June 29, 2012

Mr. Robert Perdue  
Executive Officer  
California Regional Water Quality Control Board  
Colorado River Basin Region  
73-720 Fred Waring Drive, Suite 100  
Palm Desert, CA 92260

Subject: 2011 – 2012 Storm Water Annual Report  
PG&E Topock Interim Measure No. 3  
I-40 & Park Moabi Road, Needles, California  
WDID No. 7 36I 019443

Dear Mr. Perdue:

Enclosed is the 2011 – 2012 Storm Water Annual Report for the Pacific Gas and Electric Company (PG&E) Topock Interim Measure (IM) No. 3 Groundwater Treatment System, Facility WDID No. 7 36I 019443. This report is being submitted in compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000001 for Industrial Activities.

The IM No. 3 Notice of Intent (NOI) was submitted April 5, 2005. The Storm Water Pollution Prevention Plan (SWPPP) is available at the facility.

Three locations at the treatment plant site have been identified as potential storm water discharge locations in the SWPPP. However, there were no storm events that resulted in discharge of storm water from the site during the 2011 – 2012 wet season. Therefore, no storm water samples were collected. Discharge of storm water from the plant site did not occur due to the arid climate during the wet season, drainage properties of soil at unpaved areas, and pumping of storm water collected on the concrete treatment pad into the treatment plant.

If you have any questions regarding this report, please call me at (760) 326-5582.

Sincerely,

Curt Russell  
Topock Site Manager

Enclosures:
Annual Report Form including Certification
Form 2 – Quarterly Visual Observations of Authorized Non-Storm Water Discharges
Form 3 – Quarterly Visual Observations of Unauthorized Non-Storm Water Discharges
Form 4 – Monthly Visual Observations of Storm Water Discharges
Form 5 – Annual Comprehensive Site Compliance Evaluation
Attachment A – Response Explanations to Annual Report Form
Attachment B – 2011 – 2012 Wet Season Storm Event Records

c c: Suhas Chakraborty, Colorado River Basin Regional Water Quality Control Board
Jose Cortez, Colorado River Basin Regional Water Quality Control Board
Tom Vandenberg, Colorado River Basin Regional Water Quality Control Board
Aaron Yue, California Department of Toxic Substances Control
An annual report is required to be submitted to your local Regional Water Quality Control Board (Regional Board) by July 1 of each year. This document must be certified and signed, under penalty of perjury, by the appropriate official of your company. Many of the Annual Report questions require an explanation. Please provide explanations on a separate sheet as an attachment. Retain a copy of the completed Annual Report for your records.

Please circle or highlight any information contained in Items A, B, and C below that is new or revised so we can update our records. Please remember that a Notice of Termination and new Notice of Intent are required whenever a facility operation is relocated or changes ownership.

If you have any questions, please contact your Regional Board Industrial Storm Water Permit Contact. The names, telephone numbers and e-mail addresses of the Regional Board contacts, as well as the Regional Board office addresses can be found at http://www.waterboards.ca.gov/stormwtr/contact.html. To find your Regional Board information, match the first digit of your WDID number with the corresponding number that appears in parenthesis on the first line of each Regional Board office.

REGIONAL BOARD INFORMATION:
Colorado River Basin Region
73-720 Fred Waring Dr., Ste. 100
Palm Desert, CA 92260
Contact: Suhas Chakraborty
Tel: (760) 776-8961
Email: schakraborty@waterboards.ca.gov

GENERAL INFORMATION:

A. Facility Information:
Facility Business Name: PG&E Topock Interim Measure No 3
Physical Address: I-40 & Park Moabi Rd
City: Needles
Standard Industrial Classification (SIC) Code(s): 4953, Hazardous Waste Treatment

Facility WDID No: 7 36I019443
Contact Person: Curt Russell
e-mail: GCR4@pge.com
CA Zip: 92363 Phone: 760-326-5582

B. Facility Operator Information:
Operator Name: Pacific Gas & Electric Co
Mailing Address: PO BOX 337
City: Needles
Contact Person: Curt Russell
e-mail: GCR4@pge.com
State: CA Zip: 92363 Phone: 760-326-5582

C. Facility Billing Information:
Operator Name: Pacific Gas & Electric Co
Mailing Address: PO BOX 337
City: Needles
Contact Person: Curt Russell
e-mail: GCR4@pge.com
State: CA Zip: 92363 Phone: 760-326-5582
MONITORING AND REPORTING PROGRAM

D. SAMPLING AND ANALYSIS EXEMPTIONS AND REDUCTIONS

1. For the reporting period, was your facility exempt from collecting and analyzing samples from two storm events in accordance with sections B.12 or 15 of the General Permit?

☐ YES  Go to Item D.2  ☒ NO  Go to Section E

2. Indicate the reason your facility is exempt from collecting and analyzing samples from two storm events. Attach a copy of the first page of the appropriate certification if you check boxes ii, iii, iv, or v.

   i. ☐ Participating in an Approved Group Monitoring Plan  Group Name: _______________________

   ii. ☐ Submitted No Exposure Certification (NEC)  Date Submitted: _____ / _____ / _____
     Re-evaluation Date: _____ / _____ / _____
     Does facility continue to satisfy NEC conditions?  ☐ YES  ☒ NO

   iii. ☐ Submitted Sampling Reduction Certification (SRC)  Date Submitted: _____ / _____ / _____
     Re-evaluation Date: _____ / _____ / _____
     Does facility continue to satisfy SRC conditions?  ☐ YES  ☒ NO

   iv. ☐ Received Regional Board Certification  Certification Date: _____ / _____ / _____

   v. ☐ Received Local Agency Certification  Certification Date: _____ / _____ / _____

3. If you checked boxes i or iii above, were you scheduled to sample one storm event during the reporting year?

☐ YES  Go to Section E  ☒ NO  Go to Section F

4. If you checked boxes ii, iv, or v, go to Section F.

E. SAMPLING AND ANALYSIS RESULTS

1. How many storm events did you sample? 0
   If less than 2, attach explanation (if you checked item D.2.i or iii. above, only attach explanation if you answer “0”).

2. Did you collect storm water samples from the first storm of the wet season that produced a discharge during scheduled facility operating hours? (Section B.5 of the General Permit)

☐ YES  ☒ NO  attach explanation (Please note that if you do not sample the first storm event, you are still required to sample 2 storm events)

3. How many storm water discharge locations are at your facility? 7
4. For each storm event sampled, did you collect and analyze a sample from each of the facility’s storm water discharge locations?  
☐ YES, go to Item E.6  ☒ NO

5. Was sample collection or analysis reduced in accordance with Section B.7.d of the General Permit?  
☐ YES  ☒ NO, attach explanation

If “YES”, attach documentation supporting your determination that two or more drainage areas are substantially identical.

Date facility’s drainage areas were last evaluated 06/4/2012

6. Were all samples collected during the first hour of discharge?  
☐ YES  ☒ NO, attach explanation

7. Was all storm water sampling preceded by three (3) working days without a storm water discharge?  
☐ YES  ☒ NO, attach explanation

8. Were there any discharges of storm water that had been temporarily stored or contained? (such as from a pond)  
☐ YES  ☒ NO, go to Item E.10

9. Did you collect and analyze samples of temporarily stored or contained storm water discharges from two storm events?  
( or one storm event if you checked item D.2.i or iii. above)  
☐ YES  ☒ NO, attach explanation

10. Section B.5. of the General Permit requires you to analyze storm water samples for pH, Total Suspended Solids (TSS), Specific Conductance (SC), Total Organic Carbon (TOC) or Oil and Grease (O&G), other pollutants likely to be present in storm water discharges in significant quantities, and analytical parameters listed in Table D of the General Permit.

a. Does Table D contain any additional parameters related to your facility’s SIC code(s)?  
☒ YES  ☐ NO, Go to Item E.11

b. Did you analyze all storm water samples for the applicable parameters listed in Table D?  
☐ YES  ☒ NO

c. If you did not analyze all storm water samples for the applicable Table D parameters, check one of the following reasons:

- In prior sampling years, the parameter(s) have not been detected in significant quantities from two consecutive sampling events. Attach explanation
- The parameter(s) is not likely to be present in storm water discharges and authorized non-storm water discharges in significant quantities based upon the facility operator’s evaluation. Attach explanation
- ☒ Other. Attach explanation

11. For each storm event sampled, attach a copy of the laboratory analytical reports and report the sampling and analysis results using Form 1 or its equivalent. The following must be provided for each sample collected:

- Date and time of sample collection
- Name and title of sampler
- Parameters tested
- Name of analytical testing laboratory
- Discharge location identification
- Testing results
- Test methods used
- Test detection limits
- Date of testing
- Copies of the laboratory analytical results
F. QUARTERLY VISUAL OBSERVATIONS

1. Authorized Non-Storm Water Discharges
   Section B.3.b of the General Permit requires quarterly visual observations of all authorized non-storm water discharges and their sources.
   a. Do authorized non-storm water discharges occur at your facility?
      ☐ YES ☒ NO Go to Item F.2
   b. Indicate whether you visually observed all authorized non-storm water discharges and their sources during the quarters when they were discharged.  
      Attach an explanation for any “NO” answers.  Indicate “N/A” for quarters without any authorized non-storm water discharges.
      July-September  ☐ YES ☐ NO ☐ N/A  October-December  ☐ YES ☐ NO ☐ N/A
      January-March  ☐ YES ☐ NO ☐ N/A  April-June  ☐ YES ☐ NO ☐ N/A
   c. Use Form 2 to report quarterly visual observations of authorized non-storm water discharges or provide the following information:
      i. name of each authorized non-storm water discharge
      ii. date and time of observation
      iii. source and location of each authorized non-storm water discharge
      iv. characteristics of the discharge at its source and impacted drainage area/discharge location
      v. name, title, and signature of observer
      vi. any new or revised BMPs necessary to reduce or prevent pollutants in authorized non-storm water discharges.  Provide new or revised BMP implementation date.

2. Unauthorized Non-Storm Water Discharges
   Section B.3.a of the General Permit requires quarterly visual observations of all drainage areas to detect the presence of unauthorized non-storm water discharges and their sources.
   a. Indicate whether you visually observed all drainage areas to detect the presence of unauthorized non-storm water discharges and their sources.  
      Attach an explanation for any “NO” answers.
      July-September  ☒ YES ☐ NO  October-December  ☒ YES ☐ NO
      January-March  ☒ YES ☐ NO  April-June  ☒ YES ☐ NO
   b. Based upon the quarterly visual observations, were any unauthorized non-storm water discharges detected?
      ☐ YES ☒ NO Go to Item F.2.d
   c. Have each of the unauthorized non-storm water discharges been eliminated or permitted?
      ☐ YES ☒ NO Attach explanation
   d. Use Form 3 to report quarterly unauthorized non-storm water discharge visual observations or provide the following information:
      i. name of each unauthorized non-storm water discharge
      ii. date and time of observation
      iii. source and location of each unauthorized non-storm water discharge
      iv. characteristics of the discharge at its source and impacted drainage area/discharge location
      v. name, title, and signature of observer
      vi. any corrective actions necessary to eliminate the source of each unauthorized non-storm water discharge and to clean impacted drainage areas.  Provide date unauthorized non-storm water discharge(s) was eliminated or scheduled to be eliminated.
G. MONTHLY WET SEASON VISUAL OBSERVATIONS

Section B.4.a of the General Permit requires you to conduct monthly visual observations of storm water discharges at all storm water discharge locations during the wet season. These observations shall occur during the first hour of discharge or, in the case of temporarily stored or contained storm water, at the time of discharge.

1. Indicate below whether monthly visual observations of storm water discharges occurred at all discharge locations. **Attach an explanation for any “NO” answers.** Include in this explanation whether any eligible storm events occurred during scheduled facility operating hours that did not result in a storm water discharge, and provide the date, time, name and title of the person who observed that there was no storm water discharge.

<table>
<thead>
<tr>
<th>Month</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>October</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>November</td>
<td>☐</td>
<td>☒</td>
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<tr>
<td>December</td>
<td>☐</td>
<td>☒</td>
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<td>January</td>
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<td>February</td>
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<tr>
<td>March</td>
<td>☐</td>
<td>☒</td>
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<tr>
<td>April</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>May</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

2. Report monthly wet season visual observations using **Form 4** or provide the following information:
   a. date, time, and location of observation
   b. name and title of observer
   c. characteristics of the discharge (i.e., odor, color, etc.) and source of any pollutants observed
   d. any new or revised BMPs necessary to reduce or prevent pollutants in storm water discharges. Provide new or revised BMP implementation date.

ANNUAL COMPREHENSIVE SITE COMPLIANCE EVALUATION (ACSCE)

H. ACSCE CHECKLIST

Section A.9 of the General Permit requires the facility operator to conduct one ACSCE in each reporting period (July 1-June 30). Evaluations must be conducted within 8-16 months of each other. The SWPPP and monitoring program shall be revised and implemented, as necessary, within 90 days of the evaluation. The checklist below includes the minimum steps necessary to complete a ACSCE. Indicate whether you have performed each step below. **Attach an explanation for any “NO” answers.**

1. Have you inspected all potential pollutant sources and industrial activities areas? ☒ YES ☐ NO

   The following areas should be inspected:
   - areas where spills and leaks have occurred during the last year
   - outdoor wash and rinse areas
   - process/manufacturing areas
   - loading, unloading, and transfer areas
   - waste storage/disposal areas
   - dust/particulate generating areas
   - erosion areas
   - building repair, remodeling, and construction
   - material storage areas
   - vehicle/equipment storage areas
   - truck parking and access areas
   - rooftop equipment areas
   - vehicle fueling/maintenance areas
   - non-storm water discharge generating areas

2. Have you reviewed your SWPPP to assure that its BMPs address existing potential pollutant sources and industrial activities areas? ☒ YES ☐ NO

3. Have you inspected the entire facility to verify that the SWPPP’s site map is up-to-date? The following site map items should be verified: ☒ YES ☐ NO

   - facility boundaries
   - outline of all storm water drainage areas
   - areas impacted by run-on
   - storm water discharges locations
   - storm water collection and conveyance system
   - structural control measures such as catch basins, berms, containment areas, oil/water separators, etc.
4. Have you reviewed all General Permit compliance records generated since the last annual evaluation?  

☐ YES  ☐ NO

The following records should be reviewed:

- quarterly authorized non-storm water discharge visual observations
- monthly storm water discharge visual observation
- records of spills/leaks and associated clean-up/response activities
- quarterly unauthorized non-storm water discharge visual observations
- Sampling and Analysis records
- preventative maintenance inspection and maintenance records

5. Have you reviewed the major elements of the SWPPP to assure compliance with the General Permit?  

☐ YES  ☐ NO

The following SWPPP items should be reviewed:

- pollution prevention team
- list of significant materials
- description of potential pollutant sources
- assessment of potential pollutant sources
- identification and description of the BMPs to be implemented for each potential pollutant source

6. Have you reviewed your SWPPP to assure that a) the BMPs are adequate in reducing or preventing pollutants in storm water discharges and authorized non-storm water discharges, and b) the BMPs are being implemented?  

☐ YES  ☐ NO

The following BMP categories should be reviewed:

- good housekeeping practices
- spill response
- employee training
- erosion control
- quality assurance
- preventative maintenance
- material handling and storage practices
- waste handling/storage
- structural BMPs

7. Has all material handling equipment and equipment needed to implement the SWPPP been inspected?  

☐ YES  ☐ NO

I. ACSCE EVALUATION REPORT

The facility operator is required to provide an evaluation report that includes:

- identification of personnel performing the evaluation
- the date(s) of the evaluation
- necessary SWPPP revisions
- schedule for implementing SWPPP revisions
- any incidents of non-compliance and the corrective actions taken

Use Form 5 to report the results of your evaluation or develop an equivalent form.

J. ACSCE CERTIFICATION

The facility operator is required to certify compliance with the Industrial Activities Storm Water General Permit. To certify compliance, both the SWPPP and Monitoring Program must be up to date and be fully implemented.

Based upon your ACSCE, do you certify compliance with the Industrial Activities Storm Water General Permit?  

☐ YES  ☐ NO

If you answered "NO" attach an explanation to the ACSCE Evaluation Report why you are not in compliance with the Industrial Activities Storm Water General Permit.
ATTACHMENT SUMMARY

Answer the questions below to help you determine what should be attached to this annual report. Answer NA (Not Applicable) to questions 2-4 if you are not required to provide those attachments.

1. Have you attached Forms 1,2,3,4, and 5 or their equivalent? ☑ YES (Mandatory)

2. If you conducted sampling and analysis, have you attached the laboratory analytical reports? ☐ YES ☑ NO ☑ NA

3. If you checked box II, III, IV, or V in item D.2 of this Annual Report, have you attached the first page of the appropriate certifications? ☐ YES ☑ NO ☑ NA

4. Have you attached an explanation for each "NO" answer in items E.1, E.2, E.5-E.7, E.9, E.10.c, F.1.b, F.2.a, F.2.c, G.1, H.1-H.7, or J? ☑ YES ☑ NO ☑ NA

ANNUAL REPORT CERTIFICATION

I am duly authorized to sign reports required by the INDUSTRIAL ACTIVITIES STORM WATER GENERAL PERMIT (see Standard Provision C.9) and I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those person directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name: Curt Russell

Signature: ____________________________ Date: June 29, 2012

Title: PG&E Topock Site Manager
# ANNUAL REPORT

**FORM 2-QUARTERLY VISUAL OBSERVATIONS OF AUTHORIZED NON-STORM WATER DISCHARGES (NSWDs)**

- Quarterly dry weather visual observations are required of each authorized NSWD.
- Observe each authorized NSWD source, impacted drainage area, and discharge location.
- Authorized NSWDs must meet the conditions provided in Section D (pages 5-6), of the General Permit.
- Make additional copies of this form as necessary.

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>Observers Name:</th>
<th>Title:</th>
<th>Signature:</th>
<th>WERE ANY AUTHORIZED NSWDs DISCHARGED DURING THIS QUARTER?</th>
</tr>
</thead>
<tbody>
<tr>
<td>JULY-SEPT.</td>
<td>C. Knight</td>
<td>Lead Operator</td>
<td>C. Knight</td>
<td>☐ YES If YES, complete reverse side of this form.</td>
</tr>
<tr>
<td>DATE:</td>
<td>7/27/11</td>
<td></td>
<td></td>
<td>NO</td>
</tr>
<tr>
<td>OCT.-DEC.</td>
<td>C. Knight</td>
<td>Lead Operator</td>
<td>C. Knight</td>
<td>☐ YES If YES, complete reverse side of this form.</td>
</tr>
<tr>
<td>DATE:</td>
<td>12/16/11</td>
<td></td>
<td></td>
<td>NO</td>
</tr>
<tr>
<td>JAN.-MARCH</td>
<td>C. Knight</td>
<td>Lead Operator</td>
<td>C. Knight</td>
<td>☐ YES If YES, complete reverse side of this form.</td>
</tr>
<tr>
<td>DATE:</td>
<td>3/5/12</td>
<td></td>
<td></td>
<td>NO</td>
</tr>
<tr>
<td>APRIL-JUNE</td>
<td>C. Knight</td>
<td>Lead Supervisor</td>
<td>C. Knight</td>
<td>☐ YES If YES, complete reverse side of this form.</td>
</tr>
<tr>
<td>DATE:</td>
<td>5/19/12</td>
<td></td>
<td></td>
<td>NO</td>
</tr>
</tbody>
</table>
# Annual Report

**Form 3-Quarterly Visual Observations of Unauthorized Non-Storm Water Discharges (NSWDs)**

- Unauthorized NSWDs are discharges (such as wash or rinse waters) that do not meet the conditions provided in Section D (pages 5-6) of the General Permit.
- Quarterly visual observations are required to observe current and detect prior unauthorized NSWDs.
- Quarterly visual observations are required during dry weather and at all facility drainage areas.
- Each unauthorized NSWD source, impacted drainage area, and discharge location must be identified and observed.
- Unauthorized NSWDs that can not be eliminated within 90 days of observation must be reported to the Regional Board in accordance with Section A.10.e of the General Permit.
- Make additional copies of this form as necessary.

<table>
<thead>
<tr>
<th>Quarter: July-Sept.</th>
<th>Observers Name: C. Knight</th>
<th>Were Unauthorized NSWDs Observed?</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time of Observations</td>
<td>10/1/11 13:10 PM</td>
<td></td>
<td>If YES to either question, complete reverse side.</td>
<td></td>
</tr>
<tr>
<td>Quarter: Oct.-Dec.</td>
<td>Observers Name: C. Knight</td>
<td>Were Unauthorized NSWDs Observed?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Date/Time of Observations</td>
<td>11/9/12 11:00 AM</td>
<td></td>
<td>If YES to either question, complete reverse side.</td>
<td></td>
</tr>
<tr>
<td>Quarter: Jan.-March</td>
<td>Observers Name: C. Knight</td>
<td>Were Unauthorized NSWDs Observed?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Date/Time of Observations</td>
<td>3/15/12 11:00 PM</td>
<td></td>
<td>If YES to either question, complete reverse side.</td>
<td></td>
</tr>
<tr>
<td>Quarter: April-June</td>
<td>Observers Name: C. Knight</td>
<td>Were Unauthorized NSWDs Observed?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Date/Time of Observations</td>
<td>5/9/12 14:00 PM</td>
<td></td>
<td>If YES to either question, complete reverse side.</td>
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</tr>
</tbody>
</table>

*Quarterly visual observations were performed daily, however, no unauthorized NSWDs were observed. Recording on this form was done by operator at end of quarter.*
### Monthly Visual Observations of Storm Water Discharges

**ANNUAL REPORT**

**FORM 4 - MONTHLY VISUAL OBSERVATIONS OF STORM WATER DISCHARGES**

- Storm water discharge visual observations are required for at least one storm event per month between October 1 and March 31.
- Visual observations must be conducted during the first hour of discharge at all discharge locations.
- Discharges of temporarily stored or contained storm water must be observed at the time of discharge.

**Observation Month:**
- **October 2011**
- **November 2011**
- **December 2011**
- **January 2012**

<table>
<thead>
<tr>
<th>Drainage Location Description</th>
<th>SW-1 (IM3 east)</th>
<th>SW-2 (IM3 gate)</th>
<th>SW-3 (IM3 north)</th>
<th>SW-4 (IMW-20)</th>
<th>SW-5 (Inj. area OW-2)</th>
<th>SW-6 (Inj. area OW-5)</th>
<th>SW-7 (Access Rd Area)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Observation Dates:</strong></td>
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<td></td>
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<tr>
<td><strong>Discharged Observed?</strong></td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
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<tr>
<td><strong>Date/Time of Discharge:</strong></td>
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<tr>
<td><strong>Were Pollutants Observed? (If yes, reverse side)</strong></td>
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</table>

**Lead Operator**

*C. Knight*

**Observer Name:**

*C. Knight*

**Title:**

Lead Operator

**Signature:**

*C. Knight*

From October to January, no discharges were recorded for two minor rain events. No rainfall was observed in December. No discharges were recorded during these minor rain events in December.
**ANNUAL REPORT**

**FORM 4 - MONTHLY VISUAL OBSERVATIONS OF STORM WATER DISCHARGES**

- Storm water discharge visual observations are required for at least one storm event per month between October 1 and May 31.
- Visual observations must be conducted during the first hour of discharge at all discharge locations.
- Discharges of temporarily stored or contained storm water must be observed at the time of discharge.

Indicate "None" in the first column of this form if you did not conduct a monthly visual observation.

Make additional copies of this form as necessary.

Until a monthly visual observation is made, record any eligible storm events that do not result in a storm water discharge and note the date, time, name, and title of who observed there was no storm water discharge.

<table>
<thead>
<tr>
<th>Drainage Location Description</th>
<th>SW-1 (IM3 east)</th>
<th>SW-2 (IM3 gate)</th>
<th>SW-3 (IM3 north)</th>
<th>SW-4 (MW-20)</th>
<th>SW-5 (Inj. area OW-2)</th>
<th>SW-6 (Inj. area OW-5)</th>
<th>SW-7 (Access Rd Area)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Observation Month:</td>
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<tr>
<td>February 2012</td>
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<tr>
<td>Observers Name:</td>
<td>C. Knight</td>
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<td></td>
</tr>
<tr>
<td>Title:</td>
<td>Lead Operator</td>
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</tr>
<tr>
<td>Observation Dates:</td>
<td>2-29-12</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Discharged Observed?</td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
</tr>
<tr>
<td>Date/Time of Discharge:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Were Pollutants Observed?</td>
<td>no runoff was observed for this minor rainfall event</td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
</tr>
<tr>
<td>Signature:</td>
<td>C. Knight</td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

| Observation Month:            |                |                |                |             |                       |                       |                       |
| March 2012                    |                |                |                |             |                       |                       |                       |
| Observers Name:              | C. Knight      |                |                |             |                       |                       |                       |
| Title:                        | Lead Operator  |                |                |             |                       |                       |                       |
| Observation Dates:           | 3-18-12        |                |                |             |                       |                       |                       |
| Discharged Observed?          | yes/no         | yes/no         | yes/no         | yes/no      | yes/no                | yes/no                | yes/no                |
| Date/Time of Discharge:       |                |                |                |             |                       |                       |                       |
| Were Pollutants Observed?     | no runoff was observed for this minor rainfall event | yes/no         | yes/no         | yes/no      | yes/no                | yes/no                | yes/no                |
| Signature:                    | C. Knight      |                |                |             |                       |                       |                       |

| Observation Month:            |                |                |                |             |                       |                       |                       |
| April 2012                    |                |                |                |             |                       |                       |                       |
| Observers Name:              | C. Knight      |                |                |             |                       |                       |                       |
| Title:                        | Lead Operator  |                |                |             |                       |                       |                       |
| Observation Dates:           | 4-14-12, 4-26-12 |                |                |             |                       |                       |                       |
| Discharged Observed?          | yes/no         | yes/no         | yes/no         | yes/no      | yes/no                | yes/no                | yes/no                |
| Date/Time of Discharge:       |                |                |                |             |                       |                       |                       |
| Were Pollutants Observed?     | no runoff, no runoff | yes/no         | yes/no         | yes/no      | yes/no                | yes/no                | yes/no                |
| Signature:                    | C. Knight      |                |                |             |                       |                       |                       |

<p>| Observation Month:            |                |                |                |             |                       |                       |                       |
| May 2012                      |                |                |                |             |                       |                       |                       |
| Observers Name:              | C. Knight      |                |                |             |                       |                       |                       |
| Title:                        | Lead Operator  |                |                |             |                       |                       |                       |
| Observation Dates:           | No rain events were recorded for May 2012 |                |                |             |                       |                       |                       |
| Discharged Observed?          | yes/no         | yes/no         | yes/no         | yes/no      | yes/no                | yes/no                | yes/no                |
| Date/Time of Discharge:       |                |                |                |             |                       |                       |                       |
| Were Pollutants Observed?     | yes/no         | yes/no         | yes/no         | yes/no      | yes/no                | yes/no                | yes/no                |
| Signature:                    | C. Knight      |                |                |             |                       |                       |                       |</p>
<table>
<thead>
<tr>
<th>POTENTIAL POLLUTANT SOURCE/INDUSTRIAL ACTIVITY AREA (as identified in your SWPPP)</th>
<th>HAVE ANY BMPs NOT BEEN FULLY IMPLEMENTED?</th>
<th>If yes, to either question, complete the next two columns of this form</th>
<th>Describe deficiencies in BMPs or BMP implementation</th>
<th>Describe additional/revised BMPs or corrective actions and their date(s) of implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MW-20 Bench</strong>&lt;br&gt;BMPs: good housekeeping inspection observation while loading truck</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Allen Rd Laying Area</strong>&lt;br&gt;BMPs: good housekeeping straw wattles inspection r</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>East Mesa Inject Well Area</strong>&lt;br&gt;BMPs: good housekeeping straw wattles inspection</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>IM-3 Plant Area</strong>&lt;br&gt;BMPs: site drains (containment, roof, walls, inspections good housekeeping)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
PG&E Topock Interim Measures No. 3
Groundwater Treatment System, WDID No. 7 36I 019443
Attachment A

Response Explanations for “NO” Answers for Questions E.1, E.2, E.5-E.7, E.9, E.10.c, F.1.a, and G.1:

E.1 - No storm events occurred during the October 1, 2011 through May 31, 2012 wet season that caused discharge from the site, therefore no sampling/analysis occurred.

E.2 - No storm events occurred during the October 1, 2011 through May 31, 2012 wet season that caused discharge from the site, therefore no sampling/analysis occurred.

E.5 - No storm events occurred during the October 1, 2011 through May 31, 2012 wet season that caused discharge from the site, therefore no sampling/analysis occurred.

E.6 - No storm events occurred during the October 1, 2011 through May 31, 2012 wet season that caused discharge from the site.

E.7 - No storm events occurred during the October 1, 2011 through May 31, 2012 wet season that caused discharge from the site, therefore no sampling/analysis occurred.

E.10.c - No storm events occurred during the October 1, 2011 through May 31, 2012 wet season that caused discharge from the site, therefore no sampling/analysis occurred.

F.1.a - IM-3 has periodic discharge of air conditioning condensate to the ground surface, but visual observations confirm that it did not result in a discharge from the site.

G.1 - Monthly visual observations occurred at all discharge locations (see Form 4); however, no storm events occurred during the October 1, 2011 through May 31, 2012 wet season that caused storm water discharge from the site.

For rainfall totals from storm events that **did not** result in a storm water discharge see Attachment B.
## PG&E Topock Interim Measures No. 3
### Groundwater Treatment System, WDID No. 7 36l 019443

**Attachment B**

*Storm Events, During October 1, 2011 to May 31, 2012 Wet Season, Not Resulting in Storm Water Discharge*

<table>
<thead>
<tr>
<th>DATE</th>
<th>TIME</th>
<th>RAINFALL AMOUNT <em>(inches)</em></th>
<th>Visual Observations Conducted? (Yes/No)</th>
<th>Discharge Observed? (Yes/No)</th>
<th>NAME &amp; TITLE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oct. 5, 2011</td>
<td>8:00 AM</td>
<td>.25&quot;</td>
<td>Yes</td>
<td>No</td>
<td>Chris Knight - Lead Operator</td>
</tr>
<tr>
<td>November 2011 did not have any eligible storm water events</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dec. 1, 2011</td>
<td>6:00 PM</td>
<td>.25&quot;</td>
<td>Yes</td>
<td>No</td>
<td>Ryan Phelps - Operator</td>
</tr>
<tr>
<td>Dec. 2, 2011</td>
<td>11:30 AM</td>
<td>.30&quot;</td>
<td>Yes</td>
<td>No</td>
<td>Chris Knight - Lead Operator</td>
</tr>
<tr>
<td>Dec. 12, 2011</td>
<td>2:50 AM</td>
<td>.30&quot;</td>
<td>Yes</td>
<td>No</td>
<td>Eric Yocum - Operator</td>
</tr>
<tr>
<td>January 2012 did not have any eligible storm water events</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Feb. 28, 2012</td>
<td>1:00 AM</td>
<td>.10&quot;</td>
<td>Yes</td>
<td>No</td>
<td>Eric Yocum - Operator</td>
</tr>
<tr>
<td>Mar. 18, 2012</td>
<td>2:00 AM</td>
<td>.50&quot;</td>
<td>Yes</td>
<td>No</td>
<td>Josh Rosenberg - Operator</td>
</tr>
<tr>
<td>Apr. 14, 2012</td>
<td>2:00 AM</td>
<td>1.0&quot;</td>
<td>Yes</td>
<td>No</td>
<td>Josh Rosenberg - Operator</td>
</tr>
<tr>
<td>Apr. 26, 2012</td>
<td>9:45 AM</td>
<td>.1&quot;</td>
<td>Yes</td>
<td>No</td>
<td>Joe Aide - Operator</td>
</tr>
<tr>
<td>May 2012 did not have any eligible storm water events</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Rainfall Amount from IM-3 onsite rain gauge recorded each day by plant personnel on IM-3 Facility Process Monitoring Checklist