Pacific Gas and Electric Company

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May 21, 2009

Mr. Chuck Curtis, PE
California Regional Water Quality Control Board, Lahontan Region
2501 Lake Tahoe Boulevard
South Lake Tahoe, California 96150

Subject: Request to Modify Groundwater Monitoring Frequency, PG&E Hinkley Compressor Station, Hinkley, California In Situ Source Area Remediation Project

Dear Mr. Curtis:

PG&E hereby submits a request to the Lahontan Regional Water Quality Control Board (LRWQCB), to modify the frequency of monitoring specified in the Monitoring and Reporting Program (MRP) adopted for the In Situ Source Area Remediation Project pursuant to Waste Discharge Requirements (WDR) (LRWQCB Order No. R6V-2006-0054). Specifically, PG&E requests that the required monitoring frequency be reduced from monthly to quarterly for the Source Area monitoring well network, similar to what is currently implemented for the Central Area Remediation Pilot Study under the MRP for that system (LWRQCB Order No. R6V-2007-0032).

Performance Monitoring Wells

As set forth in the MRP, performance monitoring wells (SA-SM series) are located within the recirculation area, and are primarily used to evaluate the effectiveness of reagent injections and remediation. The results of sampling conducted over the first 11 months of IRZ system operation, through March 2009, have demonstrated positive treatment effectiveness (as discussed in the quarterly monitoring reports). Based on the information obtained to date, PG&E believes that quarterly monitoring will provide sufficient data to evaluate the continued effectiveness of remediation. Therefore, we request that monitoring frequency in these performance monitoring wells be reduced to quarterly. If needed, quarterly sampling may be supplemented by more frequent monitoring for total organic carbon, to assess reagent distribution.

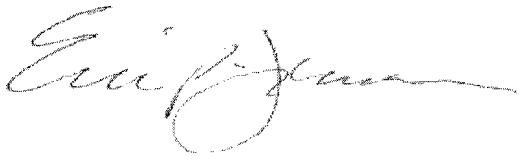
Sentry and Contingency Monitoring Wells

As set forth in the MRP, the sentry/contingency well network (SA-MW series) in the Source Area is primarily used to assess the migration of by-products (i.e. iron, manganese, and arsenic) outside the zone of influence of the recirculation system. To date, byproducts have been detected

only in single sporadic sampling events at various sentry and contingency wells. This indicates that the downgradient migration of dissolved by-products has been controlled by Source Area system operations (i.e., reagent dosing to minimize the generation of by-products, and operation of the downgradient extraction wells). Should byproducts migrate beyond the extraction wells, quarterly sampling is expected to be sufficient to detect byproducts at the first row of sentry wells before they migrate to the second row of sentry wells or the contingency wells, given the observed travel times of greater than three months between the first and second row of sentry wells. PG&E therefore requests that the monitoring frequency for the Source Area sentry and contingency wells be modified from monthly to quarterly. Quarterly sampling will provide sufficient data to ensure that by-products are controlled, similar to the monitoring program currently being implemented in the Central Area. Should by-products be detected at concentrations above the threshold concentrations, the contingency plan set forth in the MRP for the Source Area will still be implemented, including immediate re-sampling of well(s) showing exceedances.

If you have any questions regarding this request, please call me at (530) 520-2959.

Sincerely,



Eric Johnson
Hinkley Remediation Project Manager

cc: Lisa Dernbach, RWQCB Lahontan Region, South Lake Tahoe