
Lahontan Regional Water Quality Control Board

January 31, 2013

via e-mail

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RESPONSE TO PG&E'S REQUESTS FOR EXTENSIONS – MANGANESE WORKPLAN AND PLUME DELINEATION, HINKLEY CHROMIUM CLEANUP PROJECT

I have reviewed your two recent requests for additional time to complete reports required by the Lahontan Regional Water Quality Control Board (Water Board). This letter provides my determination on each request with a short narrative on the reasons supporting my decisions.

Request for a 90-Day Extension to Investigative Order R6V-2011-0079

We have received your January 28, 2013 letter, and technical memorandum, requesting a 90-day extension to allow for additional Water Board technical review and input from the community and interested technical experts as to how to interpret the 4th Quarter Sample Results from the newly installed monitoring wells in the upper aquifer and occurrence of chromium in groundwater in the western area.

I am denying the requested 90-day extension and requiring you submit the 4th Quarter Sample Results by February 6, 2013. The 4th Quarter Sample Results must include the plume boundary maps that reflect the new detections, but it may include your argument why PG&E does not believe the plume boundary maps as drawn reflect an accurate depiction of the plume boundary.

Water Board staff reviewed the January 28, 2013 technical memorandum and do not find the additional scientific information and data support extending the compliance date by 90 days for additional technical review and input from the Water Board, community and interested experts. The technical memorandum did not support PG&E's assertion that other potential chromium sources, such as a dairy, caused the elevated chromium concentrations in and around MW 169 in the western Upper Aquifer. In addition, the information submitted did not prove that the elevated chromium concentrations are isolated and are not contiguous with PG&E's overall plume. The information PG&E submitted did not include a discussion about the area of pumping drawdown from the agricultural well at the heifer ranch or other nearby supply wells and their potential influence on chromium concentrations in the mid-aquifer groundwater.

To be consistent with CAO R6V-2008-0002-A4, which I issued to PG&E on January 8, 2013, I will accept the January 28, 2013 Technical Memorandum and any additional information that PG&E would like to submit to make its argument that the chromium data in its 4th Quarter 2012 Sample Report for MW-169S1 and MW-169S2 is not related to its historic discharges and should not be drawn in the plume boundary. Therefore, at this time, PG&E is required to comply with Item B.4. of Investigative Order R6V-2011-0079 by submitting a plume map that includes the results for MW-169S1 and MW-169S2 as part of the plume but it may accompany that drawing with its argument pursuant to Order C.2.h. of CAO R6V-2009-0002-A4.

I agree that additional data should be collected and evaluated. I would welcome further discussions with PG&E, government agencies, technical experts and the community to have a better understanding of existing and new hydrogeological information in the western area.

Request to Due Date Extension for Manganese Work Plan

In its January 29, 2013 e-mail, PG&E requested a second deadline extension for submitting a workplan to delineate manganese in groundwater. At PG&E's request, I provided a deadline extension on January 3, 2013 that postponed submittal of a workplan from January 21 to February 15, 2013.

I am partially denying the second extension request. The workplan must be submitted by February 15, 2013, but may be revised if necessary, based on the February 13 and 14, 2013 technical meetings. Investigative Order R6V-2013-0001 requires a workplan for (1) installing monitoring wells to reduce gaps of >1,000 feet in length in the In-Situ Remediation Zone (IRZ) area and (2) to propose a tracer test along the western boundary of the IRZ area to determine whether byproducts are confined to the IRZ project area and if there are potential threats to nearby (<500 ft) domestic wells.

The directives in the Investigative Order were based on Water Board review of PG&E quarterly IRZ monitoring reports, whereas the manganese technical discussions are mostly focusing on high manganese detections in domestic wells. The technical meetings, scheduled for February 13 and 14, may answer questions about sources of the domestic well manganese. The workplan may be amended accordingly based on the outcome of these meetings. The Water Board is requiring you to investigate whether discharges and byproducts from IRZ activities are being contained within the permitted project area. Thus, the revised deadline for submitting a workplan for manganese investigation by February 15, 2013 stands.

Please call me at (530) 542-5412 if you have questions or would like to schedule a meeting to discuss this issue further.

PATTY Z. KOUYOUMDJIAN
EXECUTIVE OFFICER

Enclosures: January 28, 2013 **CH2MHILL** Technical Memorandum (memorandum)
January 28, 2013 **PG&E** Re: Technical Memorandum (letter)
January 29, 2013 **PG&E** Extension Request for Manganese Work Plan (e-mail)

cc: PG&E Technical Mail List and Lyris List (post to web)