Appendix E
Notice of Preparation and Scoping Comments

California Regional Water Quality Control Board
Lahontan Region

Linda S. Adams
Secretary for
Environmental Protection

2501 Lake Tahoe Boulevard, South Lake Tahoe, California 96150
(530) 542-5400 • Fax (530) 544-2271
www.waterboards.ca.gov/lahontan

Arnold Schwarzenegger
Governor

November 24, 2010

TO ALL INTERESTED PERSONS:

NOTICE OF PREPARATION OF A DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

The California Regional Water Quality Control Board, Lahontan Region (Water Board) is the Lead Agency for the preparation of a Subsequent Environmental Impact Report (SEIR) for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the SEIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached Notice of Preparation.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice. We have set the comment period deadline for no later than 5 pm on **December 31, 2010.**

Please send your response to Anne Holden at the address shown above. We will need the name for a contact person in your agency. You may also provide comments via email to aholden@waterboards.ca.gov or fax to (530) 544-2271.

Project Title: Final Groundwater Cleanup Strategy for Historical Chromium Discharges from Pacific Gas & Electric Company's Hinkley Compressor Station.

Project Applicant: Pacific Gas & Electric Company

Date: 11/24/2010 Signature: Lauri Kemper

Lauri Kemper, P.E.
Assistant Executive Officer
Phone: (530) 542-5436

Enclosure: Notice of Preparation of a Draft Subsequent Environmental Impact Report

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

AHL/clhT: NOP cover to residents.doc
File: PG&E Hinkley file

NOTICE OF PREPARATION OF A DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

DATE: November 24, 2010

TO: Responsible Agencies, Trustee Agencies, and Interested Organizations and Individuals

SUBJECT: Notice of Preparation of a Subsequent Environmental Impact Report for the Final Groundwater Cleanup Strategy for Historical Chromium Discharges from PG&E's Hinkley Compressor Station

LEAD AGENCY: California Regional Water Quality Control Board, Lahontan Region

SEIR CONTACT: Lisa Dernbach, Senior Engineering Geologist
California Regional Water Quality Control Board, Lahontan Region
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150
Phone: (530) 542-5424
E-mail: LDernbach@waterboards.ca.gov

PROJECT TITLE

Final Groundwater Cleanup Strategy for Historical Chromium Discharges from PG&E's Hinkley Compressor Station

BACKGROUND

The California Regional Water Quality Control Board, Lahontan Region (Water Board) is the California Environmental Quality Act (CEQA) Lead Agency for the environmental investigation and chromium groundwater cleanup at the Pacific Gas and Electric Company's (PG&E's) Hinkley Compressor Station. During the 1950s and 60s at the Compressor Station, PG&E discharged chromium-contaminated water, which entered groundwater in the area. In 2008, the Water Board issued Order No. R6V-2008-0014 (General Permit) allowing PG&E to implement in-situ remedial actions and freshwater injection within project area boundaries defined at that time.

Also in 2008, the Water Board issued a Cleanup and Abatement (Order No. R6V-2008-0002) which required PG&E to submit a feasibility study by September 1, 2010 to assess methods to achieve final site cleanup. These objectives are to: 1) achieve plume containment; 2) achieve background conditions for chromium; and 3) restore beneficial uses to the groundwater aquifer. PG&E prepared and submitted to the Board a Feasibility Study (FS) which developed and

analyzed five cleanup alternatives based on their ability to meet the remediation objectives for the site, considering effectiveness, feasibility, time and cost. The FS presents a "no further action" alternative, and four action alternatives:

- Plume Containment
- Plume-wide In-situ Treatment
- Core In-situ Treatment and Beneficial Agricultural Use
- Plume-wide Pump and Treat

These alternatives involve several types of remediation technologies, including:

- Groundwater Extraction and Agricultural Beneficial Reuse
- Clean Water Injection
- Groundwater Extraction, Above Ground Treatment, and Discharge
    - Discharge to Land
    - Direct Injection to Groundwater
- In-situ Treatment

PROJECT DESCRIPTION

The proposed project to be addressed by the Subsequent Environmental Impact Report (SEIR) is expanded core in-situ treatment and agricultural reuse for final cleanup of chromium in groundwater. Additionally, clean water will be injected to provide containment of the chromium in the groundwater within specified boundaries. The Water Board will revise the existing General Permit to incorporate new requirements on discharges. Specifically, the proposed changes to the General Permit will include: 1) the expansion of groundwater extraction and reuse, 2) expansion of the in-situ treatment, and 3) an expansion of the project area. Under the proposal, the expanded project area would allow the implementation of remedial measures over a broader area. Indirect effects related to the revised General Permit include construction and operation of new infrastructure to accommodate the proposed land application, ground water extraction and re-injection, clean water injection, and in-situ measures.

BASIS FOR SUBSEQUENT ENVIRONMENTAL IMPACT REPORT (SEIR)

In 2008, the Water Board adopted General Waste Discharge Requirements for PG&E's currently ongoing groundwater cleanup project. An Initial Study was prepared, and a Resolution approving of the Mitigated Negative Declaration (MND) (State Clearinghouse No. 2008011097) disclosing the effects of the adoption of the General Permit, was adopted by the Water Board in 2008. Groundwater cleanup using limited in-situ remediation and freshwater injection has been ongoing at the site under this existing General Permit. Additionally, agricultural re-use has occurred at the Desert View Dairy under individual waste discharge requirements for PG&E Interim Plume Containment and Hexavalent Chromium Treatment Project (Board Order No. R6V-2004-0034). The Water Board prepared and certified a separate MND in 2004 (certified in Water Board Resolution No. RB6V-2004-0033). Subsequent to that decision, amendments were made to the waste discharge requirements and additional environmental analyses were conducted in 2007 and 2010 to allow for pumping from off-site properties with discharges to the Desert View Dairy as well as the most recent amendment allowing a 50% increased discharge rate to the Desert View Dairy.

As described above, the Water Board expects to revise the existing General Permit to incorporate new requirements on discharges resulting from anticipated expanded remediation activities (land application and in-situ treatment) across a larger area to allow PG&E to implement the final groundwater cleanup approach proposed in the Feasibility Study Although MNDs were adopted by the Water Board for the General Permit and the individual waste discharge requirements for the Desert View Dairy, there may be new potentially significant impacts related to implementing the final groundwater cleanup approach and has therefore determined that it is appropriate to prepare an SEIR. The SEIR analysis will focus on those potential impacts not previously considered in the MNDs adopted for the existing General Permit and individual waste discharge requirements.

ENVIRONMENTAL EFFECTS TO BE EXAMINED IN THE SEIR

The purpose of an SEIR is to examine project alternatives for potentially significant environmental effects not previously considered in the 2004, 2007 and 2008 MNDs and to identify measures that can reduce, avoid, or mitigate potential adverse impacts. Based upon Water Board staff's review of the FS and experience with projects involving groundwater extraction and reuse, the following resources could be significantly affected by the final remediation actions:

- Biological Resources during construction and operation of remediation activities
- Cultural Resources during construction of new infrastructure facilities required to implement the final remediation
- Hydrology and Water Quality during implementation of remediation activities that may affect groundwater quality
- Aesthetics as a result of new infrastructure facilities required to implement the final remediation
- Air Quality during construction of new infrastructure facilities required to implement the final remediation and follow-up maintenance
- Soils during construction of new infrastructure facilities required to implement the final remediation
- Noise during construction of new wells and infrastructure facilities required to implement the final remediation
- Geology from the conversion of hexavalent chromium (Cr6) to trivalent chromium (Cr3), to be left in place

CEQA requires an SEIR to include a discussion of a reasonable range of alternatives, including the "no project" alternative. Specifically, an SEIR must "describe a range of reasonable alternatives to the project or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Here, the primary objective of the project is final remediation of the contaminated site to background levels of chromium. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives.

The Water Board has selected a consulting firm to assist the Water Board in preparing the SEIR. This firm will work at the Water Board's direction. The SEIR will reflect the independent judgment of the Water Board as lead agency. The FS prepared by PG&E will be independently reviewed by the Water Board and its consultant and used as a source document in preparing the SEIR, along with other information collected by the consultant or provided by the public and the Water Board. The Water Board and its consultant will also review and evaluate comments received on the Notice of Preparation. As described below, the FS is available for review by contacting the Water Board.

At the same time, the Water Board is circulating PG&E's Feasibility Study (FS) for public review and comment pursuant to California Water Code 13307.5. The Water Board will provide a separate notice for this effort.

Following public and agency review and comment on this NOP and the FS, the SEIR will analyze the potential environmental impacts of the proposed project and alternatives.

PROJECT LOCATION

Hinkley, San Bernardino County, California, 92347

The Compressor Station is located in the Mojave Desert approximately 6 miles west of the City of Barstow, California, about one mile north of the Mojave River. Figure 1 shows the project location and vicinity. Figure 2 shows the extent of the chromium contamination in groundwater as of August 2010.

PURPOSE OF THE NOTICE OF PREPARATION

CEQA specifies that a public agency must prepare a SEIR if the proposed project may have a new or substantially more severe significant environmental impact than was previously disclosed in a MND. The Water Board is the CEQA lead agency for the PG&E Hinkley Compressor Station Groundwater Cleanup Project because it will issue a Revised General Permit for the remediation actions. The Water Board has determined that activities to be conducted under the FS and proposed Revised General Permit, such as increased aquifer pumping and discharges of groundwater to land, may have a significant impact on the environment not previously evaluated in the previous MNDs and has therefore decided to prepare an SEIR.

The purpose of this Notice of Preparation (NOP) is to initiate interagency and public dialogue to determine the scope of this SEIR by engaging Responsible Agencies, Trustee Agencies, and interested organizations and individuals in identifying concerns to be addressed in the SEIR. The principal goal of this NOP is to inform agencies and the public about issues related to the project and to solicit recommendations and develop information regarding the scope, focus, and content of the proposed SEIR. The Water Board encourages recipients of this notice to inform others with an interest in or responsibility related to the proposed project that this NOP is available for review.

PROVIDING COMMENTS ON THE NOTICE OF PREPARATION

Responsible Agencies, Trustee Agencies, and interested organizations and individuals are encouraged to submit comments regarding the scope and content of the environmental information to be contained in the draft SEIR for the Water Board's consideration. In formulating your comments, you are encouraged to review PG&E's Feasibility Study (FS) along with the information in this NOP.

To obtain a compact disk of the FS, please contact Amber Wike at 530-542-5404, or awike@waterboards.ca.gov. Compact disks of the FS will also be available at the Hinkley School in Hinkley, California on December 1, 2010. Hard copies of the FS can be viewed at the Hinkley Senior Center, the San Bernardino County Library in Barstow, California, or at the Water Board's Victorville or South Lake Tahoe offices.

Victorville Office
14440 Civic Drive, Suite 200
Victorville, CA 92392
760-241-6583

South Lake Tahoe Office
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150
530-542-5400

A text-only version of the FS is available online at
http://www.waterboards.ca.gov/lahontan/water_issues/projects/pge/docs/pgestudy_txtonly.pdf

Please send written comments to Anne Holden, the Water Board's SEIR Project Manager, at the Water Board's South Lake Tahoe address listed above. You may also email your comments to aholden@waterboards.ca.gov or fax to (530) 544-2271 to the attention of Anne Holden. When submitting comments please identify a contact person to answer any questions regarding your comments.

DEADLINE FOR SUBMITTING COMMENTS

Comments on this NOP must be received no later than 5:00 p.m. on December 31, 2010.

DECEMBER 1, 2010 SCOPING MEETING

On December 1, 2010, beginning at 6:00 pm the Water Board will host a scoping meeting at the Hinkley Elementary School, 37600 Hinkley Road, in Hinkley. The purpose of this meeting is to give the Responsible Agencies, Trustee Agencies, and interested organizations and individuals an opportunity to appear and comment on the scope and content of the draft SEIR. Information will also be presented on PG&E's FS, current boundaries of the chromium plume in groundwater, and information on nitrate pollution in the groundwater in the Hinkley area. This scoping meeting will consist of repeated small group presentations at separate informational stations within the meeting room, including presentations that will provide a project overview, a CEQA process overview and an opportunity for meeting participants to comment orally or in writing on the scope

and content of the SEIR. Written comments will also be accepted at the meeting. A Spanish interpreter will be available at the meeting.

CONTACTS

If you wish to discuss technical details of the groundwater cleanup project, please contact Ms. Lisa Dernbach, Water Board Project Manager, at (530) 542-5424 or ldernbach@waterboards.ca.gov. For media inquiries, please contact the Water Board Public Information Officer, Lauri Kemper at (530) 542-5436 or lkemper@waterboards.ca.gov. For inquiries regarding the SEIR or review process, please contact Anne Holden, Water Board SEIR Project Manager, at (530) 542-5450 or aholden@waterboards.ca.gov.

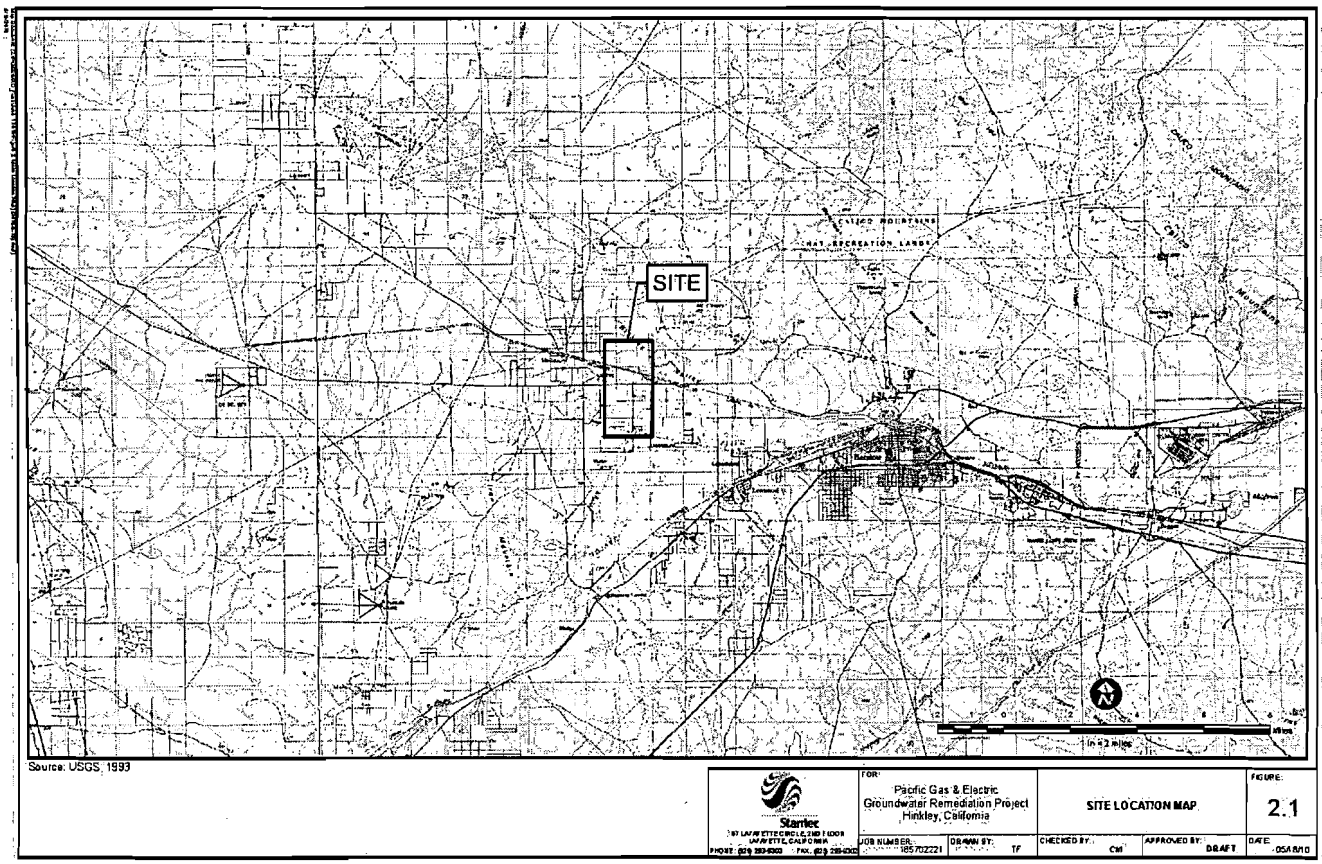
INFORMATION FOR THE DISABLED AND HEARING IMPAIRED

The meeting rooms for the scoping meetings are accessible to people with disabilities. If you have special accommodations or language needs, please contact Water Board's Project Manager Lisa Dernbach at (530) 542-5424. TDD users may dial 711 for the California Relay Service.

FIGURES

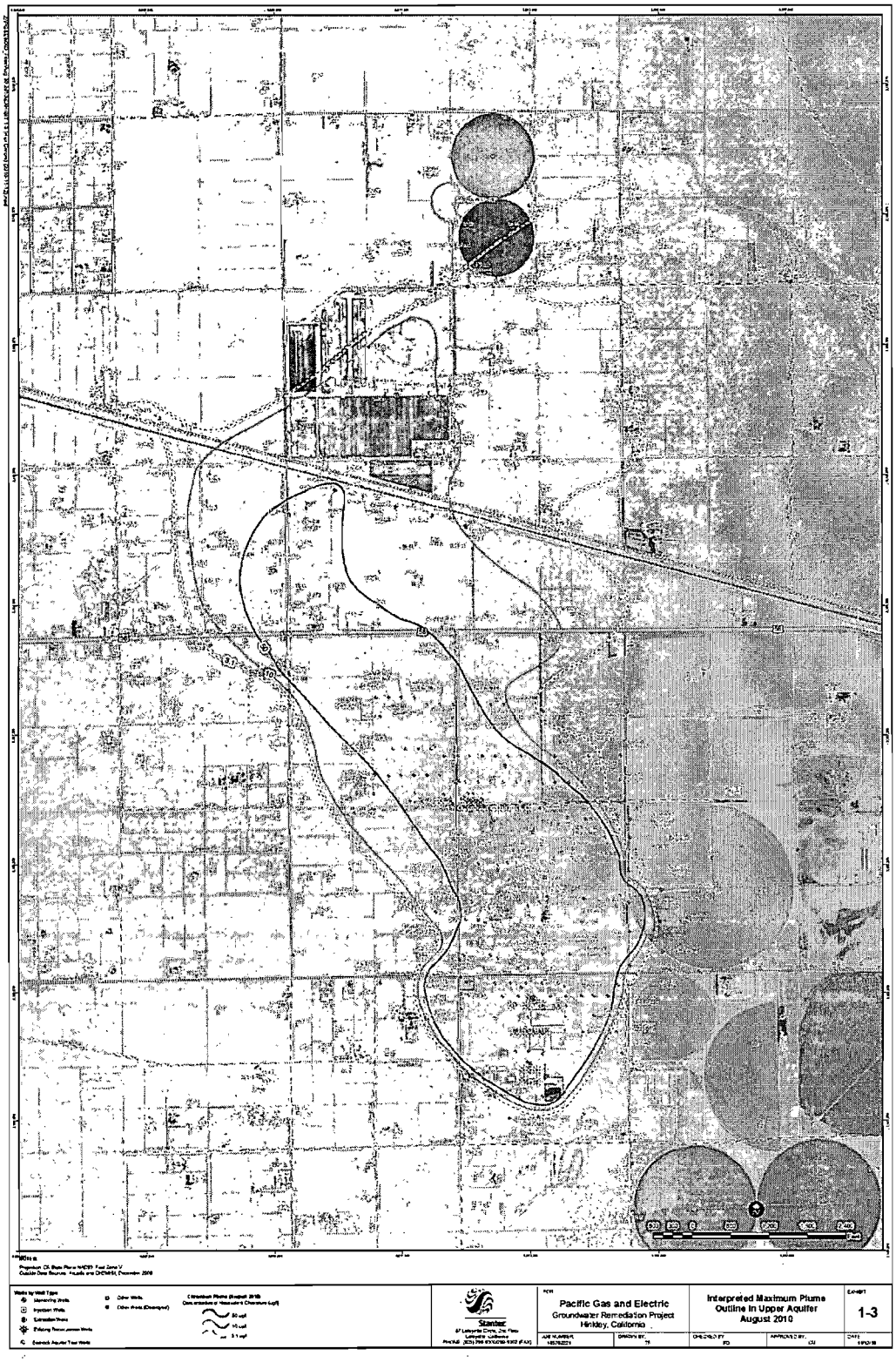
Source: Feasibility Study (Haley and Aldrich, 2010)

Figure 1. Project Location and Vicinity



Source: 3rd Quarter 2010 Groundwater Monitoring Report (CH2MHILL, 2010)

Figure 2. Chromium Plume – August 2010



STATE OF CALIFORNIA — Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
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(916) 653-6251
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Web Site www.nahc.ca.gov
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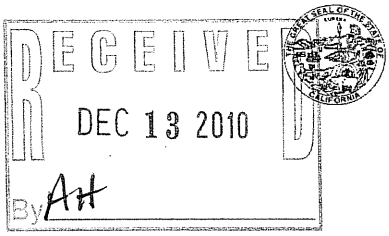

December 9, 2010

Ms. Anne Holden, Environmental Planner

Regional Water Quality Control Board, Region 6 (Lahontan)
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150

Re: SCH#2008011097 CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the **General Permit for Site-wide Groundwater Remediation Project**; located in the Mojave Desert; San Bernardino County, California

Dear Ms. Hodden:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 for the protection and preservation of California's Native American Cultural Resources. (Also see *Environmental Protection Information Center v. Johnson (1985) 170 Cal App. 3rd 604).* The California Environmental Quality Act (CEQA - CA Public Resources Code §21000-21177, amendment effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance. The lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. State law also addresses Native American Religious Expression in Public Resources Code §5097.9.

The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF Inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and Native American Cultural Resources **were NOT identified** within one-half mile of several of the Area of Potential Effect (APE). However, there are Native American cultural resources in close proximity to the APE. Also, it is important to understand that the absence of archaeological, Native American cultural resources in an area does not indicate that they are not present, or will be present once ground-breaking activity begins. The NAHC recommends early consultation with Native American tribes in your area as the best way to avoid unanticipated discoveries once a project is underway and to learn of any sensitive cultural areas. Enclosed are the names of the culturally affiliated tribes and interested Native American individuals that the NAHC recommends as 'consulting parties,' for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource.. Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional

archaeologist is employed during the 'Initial Study' and in other phases of the environmental planning processes.

Furthermore the NAHC recommends that you contact the California Historic Resources Information System (CHRIS) of the Office of Historic Preservation (OHP), for information on recorded archaeological data. This information is available at the OHP Office in Sacramento (916) 445-7000.

Consultation with tribes and interested Native American tribes and interested Native American individuals, as consulting parties, on the attached NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 [f]*et seq.),* 36 CFR Part 800.3, .4 & .5, the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 *et seq.*) and NAGPRA (25 U.S.C. 3001-3013), as appropriate. The 1992 *Secretary of the Interior's Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including *cultural landscapes.* Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e).

Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'. Discussion of these should be included in your environmental documents, as appropriate.

The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of "historic properties of religious and cultural significance' may also be protected the under Section 304 of the NHPA or at the Secretary of the Interior' discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C, 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens. Although tribal consultation under the California Environmental Quality Act (CEQA; CA Public Resources Code Section 21000 – 21177) is 'advisory' rather than mandated, the NAHC does request 'lead agencies' to work with tribes and interested Native American individuals as 'consulting parties,' on the list provided by the NAHC in order that cultural resources will be protected. However, the 2006 SB 1059 the state enabling legislation to the Federal Energy Policy Act of 2005, does mandate tribal consultation for the 'electric transmission corridors. This

is codified in the California Public Resources Code, Chapter 4.3, and §25330 to Division 15, requires consultation with California Native American tribes, and identifies both federally recognized and non-federally recognized on a list maintained by the NAHC

Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. . Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

Dave Singleton
Program Analyst

Attachment: List of Culturally Affiliated Native American Contacts

Cc: State Clearinghouse

Native American Contacts
San Bernardino County
December 9, 2010

Lone Pine Paiute-Shoshone Reservation
Melvin R. Joseph, Chairperson
P.O. Box 747
Lone Pine , CA 93545
admin@lppsr.org
(760) 876-1034
(760) 876-8302 Fax
Paiute
Shoshone

Fort Mojave Indian Tribe
Tim Williams, Chairperson
500 Merriman Ave
Needles , CA 92363
(760) 629-4591
(760) 629-5767 Fax
Mojave

Ramona Band of Cahuilla Mission Indians
Joseph Hamilton, Chairman
P.O. Box 391670
Anza , CA 92539
admin@ramonatribe.com
(951) 763-4105
(951) 763-4325 Fax
Cahuilla

San Fernando Band of Mission Indians
John Valenzuela, Chairperson
P.O. Box 221838
Newhall , CA 91322
tsen2u@hotmail.com
(661) 753-9833 Office
(760) 885-0955 Cell
(760) 949-1604 Fax
Fernandeño
Tataviam
Serrano
Vanyume
Kitanemuk

San Manuel Band of Mission Indians
James Ramos, Chairperson
26569 Community Center Drive
Highland , CA 92346
(909) 864-8933
(909) 864-3724 - FAX
(909) 864-3370 Fax
Serrano

AhaMaKav Cultural Society, Fort Mojave Indian
Linda Otero, Director
P.O. Box 5990
Mohave Valley AZ 86440
(928) 768-4475
LindaOtero@fortmojave.com
(928) 768-7996 Fax
Mojave

Chemehuevi Reservation
Charles Wood, Chairperson
P.O. Box 1976
Chemehuevi Valley CA 92363
chair1cit@yahoo.com
(760) 858-4301
(760) 858-5400 Fax
Chemehuevi

Morongo Band of Mission Indians
Michael Contreras, Cultural Heritage Prog.
12700 Pumarra Road
Banning , CA 92220
(951) 201-1866 - cell
mcontreras@morongo-nsn.gov
(951) 922-0105 Fax
Cahuilla
Serrano

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and fed eral NAGPRA. And 36 CFR Part 800.

This list is only applicable for contacting local Native Americans for consultation purposes with regard to cultural resources impact by the proposed SCH#2008011097; CEQA NOtice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the General Permit for Site-wide Groundwater Remediation Project; located in the Hinkley Area of the Mojave Desert; San Bernardino County, California.

Native American Contacts
San Bernardino County
December 9, 2010

San Manuel Band of Mission Indians
Ann Brierty, Policy/Cultural Resources Departmen
26569 Community Center. Drive — Serrano
Highland , CA 92346
(909) 864-8933, Ext 3250
abrierty@sanmanuel-nsn.gov
(909) 862-5152 Fax

Fort Mojave Indian Tribe
Nora McDowell, Cultural Resources Coordinator
500 Merriman Ave — Mojave
Needles , CA 92363
g.goforth@fortmojave.com
(760) 629-4591
(760) 629-5767 Fax

Serrano Nation of Indians
Goldie Walker
P.O. Box 343 — Serrano
Patton , CA 92369

(909) 862-9883

Kern Valley Indian Council
Robert Robinson, Co-Chairperson
P.O. Box 401 — Tubatulabal
Weldon , CA 93283 — Kawaiisu
brobinson@iwvisp.com — Koso
(760) 378-4575 (Home) — Yokuts
(760) 549-2131 (Work)

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA. And 36 CFR Part 800.

This list is only applicable for contacting local Native Americans for consultation purposes with regard to cultural resources impact by the proposed SCH#2008011097; CEQA NOtice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the General Permit for Site-wide Groundwater Remediation Project; located in the Hinkley Area of the Mojave Desert; San Bernardino County, California.

Department of Toxic Substances Control

Linda S. Adams
Acting Secretary for
Environmental Protection

Maziar Movassaghi
Acting Director
5796 Corporate Avenue
Cypress, California 90630

Edmund G. Brown Jr.
Governor

January 5, 2011

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

NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR PGE HINKLEY COMPRESSOR STATION

Dear Ms. Holden:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation of a draft Environmental Impact Report for the above-mentioned project. The following project description is stated in your document: "The proposed project to be addressed by the Subsequent Environmental Impact Report (SEIR) is expanded core in-situ treatment and agricultural reuse for final cleanup of chromium in groundwater. Additionally, clean water will be injected to provide containment of the chromium in the groundwater within specified boundaries. The Water Board will revise the existing General Permit to incorporate new requirements on discharges. Specifically, the proposed changes to the General Permit will include: 1) the expansion of groundwater extraction and reuse, 2) expansion of the in-situ treatment, and 3) an expansion of the project area. Under the proposal, the expanded project area would allow the implementation of remedial measures over a broader area. Indirect effects related to the revised General Permit include construction and operation of new infrastructure to accommodate the proposed land application, ground water extraction and re-injection, clean water injection, and in-situ measures".

Based on the review of the submitted document DTSC has the following comments:

1) DTSC recommends that the Water Board consider citing specific cleanup criteria to be used and also evaluate other constituents from the release besides hexavalent chromium. Please also take into consideration the impending change in the Public Health Goal by OEHHA for Cr in drinking water during remediation. Please see the following link: http://www.oehha.ca.gov/water/phg/pdf/123110Chrom6.pdf

2) Human health and the environment of sensitive receptors should be protected during any construction or demolition activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.

3) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

If you have any questions regarding this letter, please contact me at ashami@dtsc.ca.gov, or by phone at (714) 484-5472.

Sincerely,

Al Shami
Project Manager
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@opr.ca.gov.

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
P.O. Box 806
Sacramento, California 95812
ADelacr1@dtsc.ca.gov

CEQA # 3090

DEPARTMENT OF TRANSPORTATION
DISTRICT 8
PLANNING
464 WEST 4th STREET, 6th Floor MS 725
SAN BERNARDINO, CA 92401-1400
PHONE (909) 383-4557
FAX (909) 383-5936
TTY (909) 383-6300

Flex your power!
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January 10, 2011

Anne Holden
Regional Water Quality Control Board, Region 6 (Lahontan)
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150

Notice of Preparation (NOP) for the General Permit for Site-wide Groundwater Remediation Project Draft Environmental Impact Report (EIR).

Dear Ms. Holden:

The California Department of Transportation (Department) received the Notice of Preparation (NOP), for the General Permit for Site-wide Groundwater Remediation Project draft Environmental Impact Report (EIR).

The proposed changes to the General Permit includes the expansion of groundwater extraction and reuse, expansion of the in-situ treatment and an expansion of the project area to allow remedial measures over a larger area. The project is located in the County of San Bernardino, Community Boulevard/Fariview Road, Hinkley, CA. The proposed project extends north and south of State Highway 58.

Caltrans has the discretionary authority to issue special permits for the movement of vehicles/loads exceeding statutory limitations on the size, weight, and loading of vehicles contained in Division 15 of the California Vehicle Code. Requests for such special permits require the completion of, and application for a Transportation Permit.

Issuance of a Caltrans Encroachment Permit will be required prior to any construction within the RW and shall be in compliance to all current design standards, applicable policies, and construction practices. Please reference the Encroachment Permits Manual at http://www.dot.ca.gov/hq/traffops/developserv/permits/ Chapter 600 Utility Permits for applicable requirements.

In addition we recommend referencing the Right of Way Manual Chapter 13 http://www.dot.ca.gov/hq/row/rowman/manual/index.htm and the Project Development Procedure Manual http://dot.ca.gov/hq/oppd/pdpm/pdpmn.htm Chapter 17.

These comments are based upon a review of the materials provided for our evaluation. Other comments detailing possible impacts to State facilities may follow as the project progresses. If you have any questions regarding this letter, please contact me at (909) 383-4557 for assistance.

Sincerely,

DANIEL KOPULSKY
Office Chief
Community Planning, IGR/CEQA Review

PG & E Hinkley Groundwater Cleanup Strategy for Historical Chromium Discharges

Subsequent EIR

Comment Form

****

Optional Information:

Commenter Name: 37775 Hinkley Rd

Date: 12/1/10

Agency/Affiliation (if any):

Address/email:

****

I would like you to consider:

1) Buying out homes in hinkley hurts the community.

2) The time frame for clean up (100 + 200) years is outrageous.

3) The number of things you testing for is very minimal; More items need to be considered when testing water. (esspecialy for the school.

Return to: Lahontan Regional Water Quality Control Board
Attention: Anne Holden
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150
Fax: 530-544-2271

PG & E Hinkley Groundwater Cleanup Strategy for Historical Chromium Discharges
Subsequent EIR
Comment Form

****

Optional Information:

Commenter Name: Amber Powers/Baca Date: 12-1-10

Agency/Affiliation (if any):

Address/email: 37410 Summerset Rd 760-514-1547

****

What are all the effects of drinking, cooking, and bathing in this water?

Return to: Lahontan Regional Water Quality Control Board
Attention: Anne Holden
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150
Fax: 530-544-2271

Lahontan Regional Water Quality Control Board

PG&E's Hinkley Chromium Remediation Project

Public Information Meeting December 1, 2010

Comment Card

I am a former resident of Hinkley and I would like have the updates on the water issues. I Lived in 37445 Summerset RD Hinkley, CA 92347. I now live in 29701 1ST AVE Barstow, CA 92311. thank you. I am having Health issues. Lots of head aches stomach aches and lost of memorie.

Name CARLOTA QUIÑONEZ E-mail

Address 29701 1ST AVE Barstow, CA. 92311 Phone No. (760) 256-8475 (760) 784-7657

Comments will also be accepted by E-mail. Please send messages to LDernbach@waterboards.ca.gov

Lahontan Regional Water Quality Control Board

PG&E's Hinkley Chromium Remediation Project

Public Information Meeting December 1, 2010

Comment Card

There should be more names of streets so it is easier ~~and accurate~~ to locate peoples property. That way we can really see how this affects us. J

Name Elizabeth Hunard E-mail hinkleybetty@hotmail.com

Address 35490 Riverview Dr. Phone No. 760-953-7682

Comments will also be accepted by E-mail. Please send messages to LDernbach@waterboards.ca.gov

Lahontan Regional Water Quality Control Board

PG&E's Hinkley Chromium Remediation Project

Public Information Meeting December 1, 2010

Comment Card

I FEEL THAT THE INSTALLATION OF A WATER DISTRIBUTION SYSTEM WOULD BE A WIN WIN SITUATION. IT WOULD PROVIDE CLEAN WATER TO THE COMMUNITY AND PROVIDE JOBS. IT WOULD ALSO HELP TO RECOVER PROPERTY VALUES AND MAKE PG&E LOOK GOOD

Name DAVE CHEHEY E-mail geaman-1@YAHOO

Address 22230 HIGHCREST Phone No. 760 900 5334

Comments will also be accepted by E-mail. Please send messages to LDernbach@waterboards.ca.gov

Lahontan Regional Water Quality Control Board

PG&E's Hinkley Chromium Remediation Project

Public Information Meeting December 1, 2010

Comment Card

Home Owner North of Hinkley School. Possible TDS problem.

Name Kevin Neil Clark E-mail

Address 39073 Hinkley Rd. Phone No. 760-253-3807

Comments will also be accepted by E-mail. Please send messages to LDernbach@waterboards.ca.gov

Lahontan Regional Water Quality Control Board

PG&E's Hinkley Chromium Remediation Project

Public Information Meeting December 1, 2010

Comment Card

My name is Moises avalos I am a former resident of Hinkley in ES Highway 58 [redacted]. I am now having problem's with my family with their health issues. My doughers have lots of stomach akes head akes and often feel diser. I lived there in the contaminated area for at least 7 or 8 years. I found out that the water was contaminated after moving. I now live in Barstow, CA. 92311 I can prove I lived there.

Name Moises Avalos E-mail VictorCorral73@Yahoo.Com

Address 29281 Arrowhead. Ave. Barstow CA. 92311 Phone No. (760) 590-0336 or (760) 590-0338

Comments will also be accepted by E-mail. Please send messages to LDernbach@waterboards.ca.gov

Lahontan Regional Water Quality Control Board

PG&E's Hinkley Chromium Remediation Project

Public Information Meeting December 1, 2010

Comment Card

I am Servando Piña I would like to have the updates on the water issues. I am a former resident Hinkley 36507 Sommerset Hinkley, CA 92347. I and my famalt are having Health issues. So is my famaly often have head akes stomach akes and lost of memorie and exe vision.

Name Servando Piña E-mail

Address 25541 Hesper Rd Barstow CA. 92311 Phone No. (760) 694-3687 (760) 490-8390

Comments will also be accepted by E-mail. Please send messages to LDernbach@waterboards.ca.gov

Lahontan Regional Water Quality Control Board

PG&E's Hinkley Chromium Remediation Project

Public Information Meeting December 1, 2010

Comment Card

When will it be done?
Give them a definate time limit.
Why property values are inflated?
Impact by PG&E

Name Bradley Gormley E-mail _____

Address 38005 Hacienda Rd Phone No. (760) 954-1387

Comments will also be accepted by E-mail. Please send messages to LDernbach@waterboards.ca.gov

Lahontan Regional Water Quality Control Board

PG&E's Hinkley Chromium Remediation Project

Public Information Meeting December 1, 2010

Comment Card

General Comments heard at mtg.

1) PG+E doesn't care about lower aquifer

2) PG+E needs to provide water for animals + plants, swimming, etc.

Name _____ E-mail _____

Address _____ Phone No. _____

Comments will also be accepted by E-mail. Please send messages to LDernbach@waterboards.ca.gov

Lahontan Regional Water Quality Control Board

PG&E's Hinkley Chromium Remediation Project

Public Information Meeting December 1, 2010

Comment Card

- C-U to Ø if BG is Ø

- 34-01 deep well
  .31 Cr^{+6} 5/10
  .54 8/10

- dw standard 50 ppb

Name Joel Kiss E-mail _____

Address _____ Phone No. _____

Comments will also be accepted by E-mail. Please send messages to
LDernbach@waterboards.ca.gov

PG & E Hinkley Groundwater Cleanup Strategy for Historical Chromium Discharges
Subsequent EIR
Comment Form

****

Optional Information:

Date: Dec 5, 2010

Commenter Name: Shirley Archer

Agency/Affiliation (if any):

Address/email:

****

I went to the community meeting Dec 4 at Hinkley School and didn't learn anything It was very confusing. I asked some questions and no one could answer them or not to where the average person could understand

This is what I want answers to:

(1) Is it safe to Bath and Shower with the water?

(2) Wash your clothes and dishes in?

(3) Breath the air coming out of our Evaporative coolers?

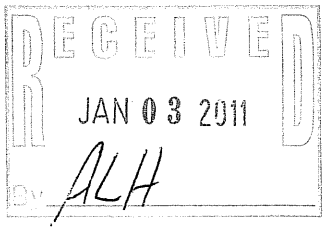
(4) The watering of Lawn and trees, being on the lawn and breathing of dust from mowing the lawn?

Return to: Lahontan Regional Water Quality Control Board
Attention: Anne Holden
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150
Fax: 530-544-2271

MICHAEL R. WENDLBERGER
ATTORNEY AT LAW

MICHAEL R. WENDLBERGER
1670 SOUTH AMPHLETT BLVD., SUITE 214
SAN MATEO, CA 94402

TELEPHONE: (650) 378-2404
FACSIMILE: (650) 378-2405



VIA MAIL

December 29, 2010

California Regional Water Quality Control Board
Lahontan Region
2501 Lake Tahoe Blvd.
South Lake Tahoe, CA 96150

Dear California Regional Water Control Board:

My name is Michael Wendlberger, I am writing this letter on behalf of my client Eleanor Ann Wendlberger in response to PG&E's cleanup proposal relating to the onsite Cleanup of Hexavalent chromium.

My client believes that the only option that should be considered is that of complete cleanup. PG&E should not be in charge of any further studies. Rather the studies should be performed by an outside agency and later billed out to PG&E. PG&E should only be used as a financial source for the cleanup. Having PG&E oversee and create studies for what they are ultimately responsible for is a clear conflict of interest. Their interest in limiting costs and the interest of public health.

This conflict of interest is one reason PG&E has proposed the option currently on the table. Under the proposed cleanup it would take 220 years for the average background to reach normal numbers. PG&E failed in the past to properly control this contaminated area. PG&E must not be allowed to do this again. They must not be allowed to do the minimum. Public safety should be the only concern, regarless of cost. Let us not condemn the public so that PG&E can keep profit up.

PG&E must do the right thing, and the only way for this to occur is if they are forced to pay for a complete and total cleanup of all contaminates in the area.

Again, the only cleanup proposal that should be considered is one that includes complete removal of all contaminants as quickly as possible. If you have any questions or would like to discuss this matter with myself or my client please contact my office at your convenience. Thank you.

Sincerely,

Michael Wendlberger, Esq.
Attorney for Eleanor Wendlberger

From: Lisa Dernbach
To: Anne Holden
Date: 1/3/2011 9:57 AM
Subject: Public Comment on Feasibility Study

The following comments were left on a phone message to me from Naz Awad of Dixie Road in Hinkley:

1) PG&E's proposed cleanup time of 150 years is excessive and unreasoanble for the public to endure contamination for that long.

2) PG&E needs to put more effort into their proposed and present remedition activities especially since their current efforts can't even stop the plume from migrating.

3) It time to fine them big.

Lisa

December 29, 2010

Anne Holden

Cc: Lisa Dernbach

Project Title: Final Groundwater Cleanup Strategy for Historical Chromium Discharges from Pacific Gas & Electric Company's Hinkley Compressor Station.

Public Comment Response to Feasibility Study prepared by P G & E

My name is Jeanette Aguayo and I reside at 22619 Thompson Rd., Hinkley, California. I have been a resident on this property for more than twenty-five years. I am making this comment on P G & E's feasibility study as an interested individual. I have no background in hydrology or geology, but I do have a lot of experience in being a neighbor of P G & E and the changes that the clean-up of this chromium plume can bring to your life.

I have read the entire study with the exception of the referenced appendices, which I have requested and plan to review in the future.

The first issue I would like to address is the position of P G & E regarding the average background level and the maximum background level. I have never understood how these levels were established and my hope is by reviewing some of the information in appendix A I will gain some of that understanding. After reading the comments by P G & E regarding the accomplishment of remediation to average background level not being technically or economically feasible, I wonder if the information in the study is even relevant. I was also shocked that P G & E FS proposed in section 5.1 that the maximum background be increased to 3.55 pg/L for Cr (VI). It is clear that when the MCL is set for Cr (VI) the level will be much lower than what is recognized now as maximum background. The FS also makes several references to the MCL for Cr (T) and cleanup to under that level will meet water quality standards as defined by the Basin Plan. I feel it is essential to establish the much referenced "target level for cleanup" more clearly and concisely for the entire plume. Those levels should not be subject to any misinterpretation.

I would like to make comment on the issue of beneficial use. P G & E describes the cleanup should be to a level of beneficial use for agricultural purposes. This is my home and I have hundreds of neighbors who would also take exception to that. We have a right to have our water cleaned up to drinking water standards. Regardless of who may own the contaminated properties the LRWQCB should oversee the remediation of the final cleanup to that drinking water standard regardless of the economic feasibility described by P G & E's FS.

I would also like to make a comment on the recommendation of Alternative 4 as the alternative selection. I have personally seen the advancement of this plume over the last twenty-three years and cannot conceive that the objective of containment or remediation can be achieved by pursuing more of

the same methods that have already been a failure. I can see that this is the most "economically feasible" for P G & E, but I do not think that is the most effective method for the most complete cleanup possible. Clearly only alternative 5 is the most viable option for complete cleanup. I realize that this option also carries the most impact as far as the esthetic value and the future of the Hinkley Valley and its residents.

I have lived on the edge of this plume for many years and have only recently come to realize the magnitude of the containment and remediation of the Chromium Plume discharged decades ago by P G & E. The final cleanup plan will come at a huge cost to the Hinkley Valley, the residents and our environment. The price we will all pay will have nothing to do with being "economically feasible".

DEC 17, 2010

MARK ORR
POBox 87
36714 Hidden River Rd.
Hinkley CA 92347
1-760-253-5304

ALL MEMBERS OF THE BOARD
ATTN: State of California California Regional Water Quality Control Board Lahontan Region
2501 Lake Tahoe Boulevard, South Lake Tahoe,Ca 96150

RE: Request to California Regional Water Quality Control Board, Lahontan Region.
→ This letter sent as comment to Remediation Project.

Concerning the expansion of the chromium 6 plume in Hinkley, California. According to information provided by CRWQCB Lahontan Region, by my understanding, the chromium 6 plume has continued expanding, especially to the North and North East directions.

If Hinkley Chromium 6 clean-up efforts are to maintain or regain water quality, quantity and/or avvailibility for the people of this region of California, then I regard the clean-up efforts as a failure. If the plume is still expanding, or if chromium 6 is migrating away from the plume, and Hinkley homes and properties are lost due to this expansion, then the primary reason for the clean-up is failed.

I REQUEST those originally responsible for the Chromium 6 plume, PG&E, be required to bring in clean water in large scale (trucked, pipelined, 5000 to 10,000 gallon or larger tanked, and/or alternated water wells etc.) at PG&E expense. This would be a just and reasonable course of action for central and North Hinkley, especially regarding any business or institution, including Hinkley School.

DEC 17, 2010 MARK ORR / CHROMIUM PLUME HINKLEY
comment to project

Yet the physical problem still remains. I myself do not side with those purely wanting a monetary solution. The Chromium 6 plume and related contamination is a physical problem that needs to be fixed. Purchasing homes and properties and having them leave the community does not solve the water quality problem. This problem is below ground, therefore people should not have to leave if water is provided. It is my opinion the usual Ramp-Down restrictions do not and/or should not exist due to the special circumstances of this situation in Hinkley. I REQUEST PG&E pay and/or provide water to offset the ramp-down water loss concerns due to their providing water to Hinkley, California.

If the physical problems in Hinkley cannot be fixed, or will take 150 years or more to solve as recent estimates have stated, then providing a means for the community of Hinkley, California, to survive would be the next logical and just course of action, rather than continue allowing the community of Hinkley to be erased from the map due to clean-up failure and/or enormous duration of time for completed clean-up.

It is my opinion if this contamination occured in the City of San Bernardino itself a completely different clean-up strategy and attitude of concern would have resulted.

MARK ORR

HINKLEY

From: Lisa Dernbach
To: Holden, Anne
Date: 1/4/2011 9:07 AM
Subject: More Public Comments on the FS

Anne,

I was contacted yesterday by Charlene Bradley of Pueblo Rd in Hinkley who wanted me to convey the following FS comments:

1) PG&E's proposed cleanup time is outrageous, especially considering that multiple technologies exist to cleanup Cr6 from the environment.

2) Wants cleanup to be completed in 10 years so she can sell her house at normal market values without the sigma of it being in a contaminated town.

Lisa

From: jeanette aguayo <iloandollars@msn.com>
To: <aholden@waterboards.ca.gov>
CC: <ldernbach@waterboards.ca.gov>
Date: 12/29/2010 9:33 PM
Subject: Final Groundwater Cleanup Strategy for Historical Chromium Discharges from Pacific Gas & Electric
Attachments: Feasibility Study Comment.docx

Attached please find my public comment response.
Respectfully,
Jeanette Aguayo

110109 Lahontan comments

One of my main concerns is the lack of true desire or ability of PGE to clean up their contamination. Their main goal seems to be to limit their costs and legal obligations and to erase Hinkley and it's people from the map and history. They are only concerned with the people who might later take legal actions against them. Their actions have affected all residents in the area, not just those they try to silence with payoffs. PGE has had substantial negative affects on the entire area and yet is only concerned with those who have the loudest voices, most legal standing and those organized enough to have decent legal representation. The rest of the community is told that they will just have to suffer the consequences of PGE's contamination. Dilution is not a solution.

PGE stating that 3.1 ppb Chrome-6 is our background level, is irresponsible and bad science. PGE will tell us that 3.1 ppb in our water is natural. But if our wells have shown non-detect (ND) for Chrome-6 in the past and then start showing contamination, PGE says it is natural and not their responsibility. If wells are ND, then any increase in Chrome-6 is due to PGE efforts to dilute their contamination. There may very well be some natural sources of Chrome locally, but for PGE to limit their clean up due to this is unfair to the locals and gives PGE a cheaper resolution to their contamination. This will be an environmental justice issue if PGE is allowed to take our ND wells and contaminate them up to 3.1ppb without any repercussions.

PGE and Lahontan Staff have stated that Chrome-6 will change to Chrome-3 and then be stable and safe forever. Why no explanation of the issue in Davis CA., where Chrome-3 changed to Chrome-6 when mixed with Sludge and manganese. Manganese is naturally occurring in our area and remnants of the chemical can be found leaching from the old Hinkley landfill. If this is a possibility, then why is Lahontan allowing this science be molded by PGE for their economic benefit?

http://www.sacbee.com/2010/02/06/2517361/uc-davis-may-have-solved-mystery.html
"Recent research by Stanford University scientists has shown that chromium-3 can be converted into the toxic chromium-6 variety when it mixes with nutrients such as sewage and with naturally occurring manganese in the soil."

If this is true then Lahontan's is allowing the possibility of more Chrome-6 be produced by the actions of PGE.

The possibility of other possible contaminants being pushed around and dislodged by PGE actions or remediation should be expected and anticipated. As PGE pushes millions of gallons of water around Hinkley, they must be responsible for any historical or other contaminants their actions dislodge or transport. If PGE's work near the Desert View Dairy (DVD) increases the nitrates in that area, then PGE is responsible for those nitrates. Same with other contaminants like arsenic, manganese, percolates, or any other substances that start to move due to PGE actions. Hinkley has many sources of historical contamination including mining, railroad, military and farming. Hinkley School is of particular concern in this regard. If the School District only tests the State minimum, and

PGE only tests for Chrome, then the kids health and safety is at risk and PGE is potentially responsible. If PGE only tests for Chrome, and their actions cause the release of any other contaminants, those contaminants will be missed by any testing even though it was caused by PGE's actions. PGE or someone needs to do a full spectrum water test at regular intervals. PGE tests most local wells when asked, but only tests for Chrome, giving residents a false sense of the safety of their water. PGE should be doing full spectrum tests and help residents understand and take measures to protect their families from all contamination. PGE sees this as adding to their liability but I see as being a good neighbor who cares about what's going on within the community. PGE should produce a source of water at the school site that is clean. Bottled water is not the answer.

I asked for and was told PGE would give us data on the tracers and other substances they put into our water. Yet years later I have never received any info. I must assume they are not using tracers then, because if they are adding things to the water that could end up in a drinking fountain on the school site, then there is a major reason of concern for parents and students at the School. I know PGE asked for and was given permission to dump more persistent tracers into the aquifer, but they were also told to supply me with info on what tracer residuals were detected down stream. If PGE is adding the enhanced tracers and denying us the info, then what other info are they denying us? We should know what is being put in our water.

PGE needs to produce one source in Hinkley with certified clean water to prove that they have the desire and ability really clean up their mess. I question their desire and ability to be truly responsible for their past actions. I feel PGE should be removed from the cleanup and an independent company brought in to clean up their mess at PGE's expense. How long will Lahontan allow PGE to muddle through this "cleanup" which closey resembles a slow measured extermination of the people and community of Hinkley from history and off the map. If Lahontan Staff and Board Members lived here and had their families threatened and humiliated by PGE, then maybe they would take more actions that protect and provide for the residents of Hinkley. The people left here, who through no fault of their own, are now are condemned to live in the Hinkley as contaminated by PGE. How can any residents expect to sell their property after the another negative media cycle seemingly perpetuated and extended by PGE. By PGE's willingness to purchase a "few" more properties, they have made it much more difficult for the rest of the community to sell land in Hinkley.

I would like PGE to place a reverse osmosis filtration building at the Hinkley School site that produces certified clean water for the school with access to the clean water for all the community to use. After all these years and money spent, can PGE produce one source of water that can be called clean. Do they want to? Should Lahontan require PGE to show their ability to do more than just dilute their contamination? If PGE is allowed to just let the plume slowly spread, buying up just the minimum of properties, then the plume becomes the aquifer with a 3.1ppb as an average "normal" contamination in Hinkley? Is this the goal and cheapest solution for PGE?

PGE does not like to be associated with Hinkley, but not as much as the people of Hinkley do not want to be associated with PGE. PGE needs to be a better neighbor. Their reaction during the last negative media cycle shows their true desire to protect themselves and their share holders at the cost of our well-being and long term viability as a small rural community. The idea that a citizens advisory committee would do anything but give PGE a way to stop the communities complaints from getting to the press or Water Board is disingenuous. Maybe Mr. Pruett or other "real" PGE decision makers can come to Hinkley and be a member of this Advisory Board, as they say they care about us and know what's best for us.

Article for the legal record:

"UC Davis may have solved mystery of chemical contamination

Share

By Matt Weiser
mweiser@sacbee.com
Published: Saturday, Feb. 6, 2010 - 12:00 am | Page 1B

A dangerous chemical on the site of a former animal-testing laboratory at UC Davis may not have come from experiments there, but rather from a chemical reaction underground in the years since.

For 30 years starting in 1958, the Laboratory for Energy-Related Health Research was, for some, a place of discovery. For others it was a source of nightmares.

The lab conducted Cold War-inspired research for the U.S. Department of Energy, including exposing beagles to lethal radiation to judge how humans might survive.

Waste from those experiments, including hundreds of radioactive dog carcasses, was dumped on-site in crudely built landfills. The 15-acre location south of Interstate 80 was declared a federal Superfund site in 1994, a category reserved for the nation's most toxic industrial facilities.

Yet the presence of cancer-causing chromium-6 on the site has been a mystery. There is no evidence the chemical was used at the lab, said Sue Fields, an environmental engineer at the university. And the plume of chromium-6 in groundwater is strangely isolated rather than linked to a particular disposal area.

Now a consultant hired by the university has concluded the carcinogen was probably formed by a chemical interaction underground.

Chromium-3 is a naturally occurring and nontoxic chemical that happens to be common in area soils.

Recent research by Stanford University scientists has shown that chromium-3 can be converted into the toxic chromium-6 variety when it mixes with nutrients such as sewage and with naturally occurring manganese in the soil.

The university once operated a campus sewage treatment plant near the laboratory. And it turns out that sewage sludge from the treatment plant was dumped in landfills on the lab grounds.

The sludge likely migrated into groundwater, feeding a reaction that bred chromium-6.

"I've worked a lot of Superfund sites and have really never seen this pattern of contamination before," said Fields. "We just have this unique area where we have naturally high chromium and manganese in our soil."

Chromium-6 has been detected at the site at levels 10 times greater

than California drinking water standards. But there is no evidence the contaminant has migrated off the site or tainted any active drinking water wells in the area.

University officials plan a pilot project to treat the chromium-6 by converting it back to chromium-3. This will be attempted by injecting calcium polysulfide underground to trigger a reverse reaction.

G. Fred Lee, a consultant in environmental engineering, said success depends on how well the injected chemical can penetrate the soil. Lee works with the Davis South Campus Superfund Oversight Committee, a neighborhood group monitoring the cleanup.

Even if it succeeds, this will not end the cleanup work. The site has a host of other problems, notably a massive plume of hazardous chloroform in groundwater that extends nearly a mile beyond the site.

"They'll be pumping and treating and using other methods for a very long time," said Lee. "For a number of years, they didn't move as fast as they should have. I think they're making pretty good progress now."

UC Davis and the Department of Energy have been working to clean up the lab location for at least 15 years. The energy agency on Jan. 29 released a record of decision on final plans to clean its portion of the site. UC Davis expects to submit its own plan to the U.S. Environmental Protection Agency this fall.

A lingering question is whether the chemical process at work on the UC Davis site could explain other chromium-6 problems in California

groundwater – such as near septic tanks or other landfills.

"If we're right about this, I think that's something that needs to be studied," Fields said.

Read more: http://www.sacbee.com/2010/02/06/2517361/uc-davis-may-have-solved-mystery.html#ixzz1AfIPLX1p

From: Lisa Dernbach
To: Anne Holden
Date: 1/10/2011 3:44 PM
Subject: More Feasibility Study Comments

Anne,

Please include the following comments that were sent to me.
Lisa

From Carmela Gonzalez
The specific issues in the Feasibility Study (FS) that I am concerned about (not in order of importance, but in order of the flow of the document) are:

1) The MCL of 50 ug/l for total Cr is being used to meet full beneficial use requirements as defined by the basin plan. I acknowledge that there is no MCL for Cr(VI), but I highlight the absolute ridiculousness of this situation – and fight for an appropriate value to be used since Cr(VI) is a known carcinogen in air and a suspected carcinogen in water. I also want to stress that the state proposed PHG recommends that 20 parts per trillion be adopted by the Water Board as the maximum for long term exposure in drinking water.

2) 220 years to achieve average background values for Cr(VI) is outrageous and unacceptable! Current technologies exist today to cleanup chromium in groundwater in a reasonable timeframe. Since PG&E has already spent 23 years attempting cleanup at the site, it should be required to complete the entire process within 27 more years, for a total of 50 years. This number is reasonable and achievable. Anything less will be considered as lack of environmental justice for Hinkley residents and only profit to PG&E shareholders at our expense.

3) The FS states that plume containment is based on 4 ug/l Cr(VI) and 50 ug/l Cr(T). Rather, per the November 2008 Amended CAO, plume containment needs to be based on the average Board adopted background value of 1.2 ug/l Cr(VI) and maximum background value of 3.1 ug/l Cr(VI). The FS needs to be revised to reflect this fact.

4) The FS does not address the serious matter of significantly increasing Cr(VI) concentrations in groundwater at the Compressor Station. Well SA-MW-05D, shows Cr(VI) increasing from 5,510 ug/l in Jan. 2009 to 9,030 ug/l in Aug. 2010. Such increases imply a source remaining in soil. The FS needs to address this potential source by listing soil sampling information and proposing soil remediation.

5) The FS states there is no regulatory basis or precedent for remediating groundwater to average background versus maximum background. There IS precedence! It is the Water Board's November 2008 Amended CAO, which makes that document the precedence.

6) Major issue – the lower aquifer contamination is not adequately addressed. MW-23C is acknowledged, but it does not appear that any of the alternatives address the lower aquifer. In addition, full delineation of the lateral and vertical extent of the Cr plume in the lower aquifer has not yet been achieved. The FS needs to address full delineation of lower aquifer contamination and propose remediation.

7) The FS unjustly identifies agriculture as the most reasonable long-term beneficial use of the upper aquifer due to TDS and nitrate, and the lower aquifer as the most suitable drinking water supply. Instead, after plume containment, the FS needs to stress that restoration of the drinking water aquifer for domestic and municipal supply is the most important goal of the remedial strategy. Agricultural re-use plays only a minor part in the scheme of things and needs to be downgraded in a revised FS.

8) The FS uses off-site agricultural pumping as the excuse for lack of plume control in the north and says that additional extraction may be needed to enhance plume control. If this was truly the problem, why wasn't the farmer's activities anticipated and removed from the equation sooner instead of waiting for the

plume to migrate?

9) The FS acknowledges that hydraulic capture at the leading edge... "applies stress... that can affect surrounding groundwater supplies." I request contingency plans be developed to address water replacement for residents should such stresses impact domestic wells.

10) The FS statement that "performance monitoring of the DVD LTU"... "indicate that the DVD operation has not resulted in accumulation of chromium in soils" indicates a data gap in the conceptual site model. If chromium is not accumulating in soils and is being removed from groundwater, where is it going? If it is all being absorbed by plants (unlikely, in my opinion) that are harvested and taken off-site, where are the data to support this? I can accept that Cr(VI) is being changed to other, less toxic forms of Cr, such as Cr(III), but that is a different argument than that Cr(T) is apparently just disappearing into thin air. All of this aside, the bottom line is that the statement in the FS contradicts the DVD monitoring reports which indicate detectable Total Cr concentrations in soil increasing with time, reflecting the buildup of Cr(III). Also, a revised FS needs to state what chromium mass will remain after final site cleanup is accomplished.

11) The FS acknowledges that the "DVD LTU operation is expected to result in a net increase in TDS in groundwater." The long-term impacts of this should be considered and, ideally, the LTU operation should be moved away from a major TDS source such as the DVD. If the latter is not proposed, then active remediation of increased TDS concentration must be made a part of PG&E's cleanup strategy.

12) I acknowledge PG&E plans to change irrigation technology at the DVD LTU from subsurface drip to drag-drip configuration in 2010. If this option is selected for final site cleanup, it needs to be monitored to ensure this technology does not pose a threat to nearby residents and to evaluate effectiveness over time.

13) The FS wants to utilize 25% uncertainty in lab sampling to increase the 95% UTL for Cr(VI) from 3.1 ug/l to 3.55 ug/l (to 4.04 ug/l for Cr(T)). This would be factored into the cleanup goal. This argument is not supported by scientific evidence or research and should, therefore, not carry any weight in final site cleanup.

14) Maps provided in the FS all appear to identify the Cr(VI) plume boundary based on 3.1 ug/l (although apparently based on some standardized dataset; not the most recent data). Since the Water Board's cleanup goal is to the average background value of 1.2 Cr(VI), at least one of the maps in the FS should attempt to be drawn to this value.

15) In light of new information showing increased Cr(VI) concentrations from PG&E's waste in domestic wells along Summerset and Thompson Roads, the results of PG&E's 2007 Background Study are now suspect. The undefined plume means that domestic well sampling in the Background Study showing Cr(VI) levels in the northern portion of the Hinkley Valley may have included PG&E's waste all along. I request that the Water Board re-visit the Background Study and have it reviewed by academia using the new data in the north and east end of the plume.

From: Lisa Dernbach
To: Cindy Wise,Lauri Kemper,Mike Plaziak,Patrice Copeland,Jeannette Bashaw,P...
CC: Anne Holden
Date: 1/10/2011 9:07 AM
Subject: Re: PUBLIC COMMENT ON PG&E's PROPOSED FINAL CLEAN-UP OF CHROMIUM 6 POLLUTION AT HE PG&E COMPRESSOR STATION at 35863 FAIRVIEW ROAD, HINKLEY

Mr. Conaway,

Thank you for your comments on PG&E's Aug. 2010 Feasibility Study proposing final site cleanup for hexavalent chromium.

The comments that you submitted in your message, as well as your prior comments from Dec. 1, 2010, will be addressed with other public scoping comments for the Subsequent EIR and the Feasibility Study. We expect the former document to be released to the public in mid-February. And Board staff is planning a public meeting at the Hinkley Elementary School on Jan. 26-27, 7:00 pm, to inform the public of the comments received for the project.

We appreciate your concern in this matter and will continue to keep you apprised as developments occur.

Lisa

Lisa Dernbach, PG, CHG, CEG
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>>> Robert Conaway <rdconaway@gmail.com> 01/07/11 3:38 PM >>>
California Regional Water Quality Control Board
2501 Lake Tahoe Blvd, South Lake
Tahoe, California 96150

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Fax: (530) 544-2271

Re: COMMENTS ON PG&E FEASIBILITY STUDY for HINKLEY COMPRESSOR STATION-CAUSED PLUME

Dear Ms. Dernback & Lahontan staff:

First, for the record, I want to take issue with the background levels for total chromium and chromium 6 being used by Lahontan and PG&E. The background should be adjusted to nominal levels (1 to 2 ppb).

The two chromium levels currently being accepted by Lahontan and PG&E are being used to hide the extent to which PG&E has impacted the water in the Hinkley Valley area. I have listened to Board members, employees of the Lahontan Board and PG&E smugly refer to 3.1 background levels, that it would be unfair to make PG&E remediate to non detect levels and that it was not necessary.

The assumption has been that surrounding areas have not been impacted by the unlawful chromium release by PG&E. In water tests done by the Lahontan

staff & the County of San Bernardino for example in December of 2008 on my property (See letter dated January 29, 2009 to this writer), the California Laboratory Services reported(their work order #CRL0116; COC# 100574,75) chromium as "ND" (non-detect)–so the question is, how in the world do you & PG&E come up with the inflated background conclusion you two do? Non-detect, means none! So to say there was a background level of chromium 6 all along, is not true. To try and convince people to the West of the plant there is no chromium now in their wells or risk of it in the future based upon the tests saying non detect (arguing from PG&E's characterization, the plume is not moving that way--even though the studies on the Lenwood dump plume, more on that later, describe a plume and groundwater flow to the southwest) is not something that should be ignored in the "background" discussion (and it needs to be addressed fully and fairly with use of 1980's and 1990's data)

Now speaking of wells in the path of the plume (assuming the accuracy of PG&E data), consider the test data on the Mullinax (Mullinex?) property. The Mullinex well is roughly 5/8th of a mile from Sommerset and Dixie. In 1998, the well test data showed .01 miligrams/liter of Chromium 6 and ZERO ("0") total chromium. In a November 4, 2010 test, the well shows 2.4 now of Chromium 6 and 3.7 of total Chromium. To argue a background level of 3.1 for that area is equally wrong.

At the Hinkley school (off Hinkley road on the north side of Highway 58) which is in the path of one acknowledged finger of the moving plume, the reported levels per a presentation made at the Barstow Unified School District Board this past fall by PG&E's roving PR team, put the chromium levels somewhere between 1.2 and 2.0, so if a background level is to be accepted, it should be no more than 2 ppb, which is what the State is looking at for new health standards in any event.

The assumption of there being a background level is a created standard of pollution tolerance and ignores the incremental change in water quality caused by PG&E's moving plume, which is perhaps being pushed by the remediation injection efforts.

*Second, the proposed clean-up thresholds in the PG&E plan, would grandfather in a hazard risk that will be below the proposed new standards & create a lower standard of protection for people in the Hinkley Valley area triggering an environmental justice concern. *

The state Office of Environmental Health Hazard Assessment submitted a draft proposal last week to limit the amount of hexavalent chromium (Chromium 6) to 0.02 parts per billion. PG&E's rush to approve a plan at the current levels being used and the Board's apparent willingness to go with it, will create a lower standard of protection for Hinkley Valley residents than what the rest of the State will have–raising not only a due process issue, but an environmental justice issue.

Why should Hinkley and the surrounding area suffer from a lower water quality standard than the rest of the state's residents where chromium is found in the future?

*Third, the assumption that the methodology used (past & future) will force Chromium 6 into Chromium 3 and it will stay that way appears to be a scientifically challenged opinion. The presence of waste (nitrates, residential, agricultural & commercial septic discharges, manure spreading

in the area) and manganese in the soil (prevalent in the Hinkley Valley area) has been shown to cause Chromium 3 to revert back to Chromium 6 !*

See:

http://www.modbee.com/2010/02/06/1037599/uc-davis-may-have-solved-mystery.html

&

http://www.sacbee.com/topstories/story/2517361.htmlClick+to+view+the+Large+Graphic

The notion of Chromium 3 being unstable and proned to convert back was raised by me over 4 years ago and nothing was done to look at conditions that could create it. UC Davis and EPA have looked at that phenomenon. Maybe PG&E should required to (finally)?

Injecting reductants at the Davis Superfund site where there are nitrates in the soil (which are also coming off PG&E's property in Hinkley), manganese in the soils (also a problem in Hinkley) and sludge (septic releases are the functional equivalent in Hinkley) does not appear to be working (nor is it in the Hinkley Valley apparently).

Fourth, why aren't the approaches used at the UC Davis Superfund or the Valley Wood Preserving Turloch sites being considered in the Feasibility Study (to treat chromium)?

Calcium/sodium polysulfide and sodium metabisulfite chemical reductants have been used to effect the conversion of Cr(VI) to Cr(III) (Rouse, 1997). In situ remedial systems are or have been in operation at chromium contaminated sites in California, Indiana, Maryland, Maine and South Australia, and are planned for Michigan and additional sites in California [cited in EPA in "In Situ Treatment of Soil and Groundwater Contaminated with Chromium: A Technical Resource Guide" (October 2000) at p. 23).

At the Turlock site a sulpher-based reductant (sodium metabisulfite) is being used to remediate Cr(VI) and has reduced the maximum chromium concentrations by more than an order of magnitude [NOTE A 10 yr SUCCESS STORY--WHICH WE WOULD HAVE HAD HAD PG&E & LAHONTAN USED THIS APPROACH].* In situ treatment from February 1998 through October 1999 has resulted in a reduction in plume size and mass of dissolved chromium in groundwater of about 98 percent, according to investigators* (EPA TRG 2000)–if this was used would we be where we are today? Metabisulfate appears quicker and unlike the reductants being used by PG&E, proven.

The peer review typically required before guinea-pigging a population and their water sources is not sufficient for the current PG&E approach (that they just want expanded)--in fact in the* EPA's in "In Situ Treatment of Soil and Groundwater Contaminated with Chromium: A Technical Resource Guide" (October 2000)*, the injection process should have been across the entire front of the plume (more below).

If anything, the injection of treated water (the reductant laden well product) may be pushing the chromium plume outward, or worst yet, the Chromium 3 byproduct, may be reverted back to chromium 6 because of soil same type of soil conditions experienced in Davis, but which the Lahonton Baord and PG&E do not appear to be considering in good faith.

* Fifth, "ion exchange" is the preferred remediation approach in Los Angeles Regional Water Quality Control Board's November 3, 2000 Special

Board meeting (their "Chromium 6 Workshop") -- which the feasibility study does not appear to be considering in good faith. Why not? *

The link to a relevant report is as follows:

[
http://www.swrcb.ca.gov/rwqcb4/water_issues/programs/remediation/chromium/sfv_chr6www_11_13_00.pdf
]

Ion exchange is listed by the Los Angeles Regional Water Control Board as the preferred approach and lists the costs range as being reasonable (less that what PG&E's Eric Johnson says it is in his December 10, 2010 letter).

The Lawrence Livermore National Laboratory (LLNL) clean-up reflects in the "Record of Decision" that ion-exchange was and is the proper approach (by the US Department of Energy that runs the site). In an article by Sally Bahowick, Douglas Dobie and Gene Kumamoto [entitled: ION-EXCHNAGE RESIN FOR REMOVING HEXAVALENT CHROMIUM FROM GROUND WATER AT TREATMENT FACILITY C: DATA ON REMOVAL CAPACITY, REGENERATION EFFICIENCY, AND OPERATION], the ion-exchange program can and did treat chromium from comparable levels found in the Hinkley Valley to below 2 ppb

Apart from the polluter's feasibility study complaining about costs, some comment is made about sulfides in the area interfering with the chromium conversion process. In the LLNL article, it is noted that sulphides & nitrates were also found, but not complained of as reducing system effectiveness. It appears that adjusting the resin used can maximize system effectiveness.

The cost for the system's operation per year $178,000 (including the resin, salt, filters, values, pumps. maintenance & waste disposal) per the LLNL article.

Sixth, soil excavation and chemical fixation techniques is another remediation approach not even being discussed–why?

In the Los Angeles Regional Water Quality Control Board in its November 3, 2000 Special Board meeting (their "Chromium 6 Workshop") report under "Remediation Approach" it states:

"After contamination is delineated in the soil, excavation and chemical fixation techniques are used to remove or immobilize residual contamination. These steps are followed by verification sampling and leachability tests to assure diminished threat to groundwater."

The MW-23C levels must be assumed to be a new release--since those concentrations were nor present. Evacuation of the impact soil AT minimum should be done and the water aggressive treated as the well documents impact to a previously untouched drinking water aquifer.

*Seventh, the EPA in "In Situ Treatment of Soil and Groundwater Contaminated with Chromium: A Technical Resource Guide" (October 2000) states that:

(1) Chromium VI remediation to Chromium III can be undone by the very chemicals in the soil in the Hinkley Valley, and

(2) for the in situ approach to have worked, the entire plume needed to flow through the reactive media (i.e. injected reductants) in order to be effective

*

"While a great deal of progress has been made, a number of needs and issues still need to be addressed before in situ soil and groundwater remediation technologies will be most effective (2000 EPA TRG at p.1).

First, *in order to successfully install a PRB, not only must do a thorough site characterization have been done (which I dispute), the entire plume must flow through and react with the reactive media*–the presence of chromium VI outside the reactive media's presence, shows that requirement has not been met.

Second, another one of the issues ignored–the effect of the manganese compounds in the Hinkley Valley soils. In page 21 of the 2000 EPA Technical Resource Guide (2000 EPA TRG):

"Reduced Cr(III) could re-oxidize to Cr(VI) under certain conditions (presence of manganese dioxide [MnO2]); however, this has not been observed in the field."

Could the new Chromium plume at MW-23C be our first in field observation of the feared phenomenon cited in the 2000 EPA TRG?
*

Eighth, is PG&E's injection methodology creating obstructions in the aquifer pore spaces and effectively destroying the Hinkley Valley aquifer, an integral part of the water resource that the State Board is obligated to protect?*

In page 22 of the 2000 EPA TRG, one of the concerns expressed is over potential aquifer pore clogging. While the comment is focused on iron/ferrous-based reductants (and there is high levels of iron in the native soils), the point should not be lost that injecting reductants into metal rich soils, could clog the very mechanism which our water resources need to exist, recharge and last into the future.

Where iron sulfides are present, as is the case in the Hinkley Valley, the in situ approach of PG&E is warned against by the EPA–the approved injection approach could be pushing ferrous metals into the aquifer pores.

Aquifers in the desert are sensitive and fragile despite their depth. Without them water will pool, trap and potentially destabilze the soils above. They are complex and require unobstructed flow of water. Putting reductant laden veggie juice and wood alchohol into iron-sulfate laden soils, is introducing foreign matter that could have catastrophic effects on the entire aquilude/aquitard system. That impact is not being considered. Why not?

* Ninth, the October 14, 2010 cost letter from Eric Johnson is ridiculous & inflated.*

First, reductions using the ion-exchange approach are quicker, so with costs being less that $200,000 per year, the clean up assuming a 10 year protocol and no more than $2,000,000 to build the same facility used by Lawrence Livermore, the cost is roughly $26,000,000 which is cheaper than all the Alternatives using 1.2 ppb assuming a 50 year program. the costs ($122,000,000) are still less than any of the alternatives listed under 1.2 ppb goal or the 3.1 ppb goal.

Second, reductions using Calcium/sodium polysulfide and sodium metabisulfite chemical reductants need to be calculated and what should be note, is that in the Turlock Superfund site, a 98% reduction of chromium 6 was achieved in roughly a decade.

Third, an independent cost analysis at minimum should done.

Letting PG&E massage the numbers to fit their recommended approach is just plain wrong.

* Tenth, to what extent is the Lenwood-Hinkley landfill a contributor to the chromium 6 problem given the predominate flow of the ground water being to the Southwest and the fractured bedrock (and its potentially transporting the type of waste that could cause Chromium 6 to revert back to Chromium 3)?*

Source: BOARD ORDER NO. R6V-2006-0026; WDID NO. 6B360304013

REVISED WASTE DISCHARGE REQUIREMENTS

(a) Under "2. Facility ": The Lenwood-Hinkley Class III Landfill stopped receiving municipal solid waste in July 1997. On the southeast portion of the property the Discharger operated six unlined, Class II surface impoundments, which accepted liquid designated waste (septage and chemical toilet waste). The surface impoundments stopped receiving waste in late 1994 and were cleaned-closed in 1995. There has been a detected release from the Landfill, and the facility is currently in a Corrective Action Program to remediate the release from the facility.

(b) Under "6. Landfill Location": The Landfill is located approximately four miles north of the Community of Hinkley, off of State Highway 58, at 37751 Lenwood Road, San Bernardino County. It is within Section 20, T10N, R2W, San Bernardino Base and Meridian, (SBBM) as shown on Attachment "A," which is made part of this Order.

(c)Under "20. Site Hydrogeology: *Ground water exists in the fractured bedrock beneath the Landfill at depths of approximately 85 to 177 feet below ground surface*. *Groundwater flow directions beneath the site are generally from east to west. *Along the west side of the site, groundwater flow diverges, with a potion of the flow going to the northwest *and a portion of the flow to the southwest*. This results in two separate flow regimes, a northern flow regime and a southern flow regime. Groundwater flows toward the north-northwest with an average hydraulic gradient of 0.003 feet/feet (ft/ft) and with an average gradient of 0.005 ft/ft to the southwest. The average groundwater velocities are 0.04 ft/day for the northern flow regime and 0.07 ft/day for the southern flow regime.

(d) "27. Receiving Waters" *The receiving waters are the ground waters of the Middle Mojave River Ground Water Basin* (Department of Water Resources Hydrologic Unit No. 6-42)."

The surface above the bedrock is where most of the monitoring well activity has been–with the bedrock fractured (and it being at levels varying from 85 to 177 feet below ground surface, is the waste mixing with the groundwater (I have made complaints of the water first developing an odor about 2 ½ years ago). Is the sub bed rock aquifer being impacted by the leaching of septic waste and is it converting Chromium 3 or total Chromium tainted soils back into Chromium 6? Is that a risk even being considered??

* Eleventh, isn't this feasibility study premature in light of the appeal filed November 10, 2010 challenging the Rescission of the Waste Discharge Requirements for PG&E (Board Order R6V-2010-0046 &R6V-2008-0045 &

Refusing to Require PG&E to Do a Supplemental EIR?

*The appeal goes to very authority of the Board to proceed with the process, does it not?

*Twelfth, why hasn't anyone addressed the questions already posed in **OPEN LETTER TO LAHONTON REGIONAL WATER QUALITY BOARD & PG&E handed to Lahontan Staff at the 12/1/2010 "SCOPING" MEETING @ the HINKLEY SCHOOL?*

— lisa answered in email response

The test of the letter is as follows:

"For too long we in the Hinkley area have gone to meetings, faced well organized teams of professional staff members and selected Lahontan Regional Water Quality District employees, have come with questions and little has been addressed. In fact some on the PG&E team have been condescending, rude and in some instances insulting. We have asked and they have advanced the pollution anxiety rather than properly respond. Lahontan has had to deal with a bully discharger, who is rumored to already be lobbying the Governor-elect to NOT consider appointing people to the PUC.

For the people that do not want to move, are concerned about our water and neighbors that are thinking about moving without knowing all the facts, the following list of concerns, questions and items should be included in the official record of the "Scoping Process":

1. Did the break in the clay at areas near or around Well 23C, create a new release of Chromium 6 into an aquifer previously unaffected? If so, what was/were the cause or causes? Would PG&E be willing to pay for an independent hydrogeological analysis to determine the cause of the lower aquifer contamination? If not, why not?

2. Do we know the direction of flow of the lower aquifer impacted by the chromium penetration through Well 23C?

3. Are there any other chromium leaks into the lower aquifer other than at Well 23C? If so, where? Causes?

4. Has the nitrate plumes in the area been affected/changed as a result of PG&E's injecting treated water as part of its in situ treatment program?

5. Have the background levels of arsenic been changed/affected as a result of PG&E's injecting treated water?

6. Has there been any movement of the known nitrate pollution as a result of PG&E's pumping of treated water?

7. Has there been any movement of the manganese pollution in the area as a result of PG&E's pumping of treated water? If so, when, where and what results were shown?

8. Has PG&E used or stored above or below ground perchlorate acid or related perchlorate byproducts? If so when and for what?

9. Has PG&E had any releases of perchlorate acid or related perchlorate byproducts whether reported or not? If so, when, where?

10. Has there been any other testing of chemical make up and changes in the Hinkley Valley's aquifers' metal content since PG&E's injections started? If so, when, where and what have been the results?

11. How big is the affected area from the break through at 23 C (how big is the plume in the lower aquifer)? To what does that newly contaminated plume connect? Does this feed or connect with the Mojave River?

12. Does any break up of the clay undermine the viability of the pilot-based study which intends to convert Chromium 6 into Chromium 3 by injecting treated water into the aquifer above the clay barrier

13. What are the risks of Chromium 3 to public health and is the in situ program just creating a new and different public health risk?

14. Do we have a full and accurate characterization of the thickness, depth and limits of the clay barrier? If so, where is that data? Would you agree to fund an independent hydrogeological analysis to evaluate if the in situ treatment program, which involves injecting large amount of treated water, should be stopped, curbed and or adjusted recognizing the risks it might create to lower aquifers?

15. Does injecting treated water weaken or thin the clay barrier? Is the thickness and strength of the clay barrier being monitored?

16. Why are background levels being argued as 3.1 ppb when the background data at the school shows the concentration levels at 1.0 to 2.0 ppb? Which level is it?

17. If wells on the West side, near the senior center in Hinkley were reported as Non-Detects, four to five years ago when tested, how can you conclude that 3.1 ppb is background? Is the background level a tad bit arbitrary in view of lower to non-detect levels in areas where PG&E says there is no Chromium 6 plume?

18. Since the Hinkley School is a 6 year school, at 1.0 to 2.0 ppb, what would be the health risks to children regularly drinking the water for six years?

19. Why is not air sparaging being used to clean up the contaminated water? Would it be effective? Wasn't that used to clean the plume at the George Air Force base plume? If more costly, how much so?

20. Why isn't the water being pumped up and treated by reverse osmosis to pull the Chromium 6 out and re-inject the clean water? If its costs that have excluded that approach, what is the cost?

21. Why was excavation, transport and treating of the soil not considered as a clean-up approach? If more costly, how much so?

22. Since part of the PG&E strategy is to buy property in the plume or in its path to facilitate its clean-up, please state the reasons that PG&E requires the settlements to be secret.

23. Has PG&E disclosed to its potential sellers, that by making the

settlement "secret", the settling property owner may be creating a taxable event, effectively reducing their net 30-40%, depending on their income, age, etc?

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24. Has PG&E disclosed to its potential sellers, that income sensitive entitlements such Medi-Cal and SSI may be lost by taking the settlement as opposed to having it paid into a Special Needs-type trust?

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25. Is PG&E making the sellers indemnify, hold harmless and or defend them in the event of a suit against them?

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26. Is PG&E withholding money for clean-up of other conditions on the sold properties out of their settlements?

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27. Is PG&E willing to open its in process water remediation operations, record-keeping and report compilation process to the public in advance of reporting to Lahontan?

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28. Why is PG&E rejecting putting the Hinkley School on bottled water since the only thing protecting its Chromium 6 levels is injecting clean water to blend down the ch levels in the school wells?

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29. Is PG&E in negotiations or had begun with the Barstow Unified School District to buy the Hinkley School property?

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30. Will PG&E begin regularly testing domestic wells surround the entire plume and including in them in the grid data, if not why not? The residents and commercial users are the the people that will be most likely affected. Handpicked Monitoring Well sites are artificial measurements of impact & putting them in limited areas, does not effectively test to monitor for any changes.

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31. Why isn't PG&E paying the State of California for all of the oversight costs including but not limited to Lahontan staff salaries, expenses and testing?

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32. With the recent additional contamination discovered, why are we pushing for a final solution and a final EIR when the new contamination may suggest the course of action taken is too dangerous to the usable drinking water in the area?

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33. Is the Lahontan letter ordering further investigative action by PG&E dated 11/8/2010 going to be followed through on with NO OBJECTION from PG&E.

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34. Could something other than the term "Final Solution" be used by PG&E--it has historical roots that some in the community find offensive. Is PG&E viewing Hinkley residents as undesirables that need to be removed from the land?

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*Conclusion:

Isn't it time that the dog's tail quit wagging the dog and PG&E get held accountable for their delays and patterns and practice of risk creation and endangerment?

*

Respectfully submitted,

ROBERT D. CONAWAY
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