



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

September 28, 2007

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

CONDITIONAL APPROVAL OF UPDATES AND MODIFICATIONS TO THE  
GROUNDWATER AND SURFACE WATER MONITORING PROGRAM,  
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 your letter, dated July 20, 2007, regarding updates and modifications to the Groundwater and Surface Water Monitoring Program (GMP) employed at the PG&E Topock Compressor Station. DTSC is in general agreement with the changes and approves them with the following conditions specified on the following pages. Please note, the Item numbers from your July 20, 2007 letter to DTSC are maintained and cited below for easy reference.

Conditions of Modifications:

**Item 1: Modifications to Well Sampling Frequencies:** DTSC concurs with the majority of the sampling frequency changes. However, the following four wells should be sampled at the frequencies identified below:

MW-29: Semiannual frequency. This well is located along the river and about 1,000 feet away from groundwater extraction wells. Due to the distance from extraction and recent detections of chromium in nearby well MW-47-055, more frequent sampling is requested.

MW-32-020: Semiannual frequency. A semiannual frequency is requested to periodically monitor for potential plume migration from the southwest (e.g., well MW-26).

MW-37D: Semiannual frequency. This is a plume margin well with elevated hexavalent chromium concentrations. The semiannual frequency would be consistent with the frequency utilized for similar GMP wells.

MW-51: Semiannual frequency. This is a plume margin well with elevated, but stable, hexavalent chromium concentrations. The semiannual frequency would be consistent with the frequency utilized for similar GMP wells.

**Item 2: Report Streamlining:** DTSC previously approved of the modified reporting frequency via email on August 31, 2007 and is in receipt of the Second Quarter Groundwater and Surface Water Monitoring Report that utilizes the new format. In a cursory review of the report, DTSC noted that PG&E had removed the California MCL contour of the plume map. DTSC believes that this contour should be retained in the revised format. DTSC may request additional changes to the format after a thorough review of this report.

**Item 3: Title 22 Metals Analysis:** As discussed at the July 10, 2007 PG&E meeting, DTSC will require sampling of Title 22 metals at other site wells after evaluation of existing site-wide metals data.

**Item 4: Hardness, TDS, and TSS:** DTSC concurs with the proposed changes. DTSC has noted that previous GMP reports have not commented on elevated specific conductance (SC) detected at shoreline station RRB on December 20, 2006 (3,870  $\mu\text{S}/\text{cm}$ ). The anomalous SC value is significantly elevated, but was not called out in the text of the document. PG&E should provide discussion of the anomalous data in response to this comment. Discussion of similar anomalous data should be contained in future reports.

**Item 5: Wider application of Cr(VI) Method 7196:**

The tentative GMP modification agreed to on July 10, 2007 was to use Method 7196 to analyze groundwater samples from wells with hexavalent chromium greater than 20  $\mu\text{g}/\text{L}$  and Method 7199 for those with concentrations less than 20  $\mu\text{g}/\text{L}$ . Exceptions included using Method 7199 for plume wells along the river, some wells at the plume margin, and all observation wells (OW wells). DTSC concurs with this approach, but PG&E's July 20, 2007 summary of the wells affected by this change does not reflect this and a revised list utilizing the most current analytical data is provided below:

Based on existing data, the following wells are to change to analytical Method 7199 (latest hexavalent chromium concentration is provided in parentheses): MW-13 (23.4  $\mu\text{g}/\text{L}$ ); MW-18 (35.6  $\mu\text{g}/\text{L}$ ); MW-31-135 (51.0  $\mu\text{g}/\text{L}$ ); MW-35-60 (31.3  $\mu\text{g}/\text{L}$ ); MW-35-135 (27.2  $\mu\text{g}/\text{L}$ ); MW-39-80 (83.6  $\mu\text{g}/\text{L}$ ); and MW-40D (78.0  $\mu\text{g}/\text{L}$ ).

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The following wells are to retain the use of analytical Method 7199 regardless of the hexavalent chromium concentration: All OW wells; wells TW-4 (35.2 µg/L) and MW-47-55 (30.3 µg/L); and plume wells along the river (e.g., MW-46-175, MW-44-115, MW-44-125, MW-34-100).

**Item 6: Discontinue Laboratory Analysis of pH and Specific Conductivity:**

DTSC requests that laboratory analyses for SC be retained during GMP sampling events. A spot check of SC laboratory data that exhibited trends was compared to the corresponding field data. The corresponding field SC generally did not exhibit the anticipated trend.

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

Sincerely,



Aaron Yue  
Project Manager  
Geology, Permitting and Corrective Action Branch

aky:090702B

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