Department of Toxic Substances Control

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January 26, 2006

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

CONDITIONAL APPROVAL TO COMMENCE START-UP OF EXTRACTION WELL PE-1 AND CONTINUED EXTRACTION FROM WELL TW-3D, PACIFIC GAS AND ELECTRIC COMPANY, TOPOCK COMPRESSOR STATION, NEEDLES, CALIFORNIA (EPA ID NO. CAT080011729)

Dear Ms. Meeks:

The Department of Toxic Substances Control (DTSC) has received the Pacific Gas and Electric Company (PG&E) letter dated January 25, 2006 requesting authorization to initiate groundwater extraction from extraction well PE-1 as part of the overall groundwater extraction system for Interim Measures No. 3. In addition, DTSC has received additional information in a January 25th and 26th email certifying that all construction and testing has been completed. PG&E is requesting authorization to stop extraction from TW-2D, to continue extract from TW-3D, and to begin extraction from PE-1. PG&E proposes to begin pumping from PE-1 at a rate of approximately 40 gallons per minute (gpm), and will determine the maximum sustainable pumping rate from this well based on data collected during the first two weeks of pumping. Well TW-3D will be pumped at approximately 95 gpm to yield a combined pumping rate of 135 gpm.

DTSC is providing conditional approval of this request as follows:

1. Upon receipt of this letter PG&E shall expeditiously proceed to begin pumping from TW-3D and PE-1. PG&E shall maintain a minimum combined pumping rate from PE-1 and TW-3D of 135 gpm, except during times of scheduled and unscheduled maintenance.

2. As described in the PG&E request letter, PG&E shall monitor the groundwater levels in PE-1 and surrounding wells during the first two (2) weeks of pumping and will confer and obtain DTSC approval prior to any adjustment of pumping rates based on this evaluation or future evaluations.

3. PG&E states that "groundwater modeling indicates that pumping PE-1 at 40 gpm

and TW-3D at 95 gpm provides plume control and increases gradients in the vicinity of MW-34-100, while minimizing the potential for PE-1 to increase gradients toward the floodplain within the toe of the plume." DTSC takes exception with this statement because the toe of the plume extends beyond PE-1 and beyond MW-34-100 for an unknown distance. DTSC believes that PG&E may be attempting to express the point that PG&E does not want pumping from PE-1 to pull the main body of the chromium plume further eastward.

4. The PG&E discussion of possible revision to relevant gradient well pairs is premature at this time. In the near future DTSC will be issuing an update to the performance criteria specified in the DTSC letter dated February 14, 2005. This DTSC letter will specify updated gradient well pairs and, if appropriate, new performance metrics for the interim measure.

5. Effective February 1, 2006, PG&E shall begin monthly sampling of wells MW-36-070 and MW-39-070.

6. No later than April 14, 2006, PG&E shall update the "Interim Measures No. 3 Treatment and Extraction System Operation and Maintenance Plan, Revision 0, dated April 2005.

7. PG&E shall provide notification to DTSC (within 24 hours) when modifications to the initial pumping rates have commenced.

If you have any questions, please contact me at (510) 540-3943.

Sincerely,

Norman Shopay

Norman Shopay, P.G.
Project Manager
Geology, Permitting and Corrective Action Branch

NTS/199B

cc: PG&E Topock Consultative Workgroup Members - Via e-mail