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**To:** [Carmela Spasojevich](mailto:Carmela.Spasojevich)  
**Cc:** [Kemper, Lauri@Waterboards](mailto:Kemper.Lauri@Waterboards); [Genera, Sue@Waterboards](mailto:Genera.Sue@Waterboards)  
**Subject:** RE: Request for Comments - Modifications to the WHWP in Hinkley  
**Date:** Friday, October 18, 2013 3:54:15 PM

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Carmela:

Thank you for your comments.

**Patty Zwartz Kouyoumdjian, Executive Officer**  
**Lahontan Regional Water Quality Control Board**

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**From:** Carmela Spasojevich [REDACTED]  
**Sent:** Thursday, October 17, 2013 5:44 PM  
**To:** Kouyoumdjian, Patty@Waterboards  
**Cc:** Kemper, Lauri@Waterboards  
**Subject:** Request for Comments - Modifications to the WHWP in Hinkley

17 October 2013

Patty Kouyoumjian  
Executive Officer  
Regional Water Quality Control Board  
2501 Lake Tahoe Boulevard  
South Lake Tahoe, CA 96150

Subject: Modifications to the Whole House Water Program (WHWP) in Hinkley

Thank you for the opportunity to respond to your September 11, 2013, request for comments concerning modifications to the WHWP in Hinkley.

I wholeheartedly agree with the public's requests to include:

1. Other areas of chromium detection above background levels to be added within the contiguous plume boundary and
2. To extend the one mile buffer from those locations. The Water Board's past orders to PG&E have stated that it is assumed that all chromium detections above background in groundwater in the downgradient and crossgradient flow directions to be from PG&E's past

releases.

In fact, in light of this, it is only right that - at a minimum - all aquifer areas with a chromium detection above background levels be included in the WHWP.

I do NOT agree with PG&E's requests to:

1. Eliminate the one mile buffer from the contiguous plume, and
2. To raise the participation level from any chromium detection to above 3.1 parts per billion hex chromium.

PG&E's requests are outrageous for these reasons:

1. The chromium plume continues to be undefined.
2. The chromium plume continues to migrate to the north, west, and east.
3. The chromium plume is not being remediated in ALL areas of groundwater contamination.
4. PG&E has been creating additional total chromium levels by converting hex chromium to trivalent chromium and needs to be held responsible for all total chromium detections above background levels.
5. The June 2012 Cleanup and Abatement Order, directive #3 clearly states that PG&E will be held responsible for complying with all directives in the order until a FINAL hex chromium MCL is released.

For these reasons, it would be wrong for the Water Board to show favoritism to PG&E by granting its request to modify the WHWP to the detriment of the Hinkley residents. The residents of Hinkley did not pollute the water – PG&E did!

As 40-plus year former resident and still a current landowner in Hinkley, I have a vested interest in the community. Even though I do now currently have a domestic well and am not eligible for the WHWP, many of my friends are still impacted by this horrible situation. Our properties have no value so we cannot sell due to PG&E's pollution of the aquifer and the resulting horrible situation of unsafe water. Due to this my friends are forced to live there - but please do not force them to drink and shower in contaminated or possibly contaminated water! Since the Hinkley residents did not pollute the groundwater with chromium do not make them bear the burden of the contamination!

As hard as it is for many to imagine, PG&E **continues** to pollute the precious groundwater as indicated by high chromium levels found in monitoring wells at the compressor station year after year. This fact should make the requirement for PG&E to be required to supply clean water to all affected or even marginally-affected residents a very definitive decision! The

only way for the Hinkley residents to receive environmental justice is through the proper accountability of the actions of PG&E! The Water Board's Basin Plan has a non-degradation policy and technically this should make ANY area where it shows an increase in chromium eligible for the WHWP – the eligibility requirements for the WHWP should include more residents - most certainly not fewer residents.

An excerpt of your Basin Plan at page 3 – 1 states: “The general methodology used in establishing water quality objectives involves, first, designating beneficial water uses; and second, selecting and quantifying the water quality parameters necessary to protect the most vulnerable (sensitive) beneficial uses. To comply with the Non-degradation Objective, quality objectives may be established at levels better than that necessary to protect the most vulnerable beneficial use.” “I would ask you, what is more vulnerable than a human being's health when exposed to pollution known to be a carcinogen?”

In closing, the residents of Hinkley are taxpaying citizens and deserve and expect the California Regional Water Quality Control Board to protect them against contaminated groundwater. Based on PG&E's 50-plus years of on-going pollution to the drinking water aquifer in Hinkley, all benefits should go to the residents - NOT to the polluter.

Sincerely,  
Carmela Spasojevich