



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 19, 2008

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

ANALYTICAL METHOD CHANGE FOR EVALUATION OF HEXAVALENT CHROMIUM AT 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 January 4, 2008 technical memorandum titled *Hexavalent Chromium Holding Time Study Results* prepared by CH2M Hill for PG&E. DTSC notes that PG&E is requesting, based on the conclusion of the study, to change the analytical methods currently used for the required monitoring programs for analysis of hexavalent chromium in groundwater, surface water and pore water samples. To date, PG&E has followed the protocol under the United States Environmental Protection Agency (US EPA) guidance for solid waste sampling and analysis (SW-846 methods 7199 or 7196A). This request for analytical method change is precipitated by the adoption and promulgation of a final rule by the US EPA which modified the maximum holding time for the analytical testing procedures from 24 hours to 28 days. The final rule became effective April 11, 2007 for analysis and sampling performed under the Clean Water Act and the Safe Drinking Water Act.

In reviewing the study provided by PG&E, DTSC concurs that there is a close correlation between the 24 hours holding time and a holding time of up to 28 days. Even though 2 of the 61 samples tested exceeded 20 percent relative percent difference, the average difference is only 4 to 5 percent. Although DTSC has not verified the conclusion with independent analysis comparisons, DTSC does not object to PG&E modifying the analysis methods for hexavalent chromium in groundwater, surface water and pore water to be in conformance with the new US EPA final rule. DTSC requests, however, that PG&E properly and clearly document in all subsequent reports of the change in analytical method for hexavalent chromium so that any

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appreciable or subtle changes in concentration as a result of the method change can be easily observed. Furthermore, DTSC requests that PG&E also seek approval of this proposed method change with the Regional Water Quality Control Board and the Department of Interior prior to implementation.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'Aaron Yue', with a stylized flourish at the end.

Aaron Yue
Project Manager
Geology, Permitting and Corrective Action Branch

aky:010802B

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