



**Matthew Rodriguez**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Deborah O. Raphael, Director  
5796 Corporate Avenue  
Cypress, California 90630



**Edmund G. Brown Jr.**  
Governor

Sent Via E-mail

October 27, 2011

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

REVIEW OF REVISED CORRECTIVE MEASURES IMPLEMENTATION/ REMEDIAL DESIGN WORK PLAN FOR GROUNDWATER REMEDIATION 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 completed the review of the redline strike-out version of the revised Corrective Measures Implementation/ Remedial Design (CMI/RD) work plan submitted by PG&E on 9/19/2011. DTSC agrees that PG&E has responded to all comments received with information currently made available with some comments being deferred to future design documentation. DTSC does not have any additional comments except for one concern noted in Table 2-1 of the CMI/RD Work Plan regarding discontinuation of water level monitoring under "process control monitoring." DTSC agrees that PG&E can further evaluate the need for water level monitoring after the remedy is operating properly; however, DTSC cannot agree up front to the discontinuation of any monitoring associated with the plume or remedy. Please revise that portion of the "note" from "discontinued" to "water level monitoring will be re-evaluated."

Although DTSC does not have any additional comments, DTSC notes that many key elements required under the 1996 Corrective Action Consent Agreement for the CMI work plan are being deferred to future design documentation as proposed in Exhibit 1-3 of the CMI/RD work plan. DTSC recognizes that there are differences in the timing of information required between RCRA corrective action and remediation evaluation under CERCLA. To allow the project to move forward, DTSC agrees to the overall concept to defer some of the required information until the subsequent design documents. However, because these key elements as outlined in Exhibit 1-3, including design

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criteria and basis, are not provided in the CMI/RD work plan, DTSC must defer approval of the CMI/RD work plan until after review of these elements within the design documents. By phasing the submission of information as proposed, PG&E runs a potential risk for schedule delays if DTSC and/or the Department of the Interior disagree with any of the fundamental design criteria or design basis after investing time and effort into the preliminary design. As stated, DTSC is deferring approval of the CMI/RD work plan at this time. Pursuant to the 1996 Corrective Action Consent Agreement, DTSC will evaluate the CMI work plan approval when all required components have been submitted as part of the design prior to the implementation of the design.

If you have any concerns or questions regarding this matter, please feel free to 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  
Senior Hazardous Substances Engineer  
Office of Geology

aky: 101102B

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