



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 31, 2007

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

CONDITIONAL ACCEPTANCE OF ADDENDUM TO WORK PLAN FOR CALIFORNIA SLANT DRILLING, 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 reviewed the Addendum to Work Plan for California Slant Drilling dated December 29, 2006 (Addendum). The addendum was prepared under DTSC's direction as a result of Tribal communication and comments. Based on our review, DTSC accepts the Addendum with the following clarifications and conditions:

1. DTSC believes that the proper management of all investigation derived material, including soil, to be PG&E's responsibility. DTSC understands that the Fort Mojave Indian Tribe has requested PG&E to explore the possibility to leave non-contaminated soil in place. DTSC does not object to this possibility as long as the placement of the soil will not create an adverse impact to human health or the environment, and that it complies with all Federal, State and local laws and requirements. DTSC cautions, however, that until action levels and background concentrations are properly established, impacted soils which are left in place may be subject to future investigation and/or remediation.
2. DTSC disagrees with the proposed modification of well casing material and design in the Addendum due to the possibility of chromium leaching from the stainless steel as a result of corrosion. DTSC, however, accepts the concept of using nylon tubing strapped to a rigid PVC rod for support as proposed in the January 9, 2007 Tech Memo submitted via email by Mr. Martin Barackman on behalf of PG&E and conceptual design figures provided to DTSC on January 29,

Ms. Yvonne Meeks
January 31, 2007
Page 2 of 2

2007. Although DTSC accepts the proposal in concept, DTSC understands that PG&E is still refining the actual well design and will provide the final well design drawings prior to field work implementation.

3. As with all drilling techniques, there is a potential for construction failure associated with the proposed slant drilling and well installation. Therefore, DTSC is requiring PG&E to be ready with contingent well designs in case the primary design fails in the field. These contingency measures shall include the possible use of multi-channel wells and/or the possibility of reverting to construction of traditional single screened well within a bore hole. If traditional well design is used, PG&E may be required to install up to four angled wells (2 wells per angle, 4 wells total).
4. PG&E shall notify DTSC, Federal and Tribal stakeholders if the construction of the primary well design fails. PG&E shall make a reasonable attempt to convene a meeting (either in person or by conference call) and obtain DTSC's approval prior to implementation of any contingency designs.
5. PG&E shall provide, at a minimum of 36 hours, notification to DTSC prior to beginning of field activities.

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
Tribal Representatives in PG&E Contact List – Via e-mail