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## Lahontan Regional Water Quality Control Board

May 26, 2026

WDID No. 6B369107001

TO: ATTACHED MAILING LIST

### **Request for Comments on Proposed Investigative Order Requiring Submittal of a Feasibility Study to Evaluate Cleanup Levels for Hexavalent Chromium, Pacific Gas and Electric (PG&E) Company, Hinkley Compressor Station, Hinkley, San Bernardino County, Cleanup and Abatement Order No. R6V-2015-0068-A1**

The Lahontan Regional Water Quality Control Board (Water Board) requests your review and comments on a proposed Investigative Order requiring Pacific Gas and Electric Company (PG&E) to submit a Feasibility Study that provides technical information to the Water Board to assist staff in determining a cleanup level for chromium contamination in groundwater at the PG&E Hinkley Compressor Station.

This order will establish requirements for PG&E to prepare a feasibility study to inform cleanup goals and cleanup approaches as required under Cleanup and Abatement Order (CAO) No. R6V-2015-0068-A1.

Please send comments to the Water Board's e-mail address at [Lahontan@waterboards.ca.gov](mailto:Lahontan@waterboards.ca.gov) and include **PG&E Hinkley WDID No. 6B369107001 13267 Order Comments** in the subject line. If you prefer to send comments by mail, please send those to our office at 15095 Amargosa Road, Building 2 - Suite 210, Victorville, CA 92394, attention Amanda Lopez. **Comments are due by 5 p.m., June 26, 2026.**

Should you have any questions or if you would like to request a hard copy of **"INVESTIGATIVE ORDER NO. R6-2026-XXXX REQUIRING SUBMITTAL OF A FEASIBILITY STUDY TO EVALUATE CLEANUP LEVELS FOR HEXAVALENT CHROMIUM"** please contact Amanda Lopez at (760) 241-7373 ([amanda.lopez@waterboards.ca.gov](mailto:amanda.lopez@waterboards.ca.gov)), or Christina Guerra, Senior Engineering Geologist, at (760) 241-7333 ([christina.guerra@waterboards.ca.gov](mailto:christina.guerra@waterboards.ca.gov)).

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## Lahontan Regional Water Quality Control Board

DRAFT

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### **INVESTIGATIVE ORDER NO. R6-2026-XXXX REQUIRING SUBMITTAL OF A FEASIBILITY STUDY TO EVALUATE CLEANUP LEVELS FOR HEXAVALENT CHROMIUM, PACIFIC GAS AND ELECTRIC COMPANY, HINKLEY COMPRESSOR STATION, SAN BERNARDINO COUNTY**

This Investigative Order requires Pacific Gas and Electric Company (PG&E) to submit a Feasibility Study that provides technical information to the Water Board to assist staff in determining a revised cleanup level for chromium contamination in groundwater at the PG&E Hinkley Compressor Station. This order establishes requirements for PG&E to prepare a feasibility study to inform cleanup goals and remedial approaches as required under Cleanup and Abatement Order (CAO) No. R6V-2015-0068-A1. This requirement is made pursuant to California Water Code section 13267 which allows the Lahontan Regional Water Quality Control Board (Lahontan Water Board) to require technical or monitoring program reports from any person of this state who has discharged, discharges, proposes to discharge, or is suspected of discharging waste that could affect water quality. The report required by this Order is necessary to ensure that water quality is protected and that cleanup achieves background water quality or the lowest level of water quality feasible. As such, the burden, including costs of this report, bears a reasonable relationship to the need for the report and the benefits to be obtained from the report. PG&E owns and operates the Hinkley Compressor Station and is identified as the discharger and responsible party in CAO No. R6V-2015-0068-A1.

#### **Background**

PG&E has been remediating hexavalent chromium (Cr[VI]) contamination in groundwater associated with the Hinkley Compressor Station since 1992. In 2007, PG&E conducted a background study to determine cleanup goals, measure cleanup effectiveness, and monitor plume migration for the Site. The 2007 PG&E background study found maximum background levels at the Site were 3.1 parts per billion (ppb) Cr(VI) and 3.2 ppb total chromium (Cr[T]), which have been used as an interim cleanup level to determine the effectiveness of cleanup actions, and to determine whether the

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chromium plume had migrated into areas previously unaffected by the discharge of waste. Due to concerns regarding PG&E's approach to the 2007 background study, the United States Geological Survey (USGS) was selected to conduct an independent background study.

CAO R6V-2015-0068-A1 established 3.1 ppb Cr(VI) as an interim background concentration and cleanup level pending the completion of the USGS Background Study.

In April 2023, the USGS Background Study was completed and found that there was a range of Cr (VI) background levels (2.8, 3.8, 4.8, 5.8, 6.4, and 9.0 ppb) within the Hinkley Valley. In February 2024, in a letter entitled Request for Proposal to Evaluate Hexavalent Chromium Background Values, the Water Board requested PG&E conduct an evaluation of the set of background levels as cleanup level(s) for groundwater (Water Board 2024). On May 15, 2024, PG&E provided its evaluation and recommended using the Cr(VI) background value of 9 ppb from the set of values provided in the USGS Background Study as the cleanup value for the entire Site.

State Water Resources Control Board Resolution No. 92-49, Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304 requires that the Regional Boards ensure that polluted groundwater achieve background water quality or, if it is not reasonable to achieve background, an alternative level of cleanup that complies with California Code of Regulations, Title 23, section 2550.4, including attaining the lowest level that is economically and technologically feasible. The alternative cleanup level must (1) be consistent with the maximum benefit to the people of the state, (2) not unreasonably affect present and anticipated beneficial use of impacted water, and (3) meet the requirements of plans and policies of the State and Regional Boards, including water quality objectives listed in the Regional Board's Water Quality Control Plan.

Because of the multiple background values, more information is needed to evaluate a revised cleanup level for the Site. In determining whether background water quality can be achieved, or whether an alternative cleanup level is the lowest level that is economically and technologically feasible, information regarding cleanup strategies for each potential cleanup level is needed.

### **California Environmental Quality Act (CEQA) Compliance**

Issuance of this Investigative Order is an information collection action taken by a regulatory agency and is exempt from the provisions of the CEQA (Public Resources Code, Section 21000 et seq.) pursuant to California Code of Regulations (CCR), chapter 3, title 14, section 15306.

**THEREFORE, IT IS ORDERED that, pursuant to Water Code section 13267, PG&E shall comply with the technical and reporting provisions of this Investigative Order:**

1. By **May 26, 2027**, PG&E must submit a feasibility study report that assesses cleanup strategies (i.e. the implementation, optimization, and operational choices regarding one or a combination of cleanup technologies) for groundwater at the Site to achieve a range of potential cleanup levels for Cr(VI). The feasibility study report must at a minimum include:
  - a. A statement indicating the cleanup levels selected for the analysis. The cleanup levels selected for the analysis must, at a minimum, include 2.8, 3.1, 3.8, 4.8, 5.8, and 10.0 ppb
  - b. Selection and description of at least three cleanup strategies to be assessed per cleanup level that at a minimum includes a “no action” strategy and the cleanup strategy currently being implemented at the Site. Cleanup strategies that are significantly less effective or far more expensive than more favorable cleanup strategies should not be chosen. Additionally, cleanup strategies that would employ technologies that are technically or administratively infeasible, or that would provide inadequate protection of human health and the environment, must not be selected for the analysis.
  - c. An evaluation of the short-term effectiveness (i.e., the degree to which human health and the environment is protected and the degree to which Cr(VI) mobility and volume is reduced, and the cleanup level is achieved) for each cleanup strategy to each cleanup level. An evaluation of short-term effectiveness must include the estimated mass reduction and areal plume footprint reduction, relative to the First Quarter 2026 chromium plume and to the 2015 baseline plume.
  - d. An evaluation of long-term effectiveness (i.e., the degree to which human health and the environment is protected after the cleanup level is achieved) for each cleanup strategy to each cleanup level.
  - e. An evaluation of implementability (i.e., technical feasibility and availability of the technologies) for each cleanup strategy to each cleanup level.
  - f. An evaluation of the expected time for each cleanup strategy to achieve each cleanup level at 90%, 95%, 99% mass reduction and areal plume footprint reduction.
  - g. An evaluation of economic feasibility (i.e., the balancing of the incremental benefit of attaining further reductions in the concentrations of constituents of concern as compared with the incremental costs of achieving those reductions) for each cleanup strategy to achieve each cleanup level. Evaluation of economic feasibility must include the cost of installing (if applicable), operating and maintaining, and monitoring and reporting the cleanup strategy.

- h. An evaluation of the potential adverse effects on ground water quality and beneficial uses for each cleanup strategy at each cleanup level taking into account the hydrogeological characteristics of the facility and surrounding land; the quantity of ground water and the direction of ground water flow; the proximity and withdrawal rates of ground water users; the current and potential future uses of ground water in the area; the existing quality of ground water, including other sources of contamination or pollution and their cumulative impact on the ground water quality; the potential for health risks caused by human exposure to waste constituents; and the persistence and permanence of the potential adverse effects.
- i. A detailed description of the assumptions underlying the model being used for the feasibility evaluation.
- j. An analysis regarding the accuracy of the model that includes a comparison of the actual Cr(VI) levels achieved at the Site between 2015-2026 with the model's projected levels of those same cleanup strategies for the same timeframe.
- k. An evaluation of the implementability (i.e., technical feasibility and availability of the technologies) and economic feasibility (i.e., the balancing of the incremental benefit of attaining further reductions in the concentrations of constituents of concern as compared with the incremental costs of achieving those reductions) of targeted treatment in the source area and difficult-to-treat areas for each cleanup strategy for each cleanup level.
- l. An evaluation of the potential quantity of byproducts generated in the aquifer associated with each cleanup strategy at each cleanup level at 90%, 95%, 99% mass reduction and areal plume footprint reduction.
- m. A recommended final cleanup strategy for the entire Site to achieve each cleanup level.

If you have any questions, please contact Amanda Lopez, Engineering Geologist, at (760) 241-7373, [amanda.lopez@waterboards.ca.gov](mailto:amanda.lopez@waterboards.ca.gov) or Christina Guerra, Senior Engineering Geologist, at (760) 241-7333, [christina.guerra@waterboards.ca.gov](mailto:christina.guerra@waterboards.ca.gov).

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