



California Regional Water Quality Control Board

Lahontan Region



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SEP 29 2011

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INVESTIGATIVE ORDER R6V-2011-0079 QUARTERLY GROUNDWATER MONITORING REPORTS, PG&E COMPRESSOR STATION, HINKLEY, SAN BERNARDINO

This investigative order requires PG&E to provide additional information in quarterly groundwater monitoring reports concerning chromium contamination from the Hinkley Compressor Station. The Water Board's requirement that you submit technical reports is made pursuant to Section 13267 of the California Water Code. Pursuant to Section 13268 of the Water Code, a violation of Water Code Section 13267 requirement may subject you to civil liability of up to \$1,000 per day for each day in which the violation occurs.

Background

Cleanup and Abatement Order No. R6V-2008-0002 (2008 CAO) requires PG&E to submit groundwater monitoring reports to the Water Board. Order No. 6 of the 2008 CAO cites the quarterly frequency for report submittal for the site-wide groundwater monitoring program.

Since the 2008 CAO was issued, the monitoring program has expanded in size as chromium has been detected in groundwater at greater distances from the compressor station. As new monitoring wells are installed to delineate the plume boundaries, they have become part of the sampling program.

This Investigative Order requires that PG&E continue to add all new monitoring wells to the sampling program for delineating the plume. The Order also requires that additional maps be included in the report and be drawn to show better details concerning water quality. Furthermore, the Order requires additional discussion of investigation results, findings, and conclusions in the quarterly reports. This Order does not alter or remove any requirements for quarterly groundwater monitoring reports made in the 2008 CAO.

Requirements

Pursuant to section 13267 of the Water Code, PG&E is required to submit technical reports to the Water Board demonstrating the status for chromium contamination in groundwater for hexavalent chromium [Cr(VI)] and total chromium [Cr(T)]. Beginning with the third quarter 2011

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monitoring report due to the Water Board by **October 30, 2011**, site-wide groundwater monitoring reports must contain the following additional information:

A. Maps

1. Extent of chromium in groundwater in the upper aquifer:
 - a. A map showing the plume boundary throughout the saturated zone.
 - b. A separate map showing the plume boundary in the uppermost saturated zone.
 - c. A separate map showing the plume boundary in the lowermost saturated zone.
2. Extent of chromium in groundwater for the entire lower aquifer.
3. A map showing the change in plume configuration from the previous monitoring report with the location of domestic wells shown. New monitoring wells added to the sampling program must be shown in a distinctive color versus other wells.
4. A domestic well plume map showing the location of all applicable domestic/community/agricultural supply wells.

B. Map Content

1. Text font size on maps shall be 9 points or greater.
2. Street names must be shown in black color to be easily legible.
3. Chromium boundary lines on plume maps must be updated in each quarterly monitoring report to reflect the reported data.
4. Plume boundary lines must show monitoring well concentration contours representing the maximum extent of the following: 50 ppb Cr(T), 10 ppb Cr(VI) or Cr(T), 3.1 µg/L Cr(VI) or 3.2 µg/L Cr(T). The dashed line representing the boundary of 3.1 µg/L Cr(VI) or 3.2 µg/L Cr(T) shall be a dark color so as to stand out and be drawn to connect any monitoring well located within 2,000 ft of any other monitoring well having chromium concentrations of 3.1 µg/L Cr(VI) or 3.2 µg/L Cr(T) or greater.
5. Use a color or symbol other than gray to denote lower aquifer monitoring, extraction, and agricultural wells.
6. The domestic well plume map must draw the concentration contours representing the maximum extent of either the 3.1 µg/L Cr(VI) or 3.2 µg/L Cr(T) boundary line of all domestic/community/agricultural supply wells regardless the aquifer. The map must highlight wells where non-detect concentrations were reported one or more times in the past and that now show a detectable chromium concentration of 0.5 ppb for Cr(VI) or Cr(T) or greater.

C. Report Content

1. A detailed description in each report explaining the difference between monitoring wells, such as, A, B, C versus S and D, etc.
2. An appendix containing the Standard Operating Procedures (SOP) for sampling of monitoring wells and domestic wells.
3. The Domestic Well Sampling Program section must include the following items:
 - a. A description of domestic/community/agricultural supply wells added or removed from the monitoring program from the previous monitoring report with stated reasoning.
 - b. Domestic/community/agricultural supply wells removed from the monitoring program must be shown on the map of domestic well locations for that monitoring event.

- c. Domestic wells removed from the monitoring program and having detectable chromium concentrations of 2.0 ppb or greater must be replaced with multi-depth monitoring wells, unless given an exemption by Water Board staff.
- d. The table containing laboratory results for domestic/community/agricultural supply wells must include the results over the prior 12-months of sampling for each well.

As required in the 2008 CAO, subsequent quarterly reports must be submitted to the Water Board on the following schedule: **January 30, April 30, July 30, and October 30 of each year**. In addition, chromium plume maps showing monitoring well concentration contours representing the maximum extent for the upper aquifer must be electronically sent to Water Board staff within three working days of the due date. Reports must be uploaded to the State Water Resources Control Board's Geotracker database, also within three working days of the due date.

Water Board staff acknowledges that PG&E has already begun implementing some of the above changes prior to issuance of this investigation order and appreciates your cooperation.

Please contact me at (530) 542-5436 or Lisa Dernbach at (530) 542-5424 and ldernbach@waterboards.ca.gov, if you have any questions.



LAURI KEMPER
ASSISTANT EXECUTIVE OFFICER

Enclosure: Section 13267 Fact Sheet

cc: PG&E-Hinkley Technical Mailing list and Iyris list (and web posting)

LSD/clhT: PGE GW monitor rpt contents 911
Send to file: WDID No. 6B369107001 (VVL)

**Fact Sheet – Requirements for Submitting Technical Reports
Under Section 13267 of the California Water Code**

October 8, 2008

What does it mean when the regional water board requires a technical report?

Section 13267¹ of the California Water Code provides that "...the regional board may require that any person who has discharged, discharges, or who is suspected of having discharged...waste that could affect the quality of waters...shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires".

This requirement for a technical report seems to mean that I am guilty of something, or at least responsible for cleaning something up. What if that is not so?

Providing the required information in a technical report is not an admission of guilt or responsibility. However, the information provided can be used by the regional water board to clarify whether a given party has responsibility.

Are there limits to what the regional water board can ask for?

Yes. The information required must relate to an actual or suspected discharge of waste, and the burden of compliance must bear a reasonable relationship to the need for the report and the benefits obtained. The regional water board is required to explain the reasons for its request.

What if I can provide the information, but not by the date specified?

A time extension can be given for good cause. Your request should be submitted in writing, giving reasons. A request for a time extension should be made as soon as it is apparent that additional time will be needed and preferably before the due date for the information.

Are there penalties if I don't comply?

Depending on the situation, the regional water board can impose a fine of up to \$1,000 per day, and a court can impose fines of up to \$25,000 per day as well as criminal penalties. A person who submits false information is guilty of a misdemeanor and may be fined as well.

What if I disagree with the 13267 requirement and the regional water board staff will not change the requirement and/or date to comply?

Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must *receive* the petition by 5:00 p.m., 30 days after the date of the Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at:

http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

Claim of Copyright or other Protection

Any and all reports and other documents submitted to the Regional Board pursuant to this request will need to be copied for some or all of the following reasons: 1) normal internal use of the document, including staff copies, record copies, copies for Board members and agenda packets, 2) any further proceedings of the Regional Board and the State Water Resources Control Board, 3) any court proceeding that may involve the document, and 4) any copies requested by members of the public pursuant to the Public Records Act or other legal proceeding.

If the discharger or its contractor claims any copyright or other protection, the submittal must include a notice, and the notice will accompany all documents copied for the reasons stated above. If copyright protection for a submitted document is claimed, failure to expressly grant permission for the copying stated above will render the document unusable for the Regional Board's purposes, and will result in the document being returned to the discharger as if the task had not been completed.

If I have more questions, who do I ask?

Requirements for technical reports normally indicate the name, telephone number, and email address of the regional water board staff person involved at the end of the letter.

¹ All code sections referenced herein can be found by going to www.leginfo.ca.gov. Copies of the regulations cited are available from the Regional Board upon request.