NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, CA 95812-3044

From: Department Of Toxic Substances Control
Geology, Permitting & Corrective Action Branch
5796 Corporate Ave
Cypress, CA 90630

Project Title: PG&E TOPOCK COMRESSOR STATION SITE:
Installation of Conveyance Piping and Power Supply for Extraction Well PE-1

Project Location – Specific: Approximately 15 miles southeast of Needles, California

Project Location – City: Unincorporated **Project Location – County:** San Bernardino

Description Of Project:

Pursuant to Chapter 6.5 of the California Health & Safety Code, the Department of Toxic Substances Control (DTSC) has approved a Corrective Action Work Plan[1, 2] submitted by the Pacific Gas and Electric Company (PG&E) that describes actions to be undertaken in a floodplain near the Topock Compressor Station site to prevent groundwater contaminated with hexavalent chromium from entering the waters of the Colorado River. Actions authorized to be undertaken pursuant to this approved Work Plan are summarized below.

- SPECIFIC FIELD ACTIVITIES:

– Submersible Pump Installation

Existing extraction well PE-1 will be equipped with a submersible pump capable of conveying up to 90 gpm extracted groundwater to the IM No. 3 treatment plant. The well pump will be installed within the well screen, approximately 79 to 89 feet below ground surface.

– Subsurface Concrete Well Vault Installation

The PE-1extraction well will be completed within a subsurface pre-cast concrete well vault (Well Vault #3). This vault is similar to that previously installed at TW-2D and TW-2S. The well vault is approximately 7 feet wide x 10 feet long x 7 feet deep to accommodate the underground double-wall conveyance piping and associated valves and fittings.

– Underground Piping and Electrical and Control Conduits Installation

Underground piping and electrical and control conduits will be connected to the well head to (1) convey extracted water from PE-1 to Valve Vault #1 on the MW-20 bench and (2) provide power and control for the pump and instrumentation. The alignment and profile for the piping and conduits that will be installed between the Well Vault #3 and Valve Vault #1 on the MW-20 bench is shown on Figure 1. The length of the alignment is approximately 500 feet. The alignment includes suggestions by BLM during site walks to avoid native vegetation (e.g., mesquite trees) and reduce the removal of non-native salt cedar that serves as potential nesting habit for the southwestern willow flycatcher.

– Instrumentation and Controls Installation

Extraction well PE-1 will be outfitted with instrumentation and controls that will include such items as:

- Water level indicators to monitor low water levels in the well to protect the pump.
- Pressure relief valve and pressure indicator inside the well vault to protect the pipe and allow operators to monitor pump performance.

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[1] *CH2M-HILL; Design Plan Conveyance Piping and Power Supply for Extraction Well PE-1,Topock Compressor Station Needles, California, July 2005*
[2] *DTSC; Conditional Approval of Final Design Plan, Conveyance Piping and Power Supply for Extraction Well PE-1, Pacific Gas & Electric Company, Topock Compressor Station,Needles, California, October 5, 2005*

- Pressure indicator, flow meter, and flow control valves inside Valve Vault #1 at the MW-20 bench.

– Construction Access and Work Limits

The staging area being considered for these activities is the north end of the MW-20 bench and would be approved by the agencies prior to its use. Construction materials will be stockpiled at the IM No. 3 treatment plant and/or the MW-20 bench and moved to the staging area as needed. Access to the floodplain would be from Park Moabi Road at the MW-35 cluster, similar to prior drilling and groundwater monitoring program access to the floodplain.

Due to the nature of the fine sandy soils in the floodplain, it is anticipated that a 50-foot-wide minimum right-of-way will be required to accommodate the trench, temporary soil stockpile, and access for materials and equipment. Existing vegetation that is within the trench excavation area will be removed. It is assumed that the trench excavation may be up to 20 feet wide, assuming one-half to 1 or shallower trench side slopes. Excavated soil will be stockpiled to avoid disturbing vegetation to the extent possible to complete the work. Figure 2 shows the alignment in relation to site vegetation. A biological and cultural monitor will be onsite to monitor the construction activities in the floodplain. The sequence of construction activities would be to grub the route and install and backfill the well vault. Trenching would be done in approximately 250-foot increments (between vaults), with the piping and conduits being joined together in the trench. Installing components in the vault could be completed concurrently with pipeline installation.

Name of Public Agency Approving Project: Department of Toxic Substances Control
Standardized Permitting & Corrective Action Branch
5796 Corporate Avenue
Cypress, CA 90630

Name of Person or Agency Carrying Out Project: Pacific Gas and Electric Company
6588 Ontario Road
San Luis Obispo, CA 93405

Exempt Status: *(check one)*

☐ Ministerial (PRC, Sec. 21080(b)(1); CCR, Sec. 15268)
☐ Declared Emergency (PRC, Sec. 21080(b)(3); CCR, Sec.15269(A))
✓ Emergency Project (PRC, Sec. 21080(b)(4); CCR, Sec.15269(b)(c))
☐ Categorical Exemption. State type and section number:
☐ Statutory Exemptions. State code number:
☐ General Rule (CCR, Sec. Sec. 15061(b)(3))

Exemption Title:
- PRC, Sec. 21080 (b)(4): Specific actions necessary to prevent or mitigate an emergency
- CCR, Sec. 15269 (c): Specific actions necessary to prevent or mitigate an emergency

Reasons Why Project is Exempt:

An Interim Measure (IM) is currently being implemented by PG&E to address hexavalent chromium in groundwater at the site. The IM consists of a groundwater extraction and treatment system that provides hydraulic control of the groundwater plume boundaries located near the Colorado River. Due to the influence of the Colorado River stage on groundwater levels, DTSC determined that extracting groundwater at a rate of approximately 130 gallons per minute (gpm) was necessary to maintain the stated goal of hydraulic control. To achieve this extraction rate, DTSC directed PG&E to install one deep extraction well (TW-2D) with a pumping capacity of 90 gpm, one shallow extraction well (TW-2S) with a pumping capacity of 40 gpm, and a monitoring well (MW-34-100) in the floodplain area of the Colorado River.

Despite preliminary successes achieved by the IM, recent samples collected on September 20, 2005 show that concentrations of hexavalent chromium in MW-34-100, located approximately 65 feet from the Colorado River, increased from 400 ppb to 675 ppb from when the well was installed in February 2005 (the California MCL for total chromium is 50 ppb). This suggests that hydraulic control of the contaminated groundwater is not being maintained. Compounding this problem, beginning in September 2005 and continuing through January 2006, Colorado River levels are expected to decline, requiring an increase in pumping rates in the deeper, more contaminated portion of the aquifer near MW-34-100 in order to maintain sufficient gradients away from the river. Immediate hook-up and operation of an existing extraction well (PE-1) installed in March 2005 in the floodplain area would provide an additional pumping capacity necessary to regain hydraulic control of the contaminated groundwater.

DTSC has determined that an emergency human and environmental health situation would occur if hexavalent chromium contaminated groundwater should enter the Colorado River and that the actions described in the approved Work Plan are being implemented to prevent this emergency situation from occurring.

Norman Shopay

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Lead Agency Contact Person — Phone #

Karen Baker — 10/5/05

DTSC Branch Chief Signature — Date

Karen Baker, CHG, CEG — Chief, Geology, Permitting & Corrective Action Branch

DTSC Branch Chief Name — DTSC Branch Chief Title

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