

Draft Soil Engineering Evaluation / Cost Analysis Available for Public Comment

PG&E Topock Compressor Station
Needles, California

June 2020



The U.S. Department of the Interior (DOI) invites public comment on the draft Soil Engineering Evaluation / Cost Analysis (EE/CA) to address contaminated soil on federal lands adjacent to the Topock Compressor Station (Station) property located about 12 miles southeast of Needles, California. DOI is using their authority under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) in directing Pacific Gas and Electric (PG&E) to write the draft Soil EE/CA and release it for comment. This factsheet summarizes the purpose and findings of the draft Soil EE/CA and provides details on how to access the report and provide comments to DOI during the 60-day public comment period from June 3, 2020 to August 5, 2020.

WHAT IS AN EE/CA?

The purpose of the Soil Engineering Evaluation / Cost Analysis is to evaluate the need for a non-time critical removal action (NTCRA), in this case to remove contaminated soil on federal lands or at locations where contamination has the potential to migrate to federal land. Based on a comprehensive soil investigation completed in 2017 and a detailed Human Health and Ecological Risk Assessment completed in 2019 as part of the overall Resource Conservation and Recovery Act (RCRA) Facility Investigation and CERCLA Remedial Investigation (RFI/RI), the draft Soil EE/CA identifies potential areas for a removal action and evaluates each removal action alternative (including a No Action Alternative) for cleanup effectiveness, implementability, and cost.

DOI is the lead Federal regulatory agency for the Topock project and works in close coordination with the lead state regulatory agency, the California Department of Toxic Substances Control (DTSC).

OBJECTIVES OF THE SOIL REMOVAL ACTION

Based on results of the soil investigation and detailed Human Health and Ecological Risk Assessment, the draft Soil EE/CA finds that an NTCRA should be considered. There are three Removal Action Objectives (RAOs) for soil removal. All apply to soil up to 10 feet below ground surface.

- **RAO 1:** Reduce human and ecological risk related to the constituents of concern in soil on or adjacent to federal land by removing soil at locations identified as driving risk in the Human Health and Ecological Risk Assessment.
- **RAO 2:** Address elevated concentrations of contaminants in soil outside the Station in or adjacent to wash areas within, or have the potential to migrate to, the Havasu National Wildlife Refuge during storm events.
- **RAO 3:** Remove debris, burnt material, and/or discolored soil associated with elevated hazardous substances within Solid Waste Management Units and Areas of Concern (AOCs).

You are invited to review and comment on the draft Soil EE/CA for a non-time critical removal action of soil from 14 areas adjacent to the PG&E Topock Compressor Station.

PUBLIC COMMENT PERIOD: June 3, 2020 to August 5, 2020

Due to COVID-19 restrictions on group gatherings and access to many public buildings, the draft document is primarily available for download via the project website:

<https://dtsc-topock.com/documents/public-involvement/public-comment-documents/documents-for-review>

Please see the "What's New" section at the top of the homepage.

Contact the Project Manager below if you need the document by an alternative method.

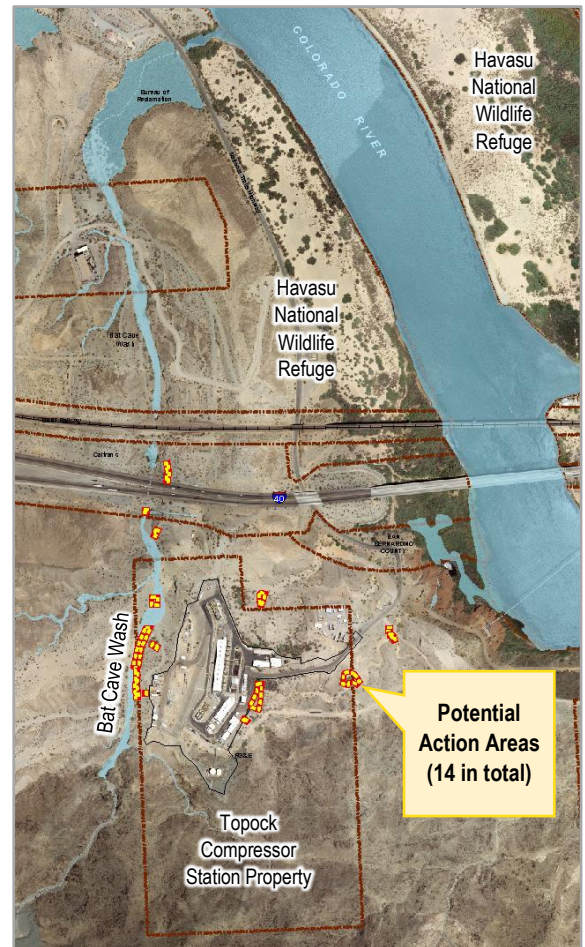
Comments must be postmarked or emailed no later than Wednesday, August 5, 2020.

Send to: Pamela S. Innis, Topock Project Manager, U.S. Department of the Interior
One North Central Avenue, Suite 800, Phoenix, Arizona 85004-4427
Pamela_Innis@ios.doi.gov

POTENTIAL ACTION AREAS

The draft Soil EE/CA identifies and develops removal alternatives for 14 Potential Action Areas. Each of these Potential Action Areas are on federal lands (Havasu National Wildlife Refuge) or at locations where contaminants in soil have the potential to migrate to federal land. Potential Action Areas are in the following investigation areas:

- **AOC 1 and Solid Waste Management Unit 1** – The Former Percolation Bed and Surrounding Area located within Bat Cave Wash west of the Station.
- **AOC 10** – An area located southeast of the Station in a small ravine known as “East Ravine”.
- **AOC 11** – Topographic low areas (depressions) on the northeast side of the Station where runoff from the facility can collect.
- **AOC 14** – The Railroad Debris Site located north of the Station and bounded by the BNSF railway tracks to the north, Interstate 40 to the south, Bat Cave Wash to the west, and a former access road to the east.
- **AOC 27** – An area located north of the Station that was used as a waste disposal area and contains miscellaneous construction debris and burned materials.



Shown here is the Topock Compressor Station property and surrounding area along the Colorado River. Soil removal action alternatives were evaluated in the draft Soil EE/CA for the 14 Potential Action Areas shown here.

SOIL REMOVAL ACTION ALTERNATIVES

As detailed in the draft Soil EE/CA, four soil removal action alternatives were developed and then evaluated in detail to determine the most effective approach to address contamination in the Potential Action Areas. All alternatives, except for Alternative 1 – No Action, meet Removal Action Objectives and comply with applicable or relevant and appropriate requirements (called “ARARs”). The removal action alternatives are summarized below.

Soil Removal Action Alternatives	Description of Action Alternatives (see the draft Soil EE/CA for details)
Alternative 1 – No Action	Baseline condition. No removal action would take place.
Alternative 2 – Excavation and Offsite Disposal of All Material	Excavation of soil within the Potential Action Areas and disposal offsite.
Alternative 3 – Excavation, Mechanical Separation, Offsite Disposal of Fines, and Reuse of Coarse Material	Excavation of soil within the Potential Action Areas and mechanical separation to isolate fine material (less than 3/8 inch) and coarse material (greater than 3/8 inch). Fine material would be disposed of offsite, and coarse material would be used to backfill the excavation areas.
Alternative 4 – Excavation, Mechanical Separation, Offsite Disposal of Fines, Soil Washing of Coarse Material, and Reuse of Washed Coarse Material	Same as Alternative 3 except that coarse material would be washed with water prior to reuse to remove fines adhered to the surface of the coarse material.

RECOMMENDED ALTERNATIVE

Based on the detailed evaluation and comparative analysis of the removal action alternatives against the criteria of effectiveness, implementability, and cost, **the recommended alternative is Alternative 3 – Excavation, Mechanical Separation, Offsite Disposal of Fines, and Reuse of Coarse Material.**

As described in the draft Soil EE/CA, Alternative 3 is considered the most effective alternative and will be protective of human health and the environment by providing a high degree of long-term effectiveness; reduction in toxicity, mobility, and volume; and short-term effectiveness, and reduces the amount of material requiring offsite disposal. Alternative 3 is also relatively cost efficient and can be implemented safely with reliable and commonly used construction methods.

NEXT STEPS

DOI will consider all public comments on the draft Soil EE/CA before finalizing the document and making a final decision. The decision will be documented in an Action Memorandum. If an NTCRA is determined to be needed, DOI will direct PG&E to prepare a detailed workplan to discuss how PG&E plans to implement DOI's selected alternative.

SITE HISTORY AND BACKGROUND

The PG&E Topock Compressor Station is located adjacent to the Colorado River in eastern San Bernardino County, about 12 miles southeast of Needles, California. The Station plays a vital role in moving natural gas into California to serve millions of business and residential customers.

To prevent corrosion of cooling tower equipment, an additive containing chromium was used in cooling tower process water and discharged into Bat Cave Wash (west of the Station) until 1964. Additionally, historical waste handling and disposal practices resulted in the contamination of soils in certain areas at and around the Station.

TOPOCK COMPRESSOR STATION PROJECT SITE INFORMATION REPOSITORY LOCATIONS

The draft Soil EE/CA can be found on DTSC's project website at:

<https://dtsc-topock.com/documents/public-involvement/public-comment-documents/documents-for-review>

Note: Due to the coronavirus (COVID-19), project Information Repositories may be closed. Please call ahead to confirm.

Department of Toxic Substances Control

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Cypress, CA 90630

Contacts: Julie Johnson (714) 484-5337

Jone Barrio (714) 484-5336

Chemehuevi Indian Reservation

Environmental Protection Office

2000 Chemehuevi Trail

Havasu Lake, CA 92363

Contact: (760) 858-1140

Needles Branch Library

1111 Bailey Avenue

Needles, CA 92362

Contact: (760) 326-9255

Lake Havasu City Library

1770 North McCulloch Boulevard

Lake Havasu City, AZ 86403

Contact: (928) 453-0718

Golden Shores Community Library

13136 S. Golden Shores Parkway

Topock, AZ 86436

Contact: (928) 768-2235

Colorado River Indian Tribes Library

26600 Mohave Road

Parker, AZ 85344

Contact: (928) 669-1332

U.S. DEPARTMENT OF THE INTERIOR
Notice of Availability of Draft Soil Engineering Evaluation / Cost Analysis (EE/CA)

PUBLIC COMMENT PERIOD: June 3, 2020 – August 5, 2020

The U.S. Department of the Interior (DOI) is announcing availability of the Draft Engineering Evaluation / Cost Analysis for the PG&E Topock Compressor Station Soil Removal Action.

DOI invites you to review and comment on the Draft Soil EE/CA. Comments must be mailed, faxed, or emailed to:

Pamela S. Innis, Topock Remedial Project Manager, U.S. Department of the Interior
One North Central Avenue, Suite 800, Phoenix, AZ 85004-4427
Phone: (602) 417-9578; Fax: (602) 417-9462; Email: pamela_innis@ios.doi.gov

All comments must be postmarked or emailed to DOI no later than August 5, 2020, for consideration in the Final Soil EE/CA. Note: Due to COVID-19, no public meetings will be held at this time to receive verbal comments.

If you have difficulty accessing material on this factsheet, please contact us (see contact information above) and we will work with you to make the information available. Please indicate the nature of the accessibility need, your preferred format, what material you are trying to access, and how to reach you if questions arise while fulfilling your request.



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