

## Lahontan Regional Water Quality Control Board

July 11, 2013

Sheryl Bilbrey  
Director, Chromium Remediation  
Pacific Gas and Electric Company  
111 Almaden Road  
San Jose, CA 95113

### **FOLLOW-UP ON MAY 16, 2013 EMAIL REGARDING REQUIREMENTS TO PROVIDE REPLACEMENT WATER TO WELLS WITHIN ONE-MILE OF WELLS EXCEEDING 3.1 µg/L HEXAVALENT CHROMIUM OR 3.2 µg/L TOTAL CHROMIUM THAT ARE OUTSIDE OF THE CONTIGUOUS PLUME**

In late May 2013, I received a telephone call from your representatives, objecting to an assertion made by the Lahontan Water Board staff about PG&E's obligation to provide replacement water to property owners on the eastern side of the plume, within one-mile of monitoring well (MW) 145S. In a May 16, 2013 email to PG&E, Lahontan Water Board staff asserted that property owners within one-mile cross gradient or downgradient from any monitoring well that is over 3.1 micrograms per liter (µg/L) hexavalent chromium or 3.2 µg/L total chromium must be added to the replacement water program. After reviewing the existing orders, including the 2011 Whole House Replacement Water Cleanup and Abatement Order (Replacement Water CAO; R6V-2011-0005A1), and the 2012 amendment (R6V-2011-0005A2) to that order, I agree with your conclusion that PG&E is not obligated to provide water to those households under the requirements of the existing orders.

The original Replacement Water CAO defined "affected area" to include all domestic wells within one mile downgradient or cross-gradient from the 3.1 µg/L hexavalent chromium plume, and that the 2012 amended Replacement Water CAO did not change the definition of "affected area," but specifically states that it would continue to "include all domestic wells located laterally within one mile downgradient or cross-gradient from the **contiguous**, including contiguous areas depicted with dashed lines, 3.1 µg/L hexavalent chromium or 3.2 µg/L total chromium plume boundaries..." (2012 Replacement Water CAO amendment, Finding 4). Footnote 2 of the 2012 Replacement Water CAO amendment was not intended to change the definition of the affected area, and that the footnote says nothing about adding non-contiguous wells to the CAO requirements. MW-145S is outside of the contiguous plume. The distance between MW-145S and the nearest well within the plume is approximately 4,200 feet, which exceeds the 2,600 feet that PG&E is required to use to connect monitoring wells having chromium concentrations of 3.1 µg/L hexavalent chromium or 3.2 µg/L total chromium or greater, defining the contiguous plume boundary.

In review of the applicable orders, which include the 2011 Replacement Water CAO, the 2012 amendment to that Order, and R6V-2008-0002-A4, which requires that plume boundary lines be drawn to connect monitoring wells within one-half mile of any other monitoring well having chromium concentrations above 3.1 µg/L hexavalent chromium or 3.2 µg/L total chromium, I agree that by the terms of our orders, PG&E is only required to provide replacement water to those with detections of chromium within one-mile of the contiguous plume, and that MW-145S is not part of the contiguous plume. Not only is this consistent with the terms of the orders, but upon further investigation, is also consistent with how PG&E has been implementing its replacement water program in the past. I would, however, encourage you to use your resources, where able, to address the community's concerns about their water supply.

If you have any questions or concerns about my conclusions, please contact Doug Smith, Richard Booth, or the board's counsel, Kim Niemeyer.



PATTY Z. KOUYOUMDJIAN  
EXECUTIVE OFFICER

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Hinkley Community Advisory Committee  
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T: PGE Replacement Water for eastern side