



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 12, 2007

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

APPROVAL OF ADDENDUM 3 TO THE FLOOD PLAIN IN-SITU HEXAVALENT CHROMIUM REDUCTION PILOT STUDY WORK PLAN, PACIFIC GAS AND ELECTRIC COMPANY (PG&E), TOPOCK COMPRESSOR STATION, NEEDLES, CALIFORNIA (EPA ID NO. CAT080011729)

Dear Ms. Meeks,

The Department of Toxic Substances Control (DTSC) has completed our review of the November 30, 2006, Addendum 3 to the In-Situ Hexavalent Chromium Reduction Pilot Test Work Plan – Floodplain Reductive Zone Enhancement prepared by Arcadis on behalf of PG&E. It is DTSC's understanding that the additional injections are proposed to evaluate the ability to enhance and sustain a more reductive groundwater environment capable of reducing hexavalent chromium. As a result, DTSC has evaluated and considered our obligations under the California Environmental Quality Act (CEQA) regarding the activities described in Addendum 3 and found that only minor technical changes or additions are being proposed to the project evaluated in the previous Negative Declaration and Initial Study, and that none of the conditions described in the CEQA Guidelines (Cal. Code Regs., tit. 14, § 15162) calling for the preparation of a subsequent Negative Declaration have occurred. Therefore, DTSC is providing approval of the Addendum 3 with the following conditions:

1. PG&E shall obtain separate authorization and/or approvals for activities proposed on federal owned land. Any modifications or revisions to the proposed work plan activities described in Addendum 3 as may be requested and/or specified by federal agencies shall also obtain additional approval from DTSC prior to the start of field activities.

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2. PG&E shall obtain authorization and/or approval from the California Regional Water Quality Control Board for the additional injection events. PG&E shall obtain additional approval from DTSC prior to the start of field activities if the Regional Water Quality Control Board, as a result of public comments or Board Hearing, requires modifications or revisions to the proposed Addendum 3 activities.
3. PG&E shall continue to provide monthly pilot study performance reports as required by the current Waste Discharge Requirements. As part of the February 15, 2007 report, PG&E shall also provide calculations on decay rates and rate of travel of the reductant to demonstrate that the Total Organic Carbon will not impact the interim measures extraction and treatment system as a result of future injections.
4. PG&E shall include tracer test monitoring of the middle zone of the aquifer to evaluate potential mounding effects and communication between the middle and deep zones of the aquifer resulting from the increased injection volume under addendum 3.
5. PG&E shall provide, at a minimum of 36 hours, notification to DTSC prior to beginning of field activities as described in Addendum 3, as well as prior to the 6th injection.

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

aky:010702E

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