



**Pacific Gas and
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November 7, 2007

Aaron Yue
California Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, CA 90630

Kris Doebbler
BLM WO-360D, Building 50
Denver Federal Center
Denver, CO 80225

Subject: Responses to Agency Comments on Soil and Sediment Data Usability
Assessment Technical Memorandum, PG&E Topock Compressor Station

Dear Mr. Yue and Ms. Doebbler:

Attached for your consideration are responses to comments from the California Department of Toxic Substances Control (DTSC) and the United States Department of the Interior (DOI) comments on the Soil and Sediment Data Usability Assessment (DUA) Technical Memorandum. The DTSC/DOI comments were transmitted in a letter dated August 31, 2007.

There are several comments for which additional clarification is requested. PG&E looks forward to working with you on resolution of your comments on the DUA. Please contact me at 805/234-2257 with any questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads 'Yvonne Meeks'.

Yvonne Meeks
Topock Remediation Project Manager

Cc: Karen Baker/DTSC
Chris Guerre/DTSC

Responses to DTSC/DOI Comments on Soil and Sediment Data Usability Assessment Technical Memorandum, Pacific Gas and Electric Company Topock Compressor Station, Needles, California

PREPARED FOR: Pacific Gas and Electric Company

DATE: November 7, 2007

PROJECT NUMBER: 334110.RF.02.01

Provided below are responses to comments from the California Department of Toxic Substances Control (DTSC) and the United States Department of the Interior (DOI) on the *Soil and Sediment Data Usability Assessment Technical Memorandum* (DUA). The DTSC/DOI comments were transmitted in a letter dated August 31, 2007. The DTSC/DOI comments are shown in *italics* and responses are shown in **bold** typeface.

DTSC/DOI General Comment 1: Although the Data Usability Assessment Technical Memorandum is meant to evaluate the quality of historic sampling data only, DTSC also cautions PG&E in the use of historic data in that there could also be uncertainty associated with the accuracy in mapping the historic sampling locations.

Response: The concern is noted. The sample locations shown in the RCRA Facility Investigation (RFI) and RFI work plans are based on the best available information, including surveyed sample locations, descriptions of the sample locations, and/or sample locations shown in figures provided with published reports. In most cases, the approximate location is known, and sufficient additional samples are proposed in the Part A and Part B work plans to ensure that areas of potential concern are adequately evaluated and delineated.

The degree of uncertainty as to the precise location of a historic sample must always be evaluated in conjunction with the degree of precision deemed appropriate for the original sampling. The inability to locate a precise sampling position does not, in itself, mean that the data from that sampling are unusable or of limited usability, provided that the location can be determined with confidence to exist within an area for which no one point was more or less appropriate to accomplish the goals of the original sampling.

DTSC/DOI Specific Comment 2: Page 1, PG&E proposes that Category 2 data may still be used to support project objectives, including risk assessment, site characterization, etc... as long as the uncertainties are known. DTSC and DOI believe that the use of data for risk assessment purposes should be of a sufficient quality. PG&E should conduct a formal validation of all available laboratory data in this Category to reduce its uncertainties.

Response: The data assigned to Category 2 are considered of sufficient quality to support risk assessments. The uncertainties, based on the available quality control results presented in the DUA, are considered known. These uncertainties have been

communicated to the data users through assignment of defined data categories. According to the *Risk Assessment Guide for Superfund, Part A*, data may not be used if the "...results are associated with unknown, few, or no QA/QC procedures..." Data assigned to Category 2 were considered to have sufficient quality control so as to conclude that the laboratory had performed the analyses in accordance with an acceptable quality program. This conclusion is further supported by the fact that the Category 2 source laboratories were certified by the State of California at the time of analyses (where the analytical methods and matrices are certifiable in California) and were operating under a quality program acceptable to the certifying agency. Finally, the data were considered to be of sufficient quality at the time they were submitted to DTSC, and DTSC did not raise quality issues at the time.

PG&E requests additional clarification from DTSC/DOI regarding the additional specific procedures they are requesting beyond those taken during the preparation of the DUA and documented in Appendix A of the DUA. Please consider the following items when developing these procedures.

- The available data are included in the consultant reports referenced in the DUA and are not contained in complete laboratory Comprehensive Certificates of Analysis or full data packages suitable for additional review and/or validation.
- As most of the laboratories in question are no longer in operation and because of the age of the data, it is unlikely that additional laboratory records, such as calibration files, can be obtained. It is believed that six of the nine laboratories in question are no longer in operation. Also, standard industry retention practices suggest that contacting the laboratories at this time will not be useful. The National Environmental Laboratory Accreditation Program (NELAP) guidelines require labs to maintain records for 5 years, while the data in question was collected between 1988 and 2003.

DTSC/DOI Specific Comment 3: Page 1, Last paragraph: PG&E should specifically call out and identify, in a separate table, data that should be categorized separately and provide discussion on their uncertainties and limitations on their use. This data set should be should be [sic]introduced with limitation discussions during the Phase 2 DQO process for the Part A Soil Work Plan and not the risk assessment process (as suggested on page 7, Section 4) so that data gaps may be identified prior to Phase 2 sampling.

Response: As requested, this comment will be addressed during development of Phase 2 data quality objectives (DQOs). The Phase 2 DQOs discussion will include both historical data and newly collected data and will address the uncertainties associated with all of the data.

DTSC/DOI Specific Comment 4: Page 2, Existing Soil and Sediment Data: Due to the loose interpretation of "sediment" in the past, PG&E should properly identify samples that are truly "sediments" and if those samples results were reported as "dry weight."

Response Seventeen sediment samples were collected. Nine samples were collected in the mouth of Bat Cave Wash (SED-1 and SED-5 through SED -12), and three samples were collected along the west bank of the Colorado River north of Bat Cave Wash (SED-2 through SED-4). SED-1 and SED-12 were collected west of Park Moabi Road (at the eastern fringe of the Tamarisk thicket). All other samples were collected east of Park

Moabi Road. SED-27, SED-28, and SED-29 were collected from river sediments adjacent to monitoring wells MW-27, MW-28, and MW-29, located south of the mouth of Bat Cave Wash. Finally, two sediment samples (SS-1-0.5' and SS-1-1.5') were collected from an intermittent pool at the mouth of Bat Cave Wash, west of Park Moabi Road. All of the samples were saturated samples; all were reported on a dry-weight basis. Three samples were also collected from locations where dredged sediment had been placed (DrSED-1, DrSED-2, and DrSED-3). DrSED-1 and DrSED-2 were collected from dredged sand at the Moabi Regional Park. DrSed-3 was collected on the east bank of the Colorado River. These three samples were characterized as sediments; however, the samples were not under saturated conditions.

DTSC/DOI Specific Comment 5: Page 3, Last paragraph: This paragraph described all laboratories to be certified. According to Table 2-1, Twining Lab for the 1988 samples and SCS Environmental Laboratory for the 1993 samples were both "unknown" for laboratory certification. PG&E must reconcile this discrepancy in the Technical Memorandum.

Response: Table 2-1 is correct. The certification status for Twining Lab in 1988 and SCS Environmental Laboratory was not documented.

DTSC/DOI Specific Comment 6: Page 6, Data Use Categories and Decision Logic: DTSC and DOI agree that Category 2 and 3 data can be of limited use with care. For investigatory purposes, we agree that these data can be used for qualitative evaluation and for determination of sampling locations; however, these data should be clearly presented in the work plans as data with limitations and uncertainties. DTSC and DOI notes that the previous Part A Soil Sampling Work Plan only identified historic data locations on its figures but did not properly differentiate the quality of the data. PG&E must properly label all future work plans when these data are incorporated or used. Furthermore, Category 3 data should not be presented in sampling reports for data interpretation due to their high degree of uncertainties.

Response: Category 3 data were flagged in the data tables included in the Part A Work Plan. Category 1 and 2 data were not differentiated, as data in both categories are believed to be of adequate quality for use in investigation, risk assessment, and remediation, and the comments on the DUA were received after the submittal of the Part A Work Plan. The Part B Work Plan data tables will identify the Category 2 and 3 data. Presenting the data category in the work plan figures would be difficult. The figures are relatively complex, and adding additional flags, colors, or symbols would make the figures difficult to read. In addition, data within most units typically were analyzed and reported as part of one or two rounds of investigation; thus, data for specific SWMUs and AOCs are typically in the same usability category.

As described in the DUA, Category 3 data will only be used to help define investigation needs and, potentially, to help delineate the extent of contamination. These data will not be relied upon for risk assessment or remediation decisions. The data will be presented in sampling reports with the appropriate data usability category identified. The data evaluation process, following the implementation of the Part A and Part B work plans, will ensure that an adequate number of samples of sufficient quality are available to meet the DQOs.

DTSC/DOI Specific Response 7: Page 7, Last Sentence: Please clarify what is meant by "...data sets will be flagged as estimated in the RFI/RI database..." These data should not be flagged with the standard "J" flags as under data validation since these data have not been validated.

Response: No additional data flag will be applied to this data set. The database has been updated to record samples with accompanying usability levels.

DTSC/DOI Specific Comment 8: Table 2-1, Phases 1 and 2 closure certification report, Mittelhauser: These data should be submitted to laboratory for formal data validation before consideration for risk assessment.

Response: See response to Comment 2.

DTSC/DOI Specific Comment 9: Table 2-1, Analytical Data Report, Sediment and Sand Samples: These data should be submitted to laboratory for formal data validation before consideration for risk assessment.

Response: See responses to Comment 2.

DTSC/DOI Specific Comment 10: Table 2-1, Report, Site Investigation, Project 62793, Environmental Profiles: According to discussions in Attachment A, these data were recommended as Category 3 instead of Category 2. Agencies concur these data should be Category 3.

Response: Agreed. As discussed in Appendix Section A.5, the subject data are considered Category 3.

DTSC/DOI Specific Comment 11: Table 2-1, Evaporation Pond Closure Report, Allwaste: Due to the lack of quality control, agencies can not accept these data as Category 2. These results should be considered Category 3. DTSC, however, notes that the closed evaporation ponds are not being reconsidered under corrective action; therefore, these data are of little significance to the current project.

Response: The assignment of usability is based on the type and acceptability of the available quality control results. The results from the subject report were assigned to Category 2 based on the availability of split-sample results. Although specific quality control analyses normally performed by the laboratory such as blanks, blank spikes, duplicates, and analytical spikes were not available for review, the use of inter-laboratory split samples is an excellent measure of the accuracy of analytical results. The comparison is not influenced by procedures that may be used by an individual laboratory to bias internal quality control results toward acceptability. As stated by the agencies, this categorization does not impact the current project or bear into the selection and implementation of a site remedy. Therefore, we will defer to the agency comment, and the subject data will be identified as Category 3.

DTSC/DOI Specific Comment 12: Table 2-1, RCRA Facility Investigation Report, Ecology and Environment: There is a discrepancy between the superscripts for E&E. Agencies assume that the superscript of "1" in the Primary Laboratory column refers to the ELAC and State of New York Certification footnote. If so, the response under "Primary Laboratory Certification (California)" column should be "No." Please reconcile this discrepancy."

Response: Agreed. The E&E Laboratory was certified by New York State and was not a State of California-certified laboratory.

DTSC/DOI Specific Comment 13: Page A-4, Attachment: Typo. Section A.6 should be labeled "A.5".

Response: Agreed. Section A.5 is incorrectly identified as Section A.6.