

Work Variance Request Form

Groundwater Remedy Phase 2A Construction, PG&E Topock Compressor Station, Needles, California

PG&E TOPOCK GROUNDWATER REMEDIATION PROJECT

Work Variance Request #14 – Proposed Installation of Pipeline C18 at Current Post-NTCRA Elevation and Addition of Aggregate-Based Access Road in East Ravine for Remedy Operation and Maintenance

Request Prepared By: PG&E

Date Submitted: 4/15/2025

Variance Request No.: 14

Location: East Ravine

Request Approval From: DTSC and DOI

Date Approval Required: To Be Determined

Map Area: See attached drawings

Land Manager/Parcel No.: PG&E/APN 650-161-08 and US Fish and Wildlife Services for Havasu National Wildlife Refuge/APN 650-161-12

Current Vegetative Cover/Land Use: Sparse vegetation/Industrial

Existing Sensitive Resource? ☐ No ☒ Yes, Specify: Palo verde trees nearby

Variance From: ☐ Mitigation Measure ☐ Work Plan/Procedure ☐ Response to Comments Drawing
☐ Permit Condition ☒ Other – Approved WVR #10 and C/RAWP Figure 4.3-2

Detailed Description of Variance and Justification (Attach additional information if necessary):

☒ Attachments: ☐ Photo ☒ Construction Drawing ☐ Aerial Photo Mark-Up ☐ Correspondence ☐ Other

Potential Impacts of Variance:

- | | | |
|---|--|--|
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hazardous Materials | <input type="checkbox"/> Aesthetic |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Water Resources |
| <input checked="" type="checkbox"/> Soils | <input type="checkbox"/> Paleo Resources | |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Hydrology and Water Quality | |

Work Variance Request Form (Continued)

Groundwater Remedy Phase 2A Construction, PG&E Topock Compressor Station, Needles, California

PG&E TOPOCK GROUNDWATER REMEDIATION PROJECT

Work Variance Request #14 – Proposed Installation of Pipeline C18 at Current Post-NTCRA Elevation and Addition of Aggregate-Based Access Road in East Ravine for Remedy Operation and Maintenance

Description and Justification:

This Work Variance Request (WVR) proposes to install pipeline C18 at current elevation and add an access road in East Ravine. The rationale and specifics are described below and included in the attached drawings.

A. Justification for installation of remedy pipeline C18 at current post-NTCRA elevation

During the Soil Non-Time Critical Removal Action (NTCRA) project, PG&E submitted a request to DOI for approval to eliminate the need for imported backfill at the East Ravine. The rationale was to reduce the need for importing approximately 5,000 cubic yards of backfill and maximizing the beneficial use of available onsite material. DOI approved PG&E's request on February 3, 2023.

Consistent with that rationale, PG&E proposes to install remedy pipeline C18 in the East Ravine at current post-NTCRA elevation, instead of at the higher pre-NTCRA elevation in the 2015 Final Design. This will reduce the need to import approximately 5,000 cubic yards of fill materials to backfill the East Ravine to pre-NTCRA elevation. No material changes to the pipeline C18 alignment, as approved in WVR #10 (can be downloaded via [Link](#)), is proposed.



B. Justification for an aggregate-based (AB) access road in the East Ravine for the operation and maintenance (O&M) of remedy wells, monitoring wells, and pipeline

Figure 4.3-2 of the Construction/Remedial Action Work Plan (C/RAWP) shows an existing access route in the East Ravine. To support the remedy O&M activities for remedy wells and pipeline in the East Ravine, it is anticipated that this access dirt route would require frequent maintenance resulting in repeated soil disturbance. Therefore, to minimize soil disturbance, PG&E proposes to construct a 14-foot wide, aggregate-based (AB) access road on top of the pipeline C18 alignment. This AB access road would require less maintenance and minimize the level of soil disturbance over the anticipated decades-long duration of the Topock remediation project.

In total, the estimated net change in the volumes of soils/other materials and access road length associated with this WVR are:

1. Import back fill: a reduction of approximately 4,227 cubic yards (5,000 cy reduction by not backfill East Ravine plus 773 cubic yards of fill estimated for pipeline C18 [see attached C-07-61])
2. Import riprap: an increase of approximately 198 cubic yards
3. Import AB: an increase of approximately 245 cubic yards
4. Access road length: an increase of 970 feet

In addition, there are no additional impacts to biological, historical, and cultural resources associated with this WVR not already evaluated in the 2018 Subsequent Environmental Impact Report (SEIR).

Approval Signatures:		5/9/25
	4/14/25	
PG&E Project Manager	Date	Approving Agency
		Date
		Approving Agency
		Date