CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LAHONTAN REGION

LATE REVISIONS

NEW WASTE DISCHARGE REQUIREMENTS FOR PACIFIC GAS AND ELECTRIC COMPANY AGRICULTURAL TREATMENT UNITS, HINKLEY, SAN BERNARDINO COUNTY

MEETING OF MARCH 12-13, 2014

BARSTOW

ITEM 4

The following late revisions are proposed as described below. Proposed revisions are highlighted below; additions are in <u>underline text</u>; deletions are in <u>strikeout text</u>.

1. Bates page 4-30: Orders Section I.B.4, insert new letter "f" and re-letter succeeding subsections and references accordingly:

f. A description of the irrigation methods proposed. Irrigation techniques must be designed to prevent aerial spraying of groundwater (using non-spray methods such as drag-drip lines or equivalent techniques).

2. Bates page 4-32: Orders Section I.D.4, delete strikeout text:

If the discharge of irrigation water containing greater than 10 mg/L nitrate as N (evaluated on a quarterly basis) causes nitrate as N levels in individual monitoring wells to exceed 10 mg/L, or to increase by more than 10 percent (if below 10 mg/L) or by more than 20 percent compared to baseline or pre-remedial reference levels, the Discharger shall propose a contingency plan to manage nitrate levels as outlined in mitigation measure WTR-MM-6.

3. Bates page 4-33: Orders Section I.D.5, insert underlined text, delete strikeout text:

If the discharge of waste irrigation water causes uranium levels in monitoring wells to exceed 20 picoCuries per liter (pCi/L), or to increase by more than 10 percent (if below 20 pCi/L) or by more than 20 percent compared to baseline or pre-remedial reference levels, the Discharger shall propose actions to manage increases in uranium levels in receiving waters.

4. Bates page 4-33: Orders Section I.E, second line, insert underline text:

Criteria are described in I.E.1, below, to determine if water quality or quantity in water supply wells have been affected, either "actually" or "potentially", by remediation activities authorized by the Order.

5. Bates page 4-36: Orders Section I.E.1.a.iii, insert underline text:

Actually affected domestic wells will be defined <u>as</u> any domestic water supply well with chromium (hexavalent or total) concentrations that exceed any of the following criteria due to activities authorized by this Order:

6. Bates page 4-37: Footnote 6, insert underline text:

Non-remedial agricultural supply wells are those <u>agricultural supply wells that</u> which are not owned by the Discharger or are not operated for the purposes of plume containment or remedial actions.

7. Bates page 4-41: Orders Section III.2, delete strikeout text:

If such increases are noted, the Discharger shall propose submit an action plan within 120 days of identifying such increases.

8. Bates page 4-66: Monitoring and Reporting Program (MRP) Section 2.b.iv, delete strikeout text:

For compliance with EIR Mitigation Measure WTR-MM-6 and Receiving Water Limitation 4, propose monitoring wells to evaluate if concentrations of nitrate (as N) at greater than 10 mg/L in irrigation water results in receiving waters exceeding the criteria outlined in WTR-MM-6. The criteria outlined in WTR-MM-6 should be evaluated at individual monitoring wells beneath and downgradient of any fields that is irrigated with water containing greater than 10 mg/L nitrate as N on a quarterly basis.

9. Bates page 4-75: MRP Section IV. Notifications, third to last sentence, insert underline text:

The Discharger shall provide notification by telephone or e-mail correspondence if the normal or average flow rate <u>or number of extraction locations</u> for that time of year is significantly changed for longer than 5 consecutive days or more than half the amount of days in a calendar month.

10. Bates page 4-108: EIR Mitigation Monitoring Reporting Program, first sentence in first bullet under "Groundwater Drawdown Monitoring", delete strikeout text:

PG&E will conduct an initial monitoring of groundwater levels and water quality in all domestic and agricultural wells (wherever allowed by well owners) within one-half mile downgradient or cross-gradient of any existing or proposed groundwater extraction well upon approval of a new order allowing expanded remediation.

11. Bates page 4-222: Second to last sentence of first paragraph, insert underline text:

Given the substantially longer times with pump and treat (aka aboveground treatment), and the importance of addressing the high-level plume concentrations for returning beneficial uses of the aquifer, exclusive use of aboveground treatment for addressing the high concentrations was rejected as an alternative.

12. Bates page 4-225: First paragraph, insert underline text:

As identified in the Final EIR (Volume II, Section 3.1.9), the Water Board will include requirements in the new CAO and/or associated WDRs issued to PG&E to monitor nitrate levels for one year before creating new agricultural treatment units (or concurrent if necessary to avoid remediation delay), monitor at the start of new agricultural treatment, and continue monitoring during implementation of all new agricultural treatment units.

13. Bates page 4-227: Second to last sentence of second paragraph, insert underline text:

Given the substantially longer times with pump and treat (aka aboveground treatment), and the importance of addressing the high-level plume concentrations for <u>returning</u> beneficial uses <u>of the aquifer</u>, exclusive use of aboveground treatment for addressing the high concentrations was rejected as an alternative.

14. Bates page 4-9: Insert underline text, delete strikeout text:

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