October 10, 2013

Patty Kouyoumdjian
Executive Officer
California Regional Water Quality Control Board
Lahontan Region
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150

Re: REQUEST FOR PUBLIC COMMENTS-MODIFICATION OF WHOLE HOUSE REPLACEMENT WATER PROGRAM CLEANUP AND ABATEMENT ORDER R6V-2011-005A2

Dear Executive Officer Kouyoumdjian:

The Hinkley Community Advisory Committee (CAC) has been committed to providing input to the Lahontan Regional Water Board (Water Board), Pacific Gas and Electric (PG&E), and the Hinkley community for the past 27 months regarding issues related to the remediation of the Hexavalent Chromium Plume that was caused by PG&E's historic discharge of wastewater from their cooling towers into unlined ponds between 1952 and 1966. The CAC would like the Water Board to know that we have reviewed PG&E's request to modify the Whole House Replacement Water program that was dated September 3, 2013 and have the following comments.

In October 2011, the Water Board ordered PG&E to provide replacement water to persons in the Hinkley area whose domestic wells contain levels of hexavalent chromium that exceeded 3.1 ug/L due to PG&E's discharge. PG&E was also required to submit a methodology to determine if levels of hexavalent chromium in individual domestic wells below 3.1 ug/L that are within one mile from the delineated plume were due, in part, to its discharge (section 3.a. of CAO R6V-2011-0005A1). In a letter dated April 16, 2012 from PG&E to the Water Board, PG&E detailed plans to implementing a Voluntary Whole House Replacement Water Program in order to be in compliance with CAO R6V-2011-0005A1 but only if section 3.a. of CAO R6V-2011-0005A1 was suspended. PG&E gave the reasoning that if they were providing whole house water that met non detect standards to everyone within 1 mile of the 3.1 ug/L plume boundary who had a detect of hexavalent chromium in their domestic well then there was no need for section 3.a. because anyone who was drinking water from their domestic well with a detect of hexavalent chromium would now be provided with whole house water that met non detect standards. Within the April 16th letter, PG&E also stated "PG&E's Whole House Replacement Water Program will be offered until the State of California has adopted a drinking water standard specifically for chromium 6 or for up to 5 years at which time the program will be evaluated to allow for the consideration of all existing data and results of any new studies relating to background and/or remediation." On June 7, 2012, CAO R6V-2011-0005A2 was ordered which essentially suspended section 3.a.

of CAO R6V-2011-0005A1 as long as PG&E implemented their voluntary Whole House Replacement Water Program.

At the time when CAO R6V-2011-0005A2 was ordered, the CAC did not agree with the Water Board in suspending section 3.a. of CAO R6V-2011-0005A1. However, the CAC did have faith that maybe PG&E's voluntary program would be the best solution to expeditiously address community concerns that exist regarding domestic well water supplies. The CAC and the community accepted PG&E's plan and would like PG&E to stick to the plan that they proposed. PG&E agreed to and stated "PG&E's Whole House Replacement Water Program will be offered until the State of California has adopted a drinking water standard specifically for chromium 6 or for up to 5 years at which time the program will be evaluated to allow for the consideration of all existing data and results of any new studies relating to background and/or remediation". It has not been 5 years since the program started and the State of California has not yet adopted a drinking water standard specifically for chromium 6. It has only been 14 months since the program was ordered and the State has only released a draft drinking water standard specifically for chromium 6 which could change before the State adopts the standard.

PG&E should not be allowed to use a draft drinking water standard for reasons to modify any parts of the remediation of the Hinkley area. In a letter dated November 23, 2011 from PG&E to the Water Board, PG&E stated "PG&E believes that the current background level for hexavalent chromium of 3.1 ppb, in the absence of a new peer reviewed background study, is the only appropriate concentration to compare to for determining impacts. California regulations support this assertion. As provided in 23 CCR section 2550.7 (e), when a background study is performed that produces a 95 percent upper tolerance limit (UTL) – as was the case with the Hinkley background study – monitoring data are to be compared to the UTL, rather than to some other parameter for background. Further clarification is given by 23 CCR section 2550.7 (e)(8)(C), which provides that the value for each constituent of concern or monitoring parameter at each monitoring point is compared to the upper tolerance or prediction limit." This statement made by PG&E should confirm that any cleanup or mitigation that they need to do in the Hinkley area should be based on a 95% UTL number which is currently 3.1 ppb unless they can come up with a new 95% UTL number which is currently underway with the help of Dr. Izbicki from the USGS.

Also, within CAO R6V-2011-0005A2 under section 4, the affected area of the Whole House Replacement Water Program was defined. Section 4 states "The affected area will continue to be defined 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 ug/L hexavalent chromium or 3.2 ug/L total chromium plume boundaries based upon monitoring well data drawn in the most current quarterly site-wide groundwater monitoring report submitted by PG&E" and there is also a footnote after this sentence that states "PG&E's quarterly site-wide groundwater monitoring report identifies all detections of hexavalent chromium above 3.1 ug/L in monitoring wells that are not contiguous to the main portion of the plume and either

proposes additional data collection to determine its source or presents data to support a conclusion regarding potential impact from PG&E's discharge." The footnote points out some terminology that is used interchangeably in some CAO's. The terminology that is used in the footnote is "not contiguous to the main portion of the plume" however in other CAO;s the "main portion" terminology is usually referred to as the "core". This can sometimes be confusing to the reader but really has nothing to do with defining the "contiguous areas" of the plume.

On January 8, 2013 the Lahontan Water Board issued CAO R6V-2008-0002-A4 which states "the chromium plume continues to be undefined to the east and north of the core plume area" but also sets out how the ***contiguous*** plume is to be drawn. CAO R6V-2008-0002-A4 states "plume boundary lines be drawn to connect any monitoring well located within one-half mile (2,600 feet) of any other monitoring well having chromium concentrations of 3.1 ppb chromium 6 or 3.2 ppb total chromium." The CAC has interpreted this definition to mean that if there are more than one monitoring wells within one-half mile of each other and have chromium concentrations of 3.1 ppb chromium 6 or 3.2 ppb total chromium, then these monitoring wells will be drawn with a contiguous plume. This contiguous plume in no way has to be connected to the "core" plume. An example of a contiguous plume on the second quarter 2013 plume map would be the contiguous plume drawn around MW-151S and MW-145S in the east and also the contiguous plume drawn around MW-163S, MW-160D, and MW-159S in the west. The circle drawn around MW-115D in the east would not be considered a contiguous plume because the plume is only drawn around one well and not more than one wells. Based on the definition and rules on how to draw a contiguous plume from CAO-R6V-2008-0002-A4, the CAC believes that the affected area should 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 ug/L hexavalent chromium or 3.2 ug/L total chromium plume boundaries based upon monitoring well data drawn in the most current quarterly site-wide groundwater monitoring report submitted by PG&E and the Water Board should ***not*** be defining the contiguous plume as the "core" or "main portion" of the plume. There are also two domestic wells in the east that have chromium 6 detections above 2ppb which may be indicative of the threatened chromium discharge. These wells are 36-26 and 30E-06.

The CAC would also like to remind the Water Board that in June 2011 PG&E submitted information showing that domestic well 34-65, at address 21928 Community Blvd. had a hexavalent chromium detection of 3.3 ppb. Subsequent detections of hexavalent chromium concentrations exceeding the maximum background level throughout 2011 put the property into the Domestic Well Sampling Program. Concurrently, PG&E presented information to Water Board staff that indicated the well location appeared to be in the upgradient groundwater flow direction and the chromium detection was likely an anomalous situation of natural chromium. For these reasons, Water Board staff verbally concurred with the conclusion that chromium in the well 34-65 ***did not*** appear to be associated with historical releases at the compressor station. Since then, however, groundwater monitoring reports list three additional domestic wells in the same vicinity

as well 34-65 having hexavalent chromium concentrations exceeding the maximum background level. These monitoring reports contain no data or potentiometric map with an interpretation of "upgradient" groundwater flow. Based upon the newer groundwater monitoring data near domestic well 34-65, Water Board staff was ***no longer convinced*** that these are anomalous detections of natural chromium in an upgradient groundwater flow direction.

In summary, the CAC believes that PG&E's request as submitted should be denied in its entirety. If PG&E would like to modify their program then section 3.a. from CAO R6V-2011-0005A1 needs to be in play and not suspended in the modified program. If PG&E would like to change the 3.1 ppb boundary and buffer to a new 95% UTL number then the CAC is willing to change the boundary only after Dr. Izbicki from the USGS is allowed to complete the study needed to provide the new 95% UTL number. The new 95% UTL number should only be based on science and not a draft drinking water standard that has not even been finalized. The CAC also strongly believes that the affected area should be defined as written and the Water Board should not be defining the contiguous plume as the "core" or "main portion" of the plume.

Sincerely,

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cc: CAC Members
IRP Manger & Staff