



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
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Arnold Schwarzenegger
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Sent Via Email

October 29, 2007

Ms. Yvonne Meeks
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Pacific Gas and Electric Company
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WORKPLAN FOR GROUNDWATER INVESTIGATION IN AREA OF CONCERN 10 - EAST RAVINE 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 evaluated the necessity of a groundwater investigation near the East Ravine and bedrock monitoring well 23 (MW-23). This particular issue has been previously presented and discussed at the August and October 2007 Geo/Hydro Technical Workgroup meetings, the August 2007 Consultative Workgroup meeting, and in a few technical meetings with PG&E representatives. DTSC now requires PG&E to proceed and submit a brief work plan to evaluate the groundwater near the subject vicinity. DTSC notes that although the investigation of the groundwater pathway for Area of Concern 10 (AOC 10) has been conceived as part of the soil sampling activities by PG&E, DTSC believes that there is benefit in expediting that investigation for the purpose of proper groundwater remedy evaluation. The main objective of this investigation is to determine if a contaminant source in AOC 10 has impacted the groundwater in bedrock. If an impact is detected, then the general nature and extent of the contamination should be determined.

As you know, DTSC remains committed to completing the final remedy at the PG&E Topock Compressor Station as expeditiously as possible. To meet that objective, DTSC has separated the groundwater from the soil media due to the timing difference in completing their respective investigations. Currently, the public notice for the final groundwater remedy selection is slated for December 2009, while the Resource Conservation and Recovery Act (RCRA) Facility Investigation Report for the soil is not anticipated to be finalized until November 2, 2010.

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Although DTSC has decided to separate the groundwater remedy from the soil remedy, DTSC must point out that there can be a distinct relationship between soil contamination and the resulting groundwater plume. To select an appropriate groundwater remedy, DTSC must evaluate the extent of groundwater contamination which may influence the design of the final remedy. Furthermore, DTSC is obligated to ensure a complete assessment of the nature and extent of actual and potential contamination resulting from management of hazardous materials under the RCRA corrective action process.

Even though DTSC did not envision additional investigation at the subject location several months ago, during a recent aerial photo review of the site for soil investigation purposes, DTSC noted an impoundment that contained liquids of unknown composition for several years in the 1960s within AOC 10. Additionally, historic soil sampling data correlates that finding and found some of the highest chromium concentrations for the site in AOC 10 despite the lack of historic record of past discharges by PG&E.

Up to now, PG&E has correctly reflected our collective understanding of the conceptual site model in that the groundwater plume is bounded by the Miocene Conglomerate bedrock south and southeast of the compressor station. DTSC notes, however, that PG&E reported on May 23, 2007 that in December 2006 and March 2007, two anomalous detections of extremely elevated (over 1 parts per million) hexavalent chromium were detected at MW-23. Given these circumstances and the improbability of determining the potential pathway of soil impacts to the groundwater until after the final groundwater remedy has been selected, DTSC is compelled to request for the immediate evaluation of the area for potential groundwater contamination.

In reviewing the project schedule, DTSC anticipates that PG&E should be able to install the requested wells, and to the extent possible, report the preliminary results in the RFI addendum to confirm the presence or absence of hexavalent chromium in groundwater in the vicinity of AOC 10 without any impacts to the current project schedule. Additional data from new wells can be collected and reported in the general groundwater and surface water monitoring program (GMP) leading up to a Technical Memorandum for the final Corrective Measures Study/ Feasibility Study report.

To provide for a small measure of relief to the Tribal Nations in evaluation of the cumulative impacts of this directive, DTSC requests PG&E to contemplate and site potential locations for contingency wells during the preparation of the AOC 10 monitoring well installation work plan in the event that elevated hexavalent chromium is detected at or near the AOC 10 location. Finally, DTSC is directing PG&E to submit the subject work plan to the Federal agencies and DTSC for review by November 19, 2007.

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If you have any questions or need clarifications regarding this directive 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
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