October 27, 2010

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: Request for Reverse Osmosis Concentrate Sampling Location Change
Board Order R7-2006-0060
Interim Measure No. 3 Groundwater Treatment System
PG&E Topock Compressor Station, Needles, California

Dear Mr. Perdue:

Pacific Gas and Electric Company (PG&E) performs monitoring at the Topock Compressor Station, Interim Measure (IM) No. 3 Groundwater Treatment System in accordance with Board Order R7-2006-0060 issued September 20, 2006 and the revised Monitoring and Reporting Program, issued August 28, 2008.

PG&E is proposing to modify the reverse osmosis (RO) concentrate sample collection location (Station D) to ensure the samples are representative of what is shipped offsite, as discussed in the Third Quarter 2010 Monitoring Report for IM3 submitted October 15, 2010. This proposed change is based on the standard operation of the modern RO system installed in mid-2009. This new RO system includes a secondary stage which operates with several on/off cycles and automatic back-flushing procedures per day. Between operating cycles, the secondary stage back-washes using permeate (water that has been treated by the RO unit to remove salinity) to flush the salty concentrate from RO unit metal pipes as a corrosion prevention measure. Under these operating conditions a sample collected at the current sampling point may contain either RO concentrate or back-wash, depending on the time of sample collection. Both the RO concentrate and back-wash flow to the RO concentrate storage tank (T-701), and then to the RO concentrate holding tanks for offsite disposal.

The current Station D is located at RO unit influent piping to the RO concentrate storage tank (T-701). This sampling location was established in 2005 when the RO unit was operating continuously, with a constant flow of concentrate past the sampling location. PG&E is proposing to relocate the RO concentrate sampling Station D to a discharge
nozzle from the RO concentrate Storage Tank (T-701). This location will ensure RO concentrate samples are representative of the material that is sent offsite for disposal.

Attached is the RO unit drawing with the new proposed sampling Station D highlighted. No other changes are proposed.

Our understanding is that revisions to the Monitoring and Reporting program require Executive Officer approval. With that approval, we would be prepared to begin use of the new RO Concentrate sampling Station D location for the next scheduled RO concentrate sampling during the first week of December 2010.

We appreciate your consideration of our request. If you have any questions regarding this request or would like to discuss it in more detail, please call me at (760) 791-5884 or Robert Doss at (415) 973-7601.

Sincerely,

Curt Russell
Topock Site Manager

cc: Tom Vandenberg, State Water Resources Control Board
Jose Cortez, Colorado River Basin Regional Water Quality Control Board
Aaron Yue, Department of Toxic Substances Control