Public Review Draft Environmental Impact Report

Comprehensive Cleanup Strategy for Chromium in Groundwater, PG&E's Hinkley Compressor Station



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Meeting Ground Rules

Ground Rules are designed to keep discussions on track, focus on the topic and use our time efficiently.

- Use common courtesy. Do not interrupt another speaker.
 Listen to each other and respect all views.
- Turn cell phones off. If you must take a call, do so outside of the meeting room.
- Give everyone the opportunity to participate. Time limits may be imposed where needed.

Purpose of Meeting

- In-depth review of Draft EIR
 - ✓ Where to find information in EIR
 - ✓ Details on impacts and mitigation measures
- Questions unrelated to Draft EIR can be discussed (as time allows) at end of meeting

3

Draft EIR

- Prepared by Water Board staff and consultant for Hinkley groundwater cleanup
 - ✓ 75-day review and comment period
 until November 5
- Needed because cleanup activities will be over a larger area, longer time period
- Water Board will issue new site-wide General Permit and Cleanup Order to PG&E





What is the Project?

- Comprehensive remediation plan to clean up chromium-contaminated groundwater in Hinkley area
- Impacts from existing chromium contamination are not analyzed (not part of project, but baseline conditions)



5

What is the Project Goal?

- Cleaning up chromiumcontaminated groundwater in the Hinkley area to background levels.
- Goal is to clean up quickly as possible, balancing speed of cleanup with impacts.



EIR Alternatives

"No Project"

- No new permit from Water Board, continues current remediation
- Doesn't address full plume
- Required by CEQA for comparison purposes

Five "Action" Alternatives

- 4B and 4C-2, 4C-3, 4C-4, 4C-5
- Developed in 2011-2012, based on public and Water Board input
- All use various combinations/intensities of the four cleanup technologies



7

EIR Action Alternatives All alternatives have Freshwater Injection three technologies in Groundwater common. Extraction & Ag Units In-situ 4C-3 and 4C-5 add (AUs) **Treatment** above-ground treatment to mix Difference between **Alternatives** alternatives is in scale and intensity of Above-ground 4C-3 activities (ex-situ) and 4C-5 treatment

Why no "preferred alternative"?

- EIR looks at all alternatives in full detail, rather than just one
- Allows maximum flexibility to choose any alternative
- Public input on balance between cleanup time and acceptable impacts needed



9

Resources Evaluated in EIR

- Water Supply
- Water Quality
- Land Use, Population, and Housing
- Hazards
- Geology and Soils
- Air Quality and Climate Change
- Noise

- Biological Resources
- Cultural Resources
- Utilities and Public Services
- Traffic
- Aesthetics
- Socioeconomics
- Cumulative and Growthinducing Impacts

CEQA Terms

Existing (or Baseline) Conditions:

Pre-project, physical environmental conditions in the project area at the time of EIR analysis (here, fourth quarter 2011). Used as a comparison point to determine environmental impacts of project.

Impact (from Project):

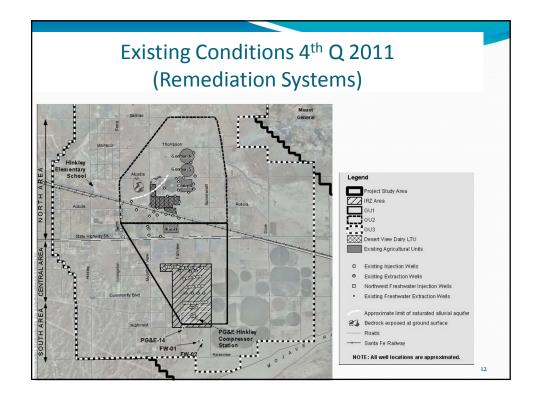
Adverse physical change to the environment due to the project. Determined by comparing anticipated physical changes from project to existing conditions. An impact is *significant* if it causes a *substantial adverse change* to the physical environment in the project area.

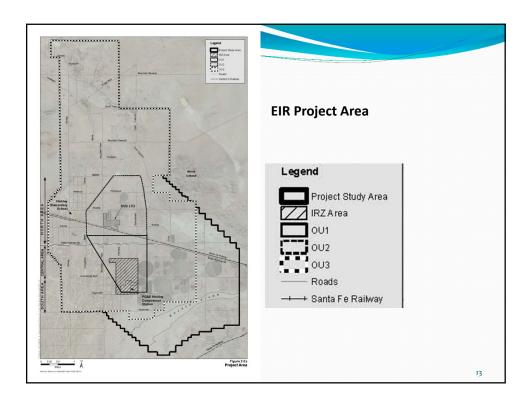
Significance Criteria:

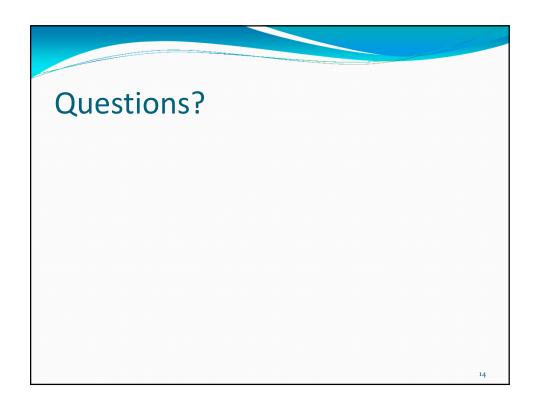
Statements or standards used determine if an impact is significant (or substantial). If so, then feasible mitigation measures are triggered.

Mitigate/Mitigation Measures:

Measures or actions taken to *avoid, reduce, restore, or compensate* for significant impacts of a project. Mitigation measures not required for less than significant impacts.







Impacts and Mitigation Measures

Water Resources

Water Supply

- Groundwater drawdown
- Aquifer compaction

Water Quality

- Agricultural unit impacts
- In-situ zone impacts
- Biological Resources
 - Desert Tortoise

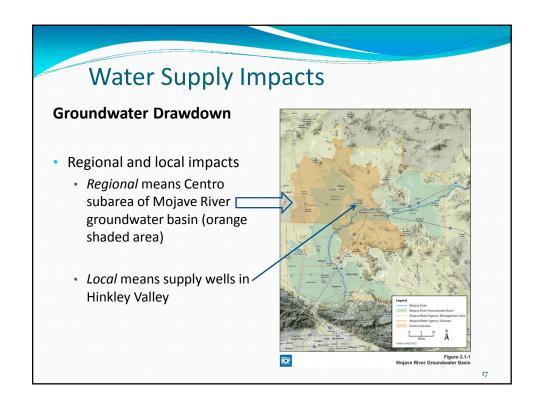
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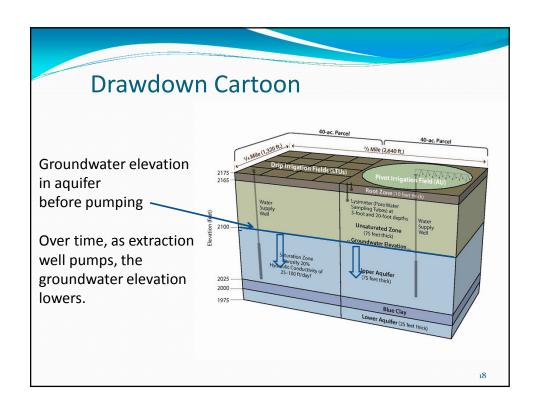
Water Resource Impacts

Water Supply and **Water Quality** impacts considered in two ways:

- 1) Impacts affecting water supply well users
- 2) Impacts to the aquifer itself Veven is groundwater is not currently supplying wells, it's still affected if impacts due to remediation occur







Water Supply Impacts

Regional supply

- Compare extraction amounts to water rights held by PG&E
- If extraction exceeds water rights, then impact is significant
 - For all action alternatives, extraction would exceed PG&E's existing rights

19

Water Supply Mitigation

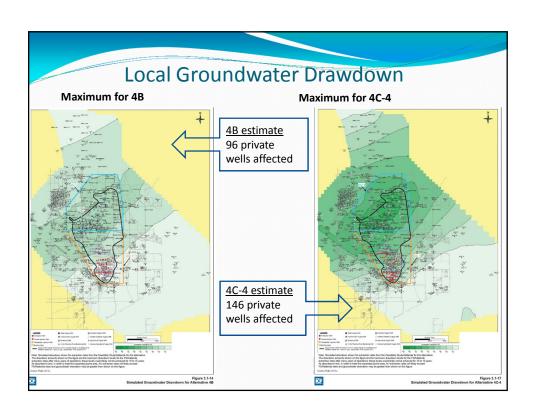
Regional supply

- EIR evaluated if Centro subarea surplus water rights available to implement all alternatives
- Surplus available, so PG&E required to obtain water rights to avoid regional exceedances
- Requirements described in mitigation measure WTR-MM-1

Water Supply Impacts

Local supply

- Evaluated by comparing supply well screen depths to estimated groundwater drawdown amounts for each alternative
 - If drawdown greater than 25% of screen depth occurs, impact is significant
- Modeled estimates used
 - Model assumed continuous pumping rates over long time (not reality)
- Not likely to occur as wide-spread as shown, but need to disclose worst-case



Water Supply Mitigation

Local supply

- Modeling shows 10-25 years to reach these maximum drawdown estimates
- Gives time to react (e.g., modify pumping to avoid impact to wells)
- Monitoring/modeling requirements provide advance warning
- Impacts to local water supply wells potentially significant for all action alternatives, so mitigation is required
 - Affected well users get alternate water supplies
 - Deeper well or pump if feasible, alternate source (water system or storage tank if acceptable to user)
 - Described in WTR-MM-2 and 2c

23

Water Supply Impacts Cartoon of Aquifer Compaction due to Groundwater Drawdown Aquifer compaction Results from drawdown, as water is removed from spaces between aquifer sediments, the spaces can collapse. Unsaturated subsurface zone (no groundwater) Groundwater level Groundwater level

Water Supply Impacts

Aquifer compaction

- Can be irreversible, so aquifer cannot store as much water in future.
 - No evidence that this has happened in Hinkley historically
 - Prior drawdown (1930s to 1990s) to around 90 feet in Hinkley Valley, and aquifer still productive today.



25

Water Supply Impacts

Aquifer Compaction

- Evaluated by comparing project drawdown levels to historic drawdown
- If alternative's groundwater extraction results in drawdown greater than historic levels, then impact considered significant
- Actual risk considered low
 - Aquifer material makeup (lots of coarse material)
 - · Prior drawdown, especially in south/central project area
 - Better data on northern projects impacts for final EIR
 - · (more detail on historic drawdown in Hinkley Valley)

Water Supply Mitigation

Aquifer compaction

- Impact potentially significant for all action alternatives in northern project area (north of Hwy 58)
 - If occurs, impact to aquifer can't be mitigated or restored
- Impact on supply wells can be mitigated (WTR-MM-2c)
 - · Same mitigation as drawdown impact to local supply

27

Questions?

Water Quality Impacts

Agricultural Unit impacts

- Total Dissolved Solids (TDS)
- Uranium/Radionuclides
- Nitrate (benefit, decreases)

In-situ zone (IRZ) remediation impacts

- Iron (Fe)
- Arsenic (As)
- Manganese (Mn)

29

Water Quality Impacts

Agricultural Unit (AU) impacts

- Overall decrease in nitrate in aquifer (plants take up N as fertilizer
- Increased TDS in aquifer
- Possibly affect uranium (research needed)
 - Data on AU affects on uranium limited, but impact considered potentially significant

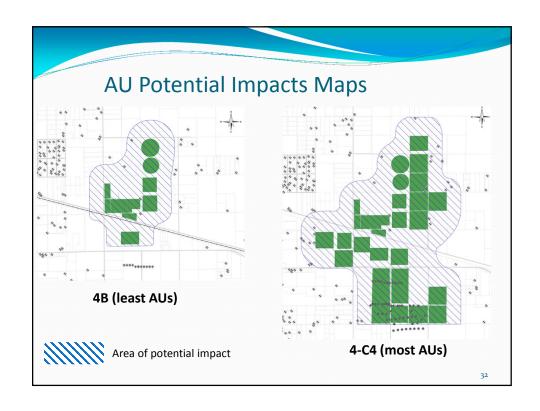


Water Quality Impacts

Agricultural Unit (AU) impacts

- For supply wells, impacts can be mitigated by alternate water supply requirement
- Requirement to establish baseline levels of TDS, N, and U in areas of new AUs
- For the aquifer, impact significant during remediation, but requirement to restore aquifer water quality after remediation is complete





Agricultural Units Mitigation

Supply well mitigation

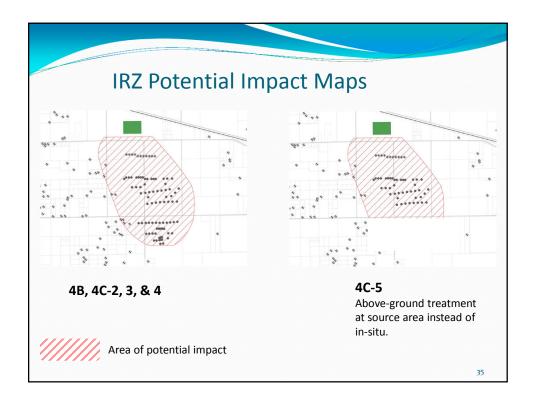
- Monitor AUs & manage to avoid increases (MM-5)
- Alternate Water Supply (examples)
 - Deeper Well
 - Storage Tank and Hauled Water
 - Wellhead Treatment
 - Well Modification (lower the pump)
 - Community water supply
- Restore baseline water quality for aquifer to be implemented before project end (WTR-MM-4)

33

In-Situ Remediation Zone Impacts

Water quality impacts

- · Increase in arsenic, iron, manganese
- Metals naturally in soil material
 - Pre-IRZ concentrations known
- Metals dissolve into groundwater from reducing conditions cause by ethanol injections
- Impact limited to IRZ areas



IRZ Mitigation

Supply well mitigation

- Mitigation measure WTR-MM-7
 - Monitor byproducts
 - If significance criteria exceeded, more extraction wells to intercept byproducts
- Mitigation Measure WTR-MM-2
 - Alternate water for supply well threatened by byproducts (same as for AUs)
- Aquifer water quality must be restored following remediation (WTR-MM-4)

IRZ Mitigation

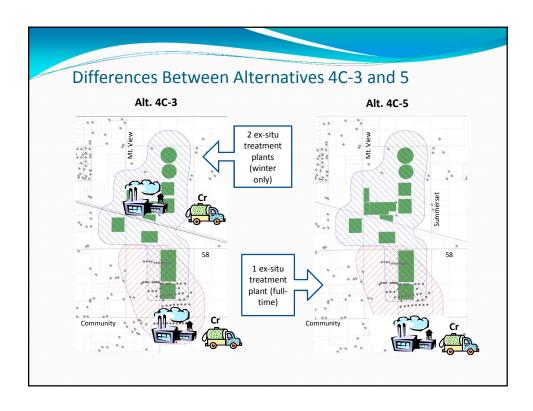
Aquifer mitigation

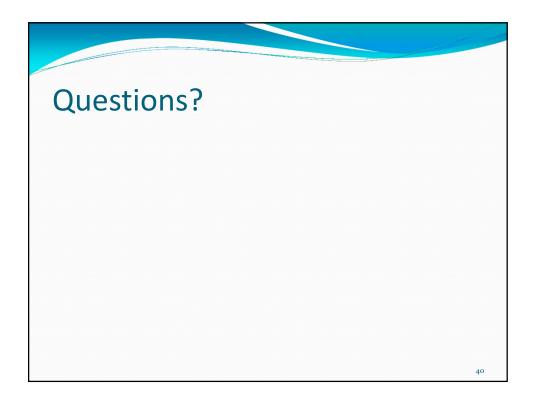
- Near injection points, impacts will occur in aquifer during remediation
- Aquifer water quality must be restored following remediation (WTR-MM-4)
- Alternative 4C-5 reduces IRZ impact
- Ex-situ treatment in source area at Compressor station
 - Chromium removed off-site for disposal
 - In-situ treatment in central area only
 - So, less by-products than other alternatives
- Alternative 4C-3 reduces impact somewhat
 - Ex-situ treatment at source area and Desert View Dairy (but winter only)

37

PG&E's Ex-situ Groundwater Treatment Facility Topock, CA





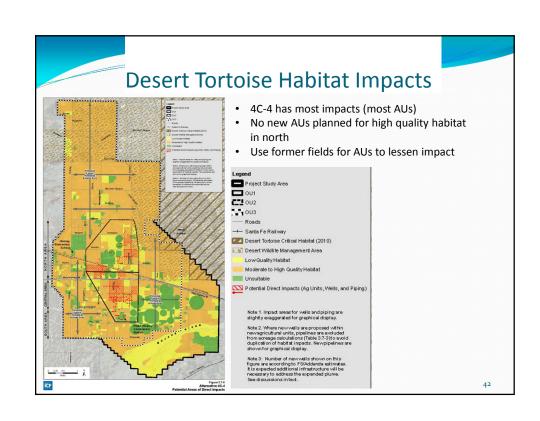


Biological Resources Impacts

Biological Resources

- Loss of habitat due to more AUs, treatment facilities
- <u>Restricted tortoise movement</u> AUs may limit desert tortoise movement through valley
- Loss of wildlife could be disturbed or killed during construction or operation





Mitigation Measures

Biological Resources:

- Clearance surveys, training, relocation protocols to limit impacts to wildlife
- Set aside habitat off-site to compensate for loss (typical: 3 to 5 acres for each acre lost)
- Tortoise movement may be restricted by AUs, difficult to mitigate this
- May be significant and unavoidable impact depending on number and layout of AUs



43

Questions?

Commenting on the DEIR

- Are the potential impacts due to project fully described?
- Additional clarification or description needed? (be specific)
- Are there feasible mitigation measures we didn't include?
- What impacts are you willing to accept or not? (even with mitigation)
 - · Groundwater drawdown
 - Cr3 in aquifer
 - Byproducts
 - · Wildlife habitat
 - · Others?



45

Send comments by **November 5** to:

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More project information:

http://www.waterboards.ca.gov/lahontan/

Contact info is on **EIR Fact Sheet**, available at this meeting