

Holden, Anne@Waterboards

From: lyris@swrcb18.waterboards.ca.gov
Sent: Thursday, January 23, 2014 3:04 PM
To: Holden, Anne@Waterboards
Cc: reg6_pge_hinkley_chromiumcleanup@swrcb18.waterboards.ca.gov; Holden, Anne@Waterboards; Drabandt, Laura@Waterboards; Dernbach, Lisa@Waterboards; Kouyoumdjian, Patty@Waterboards; Smith, Doug@Waterboards; Booth, Richard@Waterboards
Subject: PG&E Hinkley - Board member and Advisory Team comments on the tentative WDRs

Dear Ms. Kemper,

The Lahontan Water Board Prosecution Team circulated for public comment tentative waste discharge requirements (WDRs) for agricultural treatment units. The Water Board discussed the tentative WDRs at its public meeting in Barstow on January 8, 2014, and received comments from the Independent Review Panel (IRP) Manager and PG&E on January 13, 2014. The IRP Manager and PG&E's comments and the tentative WDRs can be viewed at http://www.waterboards.ca.gov/rwqcb6/water_issues/projects/pge/index.shtml

The purpose of this email is to 1) reiterate the January 8, 2014 Water Board member's comments and 2) to provide comments from the Water Board's Advisory Team to the Water Board's Prosecution Team.

1) Water Board member comments:

Mr. Jardine supported the tentative WDRs as presented.

Ms. Cox recommended taking the Basin-wide approach as a cleanup method for agricultural treatment unit byproducts.

Dr. Horne requested to see some language in the WDRs that addresses the consequences for PG&E if the plume "bulge" exceeds the 3,000 foot line allowed in the WDRs and also addresses consequences of increased uranium in soil.

Mr. Dyas agreed with Ms. Cox on the Basin-wide approach especially if it could include no net water consumption.

Mr. Sandel and Chair Pumphrey concurred with previous statements made by the Board.

2) Water Board Advisory Team comments:

On page 8, the second paragraph under "c" – 4th line, refers to unforeseen events that would preclude agricultural unit operations for "any substantial duration of time." Please provide an indication of how long is a substantial duration of time.

On page 22 - reference to 4.i in section 4.k should be changed to 4.j.

On page 26 – please clarify how the tiered secondary MCL for TDS will be used in defining actually affected domestic wells, and explain which secondary MCL (500, 1000, or 1500) for TDS will be used for making the determination.

On page 27, under "Affected by Groundwater Drawdown" – the definition of "Actually affected domestic well" includes a provision that requires that the well owner to "concur that the flow rate is adequate for their use." Please give examples of the types of information that may be acceptable to conclude that the domestic well flow rate is adequate for their use.

On page 28 - the term "non-remedial agricultural supply wells" does not specify the ownership and overall purpose of the well. Would it be better to say Non-PG&E Agricultural Supply Wells or Agricultural Wells not used for remediation by PG&E? How is it demonstrate that "agricultural products are predicted to have substantial or likely reduction in

quality or quality.” Who has the burden to make the demonstration? Does the burden of that demonstration fall on the well owner? What is acceptable for the well owner to make that determination? Can PG&E provide information to rebut that assertion?

On page 29, for the Ag Supply wells affected by drawdown, why do you not also provide the ability to demonstrate that supply is sufficient, as is done for the domestic wells on page 27?

Sue Genera

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