

January 13, 2014

Ms. Anne Holden, PG  
Engineering Geologist  
California Regional Water Quality Control Board, Lahontan Region  
2501 Lake Tahoe Boulevard  
South Lake Tahoe, California 96150

Subject: **Comment Letter – Tentative Waste Discharge Requirements for Pacific Gas and Electric Company Groundwater Remediation Project Agricultural Treatment Units; WDID No. 6B360303001; Board Order No. R6V-2014- (TENTATIVE)**  
Pacific Gas and Electric Company Hinkley Compressor Station, Hinkley, California

Dear Ms. Holden:

The Pacific Gas and Electric Company (“PG&E”) appreciates the opportunity to provide comments regarding the tentative draft of the California Regional Water Quality Control Board, Lahontan Region’s (“Regional Board”) Waste Discharge Requirements for Pacific Gas and Electric Company Groundwater Remediation Project Agricultural Treatment Units; WDID No. 6B360303001; Board Order No. R6V-2014- (TENTATIVE) (“Permit”). PG&E commends the Regional Board and its staff on the comprehensive approach taken in the Permit to facilitate remediation of historical groundwater contamination in Hinkley.

With the adoption of the Permit by the Regional Board, PG&E will implement a new phase of groundwater remediation in Hinkley with the permitted project of additional groundwater treatment at Agricultural Treatment Units (“AUs”) to increase removal of hexavalent chromium in groundwater (“Project”). This Project, as regulated by the Permit, involves cleaning up the contaminated aquifer by the extraction of groundwater containing chromium and the application of the extracted groundwater to AUs to reduce the hexavalent chromium to trivalent chromium. The Project is based upon a history of successful remediation using AUs in Hinkley, and is supported by groundwater monitoring and analysis.

The Permit is written to allow for remediation actions in accordance with the California Porter-Cologne Water Quality Act or Water Code and the State Water Resources Control Board’s Antidegradation Policy Resolution 68-16, Statement of Policy with Respect to Maintaining High Quality Waters in California. PG&E, therefore, supports the adoption of the Permit with further clarification in the record provided to emphasize the extensive monitoring efforts under both PG&E’s remediation efforts in Hinkley and the actual requirements of the Permit, and with relatively minor changes proposed in Attachments A and B.

PG&E is committed to being a steward of the environment and working to improve the communities we serve. As such, PG&E believes that this Permit is a positive step towards the remediation of contaminated groundwater in Hinkley.

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Thank you for the opportunity to comment.

Sincerely,



Kevin Sullivan  
Hinkley Remediation Project Manager, Shared Services

**Attachments**

Attachment A Summary of Comments on Board Order No. R6V-2014-(TENTATIVE)

Attachment B Proposed Revisions to the Groundwater Monitoring Program for Existing Agricultural Units Presented in the Draft Monitoring and Reporting Program R6V-2014-TENTATIVE