EE/CA has not incorporated Tribal concerns or comments. Tribal input has occurred through Government-to-Government consultation process, pursuant to Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments, November 6, 2000), and Section 106 of the National Historic Preservation Act (NHPA). It is the Tribe's position that DOI has not participated in these negotiations neither in good faith nor consistent with their obligations to the Tribe under the before-mentioned statues. Since many of the Tribal concerns regarding the EE/CA have not been addressed, the purpose of this letter and the attached RTC table is to present to the DOI, the Tribe's concerns.			DOI appreciates the perspective of the FMIT and refers the reviewers to the specific comments below.		

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5	Quechan-2	N.A.	Cover Letter	N.A.	2. The FMIT has participated in good faith in this project, but DOI has not seriously considered or incorporated Tribal comments. Regardless of the 3 points above, the Tribe has made a point to provide clear and focused comments on both the technical and administrative aspects of the EE/CA. However, the ongoing EE/CA has not incorporated Tribal concerns or comments. Tribal input has occurred through Government-to-Government consultation process, pursuant to Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments, November 6, 2000), and Section 106 of the National Historic Preservation Act (NHPA). It is the Tribe's position that DOI has not participated in these negotiations neither in good faith nor consistent with their obligations to the Tribe under the before-mentioned statues. Since many of the Tribal concerns regarding the EE/CA have not been addressed, the purpose of this letter and the attached RTC table is to present to the DOI, the Tribe's concerns.			DOI appreciates the perspective of the FMIT and refers the reviewers to the specific comments below.		
6	Cocopah-2	N.A.	Cover Letter	N.A.	2. The FMIT has participated in good faith in this project, but DOI has not seriously considered or incorporated Tribal comments. Regardless of the 3 points above, the Tribe has made a point to provide clear and focused comments on both the technical and administrative aspects of the EE/CA. However, the ongoing EE/CA has not incorporated Tribal concerns or comments. Tribal input has occurred through Government-to-Government consultation process, pursuant to Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments, November 6, 2000), and Section 106 of the National Historic Preservation Act (NHPA). It is the Tribe's position that DOI has not participated in these negotiations neither in good faith nor consistent with their obligations to the Tribe under the before-mentioned statues. Since many of the Tribal concerns regarding the EE/CA have not been addressed, the purpose of this letter and the attached RTC table is to present to the DOI, the Tribe's concerns.			DOI appreciates the perspective of the FMIT and refers the reviewers to the specific comments below.		
7	FMIT-3	N.A.	Cover Letter	N.A.	3. The EECA is based on technical arguments which are either weak, wrong or without sufficient details.			DOI acknowledges the Tribes perspective. DOI believes that the EE/CA Approval Memorandum, Final EE/CA, Action Memorandum, and associated documents provide sound technical and administrative justification for implementation of the Soil Non-Time-Critical Removal Action.	FMIT provided the following response in an e-mail dated June 3, 2022: Consultation with the participating Indian Tribes should be conducted in a manner sensitive to the concerns and needs of the Indian Tribes. First and foremost, the Tribes are concerned that our comments are not being considered as integral to the outcome (solution). From the Tribal perspective the results of the EE/CA analysis were predetermined to meet the needs of the DOI and USFWS but does not meet Tribal sensitivities or needs. There was no consultation with Tribes on this decision by USFWS. The PA consultation protocol was never followed by the DOI/USFWS. For this reason, we do not concur with their findings.	
8	Quechan-3	N.A.	Cover Letter	N.A.	3. The EECA is based on technical arguments which are either weak, wrong or without sufficient details.			DOI acknowledges the Tribes perspective. DOI believes that the EE/CA Approval Memorandum, Final EE/CA, Action Memorandum, and associated documents provide sound technical and administrative justification for implementation of the Soil Non-Time-Critical Removal Action.	In an e-mail dated June 6, 2022, the FYQIT concurred with the FMIT comment responses.	

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9	Cocopah-3	N.A.	Cover Letter	N.A.	3. The EECA is based on technical arguments which are either weak, wrong or without sufficient details.			DOI acknowledges the Tribes perspective. DOI believes that the EE/CA Approval Memorandum, Final EE/CA, Action Memorandum, and associated documents provide sound technical and administrative justification for implementation of the Soil Non-Time-Critical Removal Action.	In an e-mail dated June 6, 2022, the Cocopah Indian Tribe concurred with the FMIT comment responses.	
10	FMIT-3a	N.A. Same as comments #53, 59, 74	Cover Letter	N.A.	• The Human Health and Ecological Risk Assessment (HHERA) and its conclusions are not sufficiently or accurately included in the Work Plan. The HHERA conclusions about risks/hazards in specific areas are different than the EE/CA potential action areas (PAAs). The risk-based goals (RBGs) in the DOI approved HHERA were developed and proposed for use in ways different that in the EE/CA RAOs. These differences need to be presented for a complete and honest presentation.			The work plan accurately reflects information provided in the EE/CA, Administrative Record and Action Memorandum. In the absence of the HHERA, the more conservative screening values, identified in the EE/CA Approval Memorandum, would have been applied. These screening values were used in the previous removal action at AOC 4.	FMIT provided the following response in an e-mail dated June 3, 2022: It is the Tribal opinion that the use of screening levels in place of site-specific risk values is inappropriate. Furthermore, the DOI response that "HHERA, the more conservative screening values, identified in the EE/CA Approval Memorandum, would have been applied" is totally inappropriate and irrelevant. The fact is the HHERA does exist and therefore the response should not be discussing scenarios that are irrelevant to the status of the site characterization. This type of response supports the Tribal opinion that DOI has already concluded how they will move forward with the EE/CA and are simply acknowledging the Tribal comments but not considering them. This response does not meet the needs of the Tribes and is not in the best interest of the Tribes. For this reason, we do not concur with their findings.	
11	Quechan-3a	N.A. Same as comments #53, 59, 74	Cover Letter	N.A.	• The Human Health and Ecological Risk Assessment (HHERA) and its conclusions are not sufficiently or accurately included in the Work Plan. The HHERA conclusions about risks/hazards in specific areas are different than the EE/CA potential action areas (PAAs). The risk-based goals (RBGs) in the DOI approved HHERA were developed and proposed for use in ways different that in the EE/CA RAOs. These differences need to be presented for a complete and honest presentation.			The work plan accurately reflects information provided in the EE/CA, Administrative Record and Action Memorandum. In the absence of the HHERA, the more conservative screening values, identified in the EE/CA Approval Memorandum, would have been applied. These screening values were used in the previous removal action at AOC 4.	In an e-mail dated June 6, 2022, the FYQIT concurred with the FMIT comment responses.	
12	Cocopah-3a	N.A. Same as comments #53, 59, 74	Cover Letter	N.A.	• The Human Health and Ecological Risk Assessment (HHERA) and its conclusions are not sufficiently or accurately included in the Work Plan. The HHERA conclusions about risks/hazards in specific areas are different than the EE/CA potential action areas (PAAs). The risk-based goals (RBGs) in the DOI approved HHERA were developed and proposed for use in ways different that in the EE/CA RAOs. These differences need to be presented for a complete and honest presentation.			The work plan accurately reflects information provided in the EE/CA, Administrative Record and Action Memorandum. In the absence of the HHERA, the more conservative screening values, identified in the EE/CA Approval Memorandum, would have been applied. These screening values were used in the previous removal action at AOC 4.	In an e-mail dated June 6, 2022, the Cocopah Indian Tribe concurred with the FMIT comment responses.	
13	FMIT-3b	N.A. Same as comments #35, 47, 56, 221	Cover Letter	N.A.	• In several paragraphs the text mis-represents the consultation process that has occurred between DOI and the Tribe. An accurate description of how the consultation process actually occurred, should be included so it does not seem that the Tribe gave input and now agree with the project.			The purpose of the work plan is to describe activities, methods, and processes that will be used to implement the NTCRA, including activities to be performed for compliance with the identified ARARs and TBCs. Details regarding the consultation process on the EE/CA is in the Administrative Record.		See Response to Comments #7

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14	Quechan-3b	N.A. Same as comments #35, 47, 56, 221	Cover Letter	N.A.	• In several paragraphs the text mis-represents the consultation process that has occurred between DOI and the Tribe. An accurate description of how the consultation process actually occurred, should be included so it does not seem that the Tribe gave input and now agree with the project.			The purpose of the work plan is to describe activities, methods, and processes that will be used to implement the NTCRA, including activities to be performed for compliance with the identified ARARs and TBCs. Details regarding the consultation process on the EE/CA is in the Administrative Record.		
15	Cocopah-3b	N.A. Same as comments #35, 47, 56, 221	Cover Letter	N.A.	• In several paragraphs the text mis-represents the consultation process that has occurred between DOI and the Tribe. An accurate description of how the consultation process actually occurred, should be included so it does not seem that the Tribe gave input and now agree with the project.			The purpose of the work plan is to describe activities, methods, and processes that will be used to implement the NTCRA, including activities to be performed for compliance with the identified ARARs and TBCs. Details regarding the consultation process on the EE/CA is in the Administrative Record.		
16	FMIT-3c	N.A. Same as comments #83, 142	Cover Letter	N.A.	• While the HHERA is cited as the 'source' of the RBGs, the text must be clear that the EE/CA is not applying these RBGs in the manner described in the HHERA. The exclusion of this information is misleading.			Specific language is provided in the final EE/CA regarding how the RAGs are risk-based values (that is, Risk-based Remediation Goals (RBRGs) and risk-based concentrations [RBCs] calculated in the HHERA).	See Tribal Response to Comment #10	
17	Quechan-3c	N.A. Same as comments #83, 142	Cover Letter	N.A.	• While the HHERA is cited as the 'source' of the RBGs, the text must be clear that the EE/CA is not applying these RBGs in the manner described in the HHERA. The exclusion of this information is misleading.			Specific language is provided in the final EE/CA regarding how the RAGs are risk-based values (that is, Risk-based Remediation Goals (RBRGs) and risk-based concentrations [RBCs] calculated in the HHERA).		
18	Cocopah-3c	N.A. Same as comments #83, 142	Cover Letter	N.A.	• While the HHERA is cited as the 'source' of the RBGs, the text must be clear that the EE/CA is not applying these RBGs in the manner described in the HHERA. The exclusion of this information is misleading.			Specific language is provided in the final EE/CA regarding how the RAGs are risk-based values (that is, Risk-based Remediation Goals (RBRGs) and risk-based concentrations [RBCs] calculated in the HHERA).		
19	FMIT-3d	N.A. Same as comments #42, 68, 77	Cover Letter	N.A.	• The Tribe has been requesting a technical evaluation of soil/sediment migration from the identified PAAs. This evaluation has not been provided. DOI's response has been that 'the DOI project manager can just look at the data and know that migration is occurring'. This is a major technical deficit in the EE/CA. In addition, this rejection of the tribal request for technical evaluation by DOI brings into question the balance that the Federal agencies are taking between their competing roles as land managers and solicitors on behalf of the Tribe.			As discussed in the 2/12/2021 and 2/24/2021 consultation meetings and reiterated in the EE/CA RTC table, contaminant migration occurs with sediment migration/scouring in washes during storm event (See RTC Table Comments 4, 9, 10, 11, 13, 34, and 47, transcripts from the 2/12/2021 consultation meeting and Response to 2/24/21 consultation meeting discussion items). This is further discussed in the draft RFI/RI Conceptual Site Models. Soil data show that contaminant transport has occurred throughout the Topock Site (See meeting notes from 2/12/2021). This is particularly true on steep slopes and within the washes.	FMIT would like to have a technical document that presents migration models that the tribes could review. FMIT provided the following response in an e-mail dated June 3, 2022: This response only further supports the Tribal opinion that DOI is not soliciting on behalf of the Tribes. If DOI is truly soliciting on behalf of the Tribes why DOI has refused Tribal requests for support in data analysis and have not provided requested documents that would help the Tribes better understand how site data supports the cleanup conclusions initiated within the EE/CA work plan It is unclear to the Tribes why DOI refuses to support this tribal request which would provide a clear and reviewable rationale that uses site collected data to delineate migration at the site. For this reason, we do not concur with their findings.	

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20	Quechan-3d	N.A. Same as comments #42, 68, 77	Cover Letter	N.A.	• The Tribe has been requesting a technical evaluation of soil/sediment migration from the identified PAAs. This evaluation has not been provided. DOI's response has been that 'the DOI project manager can just look at the data and know that migration is occurring'. This is a major technical deficit in the EE/CA. In addition, this rejection of the tribal request for technical evaluation by DOI brings into question the balance that the Federal agencies are taking between their competing roles as land managers and solicitors on behalf of the Tribe.			As discussed in the 2/12/2021 and 2/24/2021 consultation meetings and reiterated in the EE/CA RTC table, contaminant migration occurs with sediment migration/scouring in washes during storm event (See RTC Table Comments 4, 9, 10, 11, 13, 34, and 47, transcripts from the 2/12/2021 consultation meeting and Response to 2/24/21 consultation meeting discussion items). This is further discussed in the draft RFI/RI Conceptual Site Models. Soil data show that contaminant transport has occurred throughout the Topock Site (See meeting notes from 2/12/2021). This is particularly true on steep slopes and within the washes.	In an e-mail dated June 6, 2022, the FYQIT concurred with the FMIT comment responses.	
21	Cocopah-3d	N.A. Same as comments #42, 68, 77	Cover Letter	N.A.	• The Tribe has been requesting a technical evaluation of soil/sediment migration from the identified PAAs. This evaluation has not been provided. DOI's response has been that 'the DOI project manager can just look at the data and know that migration is occurring'. This is a major technical deficit in the EE/CA. In addition, this rejection of the tribal request for technical evaluation by DOI brings into question the balance that the Federal agencies are taking between their competing roles as land managers and solicitors on behalf of the Tribe.			As discussed in the 2/12/2021 and 2/24/2021 consultation meetings and reiterated in the EE/CA RTC table, contaminant migration occurs with sediment migration/scouring in washes during storm event (See RTC Table Comments 4, 9, 10, 11, 13, 34, and 47, transcripts from the 2/12/2021 consultation meeting and Response to 2/24/21 consultation meeting discussion items). This is further discussed in the draft RFI/RI Conceptual Site Models. Soil data show that contaminant transport has occurred throughout the Topock Site (See meeting notes from 2/12/2021). This is particularly true on steep slopes and within the washes.	In an e-mail dated June 6, 2022, the Cocopah Indian Tribe concurred with the FMIT comment responses.	
22	FMIT-3e	N.A. Same as comments #77, 92	Cover Letter	N.A.	• Several of the PAAs have topography or barriers where off-site migration cannot occur. According to EE/CA guidance, both topography and barriers must be considered in the evaluation. DOI has not considered these factors. Furthermore, DOI has not addressed downgradient data that does not support a migration of contaminants onto federal land atconcentrations associated with human or ecological risk.			As discussed in the 2/12/2021 consultation meeting and reiterated in the EE/CA RTC table, the berms within AOC10 and the trees at the end of Bat Cave Wash are not considered mitigation measures for contaminant transport as they are neither permanent nor reliable engineered barriers that would be considered a remedy. (See RTC Table Comments 17 and transcripts from the 2/12/2021 consultation meeting).		
23	Quechan-3e	N.A. Same as comments #77, 92	Cover Letter	N.A.	• Several of the PAAs have topography or barriers where off-site migration cannot occur. According to EE/CA guidance, both topography and barriers must be considered in the evaluation. DOI has not considered these factors. Furthermore, DOI has not addressed downgradient data that does not support a migration of contaminants onto federal land atconcentrations associated with human or ecological risk.			As discussed in the 2/12/2021 consultation meeting and reiterated in the EE/CA RTC table, the berms within AOC10 and the trees at the end of Bat Cave Wash are not considered mitigation measures for contaminant transport as they are neither permanent nor reliable engineered barriers that would be considered a remedy. (See RTC Table Comments 17 and transcripts from the 2/12/2021 consultation meeting).		
24	Cocopah-3e	N.A. Same as comments #77, 92	Cover Letter	N.A.	• Several of the PAAs have topography or barriers where off-site migration cannot occur. According to EE/CA guidance, both topography and barriers must be considered in the evaluation. DOI has not considered these factors. Furthermore, DOI has not addressed downgradient data that does not support a migration of contaminants onto federal land atconcentrations associated with human or ecological risk.	Erosion and migration have been observed occurring in real time at the site during storm events over many years.		As discussed in the 2/12/2021 consultation meeting and reiterated in the EE/CA RTC table, the berms within AOC10 and the trees at the end of Bat Cave Wash are not considered mitigation measures for contaminant transport as they are neither permanent nor reliable engineered barriers that would be considered a remedy. (See RTC Table Comments 17 and transcripts from the 2/12/2021 consultation meeting).		

Comment Number	Agency/ Stakeholder[a]	Unique Comment ID (if applicable)[b]	Section/ Page	Reference Text	Soil Non-Time-Critical Removal Action Work Plan Comment *(Please provide sufficient detail, include specifically what you are looking for)*	PG&E Response	DTSC Response	DOI Response	Tribes Response	Final Resolution
25	FMIT-3f	N.A. Same as comments #126, 178	Cover Letter	N.A.	• The Tribe requests that initial removal areas be clearly identified with flags/markers in the field using the boundaries of the existing soil samples. *Then excavation would occur only to these boundaries and confirmation samples collected prior to extending the excavation beyond the existing sample locations. Tribal monitors must be present to ensure that excess excavation does not occur.			The Federal agencies recognize the importance of including Tribal Monitors in field activities. Per the Construction Consultation Protocol, Tribal monitors will be invited to participate in or observe the demarcation of work areas. Consistent with the Tribal Monitor Protocol (PA Appendix C), Tribal and Archaeological Monitors shall both be invited to monitor field work. Tribal Monitors are encouraged to provide recommendations to the PG&E site supervisor (or designee) but may not direct or supervise work activities. Any concerns or recommendations Tribal Monitors may have during work activities are to be directed to the PG&E's site supervisor (or designee), BLM Field Manager, and the Tribes.		
26	Quechan-3f	N.A. Same as comments #126, 178	Cover Letter	N.A.	• The Tribe requests that initial removal areas be clearly identified with flags/markers in the field using the boundaries of the existing soil samples. Then excavation would occur only to these boundaries and confirmation samples collected prior to extending the excavation beyond the existing sample locations. Tribal monitors must be present to ensure that excess excavation does not occur.			The Federal agencies recognize the importance of including Tribal Monitors in field activities. Per the Construction Consultation Protocol, Tribal monitors will be invited to participate in or observe the demarcation of work areas. Consistent with the Tribal Monitor Protocol (PA Appendix C), Tribal and Archaeological Monitors shall both be invited to monitor field work. Tribal Monitors are encouraged to provide recommendations to the PG&E site supervisor (or designee) but may not direct or supervise work activities. Any concerns or recommendations Tribal Monitors may have during work activities are to be directed to the PG&E's site supervisor (or designee), BLM Field Manager, and the Tribes.	FMIT requests clear, consistent, regular, and on-going communication with the monitors regarding site activities. ERTC maps and summaries should be provided to the monitors prior to the actions.	ERTC maps and work descriptions will be provided to Tribes and monitors prior to last look.
27	Cocopah-3f	N.A. Same as comments #126, 178	Cover Letter	N.A.	• The Tribe requests that initial removal areas be clearly identified with flags/markers in the field using the boundaries of the existing soil samples. Then excavation would occur only to these boundaries and confirmation samples collected prior to extending the excavation beyond the existing sample locations. Tribal monitors must be present to ensure that excess excavation does not occur.			The Federal agencies recognize the importance of including Tribal Monitors in field activities. Per the Construction Consultation Protocol, Tribal monitors will be invited to participate in or observe the demarcation of work areas. Consistent with the Tribal Monitor Protocol (PA Appendix C), Tribal and Archaeological Monitors shall both be invited to monitor field work. Tribal Monitors are encouraged to provide recommendations to the PG&E site supervisor (or designee) but may not direct or supervise work activities. Any concerns or recommendations Tribal Monitors may have during work activities are to be directed to the PG&E's site supervisor (or designee), BLM Field Manager, and the Tribes.		
28	FMIT-3g	N.A. Same as comments #224	Cover Letter	N.A.	• The Tribe requests specific consultation that is focused solely on the project's applicable or relevant and appropriate requirements (ARARs), emphasizing the difference an applicability with "to-be-considered," (TBCs) requirements. The list in the text and tables of the Work Plan is incomplete and have not been appropriately applied to the project. This consultation meeting (or meetings) is necessary to ensure that Tribal interests are identified in these ARARs and that TBCs are appropriately incorporated into the EE/CA.			DOI agreed to a consultation meeting focused on ARARs and TBCs and the meeting was held on 01/21/2022. Based on further evaluation of the identified ARAR and TBCs identified in the work plan, please add the following: - Final Topock Remediation Project Protocol for Consultation during Remedy Implementation/Construction. This document is a TBC as it is a supplement to the CHPMP.		

Comment Number	Agency/ Stakeholder[a]	Unique Comment ID (if applicable)[b]	Section/ Page	Reference Text	Soil Non-Time-Critical Removal Action Work Plan Comment *(Please provide sufficient detail, include specifically what you are looking for)*	PG&E Response	DTSC Response	DOI Response	Tribes Response	Final Resolution
29	Quechan-3g	N.A.	Cover Letter	N.A.	• The Tribe requests specific consultation that is focused solely on the project's applicable or relevant and appropriate requirements (ARARs), emphasizing the difference an applicability with "to-be-considered," (TBCs) requirements. The list in the text and tables of the Work Plan is incomplete and have not been appropriately applied to the project. This consultation meeting (or meetings) is necessary to ensure that Tribal interests are identified in these ARARs and that TBCs are appropriately incorporated into the EE/CA.			DOI agreed to a consultation meeting focused on ARARs and TBCs and the meeting was held on 01/21/2022. Based on further evaluation of the identified ARAR and TBCs identified in the work plan, please add the following: - Final Topock Remediation Project Protocol for Consultation during Remedy Implementation/Construction. This document is a TBC as it is a supplement to the CHPMP.		
30	Cocopah-3g	N.A.	Cover Letter	N.A.	• The Tribe requests specific consultation that is focused solely on the project's applicable or relevant and appropriate requirements (ARARs), emphasizing the difference an applicability with "to-be-considered," (TBCs) requirements. The list in the text and tables of the Work Plan is incomplete and have not been appropriately applied to the project. This consultation meeting (or meetings) is necessary to ensure that Tribal interests are identified in these ARARs and that TBCs are appropriately incorporated into the EE/CA.			DOI agreed to a consultation meeting focused on ARARs and TBCs and the meeting was held on 01/21/2022. Based on further evaluation of the identified ARAR and TBCs identified in the work plan, please add the following: - Final Topock Remediation Project Protocol for Consultation during Remedy Implementation/Construction. This document is a TBC as it is a supplement to the CHPMP.		
31	FMIT-3h	N.A. Same as comments #175	Cover Letter	N.A.	• The text describing area specific cleanup is vague. A more detailed description of how a soil removal action will be executed is required. In addition, tribal consultation prior to any ground disturbance along with a tribal monitoring presence during site -removal activities need to be clearly written into the work plan	See Section 3 for description of work flow and work approaches. Access routes and staging areas are identified in Figures 2-1 and 2-2		Tribal consultation on the EE/CA was initiated by BLM on 06/03/2020 and continued through 02/24/2021. Consultation was initiated on the Removal Action Work Plan on 11/01/2021 and will continue until DOI approves the work plan. Consultation after work plan approval/during remedy implementation will occur in accordance with Final Topock Remediation Project Protocol for Consultation during Remedy Implementation/Construction. PG&E shall include this protocol as a TBC as it is included as a supplement to the CHPMP. Consistent with the Tribal Monitor Protocol (PA Appendix C), Tribal and Archaeological Monitors shall both be invited to monitor field work.		
32	Quechan-3h	N.A. Same as comments #175	Cover Letter	N.A.	• The text describing area specific cleanup is vague. A more detailed description of how a soil removal action will be executed is required. In addition, tribal consultation prior to any ground disturbance along with a tribal monitoring presence during site -removal activities need to be clearly written into the work plan			Tribal consultation on the EE/CA was initiated by BLM on 06/03/2020 and continued through 02/24/2021. Consultation was initiated on the Removal Action Work Plan on 11/01/2021 and will continue until DOI approves the work plan. Consultation after work plan approval/during remedy implementation will occur in accordance with Final Topock Remediation Project Protocol for Consultation during Remedy Implementation/Construction. PG&E shall include this protocol as a TBC as it is included as a supplement to the CHPMP. Consistent with the Tribal Monitor Protocol (PA Appendix C), Tribal and Archaeological Monitors shall both be invited to monitor field work.		

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33	Cocopah-3h	N.A. Same as comments #175	Cover Letter	N.A.	• The text describing area specific cleanup is vague. A more detailed description of how a soil removal action will be executed is required. In addition, tribal consultation prior to any ground disturbance along with a tribal monitoring presence during site -removal activities need to be clearly written into the work plan			Tribal consultation on the EE/CA was initiated by BLM on 06/03/2020 and continued through 02/24/2021. Consultation was initiated on the Removal Action Work Plan on 11/01/2021 and will continue until DOI approves the work plan. Consultation after work plan approval/during remedy implementation will occur in accordance with Final Topock Remediation Project Protocol for Consultation during Remedy Implementation/Construction. PG&E shall include this protocol as a TBC as it is included as a supplement to the CHPMP. Consistent with the Tribal Monitor Protocol (PA Appendix C), Tribal and Archaeological Monitors shall both be invited to monitor field work.		
34	DTSC-1	1	Introductio n	N.A.	DTSC has requested discussion of groundwater protection as part of the discussion for the removal action (see comment 2 from EE/CA). This is particularly applicable in Bat Cave Wash and the East Ravine. The response to comment stated that text will be included to address potential migration of contamination to groundwater, but this was not found in the work plan.	Based on DTSC Comment 2 to the EE/CA, RAO 2 was modified to include the following statement: "Removing highly contaminated soils and wastes that contain mobile contaminants also minimizes the potential for further degradation of the groundwater aquifer." RAO 2 is included in Section 1.3, Table 1.1 of the NTCRA Work Plan.				
35	FMIT-4	FMIT-1 (MS)	Page 1-2, last pp, Section 1.1	According to the Programmatic Agreement and Amendment (PA), the Tribes believe that the area known as Topock, and specifically the immediate project area, is part of a broader cultural landscape. The BLM reports that the Tribes, as sovereign governments, recognize the project to be of significant importance and agree that the primary objectives are remediation of historical contamination of the soil and groundwater, and prevention of further releases of harmful materials within the cultural and natural environment of the Colorado River and specifically within the immediate project area (BLM 2010, 2017).	The text is misleading in that it attributes support to the soil cleanup to the Tribes without any mention of the Tribes continued and consistent input on cleanup at the site (i.e., when needed and with protection of Sacred Area). In addition, the PA was neither signed nor endorsed by 8 of the 9 Tribes. The Tribes have depended on the DOI requirement for government-to-government consultation on specific aspects of the Topock project. In the case of the EE/CA, those consultation meetings have not been productive. The Tribe requests meaningful consultation and the documentation of which Tribal comments have been incorporated into the EE/CA Work Plan			This language is intended to reflect the Tribes position identified in the PA and is provided for reference. The Tribes were heavily involved in the development of the included language. The PA is a legally binding document that commits an agency both by statute and by federal regulation to carry out the undertaking in accordance with the terms of the agreement in satisfaction of its responsibilities under Section 106. The signatories to the Topock PA are BLM, ACHP, AZ SHPO and CA SHPO. According to the ACHP guidance on agreements (https://www.achp.gov/executing_agreement_documents), the refusal of an invited signatory to sign the agreement does not prevent the agreement from being executed.	FMIT agrees the referenced paragraph can be deleted.	Referenced paragraph has been deleted from the Work Plan.

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36	Quechan-4	FYQIT-1 (MS)	Page 1-2, last pp, Section 1.1	According to the Programmatic Agreement and Amendment (PA), the Tribes believe that the area known as Topock, and specifically the immediateproject area, is part of a broader cultural landscape. The BLM reports that the Tribes, as sovereign governments, recognize the project to be of significant importance and agree that the primary objectives are remediation of historical contamination of the soil and groundwater, and prevention of further releases of harmful materials within the cultural and natural environment of the Colorado River and specifically within the immediate project area (BLM 2010, 2017).	The text is misleading in that it attributes support to the soil cleanup to the Tribes without any mention of the Tribes continued and consistent input on cleanup at the site (i.e., when needed and with protection of Sacred Area). In addition, the PA was neither signed nor endorsed by 8 of the 9 Tribes. The Tribes have depended on the DOI requirement for government-to-government consultation onspecific aspects of the Topock project. In the case of the EE/CA, those consultation meetings have not been productive. The Tribe requests meaningful consultation and the documentation ofwhich Tribal comments have been incorporated into the EE/CA Work Plan			This language is intended to reflect the Tribes position identified in the PA and is provided for reference. The Tribes were heavily involved in the development of the included language. The PA is a legally binding document that commits an agency both by statute and by federal regulation to carry out the undertaking in accordance with the terms of the agreement in satisfaction of its responsibilities under Section 106. The signatories to the Topock PA are BLM, ACHP, AZ SHPO and CA SHPO. According to the ACHP guidance on agreements (https://www.achp.gov/executing_agreement_documents), the refusal of an invited signatory to sign the agreement does not prevent the agreement from being executed.		
37	Cocopah-4	COCOPAH-1 (MS)	Page 1-2, last pp, Section 1.1	According to the Programmatic Agreement and Amendment (PA), the Tribes believe thatthe area known as Topock, and specifically the immediate project area, is part of a broader cultural landscape. The BLM reports that the Tribes, as sovereign governments, recognize the project to be of significant importance and agree that the primary objectives are remediation of historical contamination of the soil and groundwater, and prevention of further releases of harmful materials within the cultural and natural environment of the Colorado River and specifically within the immediate project area (BLM 2010, 2017).	The text is misleading in that it attributes support to the soil cleanup to the Tribes without any mention of the Tribes continued and consistent input on cleanup at the site (i.e., when needed and with protection of Sacred Area). In addition, the PA was neither signed nor endorsed by 8 of the 9 Tribes. The Tribes have depended on the DOI requirement for government-to-government consultation onspecific aspects of the Topock project. In the caseof the EE/CA, those consultation meetings have not been productive. The Tribe requests meaningful consultation and the documentation ofwhich Tribal comments have been incorporated into the EE/CA Work Plan			This language is intended to reflect the Tribes position identified in the PA and is provided for reference. The Tribes were heavily involved in the development of the included language. The PA is a legally binding document that commits an agency both by statute and by federal regulation to carry out the undertaking in accordance with the terms of the agreement in satisfaction of its responsibilities under Section 106. The signatories to the Topock PA are BLM, ACHP, AZ SHPO and CA SHPO. According to the ACHP guidance on agreements (https://www.achp.gov/executing_agreement_documents), the refusal of an invited signatory to sign the agreement does not prevent the agreement from being executed.		

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38	FMIT-5	TRC 1	Section 1.1.1	The nature and extent of soil contamination associated with the TCS was evaluated as part of a Resource Conservation and Recovery Act (RCRA) Facility Investigation and Remedial Investigation (RFI/RI). As directed by California Department of Toxic Substances Control (DTSC) (DTSC 2006),	Please also clearly indicate in the text that DOI participated in all of the RFI/RI process including directives which led to increased numbers of soil samples taken at the site and updated to the risk evaluations.			The RFI/RI includes text related to the investigation and regulatory authorities.		As discussed during the 4-26-22 meeting, the comment is resolved.
39	Quechan-5	TRC 1	Section 1.1.1	The nature and extent of soil contamination associated with the TCS was evaluated as part of a Resource Conservation and Recovery Act (RCRA) Facility Investigationand Remedial Investigation (RFI/RI). As directed by California Departmentof Toxic Substances Control (DTSC) (DTSC 2006),	Please also clearly indicate in the text that DOI participated in all of the RFI/RI process including directives which led to increased numbers of soil samples taken at the site and updated to the risk evaluations.			The RFI/RI includes text related to the investigation and regulatory authorities.		
40	Cocopah-5	TRC 1	Section 1.1.1	The nature and extent of soil contamination associated with the TCS was evaluated aspart of a Resource Conservation and Recovery Act (RCRA) Facility Investigationand Remedial Investigation (RFI/RI). As directed by California Department of Toxic Substances Control (DTSC) (DTSC 2006),	Please also clearly indicate in the text that DOI participated in all of the RFI/RI process including directives which led to increased numbers of soil samples taken at the site and updates to the risk evaluations.			The RFI/RI includes text related to the investigation and regulatory authorities.		
41	FMIT-6	TRC 2	Section 1.1.1	Concurrent with evaluation of the RFI/RI soil investigation data, the 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.	Please provide reference to technical document that was used to characterize migration occurrence and how hotspot locations were identified as sources to downgradient federal land locations			See RTC 19.	See Tribal Response to Comment #19	

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42	Quechan-6	TRC 2	Section 1.1.1	Concurrent with evaluation of the RFI/RI soil investigation data, the 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.	Please provide reference to technical document that was used to characterize migration occurrence and how hotspot locations were identified as sources to downgradient federal land locations			See RTC 19.		
43	Cocopah-6	TRC 2	Section 1.1.1	Concurrent with evaluation of the RFI/RI soil investigation data, the 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.	Please provide reference to the technical document that was used to characterize migration occurrence and how hotspot locations were identified as sources to downgradient federal land locations			See RTC 19.		
44	FMIT-7	TRC 3	Section 1.1.1	On October 30, 2018, DOI directed PG&E to conduct an Engineering Evaluation/Cost Analysis (EE/CA) for a potential NTCRA to address contaminated soil on land adjacent to the TCS. A draft EE/CA report was made available for public, agency, and stakeholder review and comment, and Tribal consultation on May 29, 2020.	Please include description why DOI concluded that the RFI/RI (which was approved by DOI) is not sufficient to address risk and subsequent cleanup at the site			The draft RFI/RI is not a decision document for the site cleanup. The EE/CA Approval Memorandum (10/18/2018), the Action Memorandum (10/12/2021), and the Administrative Record supporting the action address justification for the conduct of a removal action. DOI believes that it is prudent to address the soil contamination through the removal action process in order to reduce risks to human and ecological receptors. The current soil schedule does not show a decision document through the RI/FS process until 2025 at the earliest.	FMIT disagrees with the response from DOI.	
45	Quechan-7	TRC 3	Section 1.1.1	On October 30, 2018, DOI directed PG&E to conduct an Engineering Evaluation/Cost Analysis (EE/CA) for a potential NTCRA to address contaminated soil on land adjacent to the TCS. A draft EE/CA report was made available for public, agency, and stakeholder review and comment, and Tribal consultation on May 29, 2020.	Please include description why DOI concluded that the RFI/RI (which was approved by DOI) is not sufficient to address risk and subsequent cleanup at the site			The draft RFI/RI is not a decision document for the site cleanup. The EE/CA Approval Memorandum (10/18/2018), the Action Memorandum (10/12/2021), and the Administrative Record supporting the action address justification for the conduct of a removal action. DOI believes that it is prudent to address the soil contamination through the removal action process in order to reduce risks to human and ecological receptors. The current soil schedule does not show a decision document through the RI/FS process until 2025 at the earliest.		

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46	Cocopah-7	TRC 3	Section 1.1.1	On October 30, 2018, DOI directed PG&E to conduct an Engineering Evaluation/Cost Analysis (EE/CA) for a potential NTCRA to address contaminated soil on land adjacent to the TCS. A draft EE/CA report was made available for public, agency, and stakeholder review and comment, and Tribal consultation on May 29, 2020.	Please include a description why DOI concluded that the RFI/RI (which has been approved by DOI) is not sufficient to address risk and subsequent cleanup at the site			The draft RFI/RI is not a decision document for the site cleanup. The EE/CA Approval Memorandum (10/18/2018), the Action Memorandum (10/12/2021), and the Administrative Record supporting the action address justification for the conduct of a removal action. DOI believes that it is prudent to address the soil contamination through the removal action process in order to reduce risks to human and ecological receptors. The current soil schedule does not show a decision document through the RI/FS process until 2025 at the earliest.		
47	FMIT-8	TRC 4	Section 1.1.1	Tribal consultation on the draft EE/CA ended on April 8, 2020.	It is the Tribe's opinion that effective consultation on this aspect of the remedial project did not occur. Please include in the text brief descriptions of the "consultation" phone call which was terminated early and the inability to fulfill FMIT's consultation meeting request with Stephen Tyron			The meeting minutes from the 2/24/2021 consultation meeting and the correspondence from the OEPC Director Stephen Tyron regarding multiple attempts to set up a meeting with the FMIT are included in the Administrative Record and are not relevant to the work plan.		
48	Quechan-8	TRC 4	Section 1.1.1	Tribal consultation on the draft EE/CA ended on April 8, 2020.	It is the Tribe's opinion that effective consultation on this aspect of the remedial project did not occur. Please include in the text brief descriptions of the "consultation" phone call which was terminated early and the inability to fulfill FYQIT's consultation meeting request with Stephen Tyron			The meeting minutes from the 2/24/2021 consultation meeting and the correspondence from the OEPC Director Stephen Tyron regarding multiple attempts to set up a meeting with the FMIT are included in the Administrative Record and are not relevant to the work plan.		
49	Cocopah-8	TRC 4	Section 1.1.1	Tribal consultation on the draft EE/CA ended on April 8, 2020.	It is the Tribe's opinion that effective consultation on this aspect of the remedial project did not occur. Please include in the text brief descriptions of the "consultation" phone call which was terminated early and the inability to fulfill COCOPAH's consultation meeting request with Stephen Tyron			The meeting minutes from the 2/24/2021 consultation meeting and the correspondence from the OEPC Director Stephen Tyron regarding multiple attempts to set up a meeting with the FMIT are included in the Administrative Record and are not relevant to the work plan.		
50	FMIT-9	TRC 5	Section 1.1.1	Several removal action alternatives were identified.	Please clearly include text that states "Due to DOI decision, the no action alternative as presented in the EE/CA does not acknowledge that a soil RI/RFI is currently under way at the site and overlaps with much of the work presented within the EE/CA Also indicate that the tribes requested that the RFI/RI be acknowledged as a possible action alternative and that DOI refused to do this			This comment is not relevant to the work plan. The Administrative Record, consultation meeting minutes and EE/CA RTCs for the action adequately addresses this issue. See EE/CA RTC 68. This issue is further addressed in the Responsiveness Summary regarding the EE/CA. DOI acknowledges the Tribes request to include the RI/FS process as an alternative in the EE/CA. Any presumption of a remedy in this process would be pre-decisional as CEQA documentation and the DOI ROD have not been completed. Since no removal option would be considered, the alternative would remain a No Action alternative, which was evaluated in the EE/CA.	FMIT disagrees with the response from DOI.	
51	Quechan-9	TRC 5	Section 1.1.1	Several removal action alternatives were identified.	Please clearly include text that states "Due to DOI decision, the no action alternative as presented in the EE/CA does not acknowledge that a soil RI/RFI is currently under way at the site and overlaps with much of the work presented within the EE/CA. Also indicate that the tribes requested that the RFI/RI be acknowledged as a possible action alternative and that DOI refused to do this			This comment is not relevant to the work plan. The Administrative Record, consultation meeting minutes and EE/CA RTCs for the action adequately addresses this issue. See EE/CA RTC 68. This issue is further addressed in the Responsiveness Summary regarding the EE/CA.		
52	Cocopah-9	TRC 5	Section 1.1.1	Several removal action alternatives were identified.	Please clearly include text that states "Due to DOI decision, the no action alternative as presented in the EE/CA does not acknowledge that a RFI/RI cleanup process for soil is currently under way at the site and over laps with much of the work presented within the EE/CA. Also indicate that the Tribes requested that the RFI/RI be acknowledged as a possible action alternative and that DOI refused to do this.			This comment is not relevant to the work plan. The Administrative Record, consultation meeting minutes and EE/CA RTCs for the action adequately addresses this issue. See EE/CA RTC 68. This issue is further addressed in the Responsiveness Summary regarding the EE/CA.		

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53	FMIT-10	FMIT-2 (MS)	Section 1.1.1	RFI/RI Report Volume 3...	The HHERA is a major component of the site investigation and the HHERA must be listed and summarized so the reader can understand the site risks in summary (here).			This information is provided in the final EE/CA.		
54	Quechan-10	FYQIT-2 (MS)	Section 1.1.1	RFI/RI Report Volume 3…	The HHERA is a major component of the site investigation and the HHERA must be listed and summarized so the reader can understand the site risks in summary (here).			This information is provided in the final EE/CA.		
55	Cocopah-10	COCOPAH- 2 (MS)	Section 1.1.1	RFI/RI Report Volume 3…	The HHERA is a major component of the site investigation and the HHERA must be listed and summarized so the reader can understand the site risks in summary (here).			This information is provided in the final EE/CA.		
56	FMIT-11	FMIT-3 (MS)	Page 1-3, first full pp	A draft EE/CA report was made available forpublic, agency, and stakeholder review and comment,and Tribal consultation on May 29, 2020. The public review period ended on August 5, 2020. Tribal consultation on the draft EE/CA ended on April 8, 2020. DOI reviewed and considered stakeholder comments on the draft EE/CA and directed PG&E to prepare a final EE/CA.	The Tribe takes exception to the wording of this text. To the uninformed reader, it seems that the Tribes provided comments and then the DOI continued with the EE/CA "considering" those comments. While probably over 100 comments have been provided, almost none of the Tribes comments have been legitimately "considered" and incorporated. If DOI disagrees, then please provide a list of ALL the Tribal comments and highlight which were incorporated into the EE/CA.			The DOI negotiated in good faith with the Tribes during the consultation meetings held on 8/11/2020, 2/12/2021 and 2/24/2021. Tribal comments were considered in revising the EE/CA and relevant comments were incorporated. For example, in consideration of the Tribes comments, USFWS will agree to reduce the human health cleanup level from 10-6 to 10-5 for the PAAs for contamination below 2'. Additionally, in response to the request from the Tribes to consider removal of debris only, this alternative was included in the EE/CA. The Administrative Record, consultation meeting minutes, EE/CA RTCs, and the Responsiveness Summary for the action adequately addresses the requested information.	FMIT disagrees with the response from DOI.	
57	Quechan-11	FYQIT-3 (MS)	Page 1-3, first full pp	A draft EE/CA report was made available for public, agency, and stakeholder review and comment, and Tribal consultation on May 29, 2020. The public review period ended on August 5, 2020. Tribal consultation on the draft EE/CA ended on April 8, 2020. DOI reviewed and considered stakeholder comments on the draft EE/CA and directed PG&E to prepare a final EE/CA.	The Tribe takes exception to the wording of this text. To the uninformed reader, it seems that the Tribes provided comments and then the DOI continued with the EE/CA "considering" those comments. While probably over 100 comments have been provided, almost none of the Tribes comments have been legitimately "considered" and incorporated. If DOI disagrees, then please provide a list of ALL the Tribal comments and highlight which were incorporated into the EE/CA.			The DOI negotiated in good faith with the Tribes during the consultation meetings held on 8/11/2020, 2/12/2021 and 2/24/2021. Tribal comments were considered in revising the EE/CA and relevant comments were incorporated. For example, in consideration of the Tribes comments, USFWS will agree to reduce the human health cleanup level from 10-6 to 10-5 for the PAAs for contamination below 2'. Additionally, in response to the request from the Tribes to consider removal of debris only, this alternative was included in the EE/CA. The Administrative Record, consultation meeting minutes, EE/CA RTCs, and the Responsiveness Summary for the action adequately addresses the requested information.		
58	Cocopah-11	COCOPAH- 3 (MS)	Page 1-3, first full pp	A draft EE/CA report was made available for public, agency, and stakeholder review and comment, and Tribal consultation on May 29, 2020. The public review period ended on August 5, 2020. Tribal consultation on the draft EE/CA ended on April 8, 2020. DOI reviewed and considered stakeholder comments on the draft EE/CA and directed PG&E to prepare a final EE/CA.	The Tribe takes exception to the wording of this text. To the uninformed reader, it seems that the Tribes provided comments and then the DOI continued with the EE/CA "considering" those comments. While probably over 100 comments have been provided, almost none of the Tribes comments have been legitimately "considered" and incorporated. If DOI disagrees, then please provide a list of ALL the Tribal comments and highlight which were incorporated into the EE/CA.			The DOI negotiated in good faith with the Tribes during the consultation meetings held on 8/11/2020, 2/12/2021 and 2/24/2021. Tribal comments were considered in revising the EE/CA and relevant comments were incorporated. For example, in consideration of the Tribes comments, USFWS will agree to reduce the human health cleanup level from 10-6 to 10-5 for the PAAs for contamination below 2'. Additionally, in response to the request from the Tribes to consider removal of debris only, this alternative was included in the EE/CA. The Administrative Record, consultation meeting minutes, EE/CA RTCs, and the Responsiveness Summary for the action adequately addresses the requested information.		

Comment Number	Agency/ Stakeholder[a]	Unique Comment ID (if applicable)[b]	Section/ Page	Reference Text	Soil Non-Time-Critical Removal Action Work Plan Comment *(Please provide sufficient detail, include specifically what you are looking for)*	PG&E Response	DTSC Response	DOI Response	Tribes Response	Final Resolution
59	FMIT-12	FMIT-4 (MS)	Page 1-3, Section 1.2	concentrations of constituents of potential concern (COPCs) to humans and constituents of potential ecological concern(COPECs) significantly exceed background values or ecological and human health screening levels.	The word "significantly" is not defined and is used to convey an idea that is subjective. This paragraph should mention that not all the areas that are PAAs were identified in the HHERA. Because of the improper comparisons used (e.g., screening levels), some PAAs do not pose significant public health or ecological risk. A table that gives the concentration range in each PAA and compares the range to both the screening levels AND the HHERA results would be an unbiased presentation of the facts.			This discussion is related to the EE/CA Approval Memorandum and PAAs are further defined in the EE/CA (See EE/CA RTC 20, 27).	FMIT provided the following response in an e-mail dated June 3, 2022: DOIs response to this comment ignores Tribal concerns and provides an example of DOI working more as land manager than solicitor on behalf of tribal concern. The response to this comment ignores the tribal request for DOI to assist in data interpretation and alternatively appears to suggest that this concern is not warranted and therefore the concern has been recorded and shelved with no change in process. If DOI is truly soliciting on behalf of the Tribes it is unclear why DOI has refused Tribal requests for support in data analysis and have not provided requested documents that would help the Tribes better understand how site data supports the cleanup conclusions initiated within the EE/CA work plan. For this reason, we do not concur with their findings.	
60	Quechan-12	FYQIT-4 (MS)	Page 1-3, Section 1.2	concentrations of constituents of potential concern (COPCs) to humans and constituents of potential ecological concern (COPECs) significantly exceed background values or ecological and human health screening levels.	The word “significantly” is not defined and is used to convey an idea that is subjective. This paragraph should mention that not all the areas that are PAAs were identified in the HHERA. Because of the improper comparisons used (e.g., screening levels), some PAAs do not pose significant public health or ecological risk. A table that gives the concentration range in each PAA and compares the range to both the screening levels AND the HHERA results would be an unbiased presentation of the facts.			This discussion is related to the EE/CA Approval Memorandum and PAAs are further defined in the EE/CA (See EE/CA RTC 20, 27).	In an e-mail dated June 6, 2022, the FYQIT concurred with the FMIT comment responses.	
61	Cocopah-12	COCOPAH-4 (MS)	Page 1-3, Section 1.2	concentrations of constituents of potential concern (COPCs) to humans and constituents of potential ecological concern (COPECs) significantly exceed background values or ecological and human health screening levels.	The word “significantly” is not defined and is used to convey an idea that is subjective. This paragraph should mention that not all the areas that are PAAs were identified in the HHERA. Because of the improper comparisons used (e.g., screening levels), some PAAs do not pose significant public health or ecological risk. A table that gives the concentration range in each PAA and compares the range to both the screening levels AND the HHERA results would be an unbiased presentation of the facts.			This discussion is related to the EE/CA Approval Memorandum and PAAs are further defined in the EE/CA (See EE/CA RTC 20, 27).	In an e-mail dated June 6, 2022, the Cocopah Indian Tribe concurred with the FMIT comment responses.	

Comment Number	Agency/ Stakeholder[a]	Unique Comment ID (if applicable)[b]	Section/ Page	Reference Text	Soil Non-Time-Critical Removal Action Work Plan Comment *(Please provide sufficient detail, include specifically what you are looking for)*	PG&E Response	DTSC Response	DOI Response	Tribes Response	Final Resolution
62	FMIT-13	TRC 6	Page 1-3, Section 1.2	Because of this potential threat to public health and the environment, DOI has directed PG&E via the 2021 Action Memorandum to conduct this Soil NTCRA to address contaminated soil in these PAAs, hereafter identified as target action areas (TAAs) (DOI 2021a).	please provide text which discusses how areas identified as "potential- threat" within the EE/CA were characterized in the RFI/RI risk assessment. The tribes request that DOI prepare a table that allows an easy comparison between the conclusions of the risk assessment (approved by DOI with tribe and stakeholder involvement) with the conclusions of risk determined in the EE/CA. Also please include short discussion on why DOI has determined that the actions under the RFI/RI are not sufficient to address the contamination			The EE/CA and Action Memorandum address this comment. Regarding the RFI/RI, please see RTC 44.	FMIT provided the following response in an e-mail dated June 3, 2022: The Tribes request that rather than deferring the response to other documents that DOI provide the direct response within this document. The Tribes would like all information relevant to this document to be placed in this document rather than creating a difficult and convoluted paper trail. If DOI is truly soliciting on behalf of the Tribes, it is unclear why DOI has refused Tribal requests for support in data analysis and have not provided requested documents that would help the tribes better understand how site data supports the cleanup conclusions initiated with the EE/CA work plan. For this reason, we do not concur with their findings.	
63	Quechan-13	TRC 6	Page 1-3, Section 1.2	Because of this potential threat to public health and the environment, DOI has directed PG&E via the 2021 Action Memorandum to conduct this Soil NTCRA to address contaminated soil in these PAAs, hereafter identified astarget action areas (TAAs) (DOI 2021a).	please provide text which discusses how areas identified as “potential threat” within the EE/CA were characterized in the RFI/RI risk assessment.The tribes request that DOI prepare a table that allows an easy comparison between theconclusions of the risk assessment (approved by DOI with tribe and stakeholder involvement) with the conclusions of risk determined in the EE/CA. Also please include short discussion on why DOI has determined that the actions under the RFI/RI are not sufficient to address the contamination			The EE/CA and Action Memorandum address this comment. Regarding the RFI/RI, please see RTC 44.	In an e-mail dated June 6, 2022, the FYQIT concurred with the FMIT comment responses.	
64	Cocopah-13	TRC 6	Page 1-3, Section 1.2	Because of this potential threat to public health and the environment, DOI has directed PG&E via the 2021 Action Memorandum to conduct this Soil NTCRA to address contaminated soil in these PAAs, hereafter identified astarget action areas (TAAs) (DOI 2021a).	please provide text which discusses how areas identified as “potential threat” within the EE/CA were characterized in the RFI/RI risk assessment.The tribes request that DOI prepare a table that allows an easy comparison between theconclusions of the risk assessment (approved by DOI with tribe and stakeholder involvement) with the conclusions of risk determined in the EE/CA. Also please include short discussion on why DOI has determined that the actions under the RFI/RI are not sufficient to address the contamination			The EE/CA and Action Memorandum address this comment. Regarding the RFI/RI, please see RTC 44.	In an e-mail dated June 6, 2022, the Cocopah Indian Tribe concurred with the FMIT comment responses.	
65	FMIT-14	TRC7	Section 1.3	This non-time-critical removal action is intended to stabilize and mitigate the threat of release of contaminated material surroundingand within the Refuge and reduce the overall threat to human health and the environment.	Please indicate areas that the EE/CA determined as a "threat to human health and the environment” that were not determined as risks within the DOI approved risk assessment. Also provide text description why different risk conclusions have been made between the DOI approved RFI/RI risk assessment and the EE/CA			As stated in the EE/CA, RAO 1 is focused on removing locations identified in the HHERA as being locations that contribute significantly to human health or ecological risk. The purpose of RAO-2 is to address sources of contamination: 1) outside the Station in or adjacent to wash areas or 2) that have the potential to migrate to the HNWR during storm events. This potential for migration of contamination sources was not fully considered in the Soil HHERA (as stated in the Agencies’ Acceptance Letter dated May 29, 2020) and must be addressed.		

Comment Number	Agency/ Stakeholder[a]	Unique Comment ID (if applicable)[b]	Section/ Page	Reference Text	Soil Non-Time-Critical Removal Action Work Plan Comment *(Please provide sufficient detail, include specifically what you are looking for)*	PG&E Response	DTSC Response	DOI Response	Tribes Response	Final Resolution
66	Quechan-14	TRC 7	Section 1.3	This non-time-critical removal action is intended to stabilize and mitigate the threat ofrelease of contaminated material surroundingand within the Refuge and reduce the overall threat to human health and the environment.	Please indicate areas that the EE/CA determined as a “threat to human health and the environment” that were not determined as risks within the DOI approved risk assessment. Also provide text description why different risk conclusions have been made between the DOI approved RFI/RI risk assessment and the EE/CA			As stated in the EE/CA, RAO 1 is focused on removing locations identified in the HHERA as being locations that contribute significantly to human health or ecological risk. The purpose of RAO-2 is to address sources of contamination: 1) outside the Station in or adjacent to wash areas or 2) that have the potential to migrate to the HNWR during storm events. This potential for migration of contamination sources was not fully considered in the Soil HHERA (as stated in the Agencies’ Acceptance Letter dated May 29, 2020) and must be addressed.		
67	Cocopah-14	TRC 7	Section 1.3	This non-time-critical removal action is intended to stabilize and mitigate the threat ofrelease of contaminated material surroundingand within the Refuge and reduce the overall threat to human health and the environment.	Please indicate areas that the EE/CA determined as a “threat to human health and the environment” that were not determined as risks within the DOI approved risk assessment. Also provide text description why different risk conclusions have been made between the DOI approved RFI/RI risk assessment and the EE/CA			As stated in the EE/CA, RAO 1 is focused on removing locations identified in the HHERA as being locations that contribute significantly to human health or ecological risk. The purpose of RAO-2 is to address sources of contamination: 1) outside the Station in or adjacent to wash areas or 2) that have the potential to migrate to the HNWR during storm events. This potential for migration of contamination sources was not fully considered in the Soil HHERA (as stated in the Agencies’ Acceptance Letter dated May 29, 2020) and must be addressed.		
68	FMIT-15	TRC 8	Section 1.3	The scope of the removal action in accordance with Alternative 3 will be limited to soil and other solid phase matrices, including white powder, black sandy material, and debris on federal land or in locations where constituents have the potential to migrate to federal land.	Please provide reference to technical document that was used to determine migration was occurring and how hotspot locations were identified as sources to downgradient federal land locations			See RTC 19 regarding migration. The CSM (Exhibit 2-1) and Section 3.6 of the EE/CA identify how potential sources of migration either on or adjacent to federal land were determined.	FMIT provided the following response in an e-mail dated June 3, 2022: The tribes would like to point out that they have requested numerous times for DOI to produce documentation of how migration at the site has been quantitatively evaluated and how point sources of contaminants have been clearly identified as sources to elevated downgradient concentrations. To date DOI has refused to work with the tribal request stating that there is no need for this level of analysis. It is the tribes understanding that DOI’s role as solicitor is to work with the tribes in understanding how site data is interpreted and used to determine appropriate cleanup actions. This type of response supports the tribal opinion that DOI has already concluded how they will move forward with the EE/CA and are simply acknowledging the tribal comments but not considering them. If DOI is truly soliciting on behalf of the Tribes, it is unclear why DOI has refused Tribal requests for support in data analysis and have not provided requested documents that would help the Tribes better understand how site data supports the cleanup conclusions initiated with the EE/CA work plan. For this reason, we do not concur with their findings.	See response to Comment #19

Comment Number	Agency/ Stakeholder[a]	Unique Comment ID (if applicable)[b]	Section/ Page	Reference Text	Soil Non-Time-Critical Removal Action Work Plan Comment *(Please provide sufficient detail, include specifically what you are looking for)*	PG&E Response	DTSC Response	DOI Response	Tribes Response	Final Resolution
69	Quechan-15	TRC 8	Section 1.3	The scope of the removal action in accordance with Alternative 3 will be limited tosoil and other solid phase matrices, including white powder, black sandy material, and debris on federal land or in locations where constituents have the potential to migrate to federal land.	Please provide reference to technical document that was used to determine migration was occurring and how hotspot locations were identified as sources to downgradient federal land locations			See RTC 19 regarding migration. The CSM (Exhibit 2-1) and Section 3.6 of the EE/CA identify how potential sources of migration either on or adjacent to federal land were determined.	In an e-mail dated June 6, 2022, the FYQIT concurred with the FMIT comment responses.	
70	Cocopah-15	TRC 8	Section 1.3	The scope of the removal action in accordance with Alternative 3 will be limited tosoil and other solid phase matrices, including white powder, black sandy material, and debris on federal land or in locations where constituents have the potential to migrate to federal land.	Please provide reference to technical document that was used to determine migration was occurring and how hotspot locations were identified as sources to downgradient federal land locations			See RTC 19 regarding migration. The CSM (Exhibit 2-1) and Section 3.6 of the EE/CA identify how potential sources of migration either on or adjacent to federal land were determined.	In an e-mail dated June 6, 2022, the Cocopah Indian Tribe concurred with the FMIT comment responses.	
71	FMIT-16	TRC 9	Table 1-1	N.A.	The use of terms such as "identification of mobile contaminants, risk and debris" are insufficiently defined. Please provide a more technical description of how DOI defines each of these terms	The text has been revised to include, "…mobile contaminants, i.e. hexavalent chromium." The text has been revised to include the following definition of debris" (for example, wood, cans, machine parts, rebar, concrete, asphalt, railroad ties, piping, etc.)"		Table 1-1 is from the EE/CA (Exhibit 3-1) and from the Action Memorandum (Exhibit 4). A definition of "debris" as it applies to the implementation of the work plan should be included for clarity. Section 1.3		Comment resolved
72	Quechan-16	TRC 9	Table 1-1	N.A.	The use of terms such as "identification of mobile contaminants, risk and debris" are insufficiently defined. Please provide a more technical description of how DOI defines each of these terms			Table 1-1 is from the EE/CA (Exhibit 3-1) and from the Action Memorandum (Exhibit 4). A definition of "debris" as it applies to the implementation of the work plan should be included for clarity.		
73	Cocopah-16	TRC 9	Table 1-1	N.A.	The use of terms such as "identification of mobile contaminants, risk and debris" are insufficiently defined. Please provide a more technical description of how DOI defines each of these terms			Table 1-1 is from the EE/CA (Exhibit 3-1) and from the Action Memorandum (Exhibit 4). A definition of "debris" as it applies to the implementation of the work plan should be included for clarity.		
74	FMIT-17	FMIT-5 (MS)	Table 1-1	...the HHERA recommendations will be followed...	This is a misstatement of the HHERA and the USEPA regulatory process. The HHERA evaluates exposures and reports hazards and risks. While the HHERA can make recommendations, those recommendations were for a RANGE of risks and does not specify a specific acceptable risk. The risk management process, in which the Tribe will participate, is the phase of the project where risk acceptability is made. A factual approach was recommended in a comment above with a new document table that presents the information being referenced (e.g., HHERA results)			Table 1-1 is from the EE/CA (Exhibit 3-1) and from the Action Memorandum (Exhibit 4). Text within the Final EE/CA describes the how the HHERA was utilized in determining Removal Action Goals (RAGs) to satisfy the Removal Action Objectives (RAOs).		
75	Quechan-17	FYQIT-5 (MS)	Table 1-1	…the HHERA recommendations will be followed…	This is a misstatement of the HHERA and the USEPA regulatory process. The HHERA evaluates exposures and reports hazards and risks. While the HHERA can make recommendations, those recommendations were for a RANGE of risks and does not specify a specific acceptable risk. The risk management process, in which the Tribe will participate, is the phase of the project where risk acceptability is made. A factual approach was recommended in a comment above with a new document table that presents the information being referenced (e.g., HHERA results)			Table 1-1 is from the EE/CA (Exhibit 3-1) and from the Action Memorandum (Exhibit 4). Text within the Final EE/CA describes the how the HHERA was utilized in determining Removal Action Goals (RAGs) to satisfy the Removal Action Objectives (RAOs).		

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76	Cocopah-17	COCOPAH-5 (MS)	Table 1-1	…the HHERA recommendations will be followed…	This is a misstatement of the HHERA and the USEPA regulatory process. The HHERA evaluates exposures and reports hazards and risks. While the HHERA can make recommendations, those recommendations were for a RANGE of risks and does not specify a specific acceptable risk. The risk management process, in which the Tribe will participate, is the phase of the project where risk acceptability is made. A factual approach was recommended in a comment above with a new document table that presents the information being referenced (e.g., HHERA results)			Table 1-1 is from the EE/CA (Exhibit 3-1) and from the Action Memorandum (Exhibit 4). Text within the Final EE/CA describes the how the HHERA was utilized in determining Removal Action Goals (RAGs) to satisfy the Removal Action Objectives (RAOs).		
77	FMIT-18	FMIT-6 (MS)	Table 1-1	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.	In NO EE/CA document is there presented an evaluation of migration. The Tribe has requested this technical evaluation so the potential for migration can be fully evaluated. DOI has to date refused to provide this evaluation. Therefore, there is NO technical evaluation of RAO 2. For example: what is the migration pattern of soil in AOC 9 and 10? The East Ravine has a berm and road that stops sediment migration to adjacent areas. The EE/CA guidelines require that the evaluation consider existing conditions that might mitigate migration and exposures, and the Tribe has requested this consideration.			See RTC 19 regarding migration. The CSM (Exhibit 2-1) and Section 3.6 of the EE/CA identify how potential sources of migration either on or adjacent to federal land were determined. To clarify, RAO 2 addresses elevated concentrations of contaminants in soil up to 10 ft bgs outside the TCS, in or adjacent to wash areas that are within the HNWR.		
78	Quechan-18	FYQIT-6 (MS)	Table 1-1	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.	In NO EE/CA document is there presented an evaluation of migration. The Tribe has requested this technical evaluation so the potential for migration can be fully evaluated. DOI has to date refused to provide this evaluation. Therefore, there is NO technical evaluation of RAO 2. For example: what is the migration pattern of soil in AOC 9 and 10? The East Ravine has a berm and road that stops sediment migration to adjacent areas. The EE/CA guidelines require that the evaluation consider existing conditions that might mitigate migration and exposures, and the Tribe has requested this consideration.			See RTC 19 regarding migration. The CSM (Exhibit 2-1) and Section 3.6 of the EE/CA identify how potential sources of migration either on or adjacent to federal land were determined. To clarify, RAO 2 addresses elevated concentrations of contaminants in soil up to 10 ft bgs outside the TCS, in or adjacent to wash areas that are within the HNWR.		
79	Cocopah-18	COCOPAH-6 (MS)	Table 1-1	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.	In NO EE/CA document is there presented an evaluation of migration. The Tribe has requested this technical evaluation so the potential for migration can be fully evaluated. DOI has to date refused to provide this evaluation. Therefore, there is NO technical evaluation of RAO 2. For example: what is the migration pattern of soil in AOC 9 and 10? The East Ravine has a berm and road that stops sediment migration to adjacent areas. The EE/CA guidelines require that the evaluation consider existing conditions that might mitigate migration and exposures, and the Tribe has requested this consideration.			See RTC 19 regarding migration. The CSM (Exhibit 2-1) and Section 3.6 of the EE/CA identify how potential sources of migration either on or adjacent to federal land were determined. To clarify, RAO 2 addresses elevated concentrations of contaminants in soil up to 10 ft bgs outside the TCS, in or adjacent to wash areas that are within the HNWR.		
80	FMIT-19	TRC 10	N.A.	Removing highly contaminated soils and wastes that contain mobile contaminants also minimizes the potential for further degradation of the groundwater aquifer.	Clearly define how "highly contaminated soils" and "mobile contaminants" are defined in quantitative terms. In addition, please describe how highly contaminated soils differs from contaminated soils			Table 1-1 is from the Final EE/CA (Exhibit 3-1) and from the Action Memorandum (Exhibit 4). The process for determining PAAs is provided in the EE/CA		
81	Quechan-19	TRC 10	N.A.	Removing highly contaminated soils and wastes that contain mobile contaminants also minimizes the potential for further degradation of the groundwater aquifer.	Clearly define how “highly contaminated soils” and “mobile contaminants” are defined in quantitative terms. In addition, please describe how highly contaminated soils differs from contaminated soils			Table 1-1 is from the Final EE/CA (Exhibit 3-1) and from the Action Memorandum (Exhibit 4). The process for determining PAAs is provided in the EE/CA		
82	Cocopah-19	TRC 10	N.A.	Removing highly contaminated soils and wastes that contain mobile contaminants also minimizes the potential for further degradation of the groundwater aquifer.	Clearly define how “highly contaminated soils” and “mobile contaminants” are defined in quantitative terms. In addition, please describe how highly contaminated soils differs from contaminated soils			Table 1-1 is from the Final EE/CA (Exhibit 3-1) and from the Action Memorandum (Exhibit 4). The process for determining PAAs is provided in the EE/CA		

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83	FMIT-20	FMIT-7 (MS)	Table 1-2	RBRG calculated in HHERA	The HHERA, which is cited as the source of these RAGs, has a process for RGRG calculation and use. These are NOT intended to be a “bright line” criteria but an exposure-area weighted value. This table should add the words in the 'Source' column..."RBRG calculated in HHERA as an area-weighted criterion'. And Footnote "b" is inappropriate and an incorrect referral to the HHERA.			See EE/CA RTC 27 and DOI response to 2/24/2021 EE/CA discussion item 5. Table 1-2 is from the Final EE/CA (Exhibit 3-2) and from the Action Memorandum (Exhibit 3).		Comment resolved
84	Quechan-20	FYQIT-7 (MS)	Table 1-2	RBRG calculated in HHERA	The HHERA, which is cited as the source of these RAGs, has a process for RGRG calculation and use. These are NOT intended to be a “bright line” criteria but an exposure-area weighted value. This table should add the words in the ‘Source’ column…” RBRG calculated in HHERA as an area-weighted criterion’. And Footnote “b” is inappropriate and an incorrect referral to the HHERA.			See EE/CA RTC 27 and DOI response to 2/24/2021 EE/CA discussion item 5. Table 1-2 is from the Final EE/CA (Exhibit 3-2) and from the Action Memorandum (Exhibit 3).		
85	Cocopah-20	COCOPAH-7 (MS)	Table 1-2	RBRG calculated in HHERA	The HHERA, which is cited as the source of these RAGs, has a process for RGRG calculation and use. These are NOT intended to be criteria “bright line” criteria but an exposure-area weighted value. This table should add the words in the ‘Source’ column” RBRG calculated in HHERA as an area-weighted criterion’. And Footnote “b” is inappropriate and an incorrect referral to the HHERA.			See EE/CA RTC 27 and DOI response to 2/24/2021 EE/CA discussion item 5. Table 1-2 is from the Final EE/CA (Exhibit 3-2) and from the Action Memorandum (Exhibit 3).		
86	DTSC-2	2	Section 1.4.1	N.A.	DTSC has made specific comment on several locations at this SWMU in the EE/CA. The response to comment states “SWMU1-29 and SSB-5 and areas at the edges of the PAAs will be assessed during removal. Sidewall confirmation samples will be collected and the need for additional removal will be discussed with agencies. SWMU1-WP-6h will be included in the EE/CA and removed under RAO 3 criteria if white powder is present.” Where and how are these responses documented in the work plan?	Section 3.1 details the excavation approach for each TAA. An initial excavation is proposed based the presence of discolored soil and debris or historical soil sample results. As stated in Sections 2.4 and 3, if confirmation soil sample results at the edge of the excavation exceed the numerical RAGs, then removal will continue in the direction of the exceedance. SWMU1-WP-6h is a surface soil sample (0-0.5 ft bgs) where hexavalent chromium was detected at 4.98 mg/kg, just above the RAG of 3.1 mg/kg. If white powder is observed near SWMU1-WP-6h, then it will be removed under RAO 3.		.		
87	DTSC-3	3	Section 1.4.1	N.A.	The section should mention the white powder that occurs within this SWMU/AOC as it relates to removal action objective (RAO) 3. See cited response to EE/CA comment above.	Section 1.4.1 is intended to provide an overview of the SWMUs/AOCs. Individual TAA findings are presented in Section 3.1. White powder is noted in several locations in Section 3.				
88	DTSC-4	4	Section 1.4.1	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 or evaporate.	This should be corrected to acknowledge that PG&E started untreated discharge in 1951. It is believed that 1964 was the year in which PG&E started some treatment during waste discharge to the wash.	The text has been revised as follows: *“From about ~~1964~~ 1951 to approximately 1971, the facility discharged wastewater…”*				

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89	FMIT-21	FMIT-8 (MS)	Section 1.4.1	... Depositional history and patterns within this area are not known with certainty...	There have been sediment samples collected on the other side of NTH and those samples should be mentioned as part of what is known.	The previous paragraph in this section acknowledges the sediment samples collected on the other side of the NTH: *"Sediment sampling was performed at the mouth of BCW where it meets the Colorado River, on both sides of NOTH. No exceedances of interim screening levels were detected in samples collected on the eastern side of NOTH."* A summary of data collected from this area is located in Section 4.1.1 of the draft RFI/RI Report Volume 3 (Jacobs 2019b).				
90	Quechan-21	FYQIT-8 (MS)	Section 1.4.1	…Depositional history and patterns within this area are not known with certainty…	There have been sediment samples collected on the other side of NTH and those samples should be mentioned as part of what is known.	The previous paragraph in this section acknowledges the sediment samples collected on the other side of the NTH: *"Sediment sampling was performed at the mouth of BCW where it meets the Colorado River, on both sides of NOTH. No exceedances of interim screening levels were detected in samples collected on the eastern side of NOTH."* A summary of data collected from this area is located in Section 4.1.1 of the draft RFI/RI Report Volume 3 (Jacobs 2019b).				
91	Cocopah-21	COCOPAH-8 (MS)	Section 1.4.1	…Depositional history and patterns within this area are not known with certainty…	There have been sediment samples collected on the other side of NTH and those samples should be mentioned as part of what is known.	The previous paragraph in this section acknowledges the sediment samples collected on the other side of the NTH: *"Sediment sampling was performed at the mouth of BCW where it meets the Colorado River, on both sides of NOTH. No exceedances of interim screening levels were detected in samples collected on the eastern side of NOTH."* A summary of data collected from this area is located in Section 4.1.1 of the draft RFI/RI Report Volume 3 (Jacobs 2019b).				
92	FMIT-22	FMIT-9 (MS)	Section 1.4.3	... surface flow within the ravine does nottypically reach the Colorado River...	There are data to show that migration of soil- adsorbed contaminants have not migrated past the existing berm/road at the end of the East Ravine. The data should be presented in this report.			The data is included within the RFI/RI and is not relevant to the work plan.	FMIT provided the following response in an e-mail dated June 3, 2022: It is unclear to the Tribes how DOI has determined that site soil data collected under the RFI/RI is not relevant to soils clean up at the site. This would be an example of DOI ignoring tribal requests that challenge what appears to be pre-determined cleanup goals. For this reason, we do not concur with their findings.	

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93	Quechan-22	FYQIT-9 (MS)	Section 1.4.3	…surface flow within the ravine does nottypically reach the Colorado River…	There are data to show that migration of soil- adsorbed contaminants have not migrated past the existing berm/road at the end of the East Ravine. The data should be presented in this report.			The data is included within the RFI/RI and is not relevant to the work plan.	In an e-mail dated June 6, 2022, the FYQIT concurred with the FMIT comment responses.	
94	Cocopah-22	COCOPAH-9 (MS)	Section 1.4.3	…surface flow within the ravine does nottypically reach the Colorado River…	There are data to show that migration of soil- adsorbed contaminants have not migrated past the existing berm/road at the end of the East Ravine. The data should be presented in this report.			The data is included within the RFI/RI and is not relevant to the work plan.	In an e-mail dated June 6, 2022, the Cocopah Indian Tribe concurred with the FMIT comment responses.	
95	DTSC-5	5	Page 2-2, Section 2.1.7	Access to the Soil NTCRA Work Area, staging areas, and TAAs will be via existing access routes, as shown on Figures 2-1 and 2-2.	DTSC has concerns when reviewing Figures 2-1 and 2-2 (and 1-8). Our concerns are listed below for consideration: 1. See comment 10 on section 2.1.7.4. Recommend elimination of the staging area located north of the mouth of Bat Cave Wash. DTSC recommends consideration of other prior disturbed areas and their associated access routes including the Workman's Restaurant area, ponds area, MW-24 bench, Caltrans staging area south of the I-40 Park Moabi exit, etc. 2. Recommend adding a northern access route to the AOC 14 area. 3. PG&E should consider using existing disturbed area which are away from potential human exposure and or uncontaminated areas such as the quarry area instead of the SPY for waste management and soil processing. See comment 13 below.	Item 1: The text has been revised to remove the Staging Area North of BCW Mouth as an equipment staging area or other uses during the Soil NTCRA. The remaining equipment staging areas and waste management areas identified in the Work Plan will be adequate for the project. Item 2: Accessing AOC 14 from the north is not possible due to BNSF Railroad. Crossing of tracks, or equipment access along track is not permitted.		Item 3: DOI and PG&E met with representatives from the BOR Yuma Area Office (YAO) in June of 2021 to discuss use of the quarry as a potential soil processing area. The area is an active quarry and is currently being used and will be actively used for the next two years for bankline erosion and levee road maintenance work. Additionally, BOR YAO determined that a rigorous sampling event would need to occur to develop background values in the quarry and surrounding area. BOR YAO determined that this request should not be approved and that an alternative site should be used for the soil processing.		
96	DTSC-6	6	Page 2-3, Section 2.1.7	In the unlikely event that noisy construction activities are anticipated to occur during night-time (between 7 p.m. and 7 a.m.), on Sundays, or on federal holidays, PG&E will develop and implement a noise control plan that addresses compliance with the applicable requirements of San Bernardino County Development Code – Noise Standards 83.01.080.	Please define the applicable requirements for noise standards. As stated, it is unclear what those thresholds will be. Also, PG&E must consider the SEIR mitigation measures adopted for the Groundwater Remedy if construction activities will happen concurrent with the removal action.	The SEIR mitigation measure NOISE-3 will be adhered to if Groundwater Remedy activities occur concurrent with the soil removal activities. The applicable County requirements for noise include conducting noise monitoring at the boundary of the noise-sensitive land uses with ANSI S1.4 Type 1, precision sound level meters. For the Soil NTCRA field activities, the noise monitoring locations and noise standards will be same as those for the Groundwater Remedy.				
97	DTSC-7	7	Page 2-3, Section 2.1.7	An EZ and associated CRZ will be established when active excavation activities begin or when potentially contaminated or hazardous materials/soils are being managed or staged in an accessible manner.	Please incorporate the edits in the preceding column to clarify that all potentially contaminated material/soil should have an exclusion zone.	The text has been revised as requested.				

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98	FMIT-23	TRC 11	Section 2.1.7.3	The EZ will be accessed through the CRZ. Worker personnel requiring access to the EZmust be 40-hour Occupational Safety and Health Administration(OSHA) hazardous waste operations and emergency response (HAZWOPER) certified, must be qualified and trained for the appropriate personal protective equipment (PPE) as determined by the PHSEP, and must have reviewed the PHSEP.	All trainings necessary for access to EZs must be provided for tribal monitors.	The text has been revised to state: *"Construction activities can be paused to allow monitors to enter the EZ area to safely view the excavations, upon request."*				Comment resolved
99	Quechan-23	TRC 11	Section 2.1.7.3	The EZ will be accessed through the CRZ. Worker personnel requiring access to the EZmust be 40-hour Occupational Safety and Health Administration(OSHA) hazardous waste operations and emergency response (HAZWOPER) certified, must be qualified and trained for the appropriate personal protective equipment (PPE) as determined by the PHSEP, and must have reviewed the PHSEP.	All trainings necessary for access to EZs must be provided for tribal monitors	The text has been revised to state: *"Construction activities can be paused to allow monitors to enter the EZ area to safely view the excavations, upon request."*				
100	Cocopah-23	TRC 11	Section 2.1.7.3	The EZ will be accessed through the CRZ. Worker personnel requiring access to the EZmust be 40-hour Occupational Safety and Health Administration(OSHA) hazardous waste operations and emergency response (HAZWOPER) certified, must be qualified and trained for the appropriate personal protective equipment (PPE) as determined by the PHSEP, and must have reviewed the PHSEP.	All trainings necessary for access to EZs must be provided for tribal monitors	The text has been revised to state: *"Construction activities can be paused to allow monitors to enter the EZ area to safely view the excavations, upon request."*				
101	DTSC-8	8	Page 2-4, Section 2.1.7.4	N.A.	Why isn't the Construction Headquarters (CHQ) identified as an equipment staging area (ESA)? This area has already been used and will continue to be used as a staging area for the groundwater remedy which is currently under-utilized. The CHQ is pictured as an ESA on all related figures in the plan (Fig 1-8, Fig 2-1).	The text has been revised to identify the CHQ as an equipment staging area.				
102	DTSC-9	9	Page 2-4, Section 2.1.7.4	In accordance with standard site procedures, all idling powered equipment will be staged over containment devices to prevent the release of leaked fluids to the environment.	Please also indicate that powered equipment (with fuel and/or lubricant), will be parked over containment devices to prevent the release of leaked fluids to the environment when not in use. Please clarify which type of vehicles will and will not be parked over containment devices.	The text has been revised to clarify the use of containment devices under parked equipment.				

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103	DTSC-10	10	Page 2-4, Section 2.1.7.4	Staging Area North of BCW Mouth – Located immediately off NOTH, just north of the mouth of BCW and east of the former Workman's Restaurant. (Figure 2-1), this staging area is expected to be used for loading and unloading of construction equipment, vehicle parking, and other nonobtrusive temporary staging.	It is difficult to understand how this area was proposed for use since all members associated with the PG&E Topock environmental work groups should be cognizant of minimizing disturbances to the Topock landscape. While this area was disturbed in the distant past (late 40's according to aerial photographs), the area is now partially revegetated. Staging would likely devastate the existing vegetation and have it looking like a barren parking lot. Revegetation would take decades based on the history of the site. Additionally, encroachment into this area will encourage long term recreational use well after the project is completed. There already are recent examples of this as an illegal hand-made foot path made with aligned rocks occurs in this area. While illegal activities cannot be stopped, we should not be encouraging this type of activity with regards to this project. A memorial to several boaters due to a river boating accident is also located immediately adjacent to this area. It is mentioned as it highlights the area as being very visible from the river. The area allows passing boaters to see the memorial. Placing a staging area in a highly visible recreational area is not recommended unless absolutely necessary. The area is also highly visible from the main road. The area is also poorly located as it is adjacent to the Colorado River and Bat Cave Wash backwaters. DTSC has noted that trash (e.g., plastics, wind-blown trash, and trash related to surface runoff) is associated with equipment staging areas from the groundwater remedy construction and spills/releases to soil (e.g., diesel spill overflows, motor oil leaks) also occur. Keeping trash and contamination out of the river should be a priority and it begins with selecting a site away from, not adjacent to, water bodies. DTSC believes that alternative locations appear quite feasible and that the location selected does not seem critical to the success of the project. Why not use the extensively disturbed Workman's Restaurant area across the road? This area is often used for parking and a drill rig with support vehicles installed a well on the site. Why not keep the equipment in the existing CHQ staging area or SPY or both? There are other areas that are already greatly disturbed and have been used for staging in the past such as the fenced ponds area, MW-24 bench, Caltrans staging area south of the I-40 Park Moabi exit, etc. Why are these areas not selected? It is understood that other areas may not be as convenient or offer the ideal space and configuration and therefore two or more areas may need to be used, but under the circumstances, they should be sought out and used. If needed, leasing previously disturbed space in Park Moabi's compound could also be considered for equipment storage/staging.	See response to Comment #95				

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104	FMIT-24	FMIT-10 (MS)	Section 2.1.7.4	Equipment Staging Areas	In addition to the activities in the EZ, CRZ and SZ, the equipment staging areas and ingress/egress routes represent significant areas. The location of these areas has NOT been reviewed with the Tribe and at a minimum 2 criteria must be applied: 1) review of the areas for ecological resources so thatno plants or animals are disturbed and 2) not within visual line-of-site of the Topock Maze so as to be a disturbance to Tribal users of this sacred area.	As part of the Environmental Release to Construct (ERTC) process, PG&E systematically evaluates work activities and locations in relation to nearby sensitive resources, which include biological/cultural/historical resources, Measures to protect or minimize potential impacts to these resources are prescribed in the ERTC. Tribal Monitors are invited to attend a Last Look of each work area including equipment staging area, prior to the start of construction. In addition, PG&E is required to implement DOI/BLM's Consultation During Construction protocol if there is an overlap between a 25-foot evaluation zone around the work area boundary, and a 25-foot buffer area around the boundaries of each cultural or historical archaeological resource. Tribes are invited to participate in this process and provide inputs on resource protection measures. In addition, per the PG&E Tribal Access Plan, PG&E is required to accommodate Tribal requests for access to areas.				
105	Quechan-24	FYQIT-10 (MS)	Section 2.1.7.4	Equipment Staging Areas	In addition to the activities in the EZ, CRZ and SZ, the equipment staging areas and ingress/egress routes represent significant areas.The location of these areas has NOT been reviewed with the Tribe and at a minimum 2 criteria must be applied: 1) review of the areas for ecological resources so that no plants or animals are disturbed and 2) not within visual line-of-site of the Topock Maze so as to be a disturbance to Tribal users of this sacred area.	As part of the Environmental Release to Construct (ERTC) process, PG&E systematically evaluates work activities and locations in relation to nearby sensitive resources, which include biological/cultural/historical resources, Measures to protect or minimize potential impacts to these resources are prescribed in the ERTC. Tribal Monitors are invited to attend a Last Look of each work area including equipment staging area, prior to the start of construction. In addition, PG&E is required to implement DOI/BLM's Consultation During Construction protocol if there is an overlap between a 25-foot evaluation zone around the work area boundary, and a 25-foot buffer area around the boundaries of each cultural or historical archaeological resource. Tribes are invited to participate in this process and provide inputs on resource protection measures. In addition, per the PG&E Tribal Access Plan, PG&E is required to accommodate Tribal requests for access to areas.				

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106	Cocopah-24	COCOPAH-10 (MS)	Section 2.1.7.4	Equipment Staging Areas	In addition to the activities in the EZ, CRZ and SZ, the equipment staging areas and ingress/egress routes represent significant areas.The location of these areas has NOT been reviewed with the Tribe and at a minimum 2 criteria must be applied: 1) review of the areas for ecological resources so that no plants or animals are disturbed and 2) not within visualline-of-site of the Topock Maze so as to be a disturbance to Tribal users of this sacred area.	As part of the Environmental Release to Construct (ERTC) process, PG&E systematically evaluates work activities and locations in relation to nearby sensitive resources, which include biological/cultural/historical resources, Measures to protect or minimize potential impacts to these resources are prescribed in the ERTC. Tribal Monitors are invited to attend a Last Look of each work area including equipment staging area, prior to the start of construction. In addition, PG&E is required to implement DOI/BLM's Consultation During Construction protocol if there is an overlap between a 25-foot evaluation zone around the work area boundary, and a 25-foot buffer area around the boundaries of each cultural or historical archaeological resource. Tribes are invited to participate in this process and provide inputs on resource protection measures. In addition, per the PG&E Tribal Access Plan, PG&E is required to accommodate Tribal requests for access to areas.				
107	FMIT-25	TRC 12	Section 2.1.7.6	BCW - Excavated soil and debris from TAAs within BCW may be temporarily staged in theBCW Waste Management Area prior to transport to the SPY (Figure 2-2).	Please add discussion of how the selection of soil storage was previously evaluated with Tribal input. Indicate in the text if this soil storage area (within BCW) was one of the sites approved by the tribes or if this site exists outside of the areas identified as soil storage under the RFI/RI	The subject area is located within the primary construction area and is intended to be used for temporary staging of soil before soil is hauled to the SPY. It is not intended for long-term soil storage. After completion of the soil removal activities, all equipment and materials will be removed. Tribal Monitors are invited to attend a Last Look of each work area including staging areas, prior to the start of construction.				
108	Quechan-25	TRC 12	Section 2.1.7.6	BCW – Excavated soil and debris from TAAs within BCW may be temporarily staged in the BCW Waste Management Area prior to transport tothe SPY (Figure 2-2).	Please add discussion of how the selection of soil storage was previously evaluated with Tribal input. Indicate in the text if this soil storage area (within BCW) was one of the sites approved by the tribes or if this site exists outside of the areas identified as soil storage under the RFI/RI	The subject area is located within the primary construction area and is intended to be used for temporary staging of soil before soil is hauled to the SPY. It is not intended for long-term soil storage. After completion of the soil removal activities, all equipment and materials will be removed. Tribal Monitors are invited to attend a Last Look of each work area including staging areas, prior to the start of construction.				

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109	Cocopah-25	TRC 12	Section 2.1.7.6	BCW – Excavated soil and debris from TAAs within BCW may be temporarily staged in the BCW Waste Management Area prior to transport tothe SPY (Figure 2-2).	Please add discussion of how the selection of soil storage was previously evaluated with Tribal input. Indicate in the text if this soil storage area (within BCW) was one of the sites approved by the tribes or if this site exists outside of the areas identified as soil storage under the RFI/RI	The subject area is located within the primary construction area and is intended to be used for temporary staging of soil before soil is hauled to the SPY. It is not intended for long-term soil storage. After completion of the soil removal activities, all equipment and materials will be removed. Tribal Monitors are invited to attend a Last Look of each work area including staging areas, prior to the start of construction.				
110	DTSC-11	11	Page 2-4, Section 2.1.7.5	Temporary field office trailer(s) will be installed at the SPY or the Construction Headquarters area south of the SPY (Figure 2-1).	Please clarify if the existing groundwater remedy trailers will be used or if new, additional trailers will be needed. If needed, placing administrative offices in the SPY area makes sense as opposed to highly contaminated soils, materials, and debris (see comment Page 2-5, 2.1.7.6 Waste Management Areas below).	PG&E has installed new administrative trailers at the SPY. A portion of the SPY will also be used as a waste management area.				
111	DTSC-12	12	Page 2-4, Section 2.1.7.6	Waste management areas may be designated a support zone if active mechanical separation operations are not occurring…	Please clarify this statement. Once an area has been determined to be an EZ with management of contaminated material, the zone status should not be redefined due to stoppage of the activity. Perhaps what is stated is that the area can be used as a support zone if the area is not needed for the removal action EZ. Please note, the support zone is a clean zone as defined in section 2.1.7.1. One can't have contaminated or potentially contaminated waste stockpile within an exclusion zone become a support zone. Containerized waste that may be contaminated should not be located within a support zone.	Exclusion zones will be established to prevent access to contaminated or potentially contaminated materials. The areal extent of an exclusion zone, and therefore associated CRZ and Support Zones, will fluctuate as work progresses and as hazards change. For example, an exclusion zone may be large at the start of an excavation and smaller at the end after contaminated material has been removed. Exclusion Zones may also expand or contract based on wind speed and direction. Furthermore, once contaminated or potentially contaminated materials are containerized or adequately covered to prevent access, then the exclusion zone could be reduced to the edge of the container or covered material. Reduction of exclusion zones are needed in order to transport waste along publicly accessible roads, for mechanics to fix equipment, and for tribal monitors to access the work area. The text has been revised for clarity.				Based on changes to the text, the comment is resolved.

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112	DTSC-13	13	Page 2-5, Section 2.1.7.6	The SPY Waste Management Area is large enough for stockpiling multiple types of material, operation of mechanical separation equipment, and for the load-out of wastes into on-highway haul trucks.	DTSC recommends that the SPY not be utilized as a waste management area or used for mechanical separation of contaminated soil. Moving significantly contaminated soil towards residences/occupants at Park Moabi and past recreational users does not seem prudent. Moving the contaminated soil/materials to the SPY also creates worker exposure scenarios for groundwater remedy and soil removal workers who would all be located at the SPY. Concerns with contaminated dust near Park Moabi are also identified in comments on section 2.3.4 regarding mechanical separation even with air monitoring. Operations dealing with contaminated soils should be located away from populations if at all possible. It is also understood that people from Park Moabi did not want any contaminated media in this area during the groundwater remedy. Now highly contaminated soil and material are being proposed to be placed here along with mechanical separation and associated dust generation. The quarry area still seems like a reasonable alternative location for soil processing as it makes more sense to move contamination away from human receptors and since there is sufficient disturbed space for staging and treatment as it is away from people and the river. Existing access to the quarry also appears adequate.	See DOI's Response to Comment #95 Regarding use of BOR Quarry for processing soil. The SPY has been designated the primary waste management and processing area for the NTCRA. Additional language has been added to Section 2.1.7.6: *Rigorous perimeter air and dust monitoring will be implemented around the SPY, as specified in Appendix E, with increased monitoring during weather events. Wind erosion controls and dust suppression controls will be employed, as described in Appendix D. The NTCRA is scheduled to be implemented during summer months, when there is reduced use of the area around the SPY* *Coning and flagging will be employed to deter OHV use in the area.*				
113	DTSC-14	14	Page 2-5, Section 2.1.7.7	Transportation routes throughout the work area will be located in the support zone (Figures 2-1 and 2-2).	Add a northern access route to AOC 14 to these figures. At a minimum, this could allow for emergency ingress and egress, but should also be used to allow vehicles, equipment, supplies, etc. to access the site as needed without having to incur an interstate lane closure. This northern access was used previously to move backhoes to AOC 14 for investigation purposes. It does not make sense to exclude a viable access route such as this when the only other route is via a significant transportation corridor with complicated freeway lane closure.	See PG&E's response to Comment # 95				
114	DTSC-15	15	Page 2-5, Section 2.1.8	The water supply valve located on the TCS will be plumbed to a temporary network of aboveground distribution lines to convey water from the TCS to BCW, as necessary (Figure 2-2).	Text referencing Figure 2.2 doesn't appear to correlate with the figure as it does not show anything related to water supply including distribution lines. Was another figure supposed to be referenced? Indicate what design and path would distribution lines take to get from the station to the bottom of BCW. Even if the proposed distribution lines are along the transportation routes, it is recommended that a separate and specific figure be generated for water conveyance.	Figure 2.2 will be updated to show the water supply location in the lower yard; however, several options exist for routing a temporary water line down into Bat Cave Wash from the lower yard. Water supply line path and design will be developed by the remediation contractor in close coordination with PG&E Operations.				
115	DTSC-16	16	Page 2-5, Section 2.1.10	Engineering controls for the abatement of airborne particles during removal activities will be strictly applied.	It should be clarified that dust control measures will also be applied to activities other than just "removal activities" such as soil processing, staging, and dirt road travel.	The text has been revised as requested. Note that draft Section 2.1.10 is now Section 2.1.11.				

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116	DTSC-17	17	Page 2-6, Section 2.2	Perimeter air monitoring will be performed if soil removal activities have the potential to generate visible dust.	Suggest modifying the sentence as follows, *Perimeter air monitoring will be performed as soil removal activities have the potential to generate visible dust.* When would soil removal not have potential to generate dust? This same sentence should be modified in 1.1 of Appendix E.	The text in Section 2.2 and Section 1.1 of the Appendix E has been revised to read, "Perimeter air monitoring will be performed during Soil NTCRA activities that have the potential to generate dust for example, excavation, mechanical screening, backfilling, material loading, etc. Perimeter air monitoring may not be performed during Soil NTCRA activities that are not dust generating, for example, biological and cultural surveying, land surveying, underground utility surveying, etc. Fugitive dust control: Soil-Tac reference in Section 2.1.11.2 and BMP sections.				Based on discussion and revised text, comment resolved.
117	DTSC-18	18	Page 2-6, Section 2.2.1	The work area boundary is defined herein as the EZ perimeter of a TAA.	Please add language to ensure air monitoring will also occur in non-TAA areas such as soil processing areas and soil staging areas containing contaminated media. Please also clarify this in section 2.2.4 and Section 1.6 of Appendix E.	The text in Section 2.2.1 is intended to describe the basis of the risk-based levels of concern. The text has been revised to clarify the work area includes TAAs and active waste management areas. Section 2.2.4 and Section 1.6 of App E, already clarify where air monitoring will be conducted. *"Locations to be monitored and sampled are as follows:* *• Real-time fugitive dust monitoring will be performed around all TAAs that have the potential to generate visible dust, as well as the mechanical separation area and the SPY."*				
118	FMIT-26	FMIT-11 (MS)	Section 2.2.1	Calculation of LOCs	The LOCs are intended to protect individuals who are at the boundary of the EZ and TAA. Therefore, each PAA there are multiple contaminants that could be in soil. To be fully protective all the contaminants in each PAA must be considered in the air sampling. Acceptable cancer risk should be set at cumulative value of 1 in 1,000000 and cumulative non-cancer hazard at an HI of 1.0.	There are no cumulative non-cancer adverse effects because the three compounds that have a RfC or REL all act on different target organs. Cumulative cancer risks will be calculated for each sampling event after receiving analytical results. Text in section 1.3.1 has been revised to indicate this.				
119	Quechan-26	FYQIT-11 (MS)	Section 2.2.1	Calculation of LOCs	The LOCs are intended to protect individuals who are at the boundary of the EZ and TAA. Therefore, in each PAA there are multiple contaminants that could be in soil. To be fully protective all the contaminants in each PAA must be considered in the air sampling. Acceptable cancer risk should be set at cumulative value of 1 in 1,000000 and cumulative non-cancer hazard at an HI of 1.0.	There are no cumulative non-cancer adverse effects because the three compounds that have a RfC or REL all act on different target organs. Cumulative cancer risks will be calculated for each sampling event after receiving analytical results. Text in section 1.3.1 has been revised to indicate this.				
120	Cocopah-26	COCOPAH-11 (MS)	Section 2.2.1	Calculation of LOCs	The LOCs are intended to protect individuals whoare at the boundary of the EZ and TAA. Therefore, in each PAA there are multiple contaminants that could be in soil. To be fully protective all the contaminants in each PAA must be considered in the air sampling. Acceptable cancer risk should be set at cumulative value of 1 in 1,000000 and cumulative non-cancer hazard at an HI of 1.0.	There are no cumulative non-cancer adverse effects because the three compounds that have a RfC or REL all act on different target organs. Cumulative cancer risks will be calculated for each sampling event after receiving analytical results. Text in section 1.3.1 has been revised to indicate this.				

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121	DTSC-19	19	Page 2-8, Section 2.2.4, 1st bullet	Fugitive dust monitoring will be performed around all TAAs that have the potential to generate visible dust…	Please revise this sentence and in Appendix E. This statement implies that there are activities in a TAA that may not have the potential to generate visible dust. All soil removal activities from excavation to stockpiling and processing have the "potential" to generate visible dust. That should not be a criterion for monitoring.	The text has been revised to include "…*around all TAAs* during activities *that have the potential*…" Air monitoring may not be conducted during land surveying, soil sampling, or other non-intrusive activities. The text in Appendix E already includes the requested text.				See Response to Comment #116
122	DTSC-20	20	Page 2-8, Section 2.2.4, 3rd bullet	Air sampling… in the mechanical separation area within the SPY will be performed periodically.	Mechanical separation will be the activity that has the highest potential for exposure. That specific operation is the main component of the removal action for the contaminated soil. Monitoring should be conducted whenever it is in operation and not just periodically. This same point should be stressing in Appendix E as well.	Real-time fugitive dust monitoring will be conducted continually during mechanical separation operations. The Air Monitoring Plan provides the rationale and calculations for using fugitive dust to monitor for air emission hazard. Analytical sampling for Cr(IV), lead, mercury, and D/F will occur periodically to confirm dust monitoring remains appropriate to monitor air emissions.				
123	FMIT-27	FMIT-12 (MS)	Section 2.2.4	1. Monitoring will only occur in these areas when there is a potential to generate visible dust. 2. Air sampling for Cr(VI), lead, mercury, and D/F in the mechanical separation area within the SPY will be performed periodically.	1. What is the justification for "visible dust"? Also, this section does not mention "down wind" sampling. Air sampling should be performed during removal action to ensure thatDOI is causing the 'airborne migration of contaminants to other areas'. 2. periodically is undefined. There should becriteria for both the triggering and the collection of airborne samples downwind of the mechanicalseparation area.	Section 2.2.4 provides an overview of the air monitoring requirements. Details are provided in the Air Monitoring Plan (Appendix E). The Air Monitoring Plan provides the justification for visible dust, downwind sampling, and analytical air sampling frequency.				
124	Quechan-27	FYQIT-12 (MS)	Section 2.2.4	1. Monitoring will only occur in these areas when there is a potential to generate visibledust. 2. Air sampling for Cr(VI), lead, mercury, andD/F in the mechanical separation area within the SPY will be performed periodically.	1. What is the justification for "visible dust"? Also, this section does not mention "down wind" sampling. Air sampling should be performed during removal action to ensure that DOI is causing the 'airborne migration of contaminants to other areas'. 2. periodically is undefined. There should be criteria for both the triggering and the collection of airborne samples downwind of the mechanical separation area.	Section 2.2.4 provides an overview of the air monitoring requirements. Details are provided in the Air Monitoring Plan (Appendix E). The Air Monitoring Plan provides the justification for visible dust, downwind sampling, and analytical air sampling frequency.				
125	Cocopah-27	COCOPAH-12 (MS)	Section 2.2.4	1. Monitoring will only occur in these areas when there is a potential to generate visible dust. 2. Air sampling for Cr(VI), lead, mercury, andD/F in the mechanical separation area within the SPY will be performed periodically.	1. What is the justification for "visible dust"? Also, this section does not mention "down wind" sampling. Air sampling should be performed during removal action to ensure that DOI is causing the 'airborne migration of contaminants to other areas'. 2. periodically is undefined. There should be criteria for both the triggering and the collection of airborne samples downwind of the mechanical separation area.	Section 2.2.4 provides an overview of the air monitoring requirements. Details are provided in the Air Monitoring Plan (Appendix E). The Air Monitoring Plan provides the justification for visible dust, downwind sampling, and analytical air sampling frequency.				

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126	FMIT-28	FMIT-13 (MS)	Section 2	New Section Needed	The field identification of areas to be excavated must be done prior to field mobilization. Flags demarking the area WHERE samples exist must be marked and initial excavation should not extend beyond those locations. The first round of confirmation sampling should then be collected at the excavation boundary to determine if further excavation is needed. Tribal Monitors need to be in the field and appraised of any excavation (pre- or post-confirmation sampling) beyond the initial areas of excavation in EACH PAA.			See RTC 25		
127	Quechan-28	FYQIT-13 (MS)	Section 2	New Section Needed	The field identification of areas to be excavated must be done prior to field mobilization. Flags demarking the area WHERE samples exist must be marked and initial excavation should not extend beyond those locations. The first round of confirmation sampling should then be collected at the excavation boundary to determine if further excavation is needed. Tribal Monitors need to be in the field and appraised of any excavation (pre- or post-confirmation sampling) beyond the initial areas of excavation in EACH PAA.			See RTC 25		
128	Cocopah-28	COCOPAH-13 (MS)	Section 2	New Section Needed	The field identification of areas to be excavated must be done prior to field mobilization. Flags demarking the area WHERE samples exist must be marked and initial excavation should not extend beyond those locations. The first round of confirmation sampling should then be collected at the excavation boundary to determine if further excavation is needed. Tribal Monitors need to be in the field and appraised of any excavation (pre- or post-confirmation sampling) beyond the initial areas of excavation in EACH PAA.			See RTC 25		
129	DOI-1	DOI-1	Section 2.3/ Page 2-8	N.A.	Information regarding securing the excavations at the end of the day to minimize human/animal falls or entrapment and allow for egress should be included within this section.	The following text has been added to Section 2.3 to describe actions to be taken to minimize human/animals falls or entrapment and allow for egress from open excavations: "*Open excavations will be secured at the end of each day to minimize the potential for human or wildlife falls or entrapment. Egress ramps will be constructed to allow for safe entry and exit from excavations*."				
130	FMIT-29	FMIT-14 (MS)	Section 2.3.3	Stockpile Construction and Management (also see Sect 2.3.7)	There is an approved and written project policy for soil stockpile management to minimize off-site transport of on-site soils. This policy was developed to address Tribal concerns. The fine materials should be tested according to this policy to determine if they can be put back on the site (back in-place) or if they must be transported off-site.	The Soil Management Plan will be followed. The fine materials will be characterized, and if not suitable for onsite reuse, a waste profile will be developed for off-site disposal.				
131	Quechan-29	FYQIT-14 (MS)	Section 2.3.3	Stockpile Construction and Management (also see Sect 2.3.7)	There is an approved and written project policy for soil stockpile management to minimize off-site transport of on-site soils. This policy was developed to address Tribal concerns. The fine materials should be tested according to this policy to determine if they can be put back on the site (back in-place) or if they must be transported off- site.	The Soil Management Plan will be followed. The fine materials will be characterized, and if not suitable for onsite reuse, a waste profile will be developed for off-site disposal.				
132	Cocopah-29	COCOPAH-14 (MS)	Section 2.3.3	Stockpile Construction and Management (also see Sect 2.3.7)	There is an approved and written project policy for soil stockpile management to minimize off-site transport of on-site soils. This policy was developed to address Tribal concerns. The fine materials should be tested according to this policy to determine if they can be put back on the site (back in-place) or if they must be transported off- site.	The Soil Management Plan will be followed. The fine materials will be characterized, and if not suitable for onsite reuse, a waste profile will be developed for off-site disposal.				
133	FMIT-30	TRC 13	Section 2.3.6	Waste classified as nonhazardous will be transported to a PG&E-approved RCRA Subtitle D landfill for disposal. Waste classified as hazardous will be transported to a RCRA Subtitle C landfill for disposal.	Why does the text indicate that nonhazardous waste being transported off-site? The removal of any site soil must follow the soils management plan that has been developed for this project.	Text has been revised to clarify that "*Soil that is determined to be unsuitable for onsite reuse in accordance with the soil management plan will be transported off-site for disposal*."				

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134	Quechan-30	TRC 13	Section 2.3.6	Waste classified as nonhazardous will be transported to a PG&E-approved RCRA Subtitle D landfill for disposal. Waste classified as hazardous will be transported to a RCRA Subtitle C landfill for disposal.	Why does the text indicate that nonhazardous waste being transported off-site? The removal of any site soil must follow the soils management plan that has been developed for this project.	Text has been revised to clarify that "*Soil that is determined to be unsuitable for onsite reuse in accordance with the soil management plan will be transported off-site for disposal.*"				
135	Cocopah-30	TRC 13	Section 2.3.6	Waste classified as nonhazardous will be transported to a PG&E-approved RCRA Subtitle D landfill for disposal. Waste classified as hazardous will be transported to a RCRA Subtitle C landfill for disposal.	Why does the text indicate that nonhazardous waste being transported off-site? The removal of any site soil must follow the soils management plan that has been developed for this project.	Text has been revised to clarify that "*Soil that is determined to be unsuitable for onsite reuse in accordance with the soil management plan will be transported off-site for disposal.*"				
136	FMIT-31	FMIT-15 (MS)	Section 2.4	confirmation level data obtained during this process will be compared to the numerical RAGs referenced in the DOI Action Memorandum and presented in Table 1-2 of this Work Plan.	The Tribe has consistently disagreed with the bright-line approach of comparing single sample results with the RAGs proposed for this action. Once the initial excavation is completed to the identified sample locations, then the confirmation data from the entire excavation must be used in an area-weighted comparison to RAGs.			See EE/CA RTC 27 and DOI response to 2/24/2021 EE/CA discussion item 5.		
137	Quechan-31	FYQIT-15 (MS)	Section 2.4	confirmation level data obtained during this process will be compared to the numerical RAGs referenced in the DOI Action Memorandum and presented in Table 1-2 of this Work Plan.	The Tribe has consistently disagreed with the bright-line approach of comparing single sample results with the RAGs proposed for this action. Once the initial excavation is completed to the identified sample locations, then the confirmation data from the entire excavation must be used in an area-weighted comparison to RAGs.			See EE/CA RTC 27 and DOI response to 2/24/2021 EE/CA discussion item 5.		
138	Cocopah-31	COCOPAH-15 (MS)	Section 2.4	confirmation level data obtained during this process will be compared to the numerical RAGs referenced in the DOI Action Memorandum and presented in Table 1-2 of this Work Plan.	The Tribe has consistently disagreed with the bright-line approach of comparing single sample results with the RAGs proposed for this action. Once the initial excavation is completed to the identified sample locations, then the confirmation data from the entire excavation must be used in an area-weighted comparison to RAGs.			See EE/CA RTC 27 and DOI response to 2/24/2021 EE/CA discussion item 5.		
139	FMIT-32	TRC 14	Section 2.4	A portion of the sample will be segregated for field screening of metals using a field-portableX-ray fluorescence (XRF) analyzer (Section 2.4.2).	Please provide technical reference for sensitivity and accuracy of XRF. Also provide a reference for field verification of XRF accuracy for each metal that is being analyzed.	The exact XRF instrument model to be used has not been determined. Information regarding sensitivity and accuracy will be available after purchase or rental of the XRF analyzer. SOP 16 in Appendix H provides detailed information on XRF set up, operation, sample prep, calibration, and QA/QC. Field verification, calibration, and correlation will be performed at beginning of the project with site soils and laboratory analysis for metals.				Comment resolved

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140	Quechan-32	TRC 14	Section 2.4	A portion of the sample will be segregated for field screening of metals using a field-portable X-ray fluorescence (XRF) analyzer (Section 2.4.2).	Please provide technical reference for sensitivity and accuracy of XRF. Also provide a reference for field verification of XRF accuracy for each metal that is being analyzed.	The exact XRF instrument model to be used has not been determined. Information regarding sensitivity and accuracy will be available after purchase or rental of the XRF analyzer. SOP 16 in Appendix H provides detailed information on XRF set up, operation, sample prep, calibration, and QA/QC. Field verification and calibration will be performed at beginning of the project with site soils and laboratory analysis for metals.				
141	Cocopah-32	TRC 14	Section 2.4	A portion of the sample will be segregated for field screening of metals using a field-portable X-ray fluorescence (XRF) analyzer (Section 2.4.2).	Please provide technical reference for sensitivity and accuracy of XRF. Also provide a reference for field verification of XRF accuracy for each metal that is being analyzed.	The exact XRF instrument model to be used has not been determined. Information regarding sensitivity and accuracy will be available after purchase or rental of the XRF analyzer. SOP 16 in Appendix H provides detailed information on XRF set up, operation, sample prep, calibration, and QA/QC. Field verification and calibration will be performed at beginning of the project with site soils and laboratory analysis for metals.				
142	FMIT-33	TRC 15	Section 2.4	The results of confirmation laboratory analysisof soil samples will be compared to the numerical RAGs. Initially, the comparison will be done on a point-by-point basis. If confirmation results areless than the numerical RAGs, then no further removal is necessary from the TAA. If confirmation results exceed the numerical RAGs on a point-by-point basis, and if 8 to 10 samples have been analyzed from the same TAA, then average concentrations for the contaminants that exceed the numerical RAG may be calculated as the 95UCL of the mean, using ProUCL Version 4.0 software (USEPA 2007). Average concentrations will not be calculated at TAAs with less than 8 confirmation soil samples.	The HHERA, which is cited as the source of theseRAGs, has a process for RGRG calculation and use. These are intended to be used as an exposure-area weighted value. Developing a 95UCL value within a single excavation for comparison to a numerical RAG is an inappropriate use of this statistical criterion. Please indicate why this inappropriate use of statistics is deemed as appropriate by DOI.			See EE/CA RTC 27 and DOI response to 2/24/2021 EE/CA discussion item 5.		
143	Quechan-33	TRC 15	Section 2.4	The results of confirmation laboratory analysis of soil samples will be compared to the numerical RAGs. Initially, the comparison will be done on a point-by-point basis. If confirmation	The HHERA, which is cited as the source of these RAGs, has a process for RGRG calculation and use. These are intended to be used as an exposure-area weighted value. Developing a 95UCL value within a single excavation for comparison to a numerical RAG is an inappropriate use of this statistical criterion. Please indicate why this inappropriate use of statistics is deemed as appropriate by DOI.			See EE/CA RTC 27 and DOI response to 2/24/2021 EE/CA discussion item 5.		

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				results are less than the numerical RAGs, then no further removal is necessary from the TAA. If confirmation results exceed the numerical RAGs on a point-by-point basis, and if 8 to 10 samples have been analyzed from the same TAA, then average concentrations for the contaminants that exceed the numerical RAG may be calculated as the 95UCL of the mean, using ProUCL Version 4.0 software (USEPA 2007). Average concentrations will not be calculated at TAAs with less than 8 confirmation soil samples.					
144	Cocopah-33	TRC 15	Section 2.4	The results of confirmation laboratory analysis of soil samples will be compared to the numerical RAGs. Initially, the comparison will be done on a point-by-point basis. If confirmation results are less than the numerical RAGs, then no further removal is necessary from the TAA. If confirmation results exceed the numerical RAGs on a point-by-point basis, and if 8 to 10 samples have been analyzed from the same TAA, then average concentrations for the contaminants that exceed the numerical RAG may be calculated as the 95UCL of the mean, using ProUCL Version 4.0 software (USEPA 2007). Average concentrations will not be calculated at TAAs with less than 8 confirmation soil samples.	The HHERA, which is cited as the source of these RAGs, has a process for RGRG calculation and use. These are intended to be used as an exposure-area weighted value. Developing a 95UCL value within a single excavation for comparison to a numerical RAG is an inappropriate use of this statistical criterion. Please indicate why this inappropriate use of statistics is deemed as appropriate by DOI.			See EE/CA RTC 27 and DOI response to 2/24/2021 EE/CA discussion item 5.		

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145	FMIT-34	FMIT-16 (MS)	Section 2.3.3	The results of confirmation laboratory analysis of soil samples will be compared to the numerical RAGs. Initially, the comparison will be done on a point-by-point basis. If confirmation results areless than the numerical RAGs, then no further removal is necessary from the TAA. If confirmationresults exceed the numerical RAGs on a point-by-point basis, and if 8 to 10 samples have been analyzed from the same TAA, then average concentrations for the contaminants that exceed the numerical RAG may be calculated as the 95UCL of the mean, using ProUCL Version 4.0 software (USEPA 2007). Average concentrations will not be calculated at TMs with less than 8 confirmation soil samples.	The project MUST be scheduled such that sufficient samples are collected within the initial removal area in order to calculate the 95%UCL of the mean of the data. The sample-by-sample comparisons is not appropriate and contrary to theproposed use of the RAGs from the HHERA.	See Response to Comment #142				
146	Quechan-34	FYQIT-16 (MS)	Section 2.3.3	The results of confirmation laboratory analysis of soil samples will be compared to the numerical RAGs. Initially, the comparison will be done on a point-by-point basis. If confirmation results are less than the numerical RAGs, then no further removal is necessary from the TAA. If confirmation results exceed the numerical RAGs on a point-by-point basis, and if 8 to 10 samples have been analyzed from the same TAA, then average concentrations for the contaminants that exceed the numerical RAG may be calculated as the 95UCL of the mean, using ProUCL Version 4.0 software (USEPA 2007). Average concentrations will not be calculated at TAAs with less than 8 confirmation soil samples.	The project MUST be scheduled such that sufficient samples are collected within the initial removal area in order to calculate the 95%UCL of the mean of the data. The sample-by-sample comparisons is not appropriate and contrary to the proposed use of the RAGs from the HHERA.	See Response to Comment #142				

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147	Cocopah-34	COCOPAH-16 (MS)	Section 2.3.3	The results of confirmation laboratory analysis of soil samples will be compared to the numerical RAGs. Initially, the comparison will be done on a point-by-point basis. If confirmation results are less than the numerical RAGs, then no further removal is necessary from the TAA. If confirmation results exceed the numerical RAGs on a point-by-point basis, and if 8 to 10 samples have been analyzed from the same TAA, then average concentrations for the contaminants that exceed the numerical RAG may be calculated as the 95UCL of the mean, using ProUCL Version 4.0 software (USEPA 2007). Average concentrations will not be calculated at TAAs with less than 8 confirmation soil samples.	The project MUST be scheduled such that sufficient samples are collected within the initial removal area in order to calculate the 95%UCL of the mean of the data. The sample-by-sample comparisons is not appropriate and contrary to the proposed use of the RAGs from the HHERA.	See Response to Comment #142				
148	DTSC-21	21	Page 2-7, Section 2.2.1, Appendix E Tables	LOCs for compounds detected in soil samples are presented in the Air Monitoring Plan (Appendix E) and used to determine the action levels described in the next subsection.	Critical tables are missing form Appendix E to evaluate the air monitoring proposed. Tables 1-2 - Levels of Concern and Action Levels for Air Monitoring and 1-3 - Maximum Concentrations in Target Action Areas are not included in Appendix E	Tables 1-2 and 1-3 have been added to Appendix E.				Tables provided, Comment resolved pending DTSC review.
149	DTSC-22	22	Page 2-8, Section 2.2.4	Air sampling will be performed in at least one TAA per soil investigation area (with the exception of AOC 16).	The basis for excluding AOC 16 should be presented. The surficial sand blast grit at AOC 16 occurring along the TCS fence line could be blown offsite by winds in its current state, let alone during a removal. It is requested that air monitoring be included at AOC 16 due to the operation (particulate removed from sandblasting).	The text has been revised to include air monitoring at AOC 16.				Text revised, comment resolved
150	DTSC-23	23	Page 2-8, Section 2.2.4	Air sampling for Cr(VI), lead, mercury, and D/F in the mechanical separation area within the SPY will be performed periodically.	See comment 15. More stringent/defined air monitoring should be performed where mechanical separation occurs as it is a potential source of contaminated dusts. If the separation activity is located in the SPY, then it will be at a location closest to occupants of Park Moabi and workers at the SPY. Air sampling and monitoring at the SPY/soil processing area should be well defined and not left to "will be performed periodically". Revision required.	The exposure hazard associated with Cr(IV), lead, mercury, and D/F will be managed by keeping fugitive dust to below 100 ug/m3. Air monitoring for fugitive dust will be conducted continually during mechanical separation operations. The analytical sampling for Cr(IV), lead, mercury, and D/F will occur periodically. Section 2.2.2 of the Air Monitoring Plan (Appendix F) provides the analytical sampling frequency.				Comment resolved
151	DTSC-24	24	Page 2-9, Section 2.3.2	However, no bottom liner will be required if the stockpile is located within the extent of the TAA.	No bottom liner is fine as long as a stockpile is placed on top of a "dirty" TAA material/soil area that will be excavated and removed later. Otherwise, bottom liners are requested to help guide work crews with removing all of the potentially or confirmed contaminated pile while minimizing removal of cleaner soil. Revision is requested to clarify this issue. Please ensure that similar changes are made to the BMP Plan (Appendix D).	The text in Section 2.3.2 and Appendix D have been revised to indicate temporary staging of materials in a TAA will occur on potentially contaminated material slated to be excavated.				Text revised, comment resolved pending review of BMPs for AOC 14.

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152	DTSC-25	25	Page 2-9, Section 2.3.3	Runon and runoff control measures and BMPs will be implemented and inspected weekly.	Add the following to this sentence, "…and at least daily during inclement weather and the day before forecasted inclement weather."	The text has been revised as requested.				
153	DTSC-26	26	Page 2-9, Section 2.3.3	N.A.	The section should clarify how and when contaminated stockpiles will be covered to prevent dispersion due to high winds or rain. Contaminated materials (e.g., excavated soil and debris and fine materials) should be placed in covered bins or on lined plastic sheeting and then covered until transported. In general, contaminated soil and materials should be placed on tarps to assist in removing the soil later. Confirmation soil sampling would be conducted after the stockpile and liner have been removed.	Section 2.3.3 provides an overview of stockpile construction and management. The requested details are provided in the BMP Plan (Appendix D).				See Response to Comment #151
154	DTSC-27	27	Page 2-9, Section 2.3.3, 1st bullet	Temporary staging of excavated soil and debris may also be required at individual TAAs prior to transport to the SPY.	Depending how the temporary staging is conducted, confirmation soil samples may need to be taken to ensure all significant contamination associated with the temporary pile has been appropriately removed from the area. Please revise the plan to address this issue.	Temporary staging will occur on "dirty" and "to-be" excavated material. Therefore, liners and confirmation soil sampling will not be warranted. See response to Comment #151				See Response to Comment #151
155	DTSC-28	28	Page 2-9, Section 2.3.3, 1st bullet	…soil from AOC 9, AOC 10, AOC 11, AOC 14, AOC 16, and AOC 27) will be stockpiled…	For the AOCs listed here, the plan should state which units will likely use roll off bins for a direct load at the excavation area. It would be a better management practice to load these contaminated soils and wastes directly into a bin to eliminate further stockpiling and management, especially at AOCs that will not undergo soil processing.	Due to the quantity of soil being removed during the Soil NTCRA, direct loads of roll-off bins is not feasible. Furthermore, delivery and removal of roll-off bins may not be possible due to difficult terrain surrounding the TAAs. Additionally, waste characterization sampling is required prior to off-site disposal. Therefore, all excavated material will be transported to the SPY for segregation, stockpiling, and waste characterization prior to final disposition.				
156	DTSC-29	29	Page 2-19, Section 2.3.3 last bullet	Visibly contaminated materials… will be stockpiled separately in the spy…	Open stockpiling of contaminated material and debris is not recommended. If these material are removed as "visibly contaminated", the removed material should go directly into a closed container or bin for disposal and not stock piled.	See response to Comment #155. Containers or tarps may be used at the SPY for hard to manage wastes, such as white powder, or grossly contaminated material that are destined for offsite disposal.				Text has been revised including the sentences, "Soil from AOC 10 TAA 1 is expected to be segregated from material from other TAAs. The Transwestern Bench Soil Management Area and/or TCS may be used to temporarily stage visibly contaminated material prior to off-site disposal." Comment resolved.
157	DTSC-30	30	Page 2-10, Section 2.3.4	2.3.4 Mechanical Separation	Suggest changing the section title to "2.3.4 Mechanical Separation at SWMU 1 and AOC 1" to clarify that mechanical separation is only being considered at these two units.	The section title has not been changed due to the potential for mechanical separation of materials removed from other TAAs.				

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158	DTSC-31	31	Page 2-10, Section 2.3.4	Coarse grained materials in soil to be excavated from AOCs 9, 10, and 11 is limited, as is the total volume to be removed; therefore, this material will not undergo mechanical separation.	Section 2.3.3 also documents that contaminated soil from AOC 14, AOC 16, and AOC 27 will also not require mechanical separation. Please revise this section to be consistent with section 2.3.3.	The text in Section 2.3.3 has been revised to remove reference to the TAAs where mechanical separation is not planned, as this section discusses stockpile construction and management. The text in Section 2.3.4 has been revised to clarify the TAAs where mechanical separation is not planned and the rationale for this decision.				
159	DTSC-32	32	Page 2-10, Section 2.3.4	Dust suppression measures, such as water addition, will be implemented during mechanical separation as determined necessary by site conditions and established BMPs (Section 2.1.10 and Appendix D).	The text should be revised to clearly indicate what measures will/might be taken and what criteria will be utilized to suppress dust during mechanical separation as there is concern that this process may be quite dusty and that, if located in the SPY, then contaminated fines could be dispersed in the vicinity of Park Moabi occupants as well as to groundwater remedy and soil removal workers located directly in the SPY. Again, DTSC recommends that that quarry area be considered for this separation process since it is away from people and the river.	Regarding use of the quarry, See response to Comments #95 and 112. Fugitive dust control details are provided in Section 2.1.11 and Appendix D.				
160	DTSC-33	33	Page 2-11, Section 2.3.7	The following TAAs are located on steeply sloped ground and may require additional compaction and slope stability considerations: • SWMU 1 TAA 3 • AOC 1 TAA 1 • AOC 9 TAA 1 • AOC 10 TAA 1 • AOC 27 TAA 1	Shouldn't AOC 11 TAA 1 also be included on this list?	AOC 11 TAA 1 is not expected to require significant additional measures to ensure slope stability during post construction backfill. But as with any of the excavations, appropriate care will be taken to provide for stable slopes both during and after the Soil NTCRA.				
161	DTSC-34	34	Page 2-11, Section 2.3.7	N.A.	After all contaminated soils have been removed offsite, a confirmation sampling program should be implemented to ensure contaminated media were properly handled and appropriately removed. The work plan should include the process for tracking the areas where contaminated soils were placed, managed, or processed so that they can be promptly surveyed and identified for confirmatory soil sampling after contamination is taken offsite. Baseline soil sampling might be prudent.	Post-construction confirmation samples will be collected from all areas where contaminated media was handled or stored. Placement, management, and processing of contaminated soil will only occur within the SPY. Tracking of soil will follow the same process used for the groundwater remedy. Baseline samples have already been collected from the SPY. See new Section 2.3.3.1				Text revised, comment resolved.
162	DTSC-35	35	Page 2-11, Section 2.3.7	PG&E will prepare an excavation backfill and erosion control plan… work area will be returned to its preconstruction condition to the extent practicable.	Since the work area must be restored as part of the removal action project, the backfill and erosion control plan should be provided for review and comment as well.	Information and specifications for backfill, erosion control, and restoration activities is contained within the Soil NTCRA work plan, therefore a separate excavation backfill and erosion control plan is not needed. Referenced sentence will be struck from work plan.				

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163	DTSC-36	36	Page 2-12, Section 2.4, 3rd bullet and Appendix F	Field-portable XRF	Per response to comment to DTSC comment 6 on the EE/CA, "Details regarding the correlation of XRF sample with laboratory data will be included in the Removal Action Work Plan." DTSC did not see any discussion regarding correlation of XRF and laboratory samples in the work plan.	SOP 16 in Appendix H provides detailed information on XRF set up, operation, sample prep, calibration, and QA/QC. Field verification, correlation, and calibration will be performed at the beginning of the project with site soils and laboratory analysis for metals. Correlation reference added to 2.4.2 The use of a field portable XRF is intended to aid the excavation process. Only confirmation soil sample analytical results will be used for decision making.				Text revised, comment resolved. DTSC would like to see the correlation data and ensure testing protocols are in accordance with the manufacturer specs.
164	DTSC-37	37	Page 2-13, Section 2.4.3	Quality Assurance Project Plan Addendum (Jacobs 2019a)	This should be provided as an appendix to the work plan.	The Topock QAPP Addendum will be added as an appendix to the work plan.				
165	DTSC-38	38	Page 2-13, Section 2.4.3	If confirmation results exceed the numerical RAGs on a point-by-point basis, and if 8 to 10 samples have been analyzed from the same TAA, then average concentrations for the contaminants that exceed the numerical RAG may be calculated as the 95UCL of the mean, using ProUCL Version 4.0 software (USEPA 2007).	As a reminder/clarification, none of the 8 to 10 confirmation samples should represent soils with any discoloration or staining. Discolored soil should be removed as per RAO 3. Please revise the section to add that excavation may continue if elevated confirmation sample results are generally clustered in a particular area and/or are still really high (this can be quantified if needed). These data would suggest that significant contamination could continue in a particular direction beyond the excavation footprint. DTSC is envisioning a scenario, in Bat Cave Wash for instance, where contamination could still continue in one direction beyond an excavation wall. It seems the intent of the TAA removal is being diluted here literally and figuratively. Significant contamination should be removed once it is understood where the contamination occurs as learned during the excavation/sampling process. The intent of the NTCRA, to remove significant contamination, might not be met if a large volume and/or high contaminant concentration soil is left in place beyond confirmation sample locations. If contamination is found to be much larger than anticipated, then an administrative decision, using unit averaging or not, could be employed to halt excavation.	As noted, discolored or stained soil will be removed per RAO 3, therefore confirmation samples will not be collected from discolored soil. As stated in Sections 2.4 and 3, if confirmation soil sample results at the edge of the excavation exceed the numerical RAGs, then then removal will continue in the direction of the exceedance.				Comment resolved
166	DTSC-39	39	Page 2-14, Section 2.6	The PHSEP provided in Appendix B is a draft and will be updated prior to the start of the Soil NTCRA	All revisions must be circulated and made available for review since all workers and participants must be in compliance with the PHSEP.	Agreed. The final PHSEP will be available and circulated for review prior to the start of the Soil NTCRA.				
167	DTSC-40	40	Section 3.	N.A.	In responding to DTSC's comments on the EE/CA, there are specific considerations associated with various AOCs and SWMUs. Those considerations are not specifically identified in the work plan, please describe how the work will fulfill the considerations stated in the RTCs for DTSC comment 21, 22, 23, 24, 25 and 26 (associated with AOC 10, 11, 14, and 27)	**DTSC EE/CA Comment 21**: TAA #4 was reduced to include spot removal at both AOC 10-26 and L-3-2. L-3-2 was not identified in the Work plan for a spot removal but will be included in the workplan. **DTSC EE/CA Comment 22:** Removal of white powder within AOC 10 will be guided by RAO #3. **DTSC EE/CA Comment 23:** AOC 10b-1 does not exceed the dioxin/ furan RAG by a factor greater than 1 and will be not considered for removal. PAA #3 is also considered for removal under RAO#3 as it appears to be a manmade deposit of soil.				See Response to Comment #196

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						PA-18 was added to TAA #1 for removal. **DTSC EE/CA Comment 24:** The factor of exceedances at AOC11e-6 are low, and the feasibility, difficulty, and safety concerns of removal of soil at this location is not recommended for inclusion into the NTCRA. PA-12 was to be considered for a candidate for spot removal, however, upon further evaluation, PA-12 does not meet the criteria for removal and is not include for removal. **DTSC EE/CA Comment 25:** Trenching in the areas between AOC14-16W and AOC14-14W encountered debris, so AOC 14 PAA #1 was driven by RAO #3. Proposed removal will begin at the ends of AOC 14 PAA #1 and move inwards. The white powder in the road cut is not included in the Soil NTCRA. Samples collected by DTSC in 2008 indicated the white powder did not contain metals above the ISLs. **DTSC EE/CA Comment 26:** AOC27-50 was included as part of AOC 27 TAA #1.				
168	DOI-2	DOI-2	Section 3	General comment	The work plan doesn't adequately describe the excavation process if a confirmation sample(s) in a TAA exceeds a point-by-point comparison and area wide average. It just states additional soil will be removed. If a confirmation sample fails the point-by-point comparison and the area wide average, then in the case of an excavation floor confirmation sample, will the entire 1,000 sq feet of the excavation floor be excavated more and by how much before redoing field screening and collecting confirmation samples (i.e., 6-inch lifts, 1 foot)? Also, in the event a side wall sample fails the point-by-point comparison or area wide average, what length of side wall will be removed (all 50 liner feet??), what thickness of sidewall will be re-excavated (6-inches, 1 foot???) and what depth will be excavated?? (the entire excavation depth at time of sidewall sampling) before additional field screening and confirmation sampling. There should be a process for further excavation and additional screening and confirmation sampling in place to eliminate potential disagreements in field between all parties involved.	The flow diagram in Figure 2-3 indicates that if confirmation soil sample results numerical RAGs, then approximately 1 foot of additional soil will be removed. The removal will occur in the portion of the excavation floor or sidewall represented by the confirmation soil sample. The entire area represented by the sample will be excavated an additional 1 foot. As stated in Sections 2.4 and 3, if confirmation soil sample results at the edge of the excavation exceed the numerical RAGs, then removal will continue in the direction of the exceedance. DOI and Stakeholders will be notified if the numerical RAGs are exceeded at the TAA boundaries. The text has been revised to add the details provided in the Figure 2-3 flow chart.				
169	DOI-3	DOI-3	Section 3/ Page 3-1, bullet 6	extent of the excavation are less than the numerical RAGs, then removal will be considered complete.	Consider revising the language to: "extent of the excavation are less than the numerical RAGs *and the areawide calculations indicate risk is less than the numerical RAGs for CrVI, CrT, D/F and Cu,* then removal will be considered complete.	If the individual contaminant concentrations are less than the numerical RAGs, then areawide averages will not be calculated. Numerical RAGs are included for CrVI, CrT, D/F, copper, lead, mercury, molybdenum, and zinc.				

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170	DTSC-41	41	Page 3-1, Section 3.	4) …or the average concentration is less than the numerical RAGs, then removal will be considered complete.	Is this average approach as described in Section 2.4.3? Please clarify.	The text has been revised to clarify the methods described in Section 2.4.3 will be used for averaging sample data.				
171	DTSC-42	42	Page 3-1, Section 3.	5) If screening level or confirmation level analyses indicate contaminant concentrations at the extent of the excavation exceed the numerical RAGs and the average concentration exceeds the numerical RAG, then removal will continue in the portion of the excavation where the exceedance is present.	See comment above regarding Page 2-13, section 2.4.3 related to average concentrations and additional excavation.	See response to Comment # 165				
172	FMIT-35	TRC 16	Section 3.1	It is important to note that the extent of the TMs identified in the Action Memorandum (and shown on Figures 1-4 through 1-7) are approximate and were developed during the EE/CA to estimate the removal volumes and costs. Table 3-1 (Exhibit 3-3 of the EE/CA), presented at the end of Section 3, provides the EE/CA estimated extent and depths of theTAAs to be addressed	The document clearly states that depths of potential contamination are estimates, yet for example in Section 3.1.1, it states: "The initial excavation will remove discolored soil within the TAA up to a depth of 10 feet bgs prior to the collection of confirmation soil samples." This appears to imply that excavation in this area (as an example) will proceed up to 10-feet in depth based solely on the assumption that any soil subjectively deemed to be "discolored" is actually contaminated. For such large depths, and as there will be field methods on site to verify whether or not soil is contaminated, some consideration should be given to verify that any color changes actually do correlate with contaminated soils. Excavation to depths below OSHA safety regulations require either shoring or other engineering controls such as extending the excavation area out to allow for benching and/or other engineering controls. Periodic samples should be field tested to confirm such significant additional disturbances are actually warranted prior to expanding the "initial" excavation area to any assumed depth or extent.	The proposed initial excavations are based on historical soil sample results that exceed the numerical RAGs (available in Appendix A). As an initial starting point, it is assumed that excavation to the depth of the historical sample results will be required. At TAAs known to contain discolored soil, debris, or powders, those material will be used to guide the excavation. However, in accordance with RAO3, only discolored soil associated with hazardous substances requires removal. XRF and confirmation soil sample results will be used to confirm the necessity for removal of discolored soil. Ultimately, the actual extent of the excavation will be based on the results of confirmation soil sample results. 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.* Excavations deeper than 4 feet that require entry will be sloped or shored per OSHA guidance. Confirmation soil samples from locations deeper than 4 feet or where access presents a hazard will be collected with the excavator bucket. Samples for laboratory analysis will be collected from soil that has not contacted the excavator bucket.				Comment resolved

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173	Quechan-35	TRC 16	Section 3.1	It is important to note that the extent of the TAAs identified in the Action Memorandum (and shown on Figures 1-4 through 1-7) are approximate and were developed during the EE/CA to estimate the removal volumes and costs. Table 3-1 (Exhibit 3-3 of the EE/CA), presented at the end of Section 3, provides the EE/CA estimated extent and depths of the TAAs to be addressed	The document clearly states that depths of potential contamination are estimates, yet for example in Section 3.1.1, it states: "The initial excavation will remove discolored soil within the TAA up to a depth of 10 feet bgs prior to the collection of confirmation soil samples." This appears to imply that excavation in this area (as an example) will proceed up to 10-feet in depth based solely on the assumption that any soil subjectively deemed to be "discolored" is actually contaminated. For such large depths, and as there will be field methods on site to verify whether or not soil is contaminated, some consideration should be given to verify that any color changes actually do correlate with contaminated soils. Excavation to depths below OSHA safety regulations require either shoring or other engineering controls such as extending the excavation area out to allow for benching and/or other engineering controls. Periodic samples should be field tested to confirm such significant additional disturbances are actually warranted prior to expanding the "initial" excavation area to any assumed depth or extent.	The proposed initial excavations are based on historical soil sample results that exceed the numerical RAGs (available in Appendix A). As an initial starting point, it is assumed that excavation to the depth of the historical sample results will be required. At TAAs known to contain discolored soil, debris, or powders, those material will be used to guide the excavation. However, in accordance with RAO3, only discolored soil associated with hazardous substances requires removal. XRF and confirmation soil sample results will be used to confirm the necessity for removal of discolored soil. Ultimately, the actual extent of the excavation will be based on the results of confirmation soil sample results. 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.* Excavations deeper than 4 feet that require entry will be sloped or shored per OSHA guidance. Confirmation soil samples from locations deeper than 4 feet or where access presents a hazard will be collected with the excavator bucket. Samples for laboratory analysis will be collected from soil that has not contacted the excavator bucket.				

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174	Cocopah-35	TRC 16	Section 3.1	It is important to note that the extent of the TAAs identified in the Action Memorandum (and shown on Figures 1-4 through 1-7) are approximate and were developed during the EE/CA to estimate the removal volumes and costs. Table 3-1 (Exhibit 3-3 of the EE/CA), presented at the end of Section 3, provides the EE/CA estimated extent and depths of the TAAs to be addressed	The document clearly states that depths of potential contamination are estimates, yet for example in Section 3.1.1, it states: "The initial excavation will remove discolored soil within the TAA up to a depth of 10 feet bgs prior to the collection of confirmation soil samples." This appears to imply that excavation in this area (as an example) will proceed up to 10-feet in depth based solely on the assumption that any soil subjectively deemed to be "discolored" is actually contaminated. For such large depths, and as there will be field methods on site to verify whether or not soil is contaminated, some consideration should be given to verify that any color changes actually do correlate with contaminated soils. Excavation to depths below OSHA safety regulations require either shoring or other engineering controls such as extending the excavation area out to allow for benching and/or other engineering controls. Periodic samples should be field tested to confirm such significant additional disturbances are actually warranted prior to expanding the "initial" excavation area to any assumed depth or extent.	The proposed initial excavations are based on historical soil sample results that exceed the numerical RAGs (available in Appendix A). As an initial starting point, it is assumed that excavation to the depth of the historical sample results will be required. At TAAs known to contain discolored soil, debris, or powders, those material will be used to guide the excavation. However, in accordance with RAO3, only discolored soil associated with hazardous substances requires removal. XRF and confirmation soil sample results will be used to confirm the necessity for removal of discolored soil. Ultimately, the actual extent of the excavation will be based on the results of confirmation soil sample results. 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.* Excavations deeper than 4 feet that require entry will be sloped or shored per OSHA guidance. Confirmation soil samples from locations deeper than 4 feet or where access presents a hazard will be collected with the excavator bucket. Samples for laboratory analysis will be collected from soil that has not contacted the excavator bucket.				
175	FMIT-36	TRC 17	Section 3.1	Location-specific Removal Action Approach Details	The work plan details describing how initial excavation will proceed within each TAA is too brief and vague. For example, it is unclear how large initial excavations will be. Please provide detail on how excavations will proceed in areas that have no soil staining. Also provide details on how soil staining will be quantified as currently defined it appears that the classification of stained soils is rather subjective. The Tribes require that additional detailed work plans be provided for review for each TAA that provide specific delineation of the estimated vertical and lateral extent of the "initial" excavation prior to ground disturbing activities			Excavations shall proceed in accordance with the NTCRA Removal Action Work Plan. Individual TAA work plans will not be developed. Section 3 provides discussion of excavation at the individual TAAs, including Table 3-1 which provides the estimated extent and volume of excavation.		Comment resolved
176	Quechan-36	TRC 17	Section 3.1	Location-specific Removal Action Approach Details	The work plan details describing how initial excavation will proceed within each TAA is too brief and vague. For example, it is unclear how large initial excavations will be. Please provide detail on how excavations will proceed in areas that have no soil staining. Also provide details on how soil staining will be quantified as currently defined it appears that the classification ofstained soils is rather subjective. The Tribes require that additional detailed work plans be provided for review for each TAA that providespecific delineation of the estimated vertical and lateral extent of the "initial" excavation prior to ground disturbing activities			Excavations shall proceed in accordance with the NTCRA Removal Action Work Plan. Individual TAA work plans will not be developed.		

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177	Cocopah-36	TRC 17	Section 3.1	Location-specific Removal Action Approach Details	The work plan details describing how initial excavation will proceed within each TAA is too brief and vague. For example, it is unclear how large initial excavations will be. Please provide detail on how excavations will proceed in areas that have no soil staining. Also provide details on how soil staining will be quantified as currently defined it appears that the classification ofstained soils is rather subjective. The Tribes require that additional detailed work plans be provided for review for each TAA that providespecific delineation of the estimated vertical and lateral extent of the "initial" excavation prior to ground disturbing activities			Excavations shall proceed in accordance with the NTCRA Removal Action Work Plan. Individual TAA work plans will not be developed.		
178	FMIT-37	FMIT-17 (MS)	Page 3-1, bullet 1	Survey TM location, establish extent and boundaries of the initial excavation, confirmsite access and safety, and establish work zones.	The setting of the initial excavation area must be done in the presence of a Tribal monitor and identification flags must remain in-place during soil excavation so that the boundary of confirmation sampling can be easily determined and observed.			See RTC 25.		
179	Quechan-37	FYQIT-17 (MS)	Page 3-1, bullet 1	Survey TAA location, establish extent and boundaries of the initial excavation, confirmsite access and safety, and establish work zones.	The setting of the initial excavation area must be done in the presence of a Tribal monitor and identification flags must remain in-place during soil excavation so that the boundary of confirmation sampling can be easily determined and observed.			See RTC 25.		
180	Cocopah-37	COCOPAH-17 (MS)	Page 3-1, bullet 1	Survey TAA location, establish extent and boundaries of the initial excavation, confirmsite access and safety, and establish work zones.	The setting of the initial excavation area must be done in the presence of a Tribal monitor and identification flags must remain in-place during soil excavation so that the boundary of confirmation sampling can be easily determined and observed.			See RTC 25.		
181	FMIT-38	FMIT-18 (MS)	Section 3.1	Location-specific removal action approachdetails	Initial Target Action Areas (TAAs), described in the text and shown in the figures, must be re-drawn to represent initial excavation areas based on the locations of the soil samples and not beyond, otherwise soil that does not need to be removed will be removed, which increases the site disturbance. These initial exaction areas should be minimal in initial size and then let the confirmation sampling results (using an area- averaged comparison criteria) be used to determine if additional soil needs to be removed. Tribal Monitors must be present in the field to ensure that the initial excavation boundaries do not exceed the existing sample locations. And In addition, if there is debris that should be removed as part of the initial removal.			As described in the responses to the 2/24/2021 EE/CA consultation discussion items, lateral extent of the preliminary PAAs were refined in the EE/CA. PAA outlines define potential surface impact. Lateral extent of excavations were refined further in the removal action work plan. See RTC 25.		
182	Quechan-38	FYQIT-18 (MS)	Section 3.1	Location-specific removal action approachdetails	Initial Target Action Areas (TAAs), described in the text and shown in the figures, must be re-drawn to represent initial excavation areas based on the locations of the soil samples and not beyond, otherwise soil that does not need to be removed will be removed, which increase the site disturbance. These initial exaction areas should be minimal in initial size and then let the confirmation sampling results (using an area- averaged comparison criteria) be used to determine if additional soil needs to be removed. Tribal Monitors must be present in the field to ensure that the initial excavation boundaries do not exceed the existing sample locations. And In addition, if there is debris that should be removed as part of the initial removal.			As described in the responses to the 2/24/2021 EE/CA consultation discussion items, lateral extent of the preliminary PAAs were refined in the EE/CA. PAA outlines define potential surface impact. Lateral extent of excavations were refined further in the removal action work plan. See RTC 25.		

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183	Cocopah-38	COCOPAH-18 (MS)	Section 3.1	Location-specific removal action approachdetails	Initial Target Action Areas (TAAs), described in the text and shown in the figures, must be re-drawn to represent initial excavation areas based on the locations of the soil samples and not beyond, otherwise soil that does not need to be removed will be removed, which increases the site disturbance. These initial exaction areas should be minimal in initial size and then let the confirmation sampling results (using an area- averaged comparison criteria) be used to determine if additional soil needs to be removed. Tribal Monitors must be present in the field to ensure that the initial excavation boundaries do not exceed the existing sample locations. And In addition, if there is debris that should be removed as part of the initial removal.			As described in the responses to the 2/24/2021 EE/CA consultation discussion items, lateral extent of the preliminary PAAs were refined in the EE/CA. PAA outlines define potential surface impact. Lateral extent of excavations were refined further in the removal action work plan. See RTC 25.		
184	DTSC-43	43	Page 3-2, Section 3.1.1	The area to the west of the TAA and outside of the main channel of BCW is HNWR land and will be avoided.	It is not clear what the area “outside of the main channel of BCW” is referring to with certainty. It should be defined on a figure. What if this area “outside of the main channel of BCW” is found to be significantly contaminated due to older channel flows or waste discharge practices back in the 50s and 60s? Can a contingency be developed to remove additional soils to the west in this area if they are found to be contaminated?	Figure 1-4 provides the referenced HNWR land boundary in relation to SWMU 1 TAA 1. The TAA boundary established in the EE/CA will be used during the Soil NTCRA. In accordance with the Soil NTCRA Work Plan, the stakeholders will be notified if contamination exceeding the numerical RAGs is identified beyond the extent of the TAA.				
185	DTSC-44	44	Page 3-3, Section 3.1.2	White powdery material is present due to historical impoundment of cooling tower water for percolation.	Please indicate that white powdery material in this TAA will be removed according to RAO 3 as well as RAO 2.	The text will be revised to reference removal of the white powder as part of RAO 2 and 3.				
186	DTSC-45	45	Page 3-3, Section 3.1.2	The initial excavation will remove discolored soil within the TAA along the toe of the slope within approximately 3 feet of the surface prior to the collection of confirmation soil samples.	SWMU1-WP-10 has total chromium above the RAG at 10 feet so it is expected that initial excavation will go to 10 feet bgs in this select area. Why has it been identified for 3 feet?	SWMU 1 TAA 1 is located at the base of a steep slope. Historical samples collected on the east side (upslope side) are many feet above samples collected at the base of the slope. The initial excavation will be 3 feet from the base of the slope. Ultimately, excavation of discolored soil and debris will continue as needed, up to a maximum depth of 10 feet bgs.				Comment resolved
187	DTSC-46	46	Page 3-6, Section 3.1.5	An initial screening of 6-inch-plus material may be conducted at the BCW Waste Management Area (immediately to the south of the TAA) prior to load-out and transportation of the material to the SPY.	A few stained green- and iron-colored boulders associated with contamination have been observed in this particular area. Please be on the lookout for such occurrences and exclude any grossly colored rocks from mechanical separation. As stated in response to comment to EE/CA, discolored and visibly contaminated material and debris encountered will be removed and disposed.	Understood. As indicated in Section 2.3.4, coarse materials with significant residual staining will be removed.				
188	FMIT-39	TRC 18	Section 3.1.6	Historical soil sample results (Appendix A) indicate the greatest contaminant concentrations are within 3 feet of the surface.The initial excavation will remove soil to the lateral extent of the TAA and to a depth of 3 feet bgs prior to the collection of confirmation soil samples	This is another example where a potentially extensive excavation is extended over the entire area assumed to require excavation, without any confirmatory field sampling. Sampling results in allthe TAA areas are quite variable, and therefore such blanket assumptions applied over the excavated area will result in removal of soils that won't actually require remediation. This applies to any assumed depth or lateral extent.	The proposed initial excavations are based on historical soil sample results that exceed the numerical RAGs (available in Appendix A). As an initial starting point, it is assumed that excavation to the depth of the historical sample results will be required. XRF and confirmation soil sample results will be used to aid the excavation process and focus removal efforts on the contaminated soil. The actual extent of the excavation will be based on the results of confirmation soil samples.				

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189	Quechan-39	TRC 18	Section 3.1.6	Historical soil sample results (Appendix A) indicate the greatest contaminant concentrations are within 3 feet of the surface.The initial excavation will remove soil to the lateral extent of the TAA and to a depth of 3 feet bgs prior to the collection of confirmation soil samples	This is another example where a potentially extensive excavation is extended over the entire area assumed to require excavation, without any confirmatory field sampling. Sampling results in all the TAA areas are quite variable, and therefore such blanket assumptions applied over the excavated area will result in removal of soils that won't actually require remediation. This applies to any assumed depth or lateral extent.	The proposed initial excavations are based on historical soil sample results that exceed the numerical RAGs (available in Appendix A). As an initial starting point, it is assumed that excavation to the depth of the historical sample results will be required. XRF and confirmation soil sample results will be used to aid the excavation process and focus removal efforts on the contaminated soil. The actual extent of the excavation will be based on the results of confirmation soil samples.				Comment resolved
190	Cocopah-39	TRC 18	Section 3.1.6	Historical soil sample results (Appendix A) indicate the greatest contaminant concentrations are within 3 feet of the surface.The initial excavation will remove soil to the lateral extent of the TAA and to a depth of 3 feet bgs prior to the collection of confirmation soil samples	This is another example where a potentially extensive excavation is extended over the entire area assumed to require excavation, without any confirmatory field sampling. Sampling results in all the TAA areas are quite variable, and therefore such blanket assumptions applied over the excavated area will result in removal of soils that won't actually require remediation. This applies to any assumed depth or lateral extent.	The proposed initial excavations are based on historical soil sample results that exceed the numerical RAGs (available in Appendix A). As an initial starting point, it is assumed that excavation to the depth of the historical sample results will be required. XRF and confirmation soil sample results will be used to aid the excavation process and focus removal efforts on the contaminated soil. The actual extent of the excavation will be based on the results of confirmation soil samples.				
191	DTSC-47	47	Page 3-8, Section 3.1.7	Historical soil sample results (Appendix A) indicate metals and D/F contaminated soil is located within 3 feet of the surface.	Data indicate that AOC 9-7 and 9-16 exhibit hexavalent chromium above the RAG and AOC 9-16 also has elevated dioxins above the RAG. This makes sense conceptually as it would be expected for contaminants to flow or erode down slope of the source area (TAA 1). Shallow removal or at least confirmation samples in the AOC 9-7 and 9-16 area is suggested to assess current concentrations.	The TAA boundary established in the EE/CA will be used during the Soil NTCRA. A reassessment of historical sample results outside of the TAAs is not planned. If confirmation soil samples indicate contamination exceeding the numerical RAGs is present beyond the extent of the TAA, then stakeholders will be notified.	DTSC requests that confirmation samples be collected in the direction and horizon of the historical soil samples outside the TAA.			Comment resolved
192	DTSC-48	48	Page 3-8, Section 3.1.7	… soil from AOC 9 will not be processed to segregate 3/8-inch and smaller material…	Since the excavated soil will not be processed, this material should not be "stockpiled" prior to disposal. It is recommended that all material at this and other AOCs to be disposed be containerized to prevent unintentional release into the environment.	See response to Comment # 155				
193	DTSC-49	49	Page 3-9, Section 3.1.8	N.A.	For the record, elevated PAHs occur in several PA-series samples that are planned for removal.	Comment noted.				
194	DTSC-50	50	Page 3-10, Section 3.1.9	Excavation beyond the initial extent of the TAA is not expected, as topography controls the extent of impacts.	This should be true for much of this TAA except for the inlet that fed the contamination into the impoundment area. Elevated hexavalent and total chromium data at AOC10b-3 and AOC10-12 above RAGs support this concept. Therefore, please add three additional confirmation samples along the main East Ravine flow path between AOC10b-3 and AOC10c-1 to determine the extent of significant contamination above RAGs. Otherwise, consider doing spot removals associated with the high concentrations upstream of TAA 2.	The TAA boundary established in the EE/CA will be used during the Soil NTCRA. A reassessment of historical sample results outside of the TAAs is not planned. If confirmation soil samples indicate contamination exceeding the numerical RAGs is present beyond the extent of the TAA, then stakeholders will be notified.	DTSC requests that confirmation samples be collected in the direction and horizon of the historical soil samples outside the TAA.			Comment resolved

Comment Number	Agency/ Stakeholder[a]	Unique Comment ID (if applicable)[b]	Section/ Page	Reference Text	Soil Non-Time-Critical Removal Action Work Plan Comment *(Please provide sufficient detail, include specifically what you are looking for)*	PG&E Response	DTSC Response	DOI Response	Tribes Response	Final Resolution
195	DTSC-51	51	Page 3-11, Section 3.1.10	The initial excavation will remove the pile and approximately 1 foot of soil beneath the pile prior to the collection of confirmation soil samples.	Note: Dioxin data detected at AOC10-24 just at the RAG may represent an extension of the TAA3 contamination. Confirmation sampling design should take this into account.	The TAA boundary established in the EE/CA will be used during the Soil NTCRA. A reassessment of historical sample results outside of the TAAs is not planned. If confirmation soil samples indicate contamination exceeding the numerical RAGs is present beyond the extent of the TAA, then stakeholders will be notified.				
196	DTSC-52	52	Page 3-12, Section 3.1.11	The initial excavation will remove discolored soil within the TAA to a depth of 3 feet bgs prior to the collection of confirmation soil samples.	The removal should focus on the white/light colored material associated with AOC10-26 exceedances but also look for surficial contamination as noted at L-3-2. Note that AOC10-24 exhibits dioxin concentrations just at the RAG and may be an extension of the contamination at AOC10-26. Confirmation sampling design should take this into account. After understanding any contaminant relationships to depth and/or discoloration at TAA4, a small removal should then occur at L-3-2 along with confirmation samples for hexavalent chromium, total chromium, and dioxins and determine if similar contaminant distributions and waste layers exist in the L-3-2 area.	The TAA boundary established in the EE/CA will be used during the Soil NTCRA. A reassessment of historical sample results outside of the TAAs is not planned. If confirmation soil samples indicate contamination exceeding the numerical RAGs is present beyond the extent of the TAA, then stakeholders will be notified.				
197	FMIT-40	TRC 19	Section 3.1.11	Soils within the TAA are primarily depositionalsilts and sands. A cluster of mesquite trees resides to the southwest of the TAA. While excavation near the root structure will be required during the removal action, care will be taken to preserve the trees.	Considering the amount of effort to preserve plant species under the RFI/RI it seems that DOIs approach of "care will be taken to preserve the trees" is too vague. Please update the text to clearly indicate the importance of preserving the vegetation to the Tribes and clearly outline DOI method that will be implemented to prevent impacts to site vegetation	The following text will be added as Section 2.1.10 Biological Resource Protection, “Protection of biological resources including plants starts with the ERTC planning process. As part of the ERTC planning, PG&E Biologist performs a desk-top review of the requested work area in relation of the sensitive resources and specifies any needed measures to protect the resources. In addition, during the Last Look, any inputs from Tribal Monitors on plant protection will be discussed and incorporated as appropriate into the construction. Methods to be employed for the protection of plants include: high visibility fencing, traffic cones, and/or flagging around plants, or other methods as identified by the project biologists.”				Comment resolved

Comment Number	Agency/ Stakeholder[a]	Unique Comment ID (if applicable)[b]	Section/ Page	Reference Text	Soil Non-Time-Critical Removal Action Work Plan Comment *(Please provide sufficient detail, include specifically what you are looking for)*	PG&E Response	DTSC Response	DOI Response	Tribes Response	Final Resolution
198	Quechan-40	TRC 19	Section 3.1.11	Soils within the TAA are primarily depositionalsilts and sands. A cluster of mesquite trees resides to the southwest of the TAA. While excavation near the root structure will be required during the removal action, care will be taken to preserve the trees.	Considering the amount of effort to preserve plant species under the RFI/RI it seems that DOIs approach of "care will be taken to preserve the trees" is too vague. Please update the text to clearly indicate the importance of preserving the vegetation to the Tribes and clearly outline DOI method that will be implemented to prevent impacts to site vegetation	Protection of biological resources including plants starts with the ERTC planning process. As part of the ERTC planning, PG&E Biologist performs a desk-top review of the requested work area in relation of the sensitive resources and specifies any needed measures to protect the resources. In addition, during the Last Look, any inputs from Tribal Monitors on plant protection will be discussed and incorporated as appropriate into the construction. Methods to be employed for the protection of plants include: high visibility fencing, traffic cones, and/or flagging around plants, or other methods as identified by the project biologists.				
199	Cocopah-40	TRC 19	Section 3.1.11	Soils within the TAA are primarily depositionalsilts and sands. A cluster of mesquite trees resides to the southwest of the TAA. While excavation near the root structure will be required during the removal action, care will be taken to preserve the trees.	Considering the amount of effort to preserve plant species under the RFI/RI it seems that DOIs approach of "care will be taken to preserve the trees" is too vague. Please update the text to clearly indicate the importance of preserving the vegetation to the Tribes and clearly outline DOI method that will be implemented to prevent impacts to site vegetation	Protection of biological resources including plants starts with the ERTC planning process. As part of the ERTC planning, PG&E Biologist performs a desk-top review of the requested work area in relation of the sensitive resources and specifies any needed measures to protect the resources. In addition, during the Last Look, any inputs from Tribal Monitors on plant protection will be discussed and incorporated as appropriate into the construction. Methods to be employed for the protection of plants include: high visibility fencing, traffic cones, and/or flagging around plants, or other methods as identified by the project biologists.				
200	FMIT-41	TRC 20	Table 3-1.	Target Action Areas: Surface Areas and Volumes	Excavation depths do not match excavation depths discussed in 3.1.1 - 3.1.15	As indicated in the text in Section 3.1, Table 3-1 is taken from the Exhibit 3-3 of the EE/CA. The assumed excavation depths were based on the objectives of the EE/CA. The proposed excavations in Sections 3.1.1 -3.1.15 are based on historical sample data, but ultimately the actual extent of the excavation will be based on the confirmation soil sample results. The historical soil data will also be used to guide the excavations laterally and vertically.				Comment resolved

Comment Number	Agency/ Stakeholder[a]	Unique Comment ID (if applicable)[b]	Section/ Page	Reference Text	Soil Non-Time-Critical Removal Action Work Plan Comment *(Please provide sufficient detail, include specifically what you are looking for)*	PG&E Response	DTSC Response	DOI Response	Tribes Response	Final Resolution
201	Quechan-41	TRC 20	Table 3-1.	Target Action Areas: Surface Areas and Volumes	Excavation depths do not match excavation depths discussed in 3.1.1 – 3.1.15	As indicated in the text in Section 3.1, Table 3-1 is taken from the Exhibit 3-3 of the EE/CA. The assumed excavation depths were based on the objectives of the EE/CA. The proposed excavations in Sections 3.1.1 -3.1.15 are based on historical sample data, but ultimately the actual extent of the excavation will be based on the confirmation soil sample results.				
202	Cocopah-41	TRC 20	Table 3-1.	Target Action Areas: Surface Areas and Volumes	Excavation depths do not match excavation depths discussed in 3.1.1 – 3.1.15	As indicated in the text in Section 3.1, Table 3-1 is taken from the Exhibit 3-3 of the EE/CA. The assumed excavation depths were based on the objectives of the EE/CA. The proposed excavations in Sections 3.1.1 -3.1.15 are based on historical sample data, but ultimately the actual extent of the excavation will be based on the confirmation soil sample results.				Comment resolved
		DOI			The planned excavation depth in a number of the TAAs listed in the Table 3-1 does not match the corresponding TAA text. Please clarify or an provide explanation	See response to Comment #200				
203	DOI-4	DOI-4	Table 3-1/ 3-2 AOC 1 TAA2	Discolored soil is present in the area around former well TCS-4 (does not meet RAO 3).	Reference that the pipeline is part of SWMU 1, TAA 1 and that there was D/F was also present in the coating.	The requested details are provided in Section 3.1.1.				
204	DOI-5	DOI-5	Table 3-1	SWMU 1 TAAs 2 and 3	SWMU 1 TAA 2 Table 3-1 lists assumed excavation depth as 5 feet bls whereas the text on page 3-3 Section 3.1.2 says TAA to be excavated 3 feet bls and SWMU 1 TAA 3 Table 3-1 indicates the depth of excavation at 5 feet bls whereas the text on page 3-4 Section 3.1.3 indicates 1-foot bls.	As indicated in the text in Section 3.1, Table 3-1 is taken from the Exhibit 3-3 of the EE/CA. The assumed excavation depths were based on the objectives of the EE/CA. The proposed initial excavations in the Soil NTCRA Work Plan are based on historical sample data, but ultimately the actual extent of the excavation will be based on the confirmation soil sample results.				
205	DTSC-53	53	Page 3-13, Section 3.1.12	Historical soil sample results (Appendix A) indicate Cr(VI) and D/F contaminated soil is present primarily within approximately 5 to 6 feet of the surface. However, contamination may also be present at depths up to 10 feet bgs. The initial excavation will remove soil to the lateral extent of the TAA and to a depth of 5 to 6 feet bgs prior to the collection of confirmation soil samples.	Existing contaminant data should be honored and used to plan the excavation. Contamination occurs to at least 10 feet bgs at AOC11e-2 so the total initial depth should be to 10 feet bgs in that area. Similarly, contamination occurs to at least 6 feet bgs at AOC11e-4 to the south of the TAA so any planned confirmation samples should be collected around 7 feet bgs near that location. It is noted that some elevated PCBs are being removed along with the dioxins as part of this planned removal.	The 9-10 ft bgs sample at AOC11e-2 detected D/F at a concentration exceeding the RAG. The text identifies the historical soil sample result indicating contamination at a depth of 10 feet. However, the remainder of the AOC 11 samples did not detect contaminants exceeding the numerical RAGs below 6 feet bgs. The proposed initial excavation depth of 6 feet and subsequent confirmation soil samples will provide a starting point for further excavation, up to 10 feet bgs. Excavation in the area of AOC11e-2 will extend to 10 feet based on historical soil sample results.				Comment resolved

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206	DTSC-54	54	Page 3-13, Section 3.1.12	N.A.	It is requested that confirmation sampling consider the known dioxin distribution (e.g., contamination is greater at depth at location AOC11e-2 and AOC11e-4) and the conceptual site model for how the contamination was transported to this particular area. Upslope confirmation sampling might include upslope step out potholes or hand augering to assess the extent of contamination at depth. Spot removal and confirmation sampling around dioxin contamination detected at PA-12 is suggested to remove contamination that will eventually eroded along the steep slopes and into the TAA removal area.	The TAA boundary established in the EE/CA will be used during the Soil NTCRA. A reassessment of historical sample results outside of the TAAs, including PA-12 is not planned. If confirmation soil samples indicate contamination exceeding the numerical RAGs is present beyond the extent of the TAA, then stakeholders will be notified.				
207	DTSC-55	55	Page 3-14, Section 3.1.13	Access to the TAA will be directly from I-40.	As mentioned in other comments, please ensure there is at least one alternative access route to the site that does not require a freeway lane closure. The route from the north that was used to access and investigate the site previously seems like the obvious choice.	See response to Comment #113				
208	DTSC-56	56	Page 3-14, Section 3.1.13	The initial excavation will remove discolored soil and debris within the TAA to a depth of 5 to 6 feet bgs prior to the collection of confirmation soil samples.	Tables 3-2 indicates that RAG exceedances occur at a depth of 7 to 8 feet bgs, yet excavation is planned to go to 5 feet bgs. Please clarify this apparent discrepancy.	The 7-8 ft bgs sample at AOC14-16W detected mercury at a concentration exceeding the RAG. The remainder of the AOC 14 samples did not detect contaminants exceeding the numerical RAGs below 6 feet bgs. The proposed initial excavation depth of 6 feet and subsequent confirmation soil samples will provide a starting point for further excavation, up to 10 feet bgs.				
209	DTSC-57	57	Page 3-14, Section 3.1.13	N.A.	As mentioned in comments on the RFI Volume 3 document, burn waste contamination occurs in the shoulder of the I-40 potentially associated with soil dug from a Caltrans utility box. This is southwest of AOC14-19. Please ensure this area is sampled and waste/soil are removed if needed to meet RAGs and RAO 3 and to ensure contaminated soils are not spread around during I-40 maintenance and create an exposure pathway. Similarly, the white powder waste layer exposed on the road cut north of the I-40 should be sampled to ensure it is not significantly contaminated. It is subject to surficial erosion on the steep road cut and can potentially be disturbed periodically during freeway maintenance. Sample data for this exposed layer is not present in tables and the white powder has been shown to exhibit variable contaminant concentrations including high hexavalent chromium at sampling points S2-6 and S4-4 in AOC 14. At a minimum, sampling should be conducted so, if needed, appropriate plans and notifications can be developed regarding this waste layer.	The TAA boundary established in the EE/CA will be used during the Soil NTCRA. A reassessment of historical sample results outside of the TAAs is not planned. If confirmation soil samples indicate contamination exceeding the numerical RAGs is present beyond the extent of the TAA, then stakeholders will be notified.	DTSC requests that confirmation sampling be conducted toward the utility box, southwest of AOC14-19. DTSC has subsequently sampled the white powder in the freeway road cut. Analytical results did not indicate contamination above numerical RAGs.			Comment resolved
210	DTSC-58	58	Page 3-15, Section 3.1.14	Due to the small quantity of sandblast grit, hand tools are expected to be used to load grit into a waiting truck for transport directly to the SPY for processing.	Due to the nature of the loose sand blast grit, vacuuming this material up with a vacuum truck might be ideal as it could quickly remove the unconsolidated grit and hopefully leave the more indurated native soils. It would also immediately containerize the waste and allow transfer to a waiting bin eliminating further storage concerns. Please consider this technique for the grit removal.	The use of a vacuum to remove the AOC16 sand blast grit has been considered. The actual removal method will be determined in the field.				
211	DTSC-59	59	Page 3-16, Section 3.1.15	The TAA gently slopes to the southwest,	The slope at this area is somewhat steep as the mesa drops into Bat Cave Wash. It certainly is not gentle. DTSC is concerned that there is contaminant surface migration during flash floods and winter storms.	Agreed the slope of AOC27 TAA 1 is steep enough for surface erosion during flash floods and winter storms. BMPs established in the Soil NTCRA Work Plan will be used to prevent erosion during the removal action.				

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212	DTSC-60	60	Page 3-16, Section 3.1.15	Metals and D/F contaminated soil is present within the TAA.	Location AOC27-51 contains zinc at the surface at a concentration of 1,200 mg/kg which is above the RAG and is near the maximum detected at 1,300 mg/kg at location AOC 27-7 that is scheduled for removal. It is requested that surficial soil and any debris by AOC27-51 (DTSC recalls that some metal waste also occurs in this general area) be included in the removal. For the record, elevated levels of PAHs are also present in this TAA above site screening levels that will also be removed in this specific area.	The TAA boundary established in the EE/CA will be used during the Soil NTCRA. A reassessment of historical sample results outside of the TAAs is not planned. If confirmation soil samples indicate contamination exceeding the numerical RAGs is present beyond the extent of the TAA, then stakeholders will be notified. Surficial debris within or adjacent to the TAA boundary will be removed under RAO3.				Comment resolved
213	DTSC-61	61	Page 3-16, Section 3.1.15	The initial excavation will be conducted to remove discolored soil and debris within the TAA to a depth of 3 feet bgs prior to the collection of confirmation soil samples Excavation is expected to occur from the west of the TAA.	Tables 3-1 and 3-2 indicate that RAG exceedances and assumed excavation depth will be 5 to 6 feet bgs. Please clarify this discrepancy with the cited text. Should the estimated volume of soil to be removed be recalculated in Table 3-2?	As indicated in the text in Section 3.1, Table 3-1 is taken from the Exhibit 3-3 of the EE/CA. Table 3-2 includes historical soil sample results. The assumed excavation depths were based on the objectives of the EE/CA. The 5-6 ft bgs sample at AOC27-6 detected lead at a concentration exceeding the RAG. The remainder of the AOC 27 samples did not detect contaminants exceeding the numerical RAGs below 3 feet bgs. The proposed initial excavation depth of 3 feet will be used as starting point for soil screening. If lead concentrations exceed the numerical RAG in all samples, then the excavation will continue to 6 feet. If lead concentrations do not exceed at 3 ft bgs, the excavation will continue to 6 feet only at AOC27-6.				
214	FMIT-42	FMIT-19 (MS)	Section 4.1	Summary of Compliance with Identified ARARs	The bullet list of ARARs and the reference to Table 4-1 have no common link. The bullet list descriptors is not in the table. I recommend that a bullet list of ARARs using some naming process and use the same naming process be included in the table.	The bulleted list is not a list of ARAR, but a list of resource areas that are addressed by the ARARs. The text has been revised to read, "*Fourteen location-specific and ten action-specific federal and California laws and regulations have been identified as ARARs for the Soil NTCRA. Table 4-1 provides a summary of the actions taken or that will be taken to comply with the identified ARARs*." The second column of Table 4-1 provides the ARAR or TBC categories detailed in Section 4.1 and 4.2.				

Comment Number	Agency/ Stakeholder[a]	Unique Comment ID (if applicable)[b]	Section/ Page	Reference Text	Soil Non-Time-Critical Removal Action Work Plan Comment *(Please provide sufficient detail, include specifically what you are looking for)*	PG&E Response	DTSC Response	DOI Response	Tribes Response	Final Resolution
215	Quechan-42	FYQIT-19 (MS)	Section 4.1	Summary of Compliance with Identified ARARs	The bullet list of ARARs and the reference to Table 4-1 have no common link. The bullet list descriptors is not in the table. I recommend that a bullet list of ARARs using some naming process and use the same naming process be included in the table.	The bulleted list is not a list of ARAR, but a list of resource areas that are addressed by the ARARs. The text has been revised to read, "*Fourteen location-specific and ten action-specific federal and California laws and regulations have been identified as ARARs for the Soil NTCRA. Table 4-1 provides a summary of the actions taken or that will be taken to comply with the identified ARARs*." The second column of Table 4-1 provides the ARAR or TBC categories detailed in Section 4.1 and 4.2.				
216	Cocopah-42	COCOPAH-19 (MS)	Section 4.1	Summary of Compliance with Identified ARARs	The bullet list of ARARs and the reference to Table 4-1 have no common link. The bullet list descriptors is not in the table. I recommend that a bullet list of ARARs using some naming process and use the same naming process be included in the table.	The bulleted list is not a list of ARAR, but a list of resource areas that are addressed by the ARARs. The text has been revised to read, "*Fourteen location-specific and ten action-specific federal and California laws and regulations have been identified as ARARs for the Soil NTCRA. Table 4-1 provides a summary of the actions taken or that will be taken to comply with the identified ARARs*." The second column of Table 4-1 provides the ARAR or TBC categories detailed in Section 4.1 and 4.2.				
217	DTSC-62	62	Table 4-1, ARARs, Chemical Specific ARARs and Item 16	N.A.	Recent DTSC policy required all site remediation to follow promulgated regulations (Toxicity Criteria Rule) found in 68400.5, 69020 - 69022 of Title 22, California Code of Regulations for development of RBRGs. Please ensure that these regulatory standards are incorporated in the ARARs for the removal action and future addendum to the risk evaluations.	At the request of PG&E, Haley & Aldrich, Inc. conducted an evaluation of the potential impacts of the TCR on the RBRGs used in the HHERA and therefore the Soil NTCRA Work Plan. In summary, the use of updated toxicity criteria, to be consistent with the TCR, would not materially affect the conclusions of the HHERA. Furthermore, the human health RBRGs presented in the HHERA for the risk drivers, hexavalent chromium and dioxin-TEQ, would not change. Further details of the evaluation are available upon request.				
218	FMIT-43	TRC 21	Table 4-1	Final Human Health and Ecological RBRGs were estimated for two significant contributors to soil risks at the Topock site, namely total chromium, CrVI, copper, and D/F TEQ.	This sentence is unclear as it states two significant contributors and then names 4 chemicals	Text has been revised to state that the RBRGs were estimated for **four** significant contributors.				

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219	Quechan-43	TRC 21	Table 4-1	Final Human Health and Ecological RBRGs were estimated for two significant contributors to soil risks at the Topock site, namely total chromium, CrVI, copper, and D/F TEQ.	This sentence is unclear as it states two significant contributors and then names 4 chemicals	Text has been revised to state that the RBRGs were estimated for **four** significant contributors.				
220	Cocopah-43	TRC 21	Table 4-1	Final Human Health and Ecological RBRGs were estimated for two significant contributors to soil risks at the Topock site, namely total chromium, CrVI, copper, and D/F TEQ.	This sentence is unclear as it states two significant contributors and then names 4 chemicals	Text has been revised to state that the RBRGs were estimated for **four** significant contributors.				
221	FMIT-44	TRC 22	Table 4-1	Properties on and near the site that are eligible for or listed on the NRHP 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 APE in accordance with the Programmatic Agreement q, the CHPMPr, the CHPTP s, and in consultation with the Tribes.	The tribes request more detailed work plans be drafted and consultation be held prior to work that will occur on properties on and near the site that are eligible for or listed on the NRHP. The tribes would like to also understand how DOI will solicit on behalf of the tribes for the protection of these areas while at the same time be the land manager and agency pushing the EE/CA clean up action			See RTC 175. It is DOI's responsibility to ensure PG&E personnel and contractors comply with the work plan, including ARAR and TBC. BLM will work with the Tribes to ensure compliance with the PA, CHPMP, and applicable portions of the Treatment Plan. Field oversight of activities by Federal representatives will occur to monitor compliance and address tribal monitors concerns in a timely fashion.		
222	Quechan-44	TRC 22	Table 4-1	Properties on and near the site that are eligible for or listed on the NRHP 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 APE in accordance with the Programmatic Agreement q, the CHPMPr, the CHPTP s, and in consultation with the Tribes.	The tribes request more detailed work plans be drafted and consultation be held prior to work that will occur on properties on and near the site that are eligible for or listed on the NRHP. The tribes would like to also understand how DOI will solicit on behalf of the tribes for the protection of these areas while at the same time be the land manager and agency pushing the EE/CA clean up action			See RTC 175. It is DOI's responsibility to ensure PG&E personnel and contractors comply with the work plan, including ARAR and TBC. BLM will work with the Tribes to ensure compliance with the PA, CHPMP, and applicable portions of the Treatment Plan. Field oversight of activities by Federal representatives will occur to monitor compliance and address tribal monitors concerns in a timely fashion.		

Comment Number	Agency/ Stakeholder[a]	Unique Comment ID (if applicable)[b]	Section/ Page	Reference Text	Soil Non-Time-Critical Removal Action Work Plan Comment *(Please provide sufficient detail, include specifically what you are looking for)*	PG&E Response	DTSC Response	DOI Response	Tribes Response	Final Resolution
223	Cocopah-44	TRC 22	Table 4-1	Properties on and near the site that are eligible for or listed on the NRHP 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 APE in accordance with the Programmatic Agreement q, the CHPMPr, the CHPTP s, and in consultation with the Tribes.	The tribes request more detailed work plans be drafted and consultation be held prior to work that will occur on properties on and near the site that are eligible for or listed on the NRHP. The tribes would like to also understand how DOI will solicit on behalf of the tribes for the protection of these areas while at the same time be the land manager and agency pushing the EE/CA clean up action			See RTC 175. It is DOI's responsibility to ensure PG&E personnel and contractors comply with the work plan, including ARAR and TBC. BLM will work with the Tribes to ensure compliance with the PA, CHPMP, and applicable portions of the Treatment Plan. Field oversight of activities by Federal representatives will occur to monitor compliance and address tribal monitors concerns in a timely fashion.		
224	FMIT-45	FMIT-20 (MS)	Section 4.2, last pp, Page 4-1	At the Topock site, the site-specific PA, the *Cultural and Historic Properties Management Plan* (CHPMP) (BLM 2012) and the *Treatment Plan* (BLM 2018) are TBCs and will be implemented during the Soil	The Tribe believes that its concerns over protecting the cultural landscape is an ARAR (see bullet list in Sect 4.1 that recognizes and lists cultural ARARs.) However, even TBCs need to be considered. The two cultural TBCs listed here are a start but do not capture the full range of Tribal considerations. The Tribe requests a consultation meeting for the sole purpose of identifying and including ARARs and TBC that address cultural issues and how those concerns will be addressed in the project. In previous comments on the EECA the Tribe has listed Tribal cultural concerns as ARARs and those comments have not been fully addressed by DOI, as evidenced by the limited list in this Work Plan. It is also important to note that not all the Tribes have signed or agreed to the PA for the Topock site. One reason is that the PA did not offer sufficient protection of Tribal cultural resources and ongoing and effective consultation is the vehicle for DOI to understand and address Tribal concerns. Therefore, the use of the PA as an ARAR without the inclusion of other, equally valid, Tribal concerns results in an incomplete ARAR evaluation.			The bulleted list found in Section 4.1 does not identify ARAR but rather resource areas addressed by ARAR and TBC found in Tables 4.1 through 4.5. The PA, CHPMP, and Treatment Plan are considered as TBCs. See RTC 1, 25, and 28. Concerning the PA, see RTC 35.		
225	Quechan-45	FYQIT-20 (MS)	Section 4.2, last pp, Page 4-1	At the Topock site, the site-specific PA, the *Cultural and Historic Properties Management Plan* (CHPMP) (BLM 2012) and the *Treatment Plan* (BLM 2018) are TBCs and will be implemented during the Soil	The Tribe believes that its concerns over protecting the cultural landscape is an ARAR (see bullet list in Sect 4.1 that recognizes and listscultural ARARs.) However, even TBCs need to be considered. The two cultural TBCs listed hereare a start but do not capture the full range of Tribal considerations. The Tribe requests a consultation meeting for the sole purpose of identifying and including ARARs and TBC thataddress cultural issues and how those concerns will be addressed in the project. In previous comments on the EECA the Tribe has listed Tribal cultural concerns as ARARs and those comments have not been fully addressed by DOI, as evidenced by the limited list in this Work Plan. It is also important to note that not all the Tribes have signed or agreed to the PA for the Topock site. One reason is that the PA did not offer sufficient protection of Tribal cultural resourcesand ongoing and effective consultation is the vehicle for DOI to understand and address Tribal concerns. Therefore, the use of the PA as an ARAR without the inclusion of other, equally valid,Tribal concerns results in an incomplete ARAR evaluation.			The bulleted list found in Section 4.1 does not identify ARAR but rather resource areas addressed by ARAR and TBC found in Tables 4.1 through 4.5. The PA, CHPMP, and Treatment Plan are considered as TBCs. See RTC 1, 25, and 28. Concerning the PA, see RTC 35.		

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226	Cocopah-45	COCOPAH-20 (MS)	Section 4.2, last pp, Page 4-1	At the Topock site, the site-specific PA, the *Cultural and Historic Properties Management Plan* (CHPMP) (BLM 2012) and the *Treatment Plan* (BLM 2018) are TBCs and will be implemented during the Soil	The Tribe believes that its concerns over protecting the cultural landscape is an ARAR (see bullet list in Sect 4.1 that recognizes and listscultural ARARs.) However, even TBCs need to be considered. The two cultural TBCs listed hereare a start but do not capture the full range of Tribal considerations. The Tribe requests a consultation meeting for the sole purpose of identifying and including ARARs and TBC thataddress cultural issues and how those concerns will be addressed in the project. In previous comments on the EECA the Tribe has listed Tribal cultural concerns as ARARs and those comments have not been fully addressed by DOI, as evidenced by the limited list in this Work Plan. It is also important to note that not all the Tribes have signed or agreed to the PA for the Topock site. One reason is that the PA did not offer sufficient protection of Tribal cultural resourcesand ongoing and effective consultation is the vehicle for DOI to understand and address Tribal concerns. Therefore, the use of the PA as an ARAR without the inclusion of other, equally valid,Tribal concerns results in an incomplete ARAR evaluation.			The bulleted list found in Section 4.1 does not identify ARAR but rather resource areas addressed by ARAR and TBC found in Tables 4.1 through 4.5. The PA, CHPMP, and Treatment Plan are considered as TBCs. See RTC 1, 25, and 28. Concerning the PA, see RTC 35.		
227	FMIT-46	TRC 23	Section 4.2	At the Topock site, the site-specific PA, the Cultural and Historic Properties Management Plan (CHPMP) (BLM 2012) and the Treatment Plan (BLM 2018) are TBCs and will be implemented during the Soil	Only one tribe signed the PA. How is the PA then used as an ARAR to ensure that all interested tribes concerns are considered during ground disturbing activities			See RTC 35.		
228	Quechan-46	TRC 23	Section 4.2	At the Topock site, the site-specific PA, the Cultural and Historic Properties Management Plan (CHPMP) (BLM 2012) and the Treatment Plan (BLM2018) are TBCs and will be implemented during the Soil	Only one tribe signed the PA. How is the PA thenused as an ARAR to ensure that all interested tribes concerns are considered during ground disturbing activities			See RTC 35.		
229	Cocopah-46	TRC 23	Section 4.2	At the Topock site, the site-specific PA, the Cultural and Historic Properties Management Plan (CHPMP) (BLM 2012) and the Treatment Plan (BLM2018) are TBCs and will be implemented during the Soil	Only one tribe signed the PA. How is the PA thenused as an ARAR to ensure that all interested tribes concerns are considered during ground disturbing activities			See RTC 35.		
230	FMIT-47	FMIT-21 (MS)	Section 4.2, Page 4-2	Eight TBCs are related to the protection of cultural resources and consultation with Tribes.	The tables are very long, is there a way to identify the 8 TBCs that address Tribal concerns?	The eight TBCs are listed as Item No. 41-47 and 50 in Table 4-1.				
231	Quechan-47	FYQIT-21 (MS)	Section 4.2, Page 4-2	Eight TBCs are related to the protection of cultural resources and consultation with Tribes.	The tables are very long, is there a way to identifythe 8 TBCs that address Tribal concerns?	The eight TBCs are listed as Item No. 41-47 and 50 in Table 4-1.				
232	Cocopah-47	COCOPAH-21 (MS)	Section 4.2, Page 4-2	Eight TBCs are related to the protection of cultural resources and consultation with Tribes.	The tables are very long, is there a way to identifythe 8 TBCs that address Tribal concerns?	The eight TBCs are listed as Item No. 41-47 and 50 in Table 4-1.				

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233	FMIT-48	FMIT-22 (MS)	Table 4-2	Every effort shall be made to avoid and/or minimize adverse effects to the maximum extent practicable	Several of the entries to this table have language that requires "every effort" is to be made by DOI to minimize adverse effects on the site. Yet, there are few efforts listed in this table that have addressed the Tribal concerns over related to unnecessary disturbance and destruction of sacred land. Again, the Tribes request a formal consultation with the specific purpose of reviewing the ARARs and TBCs and the specific actions that DOI is taking to address these project requirements. For example: row 3 in the table focuses on archaeological findings as a requirement in this project. However, the Tribal consideration of the sacredness of this land extends to the entire cultural landscape and not just localized archaeological findings.			Efforts to minimize the amount of disturbance were considered in the selection of the PAAs, analysis of the alternatives within the EE/CA, and selection of the preferred alternative. See RTC 1, 25, and 28.		
234	Quechan-48	FYQIT-22 (MS)	Table 4-2	Every effort shall be made to avoid and/orminimize adverse effects to the maximum extent practicable	Several of the entries to this table have language that requires "every effort" is to be made by DOI to minimize adverse effects on the site. Yet,there are few efforts listed in this table that have addressed the Tribal concerns over related to unnecessary disturbance and destruction of sacred land. Again, the Tribes request a formal consultation with the specific purpose of reviewing the ARARs and TBCs and the specific actions that DOI is taking to address these projectrequirements. For example: row 3 in the table focuses on archaeological findings as a requirement in this project. However, the Tribal consideration of the sacredness of this land extends to the entire cultural landscape and not just localized archaeological findings.			Efforts to minimize the amount of disturbance were considered in the selection of the PAAs, analysis of the alternatives within the EE/CA, and selection of the preferred alternative. See RTC 1, 25, and 28.		
235	Cocopah-48	COCOPAH-22 (MS)	Table 4-2	Every effort shall be made to avoid and/orminimize adverse effects to the maximum extent practicable	Several of the entries to this table have language that requires "every effort" is to be made by DOIto minimize adverse effects on the site. Yet,there are few efforts listed in this table that have addressed the Tribal concerns over related to unnecessary disturbance and destruction of sacred land. Again, the Tribes request a formal consultation with the specific purpose of reviewing the ARARs and TBCs and the specific actions that DOI is taking to address these projectrequirements. For example: row 3 in the table focuses on archaeological findings as a requirement in this project. However, the Tribal consideration of the sacredness of this land extends to the entire cultural landscape and not just localized archaeological findings.			Efforts to minimize the amount of disturbance were considered in the selection of the PAAs, analysis of the alternatives within the EE/CA, and selection of the preferred alternative. See RTC 1, 25, and 28.		
236	FMIT-49	TRC 24	Section 4.3	N.A.	The omission within this section of any mention tribal consents prior to ground disturbing activities is noted. Why are tribal concerns over the impacts to cultural resources not included within this section?	The requirements related to cultural resources are addressed in Section 4.1 (Compliance with ARARs) and Section 4.2 (Compliance with Other Advisories, Criteria, or Guidance).				
237	Quechan-49	TRC 24	Section 4.3	N.A.	The omission within this section of any mention tribal consents prior to ground disturbing activitiesis noted. Why are tribal concerns over the impacts to cultural resources not included within this section?	The requirements related to cultural resources are addressed in Section 4.1 (Compliance with ARARs) and Section 4.2 (Compliance with Other Advisories, Criteria, or Guidance).				
238	Cocopah-49	TRC 24	Section 4.3	N.A.	The omission within this section of any mention tribal consents prior to ground disturbing activitiesis noted. Why are tribal concerns over the impacts to cultural resources not included within this section?	The requirements related to cultural resources are addressed in Section 4.1 (Compliance with ARARs) and Section 4.2 (Compliance with Other Advisories, Criteria, or Guidance).				

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239	DTSC-63	63	Figure 2-3	Does the current excavation extend to the edge of the TAA? Notify Stakeholders	The decision leading to and from this point is confusing. If excavation is at edge of TAA, then notify Stakeholders, but there are two potential outcomes, one is to continue excavation and the other determined removal complete. What triggers which event? DTSC understands that the cited text could lead to stakeholder notification and removal action completion with only XRF metal data collected. It is assumed that laboratory data collection is mandatory for completing the removal action. Please clarify and make appropriate revisions as needed. The cited language suggests that excavation removals at TAAs cannot go beyond the "edge of the TAA". Won't excavation begin at the edge of the TAA as discussed in section 3? Please clarify. It seems inappropriate to stop at a TAA boundary as confirmation sample data should define the extent of the contamination. Is this just a notification process? Please clarify and revise the flow diagram.	The flow diagram has been revised to ensure that confirmation soil samples are submitted for laboratory analysis prior to actions that would lead to stakeholder notification or the determination that the excavation is complete. This applies to TAA boundaries that encompass the extent of contamination in excess of the numerical RAGs and those where contamination in excess of the numerical RAGs extends beyond the TAA boundary.				Comment resolved
240	FMIT-50	TRC 25	SOP B11	Site Clearance and Permitting Standard Operating Procedures for PG&E Topock Program	Please update this SOP to include tribal site walk prior to site work	Section 2.1.3 (Pre-construction Field Verifications) describes the current site practice of preconstruction field verifications or informal walk-downs with Archaeological Monitors, Tribal Monitors, and onsite personnel prior to the start of ground-disturbing activities. This SOP and the process described in Section 2.1.3 will be implemented during the field implementation of the Soil NTCRA.				
241	Quechan-50	TRC 25	SOP B11	Site Clearance and Permitting Standard Operating Procedures for PG&ETopock Program	Please update this SOP to include tribal site walk prior to site work	Section 2.1.3 (Pre-construction Field Verifications) describes the current site practice of preconstruction field verifications or informal walk-downs with Archaeological Monitors, Tribal Monitors, and onsite personnel prior to the start of ground-disturbing activities. This SOP and the process described in Section 2.1.3 will be implemented during the field implementation of the Soil NTCRA.				
242	Cocopah-50	TRC 25	SOP B11	Site Clearance and Permitting Standard Operating Procedures for PG&ETopock Program	Please update this SOP to include tribal site walk prior to site work	Section 2.1.3 (Pre-construction Field Verifications) describes the current site practice of preconstruction field verifications or informal walk-downs with Archaeological Monitors, Tribal Monitors, and onsite personnel prior to the start of ground-disturbing activities. This SOP and the process described in Section 2.1.3 will be implemented during the field implementation of the Soil NTCRA.				

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243	DOI-6	DOI-6	Appendix B, Section 6.2.1.2/ Page 6-4	N.A.	Due to the proximity of NTCRA activities to washes, it is recommended that additional information be provided regarding response prior to and during potential flash flood events.	The HASP section on flash floods will be updated with the following information: "*Flash Flood* *Leave work area and find higher ground if rapidly changing weather, rapid formation of clouds, drop in temperature is observed, or thunder is heard in the distance. If a flash flood warning is issued, climb to higher ground. Seek shelter on stable ground. Do not stay in an area where there is un-compacted material on a steep slope. Do not drive or walk into flood waters. Never drive around the barriers blocking a flooded road. A mere 6 inches of fast-moving flood water can knock over an adult. It takes just 12 inches of rushing water to carry away most cars and just 2 feet of rushing water can carry away trucks.*"				
244	DTSC-64	64	Page 6, Appendix C, Section 7.1	This Transportation Plan is a "living document" that will be updated as needed based on changed project circumstances or lessons learned that may occur during execution of the project.	Suggest adding language indicating that updates to the Transportation Plan should be approved by DOI prior to implementation.	Agreed, the text has been revised as requested.				
245	DOI-7	DOI-7	Appendix C, Section 4.4/ Page 4	A cleanout station will be maintained…	Please provide additional detail regarding the setup of a cleanout station and clarify how trucks will be kept "clean during transport".	The text has been revised to include additional cleanout station details. The text has been revised to clarify the need to keep truck clean prior to transport to the landfill, not 'during'.				
246	DOI-8	DOI-8	Appendix D, Section 2.2/ Page 2-1	N.A.	K-rails should be considered in areas where erosion or sediment sheet flow may be problematic.	The BMPs presented in Section 2.2 were selected based on experience managing erosion at the Topock site. K-rails have not been particularly effective. No change has been made to the document.				
247	DOI-9	DOI-9	Appendix D, Section 2.2/ Page 2-2	Sediment accumulated by the fiber rolls will be removed to maintain the effectiveness of the fiber rolls.	Identify how sediment will be managed after removal.	The text will be revised to read, "*Sediment accumulated behind the fiber rolls will be removed and transported to the SPY for management with other potentially contaminated soil*"				
248	DOI-10	DOI-10	Appendix D, Section 2.3.3/ Page 2-3	Temporary stockpiling of Resource Conservation and Recovery Act (RCRA) and non-RCRA hazardous…	Bins or containers may be appropriate for managing certain hazardous wastes due to its characteristics or level of contamination.	Due to the expected volume of excavated soil, storage of waste in roll-off bins will not be practical. However, roll-off bins will be considered if small quantities of significantly hazardous or hard to manage waste is generated. The text has been revised to include the potential use of roll-off bins to manage wastes.				Comment resolved

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249	DOI-11	DOI-11	Appendix D, Section 2.3.3/ Page 2-3	Only soil that does not contain free liquids will be stockpiled.	What field testing will be employed to determine if “free liquids” are present? How will soil with “free liquids” be managed?	Soils that contain enough water to prevent piling or that drains from piled soil will not be stockpiled. Soil with free liquid will not be excavated and therefore not require management				
250	DOI-12	DOI-12	Appendix D, Section 2.3.3/ Page 2-3	Soil above approved soil management screening levels can be stockpiled if placed on liner or placed in roll-off bins or similar containers.	A discussion of bin/container management should be included.	Agreed. See response to Comment #248				
251	DOI-13	DOI-13	Appendix D, Section 2.3.3/ Page 2-4	After the stockpile has been removed, residual material, if any, will be removed from the underlying and surrounding areas.	Please clarify why residual material, presumably clean soils, would need to be removed.	The text has been revised to clarify residual material refers to stockpile cover and BMPs.				
252	DOI-14	DOI-14	Appendix D, Section 2.4/ Page 2-5	Loaded haul vehicles will be covered on publicly maintained roads.	Loaded haul trucks should be covered when transporting waste on <u>all</u> transportation routes.	The text has been revised to include covers on trucks transporting waste on all transportation routes.				
253	DOI-15	DOI-15	Appendix D, Section 2.5/ Page 2-5	on publicly maintained paved surfaces	Track-out or spills should be cleanup up on all transportation routes.	The text has been clarified to indicate that track-out or spill beyond the AOCs will be cleaned up.				
254	DOI-16	DOI-16	Appendix D, Section 2.7/ Page 2-5	N.A.	Good Housekeeping BMPs should include minimizing windblown trash/plastic and providing trash receptacles that are emptied regularly.	Agreed. The text has been revised as requested.				
255	DOI-17	DOI-17	Appendix D, Section 2.7/ Page 2-5	4th bullet	Define “receiving water”.	The text has been revised to remove “receiving water”.				
256	DOI-18	DOI-18	Appendix F, Section 2.1/ Page 2-1	In compliance with ARAR #19,	Reference to ARAR #19 is incorrect. ARAR #16 identifies how excavated materials will be managed and how the SMP applies.	Correct. The text has been revised to reference ARAR #16.				
257	DOI-19	DOI-19	Appendix F, Section 3.2.5/ Page 3-3	PPE is visibly contaminated,	PPE can, in some instances, be decontaminated and should be considered.	The text has been revised to indicate, that if the PPE cannot be decontaminated, then it will take on the same profile as the waste in which it is contaminated.				
258	DOI-20	DOI-20	Appendix F, Section 4.1.1/ Page 4-1	No hazardous wastes will be stored at the Soil Processing Yard.	Identify where hazardous waste will be stored.	Wastes pending analysis will be temporarily staged at the SPY. Upon completion of waste characterization, wastes will be transported to an appropriate offsite facility for disposal All hazardous wastes will be removed on an expedited basis. . Please see Response to Comment #248				Comment resolved
259	DOI-21	DOI-21	Appendix F, Section 4.1.4.1/ Page 4-2	N.A.	90-day accumulation areas should be identified on a figure.	The text has been revised to indicate that 90-day accumulation areas will be located within the SPY or the Soil Staging Area on the Transwestern Bench, these locations are identified is several work plan figures.				

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260	DOI-22	DOI-22	Appendix F, Section 5/ Page 5-1	…if the truck is transporting hazardous waste.	All loose material should be removed from trucks, regardless if it is hazardous.	Correct. The text has been revised to indicate that all loose material will be removed from trucks transported both hazardous and nonhazardous wastes.				
261	DOI-23	DOI-23	Appendix F, Section 5/ Page 5-1	Appropriate documentation to include waste manifests or shipping papers will be completed, checked, and kept onsite.	Clarify that copies of the waste manifest and shipping papers/bills of lading should be kept on site. Appropriate documentation will be carried by the transporter.	The text in Section 5 has been revised to indicate that copies of the shipping documents will be kept on site. Section 5.1 provides the details for the appropriate documentation to be carried by the transporter.				
262	DOI-24	DOI-24	Section 2.1.7.6/ Page 2-5	material will be located with an EZ due	"With" should be "within".	The text has been revised as requested.				
263	DOI-25	DOI-25	Appendix F, Section 4.1.4.1/ Page 4-2	as central…	Should be "at central…"	The text has been revised as requested.				
264	DTSC-65	65	Appendix F	N.A.	DTSC has previously commented on the EE/CA requesting that waste characterization to include applicable California Hazardous Waste testing protocols (i.e. Total Threshold Limit concentrations (TTLC) and Soluble Threshold Leachate Concentration (STLC) standards). RTC for this comment states that "testing procedures will be identified in the removal action work plan…" DTSC did not find any specific consideration in the work plan for the California H.W. Testing protocols in Appendix F.	Sections 3.1.1 and 3.1.2 of Appendix F describe the waste characterization procedures including when the WET method will be used for comparison to STLC values. No change has been made to the document.				
265	DTSC-66	66	Appendix F	N.A.	DTSC comment 5 of the EE/CA discussed the possibility of contamination to coarse material. In response to comment, it was stated that "coarse material that has significant residual staining or colored encrustation will, however, be removed for offsite disposal… Testing of coarse fraction will be considered during the removal action. This will be detailed in the Removal Action Work Plan. "This protocol is not found in the work plan.	The results of a 2019 treatability study during the EE/CA indicated that the coarse fraction of excavated material does not contain significant contaminant concentrations. However, as indicated in Section 2.3.4, coarse materials with significant residual staining will be collected for offsite disposal. The testing of coarse material without significant residual staining is not proposed. No change has been made to the document.				Comment resolved

[a] Cocopah = Cocopah Indian Tribe; DOI = U.S. Department of the Interior; DTSC = California Department of Toxic Substances Control; FMIT = Fort Mojave Indian Tribe; MWD = Metropolitan Water District; Quechan = Quechan Indian Tribe

[b] Comment ID as it appeared in the commenter's original comment letter (where applicable).

N.A. = not applicable