



**Pacific Gas and
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December 24, 2012

Patty Kouyoumdjian
Executive Officer
Regional Water Quality Control Board
Lahontan Region
2501 Lake Tahoe Blvd
S. Lake Tahoe, CA 96150

Re: INVESTIGATIVE ORDER NO. R6V-2012-0060

Dear Executive Officer Kouyoumdjian:

Pacific Gas and Electric (PG&E) is writing in response to the recently issued Investigative Order No. R6V-2012-0060 (13267 Order). The 13267 Order is ostensibly issued to address byproduct manganese mobilized from the In-situ Reactive Zone (IRZ) remediation project in Hinkley.

The manganese byproduct issue has been the subject of numerous discussions with the Regional Water Quality Control Board, Lahontan Region (Regional Board). As we have discussed with you and your staff, PG&E is fully engaged and committed to addressing this issue based upon a collaborative approach with the Regional Board, independent technical experts and the Hinkley community. We understand the community wants and deserves answers quickly and PG&E is committed to assisting the Regional Board in finding the answers collaboratively based on all of the available data and input received.

PG&E received the 13267 Order on the morning of December 21, 2012. As you know, PG&E, the Independent Review Panel (IRP) Manager, Ian Webster, the Community Advisory Committee (CAC), and the United States Geological Survey (USGS) were invited by the Regional Board to participate in a collaborative, public process to review the existing manganese data and determine the data gaps and path forward the evening of December 20, 2012. During the December 20th meeting, it was agreed by all the parties, including the Regional Board, that additional technical discussion (scheduled for January 15, 2013) was needed before the path forward could be determined.

Additionally, on December 17, 2012, in advance of the December 20th technical discussion, PG&E submitted a technical memorandum that presents an evaluation of the extent of migration of byproducts, including manganese and arsenic, produced as a result of the in-situ treatment of hexavalent chromium (Cr6) in groundwater at the PG&E Hinkley Compressor Station Site, Hinkley, California. This memorandum also presents an assessment regarding the potential for those byproducts to affect water quality in

an assessment regarding the potential for those byproducts to affect water quality in domestic wells in the vicinity of the site (Attached to this correspondence is another copy of the memorandum for your convenience).

During the December 20th meeting, your staff communicated that they had not yet reviewed the memo. However, PG&E did utilize the maps, evaluations and findings from this technical memorandum during the December 20th meeting to inform the dialog and answer questions posed by the Regional Board and the community. PG&E continues to believe that the issues raised in technical memorandum are critical to a sound scientific approach which takes in to account all the lines of evidence available. We also believe that the regulatory approach towards the manganese byproduct definition would be further illuminated by, at a minimum, the review of the technical memorandum by the experts on the Regional Board staff. Once reviewed, the Regional Board may determine that the December 17, 2012 technical memorandum would render the 13267 Order unnecessary.

Based upon the aforementioned, we are requesting that you consider issuing an additional order modifying Order No. R6V-2012-0060 that will extend the 30 day deadline and reflect your understanding that the previously agreed upon collaborative, public process is the appropriate approach to resolve the manganese byproduct issue. In the absence of a modified order, it is not clear that a comprehensive and reasonable regulatory approach to the manganese byproduct will be possible.

We look forward to your response and appreciate your timely consideration of our request.

Sincerely,



Sheryl Bilbrey
Director, Chromium Remediation