



## Department of Toxic Substances Control

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Maureen F. Gorsen, Director  
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Arnold Schwarzenegger  
Governor



Linda S. Adams  
Secretary for  
Environmental Protection

Sent Via Email

July 28, 2008

Ms. Yvonne Meeks  
Portfolio Manager – Site Remediation  
Pacific Gas and Electric Company  
4325 South Higuera Street  
San Luis Obispo, CA 93401

MODIFICATION TO SURFACE WATER MONITORING PROGRAM AT PACIFIC GAS AND ELECTRIC COMPANY (PG&E), TOPOCK COMPRESSOR STATION, NEEDLES, CALIFORNIA (EPA ID NO. CAT080011729)

Dear Ms. Meeks,

In response to PG&E's proposal in the March 28, 2008 Groundwater and Surface Water Monitoring Report, Fourth Quarter and Annual Summary to modify the existing surface water monitoring program, and concerns raised by the Colorado River Indian Tribe in their letter dated February 13, 2008, comments to the Risk Assessment Work Plan dated March 26, 2008, and letter to DTSC on June 10, 2008 regarding the sampling program, DTSC hosted a technical discussion on June 17, 2009 Technical Workgroup teleconference to discuss the surface water monitoring program. As a result of the discussion, DTSC provided an outline of the proposed modifications and solicited input from interested stakeholders in an email dated June 30, 2008. DTSC notes that there were no comments or recommendations from interested stakeholders; therefore, DTSC approves the modifications as proposal by PG&E with the noted additions and changes below.

### ***Modifications proposed by PG&E:***

- *Sampling Frequency:*
  - *Maintain quarterly sampling with three events during high river level*
  - *Eliminate one of the three low river level (winter) events*
- *In-channel sampling depths:*
  - *Retain shallow and deep sampling depths*
  - *Eliminate mid-depth sampling*
- *Shoreline sampling locations:*
  - *Eliminate seven of the nine locations due to data overlap with the shallow in-channel locations*
  - *Keep R-23, added January 2008; sample for one year & evaluate*

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- *Keep R-28, continue IM PMP sampling*
- *No changes to analytical parameters.*

***Additional changes and additional conditions:***

PG&E shall maintain the following shoreline sampling locations in addition to R-23 and R-28:

- *RRB (include sampling at this station until soil investigation within Bat Cave Wash is completed and evaluated by DTSC)*
- *R-19 (include sampling at this old station due to chromium detections and trends in nearby shallow groundwater wells MW-47-055 and MW-33-040)*
- *Continue sampling R-23 until the East Ravine groundwater and soils investigations are completed and the data are evaluated by DTSC*

In response to specific concerns raised by the Colorado River Indian Tribe, PG&E shall:

- *Begin collecting and analyzing unfiltered surface water samples in conjunction with filtered samples. (Note: To continue progress of project, PG&E shall proceed to evaluate human health risk assessment for incidental ingestion pathway using existing filtered water data; if resulting assessment suggests that the pathway has significant risk contribution, PG&E shall evaluate risk using unfiltered data)*
- *Move in-channel station C-R22 to the middle pier of the former red rock bridge (southwest of current C-R22 position - see Figure A) to evaluate if pier is acting as preferential groundwater pathway*

If you have any questions regarding the surface water monitoring program modifications and conditions above, please feel free to contact me at (714) 484-5439.

Sincerely,



Project Manager  
Geology and Remediation Engineering

Enclosure

aky: 070804A

cc: PG&E Topock Consultative Workgroup Members – Via e-mail  
PG&E Topock Geo/Hydro Technical Workgroup Members – Via e-mail  
Tribal Representatives in PG&E Contact List – Via e-mail

Figure A

