

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LAHONTAN REGION

# REQUEST FOR COMMENTS

On

**PROPOSED CLEANUP AND ABATEMENT ORDER  
REQUIRING PACIFIC GAS AND ELECTRIC COMPANY  
TO CLEAN UP DISCHARGES OF CHROMIUM TO  
GROUNDWATERS IN HINKLEY**

The Lahontan Regional Water Quality Control Board (Water Board) requests your review and comment on a proposed Cleanup and Abatement Order (CAO), which consists of the proposed order and eight attachments, including a map describing an area of allowed plume expansion related to the plume remediation, hydraulic capture metrics, and monitoring requirements. On January 21, 2015, the Water Board Prosecution Team mailed the proposed CAO to Pacific Gas and Electric Company (PG&E). At the same time, for public accessibility the Water Board posted the proposed CAO on its website at this location:

[http://www.waterboards.ca.gov/lahontan/water\\_issues/projects/pge/cao/](http://www.waterboards.ca.gov/lahontan/water_issues/projects/pge/cao/)

The Water Board will consider comments on the proposed CAO. **Comments are due by 5 p.m., March 13, 2015.** The Water Board will post the comments received on the webpage location noted above.

### **Public Participation**

After receiving comments on the draft CAO, to further facilitate public discussion the Water Board will likely hold workshops to discuss the issues and comments raised during the comment period. The Water Board will provide dates for subsequent workshops within 30 days after the March 13, 2015 comment deadline. The Water Board is tentatively scheduled to consider the CAO at its September 16, 2015, board meeting in Barstow. In anticipation of that board meeting, the Water Board may issue special instructions regarding procedures about how the Water Board wishes to hear the proposed CAO item at its meeting. At that board meeting, the Water Board will consider the comments received and would either adopt the CAO as proposed, adopt it with modifications, or reject it.

### **Purpose and Overview of CAO**

Since 1987, the Water Board has been requiring PG&E's to investigate, cleanup and abate its discharges of total and hexavalent chromium to the groundwaters beneath the Hinkley area. During that time, the Water Board has issued numerous orders directing

PG&E's actions. The proposed CAO reduces confusion by consolidating requirements and replacing 15 previous orders issued; directs PG&E to continue to remediate chromium-contaminated groundwater; requires refinement of the chromium plume boundaries; sets plume capture requirements; and sets deadlines to meet interim cleanup targets. A monitoring and reporting program is included.

## **Background**

PG&E's Hinkley Compressor Station is located southeast of the community of Hinkley, about 8 miles west of Barstow in San Bernardino County. The Compressor Station has operated since 1952. From 1952 to 1965, hexavalent chromium-based corrosion inhibitor was added to water used in the cooling towers, and the untreated cooling tower water was discharged to unlined evaporation ponds. In 1987, PG&E reported to the State that total chromium and hexavalent chromium concentrations exceeding the California drinking water standard of 50 parts per billion (ppb) total chromium were found in groundwater beneath and down gradient of the site.

Since 1987, the Water Board has been requiring PG&E to carry out investigation and cleanup actions for chromium in groundwater at the Hinkley Compressor Station. Various cleanup methods have been operated on a limited-scale basis to stop the spreading of chromium in groundwater and to test cleanup methods to remove chromium from soils and groundwater, including excavation of contaminated soil, groundwater extraction and agricultural land treatment, in-situ (subsurface) treatment, and freshwater injection into the aquifer.

## **Instructions for Submitting Comments**

All comments less than 50 MB that do not contain large maps or attachments (those which need to be printed on larger than 8½ x 11" paper to be legible) may be submitted electronically to the following email address: [RB6enfproceed@waterboards.ca.gov](mailto:RB6enfproceed@waterboards.ca.gov). All electronic submittals should be submitted in a searchable pdf format in a legible font no smaller than 11-point size.

If your submittal is more 50 MB, or contains maps or attachments that need to be printed on paper larger than 8½ x 11" to be legible, then you must provide 10 copies to the following address:

Attn: Sue Genera, Executive Assistant and Water Board Clerk  
Lahontan Regional Water Quality Control Board  
2501 Lake Tahoe Blvd.  
South Lake Tahoe, CA 96150

Similarly, if you do not have access to the Internet, please submit your comments to the address above. Each email or hard copy submittal must have in the subject line, "Pacific Gas and Electric Company CAO Hearing." All documents received by the March 13, 2015 5 p.m. deadline will be distributed to the Water Board members and the Water Board's Advisory Team, and posted on the Water Board's website. If you have any questions or difficulties submitting documents, please contact:

Douglas F. Smith, Water Board Advisory Team member at  
[Doug.Smith@waterboards.ca.gov](mailto:Doug.Smith@waterboards.ca.gov) or (530) 542-5453.

In an effort to save paper and electronic file space, you may reference documents that have been previously submitted or are part of the public record for this case, and there is no need or requirement to include full copies of those documents. For each document included by reference, identify the name of that document, the location of where the document resides, a copy of the relevant pages from the document, and a statement explaining why those excerpts of the document are relevant. Examples of such documents that need not be submitted in full include, but are not limited to, previously submitted monitoring reports and documents that can be downloaded from the Water Board's website regarding this case:

[http://www.waterboards.ca.gov/lahontan/water\\_issues/projects/pge/index.shtml](http://www.waterboards.ca.gov/lahontan/water_issues/projects/pge/index.shtml)

### **Separation of Functions**

The Water Board staff participating in this proceeding has been separated into two teams to help ensure the fairness and impartiality of this proceeding. The Water Board's Prosecution Team includes staff who prepared the draft CAO and will be advocating for its adoption. The Water Board's Advisory Team includes staff who will provide the Water Board with objective technical and legal advice.

Advisory Team members are: Patty Z. Kouyoumdjian, Executive Officer; Kim Niemeyer, Staff Counsel; Douglas F. Smith, Supervising Engineering Geologist; and Rich Booth, Senior Engineering Geologist.

Prosecution Team members are: Lauri Kemper, Assistant Executive Officer; Lisa Dernbach, Senior Engineering Geologist (Specialist); Anne Holden, Engineering Geologist; AnnaKathryn Benedict, Staff Counsel; Laura Drabandt, Staff Counsel; and David Boyers, Staff Counsel.

Any members of the Advisory Team who normally supervise any members of the Prosecution Team are not acting as their supervisors in this proceeding, and vice versa. Members of the Prosecution Team may have acted as advisors to the Water Board in other, unrelated matters, but they are not advising the Water Board in this proceeding. Members of the Prosecution Team have not had any ex parte communications with Water Board members or Advisory Team members regarding this proceeding.

### **Ex Parte Communication**

The Prosecution Team, PG&E, and the public are prohibited from engaging in ex parte communications regarding this matter with Water Board members or Advisory Team members. An ex parte contact is any written or verbal communication pertaining to the proposed CAO between the Prosecution Team, PG&E and the public on one hand, and a Water Board member or Advisory Team member on the other hand, unless the communication is shared with other parties. Communications regarding non-controversial procedural matters are not ex parte contacts and are not restricted. Communications among one or more of the Prosecution Team, PG&E and the public themselves are not ex parte contacts.

### **Evidentiary Documents and File**

The proposed CAO and related evidentiary documents are on file and may be inspected or copied at the Water Board's office at 14444 Civic Drive, Suite 200, Victorville, CA 92392. These files shall be considered part of the official administrative record for this public hearing. Other submittals received for this proceeding will be added to these files and will become part of the administrative record absent a contrary ruling by the Water Board Chair. Information on the administrative record for this proposed CAO is available at

[http://www.waterboards.ca.gov/lahontan/water\\_issues/projects/pge/index.shtml](http://www.waterboards.ca.gov/lahontan/water_issues/projects/pge/index.shtml)

### **Questions**

Please send any questions regarding this public hearing to Douglas F. Smith, Water Board Advisory Team member at [Doug.Smith@waterboards.ca.gov](mailto:Doug.Smith@waterboards.ca.gov) or (530) 542-5453.

  
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PATTY Z. KOUYOUMDJIAN  
EXECUTIVE OFFICER

DATE: \_\_\_\_\_ 02/04/15 \_\_\_\_\_