

Lahontan Regional Water Quality Control Board

July 10, 2014

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RESPONSE TO COMMENTS, FORMER WASTE PIT GROUNDWATER INVESTIGATION, PACIFIC GAS AND ELECTRIC COMPANY, SAN BERNARDINO COUNTY

We received comments from Daron Banks on June 11, 2014, and Project Navigator on behalf of the Hinkley Community Advisory Committee (CAC) on June 23, 2014, in response to a June 3, 2014 Water Board staff letter on a groundwater investigation proposed at the PG&E Former Waste Pit (Pit) in western Hinkley. The comments requested clarification for Board staff's decision agreeing to reduced groundwater monitoring at the site. The comments also requested that the original monitoring program required in a Water Board Order be reinstated and an additional monitoring well be considered. We offer our explanation here and a commitment to meet with you following PG&E's July 30, 2014 data submittal.

On March 3, 2014, the Water Board issued an Investigative Order (Order) requiring PG&E to implement groundwater sampling and reporting to investigate potential impacts to groundwater from the Pit. The Order listed 21 monitoring wells and domestic wells for sampling and laboratory analyses to be included in the investigation.

On May 1, 2014, PG&E submitted a workplan (Technical Memo) proposing reduced monitoring as an initial response and as part of a phased approach to complying with the Water Board Order. In lieu of complying with the specific requirements in the Order, PG&E proposed quarterly sampling from monitoring well pair MW-163S/D for volatile organic compounds (VOCs) for one year to determine if there has been a release from the Pit. Should the results of water samples indicate an impact to groundwater quality after the year period, PG&E stated additional monitoring wells may be added to determine the extent of impact(s). Water Board staff reviewed the workplan and agreed this reduced iterative approach appeared reasonable. Also, staff requested

petroleum hydrocarbons and PCBs analyses be added in the proposed monitoring program consistent with the constituents detected in the Pit soils during excavation.

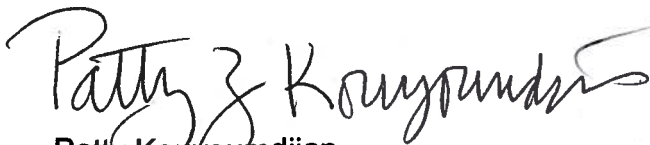
I understand people's confusion about the monitoring program being reduced in Water Board staff's June 3, 2014 letter compared to the monitoring specified in the Order. Dischargers, including PG&E, may request modifications or alternate approaches to the Water Board's orders. In this case, staff has not revised the Order, but accepted an iterative and phased approach to investigating whether discharges to the Pit have impacted groundwater. We are committed to meeting with you, USGS and PG&E to discuss the available information regarding this site, including the results of the first round of sampling, due to our office July 30, 2014.

Project Navigator's comments included a recommendation to install an upgradient monitoring well to assist in the investigation. If PG&E wants to determine whether the ongoing elevated hexavalent chromium in MW 163S is from natural or background conditions, they can propose additional investigations, including installation of an upgradient monitoring well.

We appreciate Project Navigator's suggestion that a decision tree be used to help explain the iterative approach agreed upon by Water Board staff. The decision tree is essentially described in PG&E's Work Plan. Should elevated concentrations of constituents of concern be detected in well pair MW-163 S/D, Water Board staff would then require timely implementation of appropriate next steps.

With respect to your recommendation that the Water Board and PG&E staff discuss the U.S. Geological Survey (USGS) Background Study in the areas near the Former Waste Pit, I will continue to support increased communication among Water Board staff and the USGS staff.

I welcome our future discussion and appreciate your commitment to working with us. If you have any questions regarding this letter, please contact Brianna Bergen, Engineering Geologist at (760) 241-7305 (bbergen@waterboards.ca.gov), Patrice Copeland, Senior Engineering Geologist, at (760) 241-7404 (pcopeland@waterboards.ca.gov), or Mike Plaziak, Supervising Engineering Geologist, at (760) 241-7325 (mplaziak@waterboards.ca.gov).



Patty Kouyoumdjian
Executive Officer

cc: Kevin Sullivan, PG&E
PG&E Hinkley Lyris list