

Lahontan Regional Water Quality Control Board

October 4, 2013

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PG&E'S REQUEST TO CLARIFY USE OF HISTORICAL DATA IN DRAWING THE CHROMIUM PLUME BOUNDARY

As you requested during our previous technical meeting on September 13, 2013, I have evaluated your request to clarify the meaning of a particular requirement in a Cleanup and Abatement Order (CAO). Requirement I. in CAO R6V-2008-0002A4 states,

"The Discharger must define the extent of total and hexavalent chromium in the upper aquifer within the targeted areas of the Hinkley Valley shown on the chromium plume maps in the *Third Quarter 2012 Groundwater Monitoring Report and Domestic Well sampling Results*, the figure showing proposed well locations in the *July 9, 2012 Monitoring Well Installation Workplan*, and to locations in the Harper Dry Lake Valley where chromium has been detected in domestic wells above the maximum background levels."

A specific part of Requirement I. is C.2.h. that states:

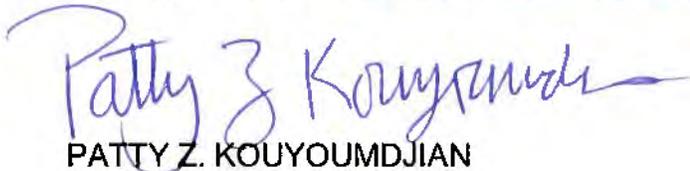
"If PG&E believes that chromium data in groundwater is not related to its historic chromium discharges and should not be drawn in the plume boundary, it must use data collected within the past three years to make its argument."

The CAO, specifically, Requirement I.C.2.h, is not intended to restrict PG&E from using only data collected in the previous three-year period. PG&E may use any relevant historic and recent ("recent" defined as data collected within the previous three years) data to evaluate the chromium plume boundary. This requirement is intended for PG&E to not exclude recent data from consideration. PG&E must evaluate recent data in the context of all relevant data. In the event PG&E concludes recent data is not warranted, PG&E must demonstrate why recent data is not pertinent. PG&E may use all relevant data, including data older than three years old, but should explain the relevancy of any data used in defining the extent of total and hexavalent chromium in groundwater.

Sheryl Bilbrey

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If you have any questions, please contact Richard Booth, Senior Engineering Geologist, at (530) 542-5574 or RBooth@waterboards.ca.gov.



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EXECUTIVE OFFICER

cc: PG&E Hinkley Lyris List

RWB/adw/T: PG&E 3-year data clarify