



Linda S. Adams  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Maureen F. Gorsen, Director  
5796 Corporate Avenue  
Cypress, California 90630



Arnold Schwarzenegger  
Governor

Sent Via Email

January 5, 2007

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

ACCEPTANCE OF THE PERFORMANCE ASSESSMENT REPORT FOR INTERIM MEASURES NO 3 INJECTION WELL FIELD, PACIFIC GAS AND ELECTRIC COMPANY (PG&E), TOPOCK COMPRESSOR STATION, NEEDLES, CALIFORNIA (EPA ID NO. CAT080011729)

Dear Ms. Meeks,

On July 15, 2005, the Department of Toxic Substances Control (DTSC) issued a conditional approval for the start up and operation of the Interim Measures No. 3 Treatment System and Injection Wells. Contained in the letter is a requirement for PG&E to submit a performance assessment report (Report) for the injection well field. Based on the Report, DTSC will determine if the continued use of the injection well field is appropriate. As required, PG&E submitted the Report on November 30, 2006 and concluded that the injection system has operated successfully and that it is an effective strategy for management of treated groundwater generated from the implementation of Interim Measure No. 3. The report further concluded that the operation of the injection wells did not adversely affect the aquifer water quality and recommended against the installation of the additional shallow compliance wells since the injected water is moving "almost entirely through the aquifer in the middle and deep zone."

As a result of our review of the Report, DTSC concurs with the Report's summary and recommendations. Furthermore, DTSC continues to believe that the use of the injection wells is an important part of the Interim Measures No. 3 project to create a hydraulic gradient of groundwater away from the Colorado River regardless of fluctuating river levels. DTSC; therefore, concludes that the continued use of the injection wells is consistent with the approval of the Interim Measures No. 3. DTSC, however, requires PG&E to continue to submit a performance assessment report every two years to evaluate the injection well operations and the influence of treated water on aquifer water quality. The performance assessment report shall be submitted by November 30 of every even year until the Interim Measures are complete

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or replaced with the final remedy. DTSC also reserves the right to require PG&E to install the additional shallow compliance wells based on additional interpretation and/or results of future sampling data.

In a related matter, DTSC is requesting that PG&E submit an Alternative Demonstration Report (ADR) to DTSC within 30 days of receipt of this letter regarding total chromium and hexavalent chromium concentrations detected in wells OW-2S and OW-5S above action levels. PG&E believes that the elevated values are due to natural variability within the shallow portion of the aquifer and are not related to the injection water. This is based on evaluation of water quality data for the injected water and comparisons to water quality data from groundwater wells monitoring the injection. The ADR is requested to better document and investigate the observed exceedances. The ADR should, at a minimum, include: evaluation of existing core/logs for organic content; evaluation of potential impact drilling and development could have had on water quality monitoring data; evaluation of other monitoring well data to determine if similar concentration trends have been observed elsewhere at the site; and sampling of wells OW-2S and OW-5S for chromium isotopes. The basic ADR approach was discussed and agreed to by PG&E, the Regional Water Quality Control Board (RWQCB), and DTSC on December 1, 2006 at the RWQCB office in the Palm Desert and further refined during the Technical Hydrogeologic Workgroup Meeting held on December 12, 2006. Based on existing data and interpretation, DTSC does not believe it is necessary or prudent to continue following the updated contingency plan flowchart, dated August 8, 2006, for total chromium and hexavalent chromium concentrations from wells OW-2S and OW-5S.

If you have any questions or comments regarding this letter, please contact me at (714) 484-5439.

Sincerely,



Aaron Yue  
Project Manager  
Geology, Permitting and Corrective Action Branch

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