

Lahontan Regional Water Quality Control Board

April 16, 2015

Additional Information Requested: Proposed Cleanup and Abatement Order requiring Pacific Gas and Electric Company to cleanup discharges of chromium to ground waters in Hinkley.

I would like to thank the Parties for submitting comments on the proposed Cleanup and Abatement Order (CAO) by March 13, 2015. The comments received on the proposed CAO have raised issues that need additional clarification. The Water Board must have all pertinent information in hand before considering adoption of a final CAO. The following questions or requests for information are directed at certain Parties in an attempt to gather the necessary information for the Water Board to consider. **Responses must be sent to RB6enproceed@waterboards.ca.gov and received by May 21, 2015:**

For the Water Board Prosecution Team:

- a. Submit a written explanation, including all the information relied upon, to support the assertion in Finding 8 that two detached plumes of Cr6 exist in the northern area. Please respond to the contradictory information provided by PG&E that asserts the Cr6 in the northern area may not be attributable to the PG&E discharge, including Attachment B to PG&E's March 12, 2015 Comments on the Proposed Order, "Comments on Proposed CAO with Regards to Background Chromium Levels."
- b. Submit a written explanation of the reasons why PG&E's proposal (Proposed MRP, submitted December 19, 2014) is not sufficient to 1) detect and react to any unforeseen changes in water quality in the southern plume area, 2) verify that its recent remediation efforts are effective, and 3) track chromium concentrations changes and protect public health in the northern area. Finding 36 in the proposed CAO states that Water Board staff do not agree that reducing the number of monitoring wells and frequency of monitoring to the full extent as PG&E proposed in its December 19, 2014, draft MRP is appropriate at this time, but the Finding does not contain specific rationale to explain why PG&E's proposal is inadequate.
- c. Provide a written explanation of the information and rationale relied upon for how Finding 43 defined an "affected area" as all domestic or community supply wells located laterally one mile down or cross-gradient from the 3.1 ppb Cr6 plume boundaries. What purpose does having a defined "affected area" serve?

For PG&E:

- a. As recommended in its Northern Areas Investigation Proposal, dated January 17, 2014, PG&E offered to install reverse osmosis systems in residences with active domestic wells in the Harper Dry Lake Valley. Since the adoption of the MCL for Cr6, how many active domestic well owners have received an offer from PG&E to install a reverse osmosis system and in what areas are those domestic wells located? How many accepted that offer and how many rejected it?
- b. What additional actions, if any, is PG&E willing to perform for the areas downgradient of the southern core plume to ensure protection of public health and water quality from the potential migration of the chromium plume?

For the IRP Manager:

What options would the IRP Manager recommend to engage and broaden community involvement in CAO implementation?

PATTY Z. KOUYOUMDJIAN
EXECUTIVE OFFICER

cc: PG&E Lyris List