

Sent: Tuesday, January 14, 2020 4:14 PM

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Subject: [EXTERNAL] RE: NOISE-2 Compliance - Request for a waiver of a sound barrier at MW-Z

Christina and Curt,

DTSC has completed our review of PG&E's December 2, 2019 request for a waiver of a sound barrier at the MW-Z location as required under the adopted SEIR NOISE-2 Mitigation Measure due to the expected noise levels during well installation. Since the December 2, 2019 request, DTSC has met with PG&E and the Tribes to explore other options for a safe and effective noise barrier as an alternative to the pre-casted sound panels as described by Cascade. As noted, Cascade has reservations to the use of the sound panels due to safety concerns. In more recent discussions, the most viable option, from a safety standpoint, was the use of stacked shipping containers. While the use of stacked shipping containers was acceptable by Cascade for safety, that was not a preference expressed by the Fort Mojave Indian Tribe during the site walk with PG&E and Tribal representatives on January 6, 2020. Tribal representatives concurred with the Fort Mojave Indian Tribe that the preference is to waive the use of sound barrier over the aesthetic impacts and potential additional footprint of using containers as sound barriers.

Since the application of NOISE-2 mitigation measure at this location was specifically for the protection of the Tribal resource near that area, DTSC will give deference to the Tribes' preference and waive the necessity of a noise barrier for the drilling of MW-Z. This waiver, however, is limited only to the drilling, installation and development of well MW-Z and should not be construed as a waiver of any other mitigation measure requirements applicable for this activity and at this site. The necessity of using noise barriers should continued to be evaluated on a case-by-case basis.

As a result of agreeing to a waiver to the use of noise barrier for the drilling, installation and development of MW-Z, DTSC also agrees to suspending noise monitoring at this location during well installation except for one noise sample to be taken during the maximum noise output of the drill rig to document the representative maximum noise level of the well installation activity. The result of this noise measurement should be reported in the appropriate monthly report following the completion of monitoring wells at the MW-Z location.

If you have any questions regarding this waiver and DTSC's direction regarding the drilling of MW-Z wells, please feel free to contact me.

Regards,

Aaron Yue
Project Manager
Department of Toxic Substances Control
Office of Geology

From: Hong, Christina/LAC <Christina.Hong@jacobs.com>
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Subject: NOISE-2 Compliance - Request for a waiver of a sound barrier at MW-Z

Hello -

PG&E is requesting a waiver of a sound barrier at the drilling location of MW-Z due to concerns for safety. This drilling location is approximately 130-150 feet from the edge of the closest Topock maze, and is at a lower elevation than the maze. Due to its proximity, PG&E conducted a short-term pre-mobilization sound test with the drill rig engine at rated load to assess potential compliance with NOISE-2. A total of six sound level measurements (M1 to M6) were collected on Saturday 11/16/19 (see 1st pdf). Sound level measurements were plotted versus distance from the well location (see 2nd pdf). A sound level of 71 dBA was measured at about 103 feet from the well location and sound levels are projected to exceed the County standard of 65 dBA at the approximate edge of the closest Topock maze. Therefore, unless MW-Z is relocated, a sound barrier is anticipated to be required to comply with NOISE-2.

For this location, Cascade has proposed a NOISE-2 compliant sound barrier that can withstand the maximum wind speed of 89 miles per hour registered at the nearby IM3 weather station during the last wind storm at the site on October 9-10, 2019. See the 3rd pdf for detailed information about the sound panels. These modular panels are approximately 8 feet wide and 24 feet tall. Each panel has a pre-cast, 5-feet by 5 feet, concrete footing. Due to their large size and heavy weight, these panels can only be installed and removed by the supplier, i.e., Cascade cannot maneuver the panels with their own staff.

PG&E and Cascade have the following safety concerns about these panels:

1. Although the sound panels are rated for a wind speed of 105 miles per hour, if these panels were to be dislodged during drilling, they can hit and damage the drill rig and harm the drill crew,
2. If these panels were to be dislodged, they can hit the traveling public and may cause property and/or bodily injuries,
3. If these panels were to be dislodged, they can fly into the nearby maze and cause damage to cultural resources, and

4. Due to their size, they will be visible to the public from NTH and the Colorado river. Members of the public can be attracted to these panels for various reasons including shooting or climbing during non-work hours (note that Cascade cannot take down these panels over long weekends or holiday periods). They could injure themselves if they try to climb the sound panels. They could also vandalize the drill rig and supporting equipment, and injure themselves in the process.

PG&E presented the sound measurement results, sound panel detail, and the safety concerns to the agencies on 11/21/19 and requested that MW-Z be relocated approximately 100 feet to the east/southeast of the current location. On 11/22/19, the agencies informed PG&E that the agencies have decided to not compromise the quality of well data due to noise concerns, and would like to keep the MW-Z borehole at the pre-determined location which was walked with the Tribes. DTSC stated that if safety is a concern at that location for the purpose of the noise barrier, DTSC requests that PG&E document its safety concerns and petition a waiver of the noise barrier requirements.

Because PG&E cannot predict the weather and cannot guarantee that a wind storm will not occur during drilling, PG&E therefore requests a waiver of a sound barrier at the MW-Z location.

Please let us know if the agency needs additional information.

Thank you.
Christina Hong