CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LAHONTAN REGION

MEETING OF JUNE 12, 2019 BARSTOW

ITEM 9

STATUS REPORT ON CLEANUP ACTIVITIES CONCERNING CHROMIUM CONTAMINATION FROM PACIFIC GAS AND ELECTRIC COMPANY'S (PG&E'S) HINKLEY COMPRESSOR STATION

CHRONOLOGY	
Nov. 4, 2015	Cleanup and Abatement Order (CAO) No. R6V-2015-0068 directed PG&E, among other things, to continue remedial actions and to achieve cleanup of chromium in groundwater to 50 parts per billion (ppb) by Dec. 31, 2025 and to 10 ppb by Dec. 31, 2032. Annual remediation effectiveness reports are required to be submitted every February 28.

BACKGROUND

This agenda item is the third annual summary of PG&E's remediation effectiveness and cleanup status since adoption of the 2015 CAO.

ISSUES

The Water Board will be given a report of remedial actions conducted for chromium contamination cleanup in Hinkley during 2018. PG&E will present proposed actions for 2019. PG&E asserts they are on track for meeting cleanup requirements of the CAO.

DISCUSSION

PG&E staff and the Hinkley Community independent consultant, Project Navigator will make presentations (Enclosures 1 and 2) updating the Board on these topics:

- Chromium plume status
- Remedial actions in 2018 and planned in 2019
- Domestic wells
- Technical Working Group meetings/Background Study actions
- Public outreach

Enclosure 3 is the executive summary from PG&E's 2018 Annual Report on cleanup status and remediation effectiveness, required by the CAO.

Water Board staff will provide an update on the following topics (Enclosure 4):

- Review of projects to continue progress for chromium actions
- Status of hexavalent chromium drinking water standard
- U.S. Geological Survey (USGS) Chromium Background Study update and mid-term report

Enclosure 5 is the April 2019 Status of Actions sheet created by Water Board staff which was distributed to the Hinkley community at the second quarterly community meeting on April 26, 2019.

PUBLIC OUTREACH/INPUT

The Water Board's quarterly Status of Action sheets are provided and discussed during quarterly Hinkley Community meetings. Water Board orders, letters, and requests for comments are uploaded to Geotracker and posted on the PG&E Hinkley Chromium Cleanup webpage on the Water Board's website. This item was distributed to the Hinkley interested persons email subscription list and posted to the Water Board's website.

PRESENTERS

Kevin Sullivan/Betsy Brunswick, PG&E Dr. Ian Webster, Project Navigator

Lisa Dernbach and Anne Holden, Water Board

RECOMMENDATION

This is an information item only. The Water Board may provide direction to staff as appropriate.

ENCLOSURE	ITEM	BATES NUMBER
1	PG&E presentation	9 - 3
2	Community Advisory Committee presentation by Project Navigator	9 - 19
3	Executive Summary of PG&E's 2018 Cleanup Status and Effectiveness Report	9 - 35
4	Water Board staff presentation	9 - 43
5	April 2019 Status of Actions sheet	9 - 53

ENCLOSURE 1





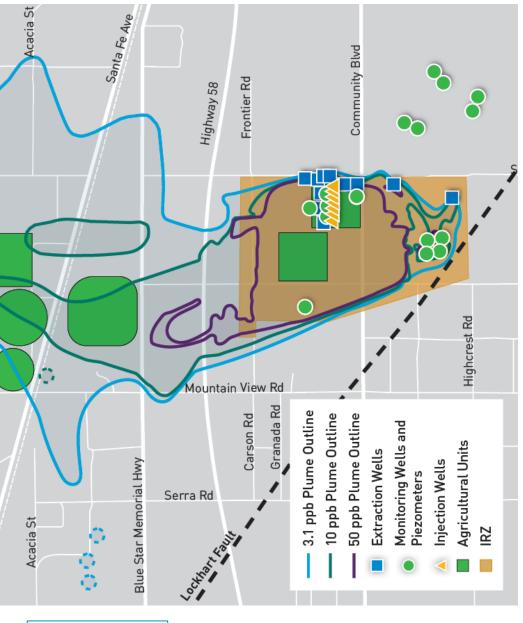
- 2018 Remedy Progress
- Impacts of Long Term Drought
- Progress on Chromium Treatment
- **Look Ahead**

Hinkley community, and we will be here until we PG&E is committed to doing what's right for the finish the job.

PROBLES Significant Progress on Remedy in 2018

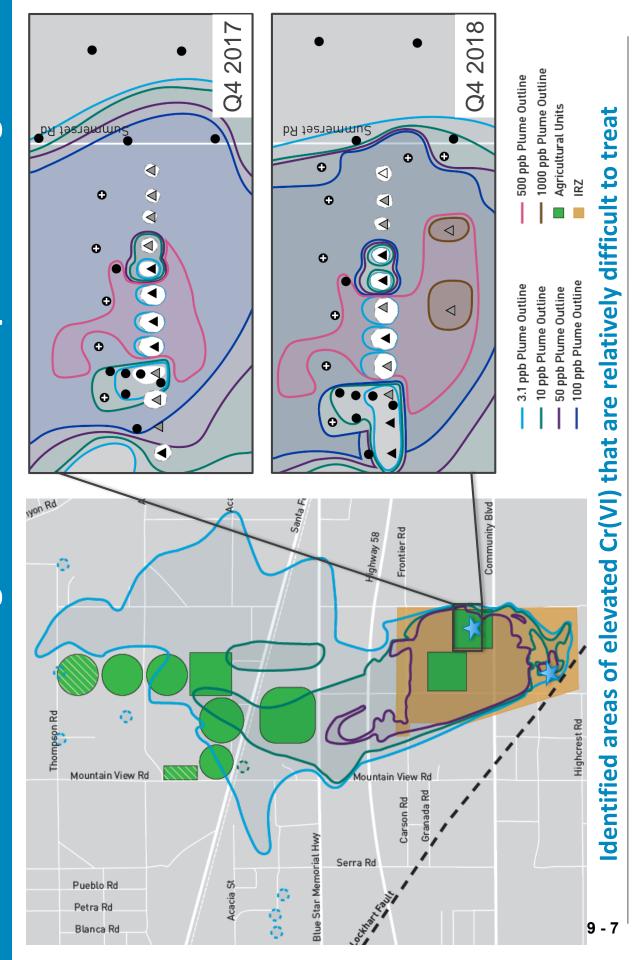
Installed

- 12 extraction wells
 - 7 injection wells
- 13 monitoring wells
 - piezometers

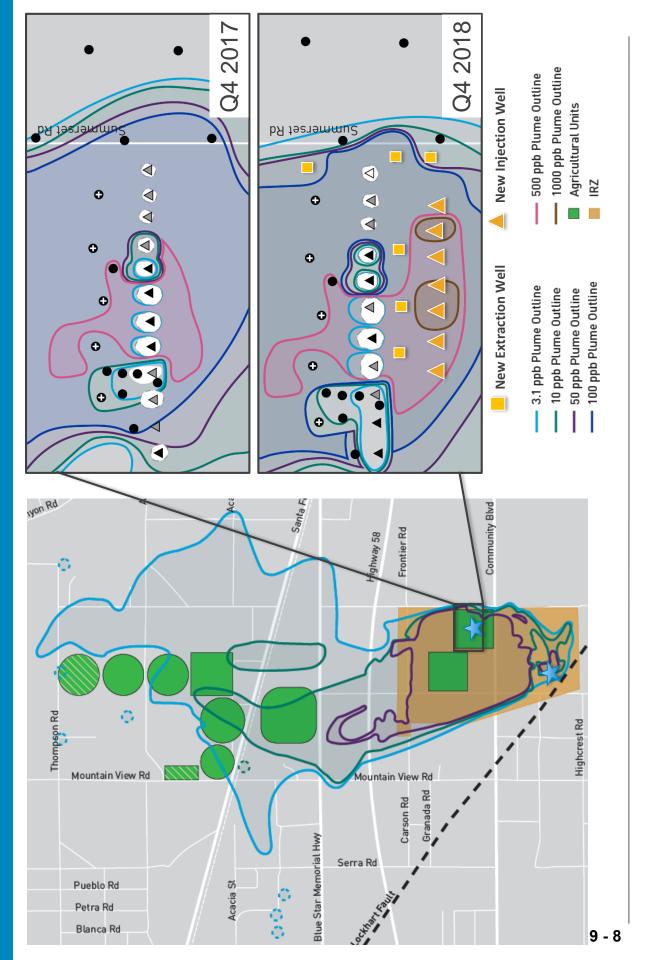


Proactive Investigations with Adaptive Management

P.F.S.



2018 Remedy Enhancements Target High Cr6 Areas





Aquifer is Recharged by Flow of Mojave





10000 15000 20000 25000



Currently in Long Term Drought



Discharge, cubic feet per second

Jan 05 2019

Jan 19 2019

Feb 82 2019

Feb 16 2019

Mar 82 2019

Mar 16 2019

Mar 30 2019

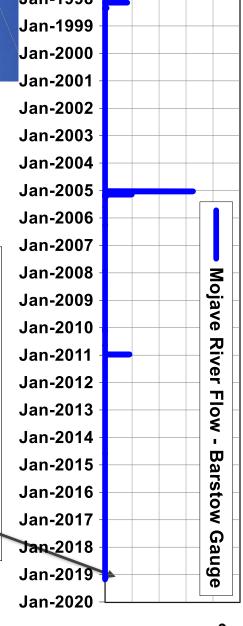
Median daily statistic (47 Discharge

100

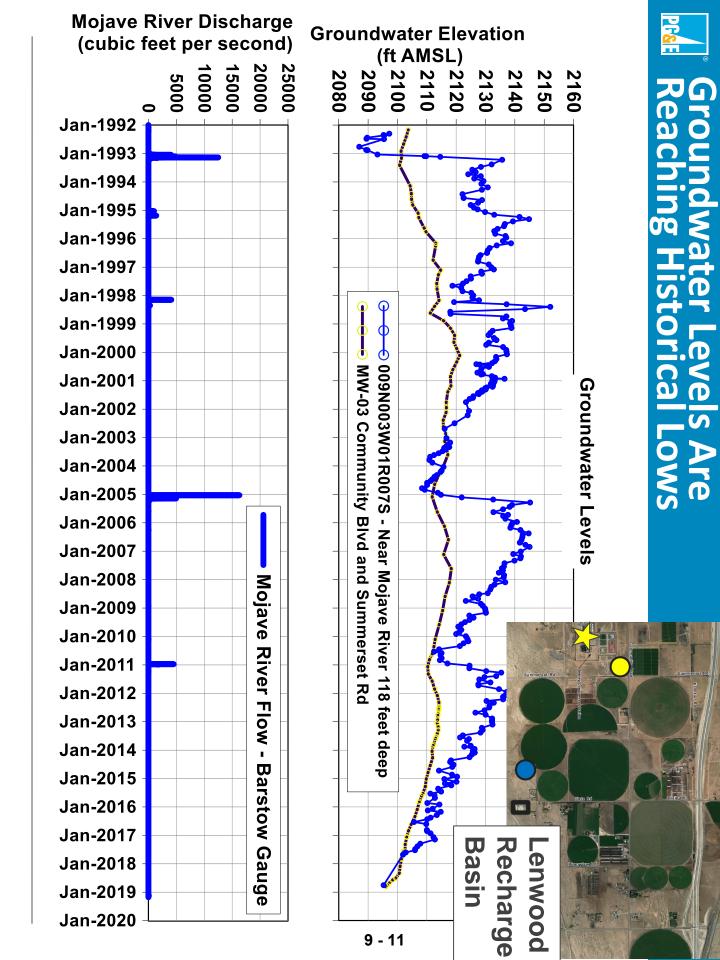
≥USGS

150

USGS 10262500 MOJAVE R A BARSTOW CA



but was not a significant event River flowed in February,







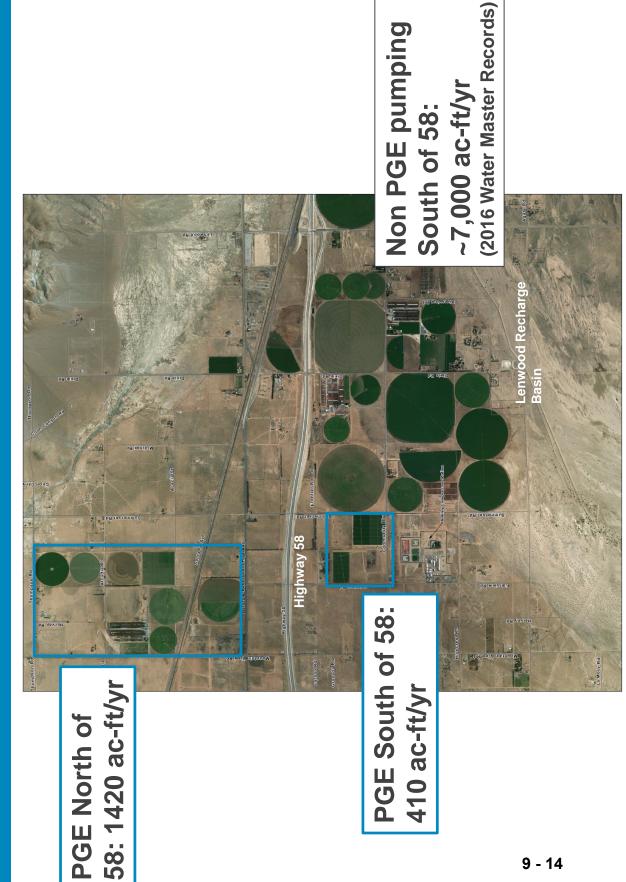
Impact of Drought

Dry Monitoring Wells Hervey Rd having multiple effects Regional drought and declining water levels

adjustments to remediation more than 10 feet across Water table has dropped thickness has required Reduced saturated plume area



Relative Water Use



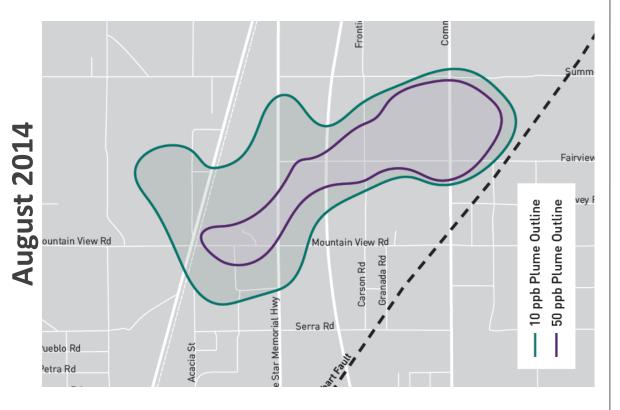


Continued Progress on the Plume

Fourth Quarter 2018

Acas of the poly Plume Outline

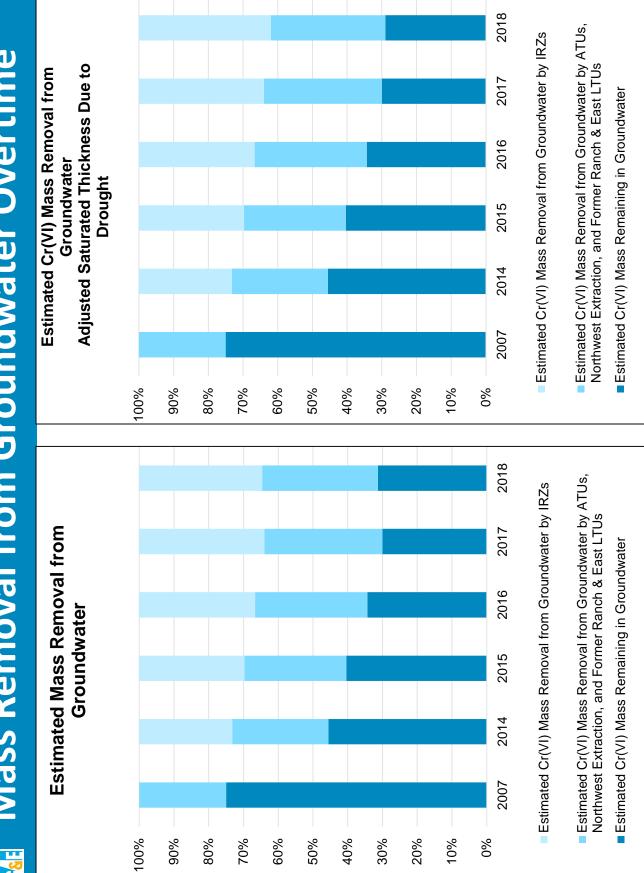
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Mass Removal from Groundwater Overtime





Looking Forward

- PG&E continues its strong commitment to the community through local hiring, sustainable practices and community partnerships.
- Continued Implementation of the remedy in accordance with the CAO and EIR is protective of the community
- 2018 Updated model predictions regarding domestic well changes due to remediation:
- No increase of chromium concentrations
- No remedy byproducts
- No drawdown of water levels
- 4- All domestic well chromium results to remain below safe drinking water standards

ENCLOSURE 2

IRP Manager's Board Update

Hinkley Community Outreach Program Regarding PG&E's Cr(VI) Groundwater Remediation Program

Barstow, California June 12, 2019

Lahontan Regional Water Quality Control Board **Board Members' Meeting**

Dr. lan A. Webster, as IRP Manager

Dr. Raudel Sanchez,

Mr. Anthony L. Vu Dr. Halil I. Kavak

Mrs. Annie M. Cwieka Margaret DeAngelis

www.SafetyMoment.org ، www.HinkleyGroundwater.com | www.ProjectNavigator.com ا

CAO No.R6V-2015-0068, Section VIII.B. (November 4, 2015). **Technical Advisory Services to the Hinkley Community per**



An annual report and presentations to the Water Board on the independent consultant's efforts within the Hinkley Community.

A minimum of six community newsletters each year to disseminate information to Hinkley residents.

A minimum of four public meetings held in the Hinkley community.

Available for one-on-one communications with individuals, or groups of Hinkley residents.

Production of technical reviews, written comments and presentations to respond to Water Board orders, PG&E reports, USGS eports and other technical materials related to the chromium remediation (e.g. new cleanup technology)

Task 6: Outside expert on matter(s) of greatest concern to the Community.



How: As IRP, We Perform Outreach in Three Ways.

1. Relationships

- Reputation for delivering fact-based information
 - One on Ones with timely follow-up
- Relationships built over our tenure
- Accurate media reporting and outreach
 - Persistence and Attitude

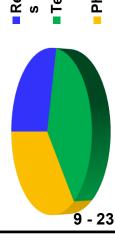
2. Technical

- Third party data review, analysis and feedback
 - Translating complex science and data into understandable visuals
 - Photo reports, visual descriptions
 - riioto reports, v
 - Newsletters Website
- Project Knowledge
- TWG Participation (re BGGS)

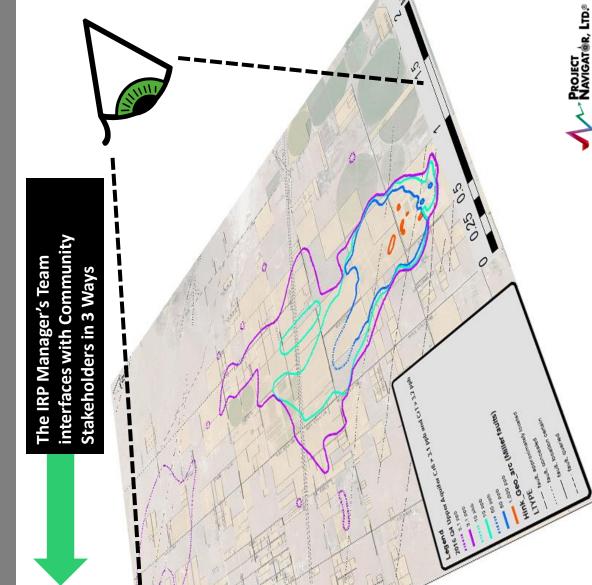
3. Physical

- Meetings –Be Visible
- Community Sponsored Events
- IRP Office Backroom/Models
 - Use of a Local, Community PM
- Field Trips

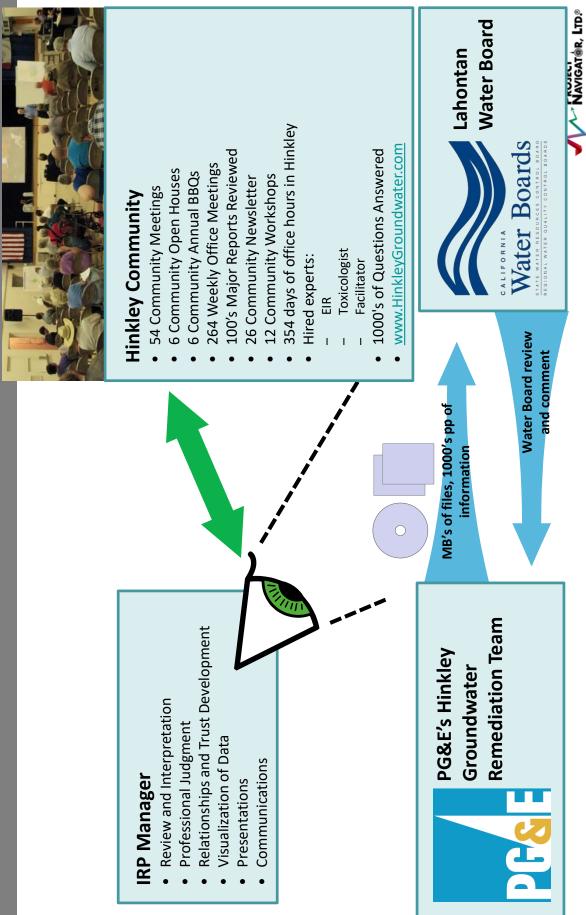
Our Efforts are Equally Distributed

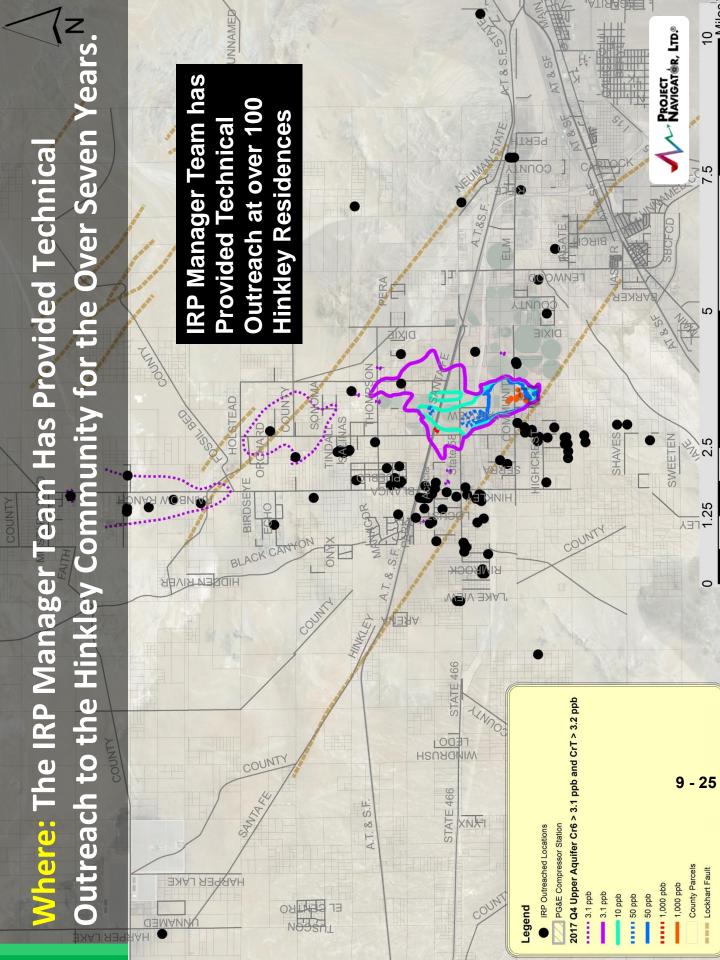


Relationship s
S
Technical
Physical



How: Our Efforts to Date: Some Metrics.





Here are 6 Ways We're Performing Technical Outreach, **Building Understanding...and Thereby Trust.**



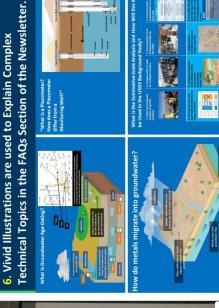
4. Community Newsletters Are Issued 6 Times a Year.



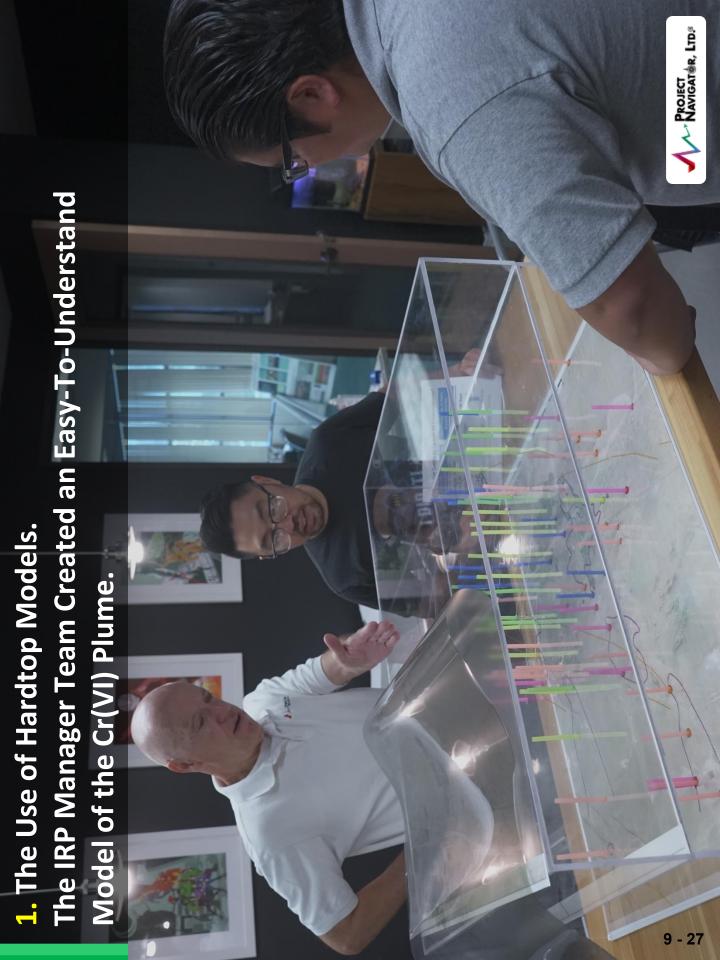












PROJECT NAVIGATIĞIR, LTD.8 Depicted: Informal Q&A About the USGS Background Study Before 2. High Touch Interactions with Interested Community Members. the July 26, 2018 Community Meeting.

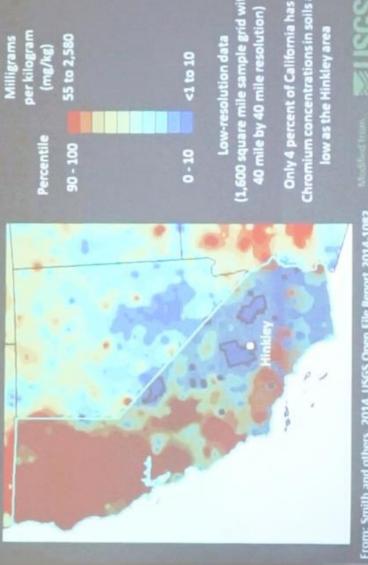
Remediation Program at the IRP Manager's Office on June 22, 2018. 3. Mid-Year Workshop on USGS Background Study and PG&E's





Available online at www.bimklaxSReundaxateringons in California

(mg/kg)

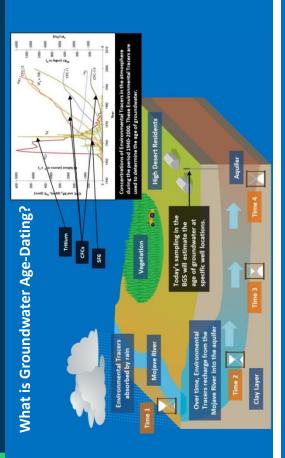


From: Smith and others, 2014. USGS Open File Report 2014-1082 http://pubs.usgs.gov/of/2014/1082/pdf/ofr-2014-1082.pdf

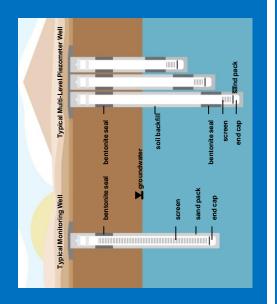
NINGS .

PROJECT NAVIGATION LTD

Technical Topics in the FAQs Section of the Newsletter. 6. Vivid Illustrations are used to Explain Complex



How does a Piezometer "What is a Piezometer? Monitoring Well?" differ from a



How do metals migrate into groundwater?



What is the Summative Scale Analysis and How Will this Method be Used in the USGS Background Study?



Current Messaging...

...4th Quarter 2018 Plume Map.

Key Take-Aways

2018 Q4 Upper Aquifer Cr6

Legend

3.1 ppb 10 ppb

All domestic wells are below 10ppb

Hydraulic Capture continues at Thompson Rd

Alcudia Rd

In Situ Reacitve Zone
PG&E Compressor Station

1,000 ppb

10 ppb 50 ppb 50 ppb

Lockhart Fault

Plume is *generally* stable and continues to *shrink in most areas*

Continuing assessment in southwest area to understand increasing Cr(VI) trends



9 - 33

Grand Conclusions:

IRP activities are in compliance with Water Board Order.

understanding of the Cr(VI) Remediation Process, and USGS's Community Members are actively interested in the technical Background Study. The Background Study (BGS) Technical Working Group (including Community Members) meets and provides input to USGS... helps ensure a *transparent, and trustworthy* study process.

www.HinkleyGroundwater.com



ENCLOSURE 3



Pacific Gas and Electric Company

ANNUAL CLEANUP STATUS AND EFFECTIVENESS REPORT (JANUARY TO DECEMBER 2018)

Hinkley Compressor Station Hinkley California

Cleanup and Abatement Order No. R6V-2015-0068

February 28, 2019

Executive Summary

This Annual Cleanup Status and Effectiveness Report (January to December 2018) (report) evaluates the effectiveness of remedy components (including hydraulic containment, agricultural operations, and in situ treatment) that have been implemented at the Pacific Gas and Electric Company (PG&E) Hinkley. Compressor Station (the site) to date towards reaching remedial targets specified in the Cleanup and Abatement Order No. R6V-2015-0068, issued on November 4, 2015 (2015 CAO; California Regional Water Quality Control Board, Lahontan Region [Water Board] 2015). The report also recommends improvements for remedy performance and includes the operational plan for 2019. Exhibit ES-1, below, summarizes key construction activities, effectiveness evaluations, and recommendations for improvements from observations made between January and December 2018.

The 2015 CAO established cleanup requirements for the site, including the following cleanup timeframes for the southern plume:

- Reach and maintain 50 parts per billion (ppb) hexavalent chromium (Cr[VI]) and total chromium (Cr[T]) in 90% of the 50 ppb Cr(VI) plume as of the date of the 2015 CAO by December 31, 2025, as determined by a specified set of monitoring wells.
- Reach and maintain 10 ppb Cr(VI) and Cr(T) in 80% of the 10 ppb Cr(VI) plume as of the date of the 2015 CAO by December 31, 2032, as determined by a specified set of monitoring wells.

In 2014, a Remedial Timeframe Assessment (RTA; Arcadis U.S., Inc. [Arcadis] 2014) was conducted that estimated remedial timeframes based on a preliminary design of remedial infrastructure and a preliminary plan of construction sequencing and operations. The estimated timeframes from the RTA informed the cleanup timelines adopted in the 2015 CAO, although the exact deadlines in the 2015 CAO are sooner than the range of estimates from the RTA. Since the RTA was conducted, PG&E has implemented investigation in areas of planned remedial infrastructure to design remedial actions, constructed additional remedial system wells, and continued to operate and optimize the existing remedial systems, including the Agricultural Treatment Units (ATUs) and In Situ Reactive Zone (IRZ) systems. The information gathered through implementation of these activities is used to inform and refine plans for future remedy infrastructure and operations, employing an adaptive management approach.

In 2018, significant progress was made towards remedy implementation, with a focus on remediation of higher Cr(VI) concentration areas across the plume. The 2018 remedy enhancements included 12 extraction wells, seven injection wells, 13 monitoring wells, and nine piezometers across the site. The RTA did not account for expansions or construction in 2018; however, the remedy expansion plans recommended in the 2017 Annual Cleanup Status and Effectiveness Report (Arcadis 2018) were implemented in 2018 with a few modifications and several additions. As part of the adaptive management approach, proactive investigations were completed across the plume. Results from these investigations identified areas with concentrations of Cr(VI) greater than originally estimated or considered in the RTA, including areas of elevated Cr(VI) concentrations that appear relatively difficult to treat in the deep zone of the Upper Aquifer (e.g., the Deep South Central Reinjection Area [SCRIA] East). Remedy enhancements were implemented in 2018 and additional infrastructure is planned in 2019 to further target areas containing high chromium concentrations.

The possibility of the existence of additional areas of high Cr(VI) concentrations was recognized to affect the validity of the model predictions in the RTA, as stated in Section 5 of the RTA on modeling uncertainty, "the influences of aquifer heterogeneities on plume behavior, mass removal, reagent delivery and IRZ performance cannot be described or predicted prior to remedy implementation, and cannot be fully

ANNUAL CLEANUP STATUS AND EFFECTIVENESS REPORT (JANUARY TO DECEMBER 2018)

predicted with the solute transport model. In addition, the model cannot fully describe the heterogeneity in the Cr(VI) distribution and areas where there may be more mass loaded into tighter lithologies or the immobile pore space or areas which may not be in communication with the rest of the aquifer. Such areas may be more difficult to treat or may show rebound after treatment and require additional remediation" (Arcadis 2014). PG&E is making a concerted effort to address these difficult-to-treat areas with the installation of additional infrastructure, but the potential that some of these areas will lag the modeling predictions is not surprising and was recognized at the time of the RTA.

Throughout 2018, hydraulic control was maintained through adaptive management. In the northern portion of the southern plume (northern ATUs), hydraulic control was maintained and capture was further enhanced with the construction of an additional extraction well. In the southern plume area (southern ATUs), hydraulic control was maintained and capture was enhanced by bringing six extraction wells online along the eastern plume boundary, although declining groundwater levels due to drought conditions presented challenges that required adaptive management actions to improve hydraulic control.

Prevalent drought conditions continue to be present in the Mojave Desert where groundwater is the primary source of water for domestic, municipal, and agricultural use. The Hinkley Valley aquifer is almost entirely replenished by intermittent Mojave River flows, which require very large storm events for the river to flow sufficiently to result in groundwater recharge. Recharge to the Hinkley Valley aquifer from intermittent Mojave River flows is supplemented with imported water sourced from northern California that is applied to the Lenwood recharge basin. However, due to the lack of Mojave River flows (last flow events occurred in 2005 and 2011) and limited Lenwood recharge basin imports in recent years, groundwater levels in the Hinkley Valley and greater area have generally shown a steady decline since 2011. Currently, groundwater levels are approaching historic low levels.

These continued declining water levels in the region resulted in unplanned remedial infrastructure design and construction to monitor groundwater levels and improve concentration trends in the east and southeast southern plume core. Increasing Cr(VI) concentration trends at the plume edge in the southeast were observed related to changing conditions associated with the drought. PG&E responded rapidly to the observed trends by installing eight new (six operational in 2018; two more will be operational in the first half of 2019) extraction wells, adding an estimated 350 gallons per minute of additional extraction capacity along the east side of the southern plume boundary in 2018. PG&E also installed eight piezometers to better understand the changing groundwater gradients. Monitoring results for wells in areas where new extraction wells became operational during 2018 show improvements in chromium concentrations.

Estimates of mass removed from groundwater continue to be updated. In 2018, the estimates for mass removal from groundwater by in situ remediation and mass remaining in groundwater were complicated by the decreasing water levels due to the drought, resulting in less certainty in the estimates. Despite uncertainty, estimates of mass removed from groundwater demonstrate continued, steady mass removal is occurring. Since 1992, groundwater extraction and ATU operations have removed an estimated 2,392 pounds of Cr(VI) from groundwater in the Upper Aquifer. During that time, approximately 262 tons of nitrate also present in groundwater from pre-existing land use activities were also removed from groundwater. A significant amount of Cr(VI) has also been removed from groundwater (an estimated 2,533 to 2,737 pounds) by IRZ operation to date. However, given the uncertainty in mass removal estimates as saturated thickness declines due to the drought and the incorporation of high-concentration data delineated by new wells, the estimated portion of mass remaining in groundwater is roughly equivalent to 2017. Regardless, the mass removal evaluation continues to indicate that twice as much chromium has been removed from groundwater than remains to be treated. The majority of the mass

ANNUAL CLEANUP STATUS AND EFFECTIVENESS REPORT (JANUARY TO DECEMBER 2018)

removed by the agricultural treatment systems to date was achieved by operation of the historical Land Treatment Units in the plume core. Since 2007, the IRZs have accounted for most of the mass removed.

The changes to sampling frequencies under 2015 CAO requirements I.C and I.D in 2019 included reduced sampling frequency in 29 wells and increased sampling frequency in 21 wells. During 2018, remedial systems were generally operated according to the 84 monthly goals set forth in the 2018 operational plan (Arcadis 2018), with two very minor exceptions, one that was 1 gallon per minute below plan in the freshwater injection system in April 2018, and one month due to construction within the Community East ATU. These minor exceptions did not impact system performance. Data collected to date indicate improved treatment from optimized operations of remedial systems, with positive trends toward remedial goals exhibited in many areas. In some cases, data evaluations indicated areas where treatment is not performing as anticipated. These areas were identified for remedy enhancements and investigations were conducted to inform remediation infrastructure enhancements to improve treatment. Initial results indicate improvements have been observed following the remedy enhancements. Plans for continuing these improvements in 2019 are presented in this report.

ANNUAL CLEANUP STATUS AND EFFECTIVENESS REPORT (JANUARY TO DECEMBER 2018)

Exhibit ES-1 2018 Remedy Summary

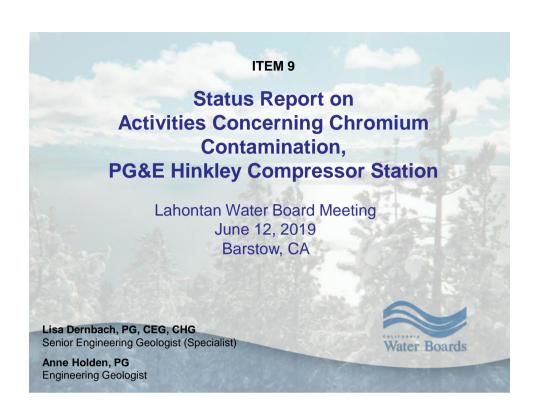
Remedial System/ Area	Were Plans for 2018 Construction Implemented? ¹	Additional Construction Activities ²	System Effectiveness	Changes Recommended for 2019
Hydraulic Containment North	Yes	Yes •1 additional extraction well	Effective Successful containment Significant plume contraction continued Western operations optimized	No
Hydraulic Containment South	Yes	Yes • 2 extraction wells south of Community Boulevard in the Southeastern Source Area • 6 extraction wells East of Community East ATU	Hydraulic control of plume was maintained under changing drought conditions with the addition of 6 new extraction wells. Supplemental infrastructure to ensure hydraulic control as drought continues	Yes • Operation of new extraction wells
Lower Aquifer	Not applicable	Not applicable	Effective Remedy will take time due to complexity of geologic conditions	No
Central Area IRZ	Not applicable	Not Applicable	Effective, with recommendations Eastern and central portions progressing Existing infrastructure does not effectively target the far western extent of the IRZ	Yes • Expand the remedial system to the west following Habitat Conservation Plan (HCP) approval and Incidental Take Permit (ITP) issuance
SCRIA IRZ	Yes	Yes To injection wells and a extraction wells were installed in the Deep SCRIA East To monitoring well to evaluate the western extent of Cr(VI)	Effective, with recommendations Improvement in areas of new operations Investigations identified area with elevated Cr(VI) in the Deep SCRIA East and further west than previously estimated	Yes Operate the newly installed Deep SCRIA East IRZ remedial wells Expand to the west after approval of the HCP and receipt of ITP
Source Area IRZ	Yes	Not applicable	Effective, with recommendations Continued Cr(VI) concentration declines in highest concentration areas Investigation defined one area in southwest for remedy improvement	Yes Develop strategy to address elevated Cr(VI) concentrations in southwestern Compressor Station Area

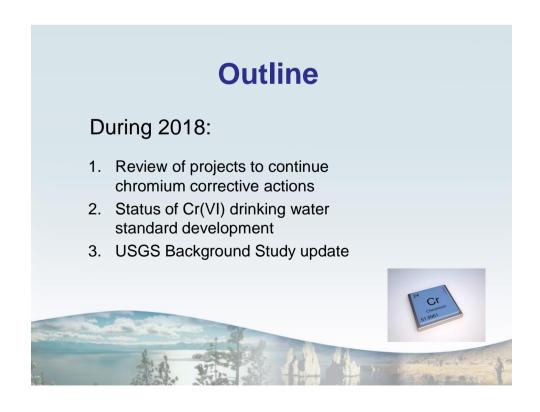
Notes:

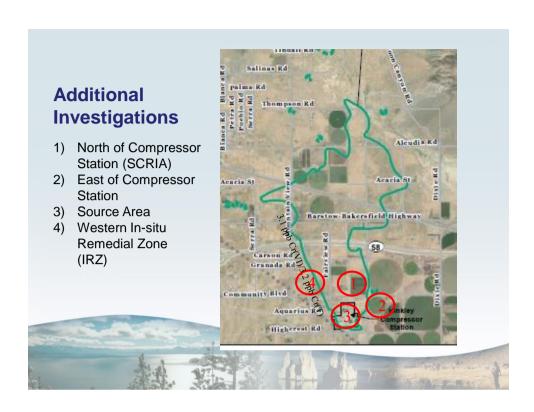
¹ 2018 construction plan as presented in Arcadis 2018.

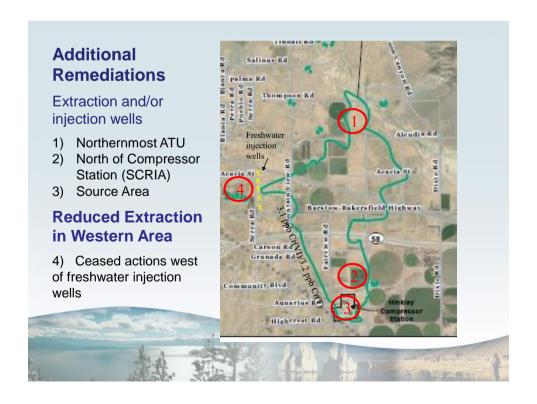
² Construction activities in addition to those in Arcadis 2014 Remedial Timeframe Assessment (Arcadis 2014).

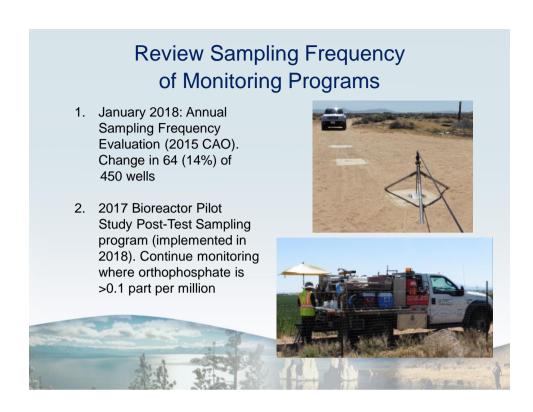
ENCLOSURE 4

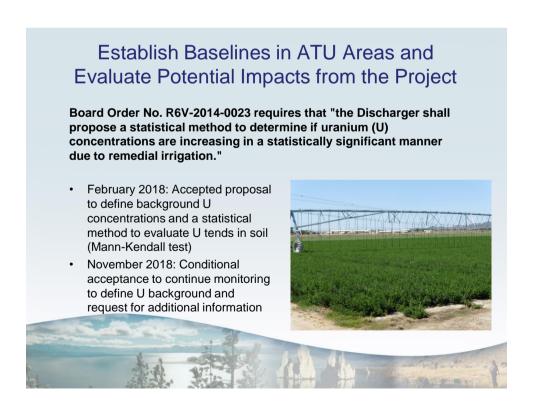


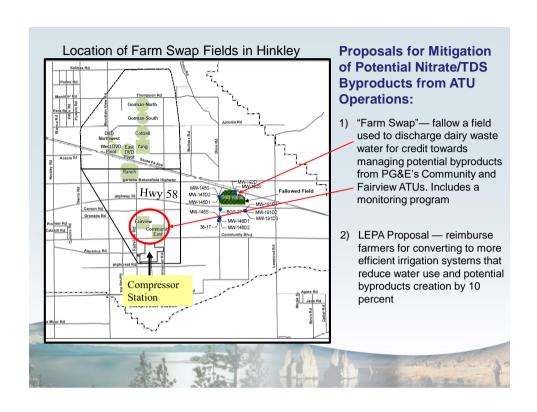


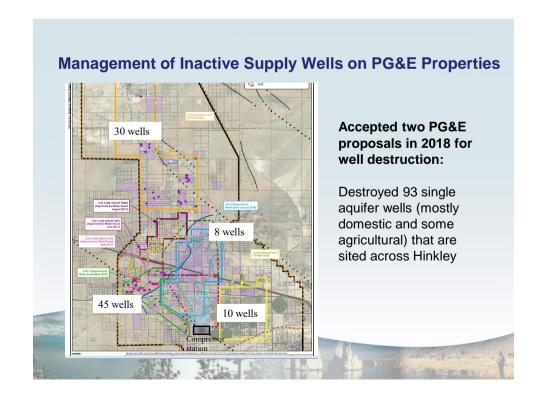


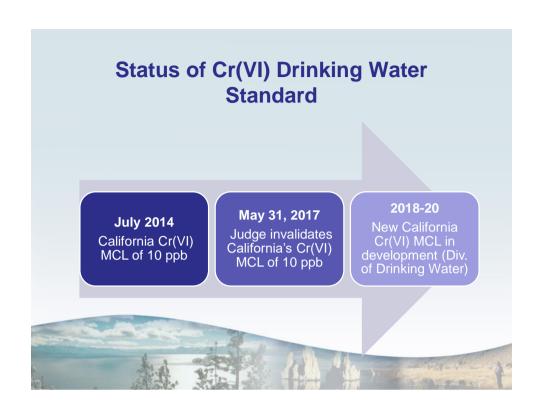


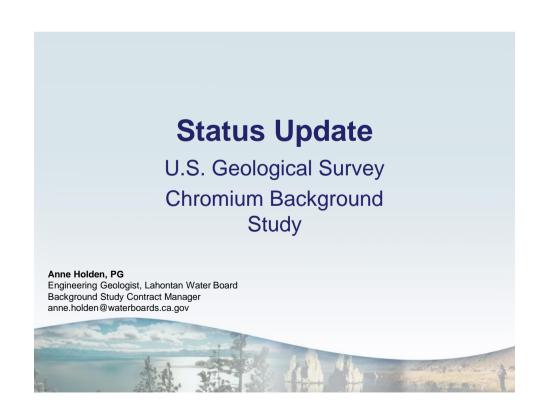




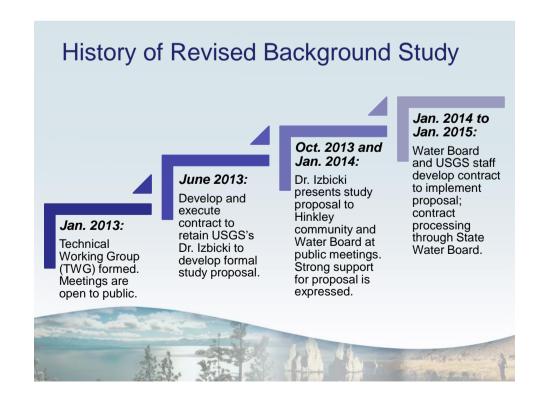




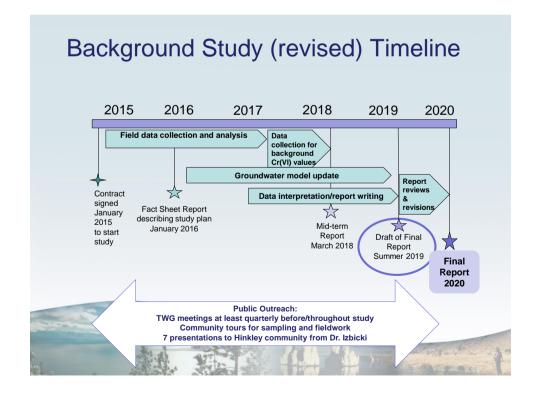


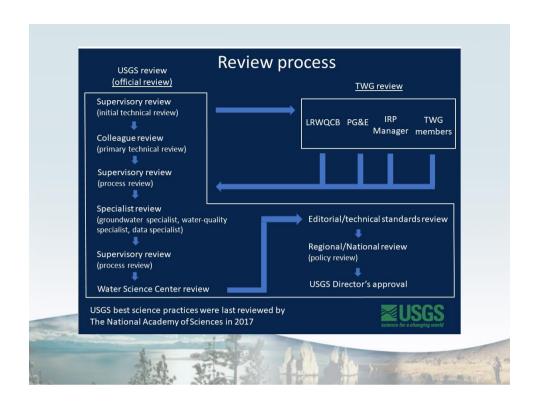


Purpose of Background Study **USGS** Evaluate extent of anthropogenic hexavalent chromium (Cr[VI]) A Plan for Study of Natural and Man-Made Hexavalent Chromium, Cr(VI), in Groundwater near a Mapped Plume, released from the PG&E Hinkley, California By John A. Izbicki and Krish compressor station Estimate background Cr(VI) concentrations in the upper aquifer of study area (Hinkley and Water Valleys) Investigate potential for trivalent chromium (Cr[III]) to re-convert back to Cr(VI) after in-situ treatment is completed USGS Study Fact Sheet, Jan 2016



Good Progress... · Majority of report chapters drafted, and many are complete · Graphics and figures drafted and under review **Draft Final** .. Some Challenges Report · Groundwater model evaluation (Task 5) was more time intensive **Status** than predicted · Federal government shutdown in late 2018/early 2019 caused runon backups in schedule Status: Draft Final Report release delaved







ENCLOSURE 5

Status of Actions PG&E Hinkley Chromium Contamination April 2019

Chromium Plume Boundary

The 4th quarter 2018 chromium plume map is posted on the Water Board's Hinkley website at: http://www.waterboards.ca.gov/lahontan/water_issues/projects/pge/index.shtml, at the bottom of the page under the section titled "Other Documents and Information." The first quarter 2019 plume map is due on May 10, 2019, consistent with the reporting due dates contained in the CAO.

Mitigation of Potential Groundwater Impacts

The 2013 Environmental Impact Report (EIR) listed different strategies available to PG&E to implement for mitigating potential impacts to groundwater from its remedial actions. On November 21, 2018, PG&E submitted the document, "Water Conservation Program: Basin Wide Approach to Mitigation of Potential Groundwater Impacts Associated with Operation of Agricultural Treatment Units (ATUs) Managing Potential ATU Byproducts (Mitigation Measure WTR-MM-4)." The document presents a proposal for a new irrigation water conservation program to mitigate potential impacts of groundwater quality that could occur as a result of operations of the Agricultural Treatment Units (ATUs) used for remediation of hexavalent chromium in groundwater. The program would financially reimburse Hinkley Valley farmers to convert from less water efficient broadcast sprinklers or spray heads to Low Energy Precision Application (LEPA) irrigation methods. LEPA systems reduce water loss from the aquifer, reduce total dissolved solids (TDS) in the water not taken up by the plant and thus reduce the potential TDS accumulation in irrigation return water. This reduction in TDS to the Hinkley aquifer is expected to offset potential TDS impacts to groundwater generated at any of the ATU fields. PG&E's proposal is still being reviewed by Water Board staff.

Annual Evaluation of Groundwater Monitoring Program

Consistent with Cleanup and Abatement Order (CAO) R6V-2015-0068, in January PG&E submitted its annual evaluation of the groundwater monitoring program. Attachments B and C of the CAO's monitoring and reporting program are decision trees that specify criteria to evaluate the sampling frequencies of each monitoring well in the CAO program to determine if those frequencies should be changed. PG&E's evaluation has proposed reducing the sampling frequency for some wells, increasing the sampling frequency at other wells, and keeping the sampling frequency the same at most wells. PG&E's proposal is still being reviewed by Water Board staff.

Other Remedial Actions

PG&E has been aware of increasing chromium concentrations in certain monitoring wells located in the southern and southeastern portion of the chromium plume. PG&E installed off-site piezometers and on-site extraction wells to better understand groundwater flow and improve hydraulic containment. Data from the new wells will be used to evaluate if the groundwater flow direction is changing on a regional scale due to drought conditions or from pumping at agricultural wells for the two fields located north of the compressor station. Results of this investigation, as reported in a fourth quarter 2018 monitoring report, are so far promising as chromium concentrations are reducing. PG&E has proposed to continue groundwater extraction and monitoring chromium changes for the first three quarters of 2019. The fourth quarter 2019 monitoring report will evaluate remedial results and state whether additional monitoring wells are needed to define the southern and southeastern chromium boundary. PG&E's proposal is being reviewed by Water Board staff.

Chromium Background Study

Data interpretation, groundwater flow model evaluation and report writing continue to be the focus of Dr. Izbicki's current efforts. Dr. Izbicki is scheduled to discuss the background study at the April 25, 2019 Hinkley community meeting.