

February 28, 2014

Ms. Anne Holden, P.G.
Ms. Lauri Kemper, P.E.
California Regional Water Quality Control Board, Lahontan Region
2501 Lake Tahoe Boulevard
South Lake Tahoe, California 96150

**RE: IRP Manager's and Hinkley Community Advisory Committee's (CAC's)
Comments Regarding Lahontan Regional Water Quality Control
Board's Proposed Waste Discharge Requirements (WDRs) for Pacific
Gas and Electric's (PG&E) Agricultural Treatment Units¹**

Dear Anne and Lauri:

The Independent Review Panel (IRP) Manager and the Hinkley Community Advisory Committee (CAC) are submitting **final comments** to the Lahontan Regional Water Quality Control Board (Water Board) regarding the Tentative Waste Discharge Requirements (WDRs) for Pacific Gas and Electric Company's Agricultural Treatment Units (ATUs), revised by the Water Board on February 10, 2014. The CAC and the IRP Manager appreciate the opportunity offered by the Water Board to receive final comments on the Proposed WDRs.

The IRP Manager and the CAC thanks the Water Board for clarifying and addressing all the comments submitted regarding the Tentative WDRs on January 13, 2014², and incorporating, as appropriate, the comments into the Proposed WDRs.

Topics identified by the IRP Manager and the CAC for comment included the following:

1. *Increased Acreage of ATUs*
2. *Allocation of Water Rights*
3. *Water Quality*
4. *Groundwater Drawdown*
5. *Water Replacement for "Actually Affected Agricultural and Domestic Wells"*
6. *Reporting*

¹ Lahontan Regional Water Quality Control Board issued the *Proposed Waste Discharge For Pacific Gas and Electric Company Agricultural Treatment Units, San Bernardino County* on December 13, 2013

² IRP Manager. 2014. *Letter Regarding IRP Manager's Comments Regarding Lahontan Regional Water Quality Board's Tentative Waste Discharge Requirements (WDRs) for Pacific Gas and Electric (PG&E) Agriculture Treatment Units*. January 13.

Additional detailed comments were submitted by PG&E on the following items:

1. Plume bulging
2. Water agronomic rates on ATUs
3. Water quality
4. Clarifications and suggestions to the monitoring program for the Proposed WDRs
5. Application and clarifications of the mitigation measures

On reviewing the Water Board's response to our comments and PG&E's submitted comments, the IRP Manager has no further comments or questions regarding the Proposed WDRs.

However, as we have discussed the WDRs with the CAC, and further explained our recent comments, the following newly derived CAC-questions have materialized. In our IRP Manager role, we have discussed their questions with the CAC, but the CAC also wishes to share these questions with the Water Board, seeking feedback.

CAC Final Comments and Clarifications:

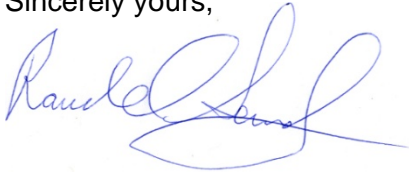
The CAC is submitting the following comments and clarifications to the Water Board regarding the Proposed WDRs for the ATUs:

- Can the current MODFLOW model be revised to estimate groundwater levels for domestic wells in the Project Area pre-remedial activities? In PG&E's FS Addendum #3³ the MODFLOW Model construction and assumptions are discussed in detail in Appendix G. The model presented was calibrated using water level data from 1996 to 2007. Can the model be used to estimate water levels in 2005 (using a similar baseline date as Total Dissolved Solids (TDS) and nitrates as outlined in the Proposed WDRs)?
- The CAC seeks feedback on how the WDRs will be applied to manage the threat of airborne Cr6 and other constituents as a result of applying Cr6 impacted groundwaters to the ATUs. If possible, please reference any study conducted which shows that using a drip-drag system does not contribute to airborne Cr6 and other constituents.
- What is the estimated average increase of chromium (as either Cr6 or Cr3) concentrations in the ATU soils as a result of applying groundwater to the ATUs?

³ Haley & Aldrich Inc. 2011. *Addendum #3 to the Feasibility Study, Pacific Gas and Electric Company's Hinkley Compressor Station, Hinkley, California. Appendix G: Groundwater Model Construction and Assumptions*. September 15.

Should you have any questions or comments, please feel free to contact either of the undersigned at rsanchez@projectnavigator.com or iwebster@projectnavigator.com (714-388-1800 (PNL main number) or 714-388-1821 (RS) or 714-863-0483 (IAW mobile)).

Sincerely yours,



Raudel Sanchez, Ph.D.
Project Manager



Ian A. Webster, Sc.D.
IRP Manager

CC:
CAC Members
Kevin Sullivan, PG&E
Devin Hassett, Keadjian and Associates