Appendix A
Responses to Comments
Response to Comment S2-1(RS_101805_4)

DTSC RESPONSE: Comment Noted. PG&E is not required to address this comment at this time. The site history has been extensively researched by PG&E and a significant amount of information relating to facility operations has been compiled and documented in the draft RFI/RI Report. The compiled information provides a detailed account of chemical usage and waste disposal practices from the beginning of facility operation in 1951 through the present time. Sources used for the research include PG&E company records (for Topock and other compressor stations), interviews with current employees, reviews of information gained from interviews with former employees, and regulatory agency (DTSC, RWQCB, County, EPA, etc.) files.

With any project that dates back to 1951 it can be anticipated that some specific details and information may have been lost. However, the historic information collected by PG&E to date provides a reasonable and sufficient effort and understanding relative to general chemical category usage and waste disposal practices at the PG&E Topock Compressor Station for the purposes of identifying potentially affected areas and contaminants of concern, and the development of conceptual site models. Continued additional historic research would be repetitive and may introduce unnecessary delays into the RFI/RI process, and it most likely would produce little if
any additional significant information. It is also likely that any additional information (e.g., identification of chemical class and volume) would not significantly alter the overall basic understanding of site history or significantly aid in the identification and assessment of potentially contaminated areas. In addition, any uncertainties with respect to the types of potential contaminants will not significantly alter the overall identification or assessment of Areas Of Concern (AOCs).

PG&E has made a best faith effort to provide a study that meets the standard level of care prescribed for the development of site history and the documentation of chemical usage and waste management practices associated with Resource Conservation Recovery Act (RCRA) RCRA Facility Assessment (RFA)/RCRA Facility Investigation RFI and CERCLA Preliminary Assessment (PA)/Site Assessment (SI)/Remedial Investigation (RI) programs. Additional historical documentation is not warranted at this time and would not materially assist or improve the Site History section of the draft RFI/RI.

PG&E shall complete the RCRA RFA questionnaire and sign the certification provided in the DTSC letter dated January 6, 2006. A copy of the completed questionnaire and executed certification shall be placed in an Appendix of the Revised Site History Section.

PG&E RESPONSE: PG&E reviewed the few historical files not available at the time of the 2005 RFI and conducted additional interviews with former employees. Only limited additional information was identified. This information is reflected in Sections 3.0 through 5.0. Detailed information regarding specific chemicals used and specific quantities and disposal locations for each potential waste stream is not available. A new table has been included in Section 3.0 that summarizes available historic information regarding volumes of chemicals purchased and/or stored.

DTSC RESPONSE to Comment S2-2

Comment Noted. PG&E is not required to address this comment at this time. DTSC has deferred response to this comment to a future date since the comment does not relate to the site history section of the RFI. In accordance with DTSC’s instructions and direction, PG&E was directed to establish an initial data cut-off-date of June 2004 for the RFI. Otherwise no defined data end point could be established since data continues to be collected on a frequent and regular basis. DTSC anticipates establishing a new RFI data cut-off-date in April 2006 for groundwater, surface water, pore water and river sediment data to be included into Volume 2 and March 30, 2007 for the soil data to be included into Volume 3. These dates will be identified in future written correspondence from DTSC to PG&E.

PG&E RESPONSE: No response required.
Comment noted. PG&E is not required to address this comment at this time. The RFI/RI Report provides a reasonable level of information on the entire facility and identified chemicals of concern in addition to those listed in the Corrective Action Consent Agreement (CACA).

PG&E RESPONSE: No response required.

Response to Comment S2-12(RS_110105_52)

DTSC will defer a response to this comment to a future date. PG&E is not required to address this comment at this time. Response to comment is deferred to Volumes 2 and 3. For additional information see response to comment S2-1.

PG&E RESPONSE: No response required.

Response to Comment S2-13(RS_110105_54)

PG&E shall revise the text to indicate that a Human and Ecological Risk assessment will be prepared as was previous required by DTSC.

PG&E RESPONSE: The following text has been added “A human health and ecological risk assessment will be prepared as a stand-alone document following completion of the soil investigation program.”
Response to Comment S2-14(RS 110105 55)

Comment noted. PG&E is not required to address this comment at this time. Applicable Relevant and Appropriate Requirements (ARARs) will be identified in a separate document that will be prepared by DTSC.

PG&E RESPONSE: No response required.
Response to Comment S2-15(RS 110105 56)

DTSC RESPONSE: PG&E shall include any information on other properties in the immediate vicinity that are owned or leased to PG&E (if any exist).

PG&E RESPONSE: The additional information has been included as requested.

Response to Comment S2-16(RS 110105 57)

DTSC RESPONSE: PG&E shall provide additional clarification in the text that the values are based on distance from the facility.

PG&E RESPONSE: The clarification has been made as requested.
Response to Comment S2-17(RS_110105_58)

DTSC RESPONSE: Comment noted. PG&E is not required to address this comment at this time. The report does include a complete regulatory history in Section 3. The level of effort and inclusion of all historic and current permits is not warranted as these permits are not likely to provide any substantive information that is not already identified.

PG&E RESPONSE: No response required.

DTSC RESPONSE: PG&E should provide additional clarification related to the statement "hazardous substances" that this is taken directly from RCRA guidance documents, while the statement regarding "hazardous waste and constituent releases" is taken directly from the CACA.

PG&E RESPONSE: The text in Section 1.2 has been revised and streamlined to clarify the regulatory framework for the project, and the requirements of the RCRA Corrective Program (and CERCLA) are described in Table 1-1.

Response to Comment S2-18(RS_110105_59)

DTSC RESPONSE: PG&E shall address this comment by including information on why the facility is being addressed under RCRA.

PG&E RESPONSE: See response to second comment under comment S2-17.
DTSC RESPONSE: PG&E shall address this comment. The text shall be clarified and revised to be consistent.

PG&E RESPONSE: The text in both sections has been streamlined and clarified to refer to the requirements of the CACA.
Response to Comment S2-21(RS_110105_62)

DTSC RESPONSE: Comment Noted. PG&E is not required to address this comment at this time. DTSC assumes that soil removal could and probably will be one likely alternative for evaluation.

PG&E RESPONSE: No response required.

Response to Comment S2-23(RS_110105_64)

DTSC RESPONSE: PG&E shall address this comment. Please note that the objectives are taken directly from the CACA; however, PG&E shall revise the wording to indicate that an area larger than just the compressor station will be addressed. Reference to the Area of Potential Effect (APE) as determined by BLM should be incorporated with an appropriate reference figure that identifies the APE. Include a discussion of the purpose and definition of the APE.

PG&E RESPONSE: The text has been changed to refer to the Topock Compressor Station site.

Response to Comment S2-24(RS_110105_65)

DTSC RESPONSE: PG&E shall address this comment. Additional information on the CWG shall be provided and the time period shall be better defined.

PG&E RESPONSE: Per direction from DTSC, Section 1.4 has been streamlined, and the reader is referred to the Public Participation Plan for detailed information. This change has not been made.
Response to Comment S2-25(RS_110105_66)
DTSC RESPONSE: PG&E shall address this comment. The text will be revised to state that the CWG has a responsibility to participate and provide meaningful input as an advisory resource to DTSC. DTSC is sole and final decision making authority as the lead regulatory administering agency.

PG&E RESPONSE: Per direction from DTSC, Section 1.4 has been streamlined, and the reader is referred to the Public Participation Plan for detailed information. The text was clarified to indicate that DTSC is the sole decision-making agency with respect to RCRA and that the CWG is an advisory group.

Response to Comment S2-26(RS_110105_67)
DTSC RESPONSE: PG&E shall address this comment. The section shall be updated as requested.

PG&E RESPONSE: Per direction from DTSC, Section 1.4 has been streamlined, and the reader is referred to the Public Participation Plan for detailed information.
Response to Comment S2-27(RS 110105 68)

DTSC RESPONSE: PG&E shall address this comment and update the text

PG&E RESPONSE: Per direction from DTSC, Section 1.4 has been streamlined, and the reader is referred to the Public Participation Plan for detailed information. This change has not been made.
Response to Comment S2-28(RS_110105_69)
DTSC RESPONSE: Comment Noted. PG&E is not required to address this comment at this time. Documents referenced in the RFI/RI have been provided in hardcopy and placed in several central locations. Providing these documents on CD to CWG members may be considered in the future.

PG&E RESPONSE: No response required.

Response to Comment S2-29(RS_110105_70)
DTSC RESPONSE: Comment Noted. PG&E is not required to address this comment at this time. The Website will be continually updated. However, this activity is not part of the RFI/RI.

PG&E RESPONSE: No response required.
Response to Comment S2-30(RS_110105_71)

DTSC RESPONSE: PG&E shall address this comment and update the text to better define the study area in future documents. The remaining editorial comments may be incorporated as desired.

PG&E RESPONSE: The western extent of the study area has been clarified. A portion of the requested editorial changes have been incorporated.

DTSC RESPONSE: PG&E shall clarify that the text refers to RFI/RI work "completed to date".

PG&E RESPONSE: The text has been revised to refer to the relevant types of source documents only.
3.0 Facility Operations and History

The Topock Compressor Station began operations in December 1951 to compress natural gas supplied from the southwestern United States for transport through pipelines to PG&E's service territory in central and northern California. The compressor station is anticipated to remain an active facility into the foreseeable future. This section provides detailed information on the history of the facility.

3.1 Current and Historic Operations

Prior to construction of the compressor station in 1951, the area was mostly undeveloped land, though the Teapot Dome occupied a small portion of the property at the very north (Figure 3-1). It is unknown when the Teapot Dome was located on the property; it was present at the site in 1947, but any information prior to, or during construction of, the compressor station the property was not owned by the State or PG&E. The property was leased from the State in 1955, and PG&E subsequently made changes to the property.

The main structures at the facility include the compressor building, two underground tanks, and the generator building. Adjacent to these main structures are various auxiliary structures including an office, a warehouse, a vehicle garage, maintenance buildings, and a water treatment plant. Additional compressor equipment is stored in the main structures. The underground tanks at the facility that are used for storage of natural gas and water are located near the facility. The facility includes a compressor building and two underground tanks. These tanks were constructed to store natural gas for later use.

Depending on demand, the facility was designed to increase its associated changes in waste/waste-handling operations. Changes in gas processed and associated changes in waste/waste-handling operations need to be documented with appropriate citations. PG&E is not required to address this comment at this time. Underground tanks are discussed in detail in Section 3.1.5.1.

Information on changes in gas processed and associated changes in waste/waste-handling operations need to be documented with appropriate citations. PG&E is not required to address this comment at this time. Underground tanks are discussed in detail in Section 3.1.5.1.

Response to Comment S2-58(RS_101805_36)

DTSC RESPONSE: PG&E shall address this comment and update the historic ownership of the property with available information. The word "currently" shall be inserted as requested. Comment Noted. PG&E is not required to address this comment at this time. Underground tanks are discussed in detail in Section 3.1.5.1.

Information on changes in gas processed and associated changes in waste/waste-handling operations need to be documented with appropriate citations. PG&E is not required to address this comment at this time. Underground tanks are discussed in detail in Section 3.1.5.1.

No response required. See response to Comment S2-1.
DTSC RESPONSE: PG&E shall address this comment and update the text. PG&E shall determine if water derived from wells PGE-01 and PGE-02 was apparently used for all domestic purposes except drinking water and that domestic wastewater presumably was discharged to a septic system.

Comment Noted. PG&E is not required to address this comment at this time. The locations of wells PGE-01 and PGE-02 are shown on Figure 3-2.

The predominate water quality issue with wells PGE-01 and PGE-02 was TDS. PG&E shall revise the text as necessary.

PG&E RESPONSE: The text was updated as requested.

No response required.

The text was revised to indicate that the predominant water quality issue with wells PGE-01 and PGE-02 was TDS (high iron and chloride).
Response to Comment S2-60(RS_101805_6)

DTSC RESPONSE: PG&E shall address this comment and clarify and update the text. Statement regarding lime sludge disposal should read "1951 to 1962", not "1951 to 1961".

It is possible that other "names" may have been used for the Sludge Dry Beds; PG&E shall identify if possible.

Comment Noted. PG&E is not required to address this comment at this time. Since no citation for where the term "waste piles" is used. PG&E is not able to make an assessment whether the terms refer to the same or separate features.

PG&E has already performed a significant historical information search and have compiled sufficient chemical usage and waste disposal information to support the identification of potentially affected areas and contaminants of concern, and the development of conceptual site models. However, PG&E shall make a reasonable attempt to gather additional information on dry wells and cisterns, and on cartridge removal. See also the response to Comment S2-1.

PG&E RESPONSE: The text was revised as requested.

No other names for the sludge-drying beds were identified as part of the additional site history review.

No response required.

Available information suggests that cartridges were removed and regenerated starting in 1962 (when the cartridge system was put into service). This information has been included in the text. There is no information to suggest that dry wells or cisterns were used at the site.
Response to Comment S2-61(RS_101805_7)

DTSC RESPONSE: PG&E shall address this comment regarding “foreign Material” and update/clarify the text.

Comment Noted. PG&E is not required to address this comment at this time. Handling and disposal of scrubber waste (both pre- and post-1970) are discussed in Section 3.1.2.2.

PG&E shall address this comment to clarify that the fuel and oil storage area has been in the same location since the station was constructed in 1951.

PG&E shall address this comment and describe the chemical make up of TBM and THT.

PG&E has already performed a significant historical information search and have compiled sufficient chemical usage and waste disposal information to support the identification of potentially affected areas and contaminants of concern, and the development of conceptual site models. However, PG&E shall attempt to gather additional information on the incoming gas pipeline. See also the response to Comment S2-1.

PG&E RESPONSE: The discussion of pipeline liquids, including composition, source, and disposal, has been expanded and clarified (see Section 3.1.2.2).

No response required.
The text was revised as requested.
The text was revised as requested.
The pipelines have generally been in the same locations as they are today. No changes to the document are required.
Response to Comment S2-62(RS_101805_39)

DTSC RESPONSE: PG&E has already performed a significant historical information search and have compiled sufficient chemical usage and waste disposal information to support the identification of potentially affected areas and contaminants of concern, and the development of conceptual site models. However, PG&E shall make a reasonable attempt to identify the additional requested information. See also the response to Comment S2-1.

PG&E RESPONSE: Available information on the pipeline liquids tank has been added to the document (Sections 3.1.2.2 and 4.3.2).
Response to Comment S2-63(RS 101805 40)

DTSC RESPONSE: PG&E has already performed a significant historical information search and have compiled sufficient chemical usage and waste disposal information to support the identification of potentially affected areas and contaminants of concern, and the development of conceptual site models. However, PG&E shall make a reasonable attempt to respond to the additional requested information. See also the response to Comment S2-1.

PG&E RESPONSE: The text was revised (Section 3.1.2.2) to state that pipeline liquids currently collected at the drip points do come back to the facility prior to proper disposal. However, this does not expand the definition of the study area. Past disposal practices may have included the spraying of pipeline liquids on plant roads; this information is also provided in Section 3.1.2.2.

The text was revised to state that there has been no known record of waste disposal from offsite locations.
Response to Comment S2-64(RS_101805_8)

DTSC RESPONSE: PG&E has already performed a significant historical information search and have compiled sufficient chemical usage and waste disposal information to support the identification of potentially affected areas and contaminants of concern, and the development of conceptual site models. According to PG&E, available information on the Betz products has been provided. Sources include monitoring and inspection reports prepared by Betz, Betz product information sheets, and correspondence between Betz and PG&E. PG&E shall provide additional clarification in the text. See also the response to Comment S2-1.

PG&E RESPONSE: A new table, Table 3-3, has been added to the text that summarizes the limited information available regarding chemicals ordered and stored at the facility. The lack of any other information is explicitly stated in Section 3.1.3.7.
Response to Comment S2-65(RS_101805_41)

DTSC RESPONSE: PG&E has already performed a significant historical information search and have compiled sufficient chemical usage and waste disposal information to support the identification of potentially affected areas and contaminants of concern, and the development of conceptual site models. However, PG&E shall make a reasonable attempt respond to the additional requested information. See also the response to Comment S2-1.

PG&E RESPONSE: The processing and treatment of blowdown water is described in detail in the text (Section 3.1.3.8). The blowdown rate cannot be estimated. As is stated in the text, it varies daily, seasonally, and annually, depending on temperature, gas flow, additive efficiency, etc. No minimum or discharge rate or trend can be determined. It is not known how TDS ranges were determined; however, some historic laboratory data reports provide information that could be used in calculating TDS. The volume of sulfuric acid used is unknown. The sulfuric acid tanks have a capacity of 2,000 gallons. Chromium mass cannot be accurately estimated from the available data because chromium concentration data in the effluent are limited, and the actual concentration is likely to have varied extensively over time (see discussion in Section 3.1.3.7).
Response to Comment S2-66(RS_101805_9)

DTSC RESPONSE: Comment Noted. PG&E is not required to address this comment at this time. Section 3.1.4 clearly documents when and how blowdown was treated.

Poly Floc II and ferric sulfate were used to minimize particulate matter in the wastewater which was important while the injection well was being used. Once use of the injection was discontinued, the use of Poly Floc II and ferric sulfate was also discontinued (i.e., after 1974).

The Mittelhauser report (1986) contained copies of laboratory reports of blow down and wastewater samples collected in the mid 1970s. Mittelhauser used these data to identify contaminants of concern for the removal of the wastewater treatment facilities.

The RFI map does include the location of both oil/water holding tanks.

PG&E RESPONSE: To clarify, the only change made to the wastewater treatment process between 1969 and 1985 was the temporary use of Poly Floc II and ferric sulfate while the injection well was in use. The goal was to remove the maximum amount of particulates possible to avoid clogging the injection well. No changes are required to the text.
Response to Comment S2-67(RS_101805_10)

DTSC RESPONSE: PG&E shall address this comment indicating that the remainder of the wastewater was injected through PGE-08.

Pond closure citations shall be added.

PG&E shall clarify that little if any sludge was generated prior to 1969 since only a single-step treatment system was used. The single-step system converts Cr(VI) to Cr(III), but does not remove the chromium (i.e., precipitate).

The 1970 letter does not contain any information on where disposal was planned.

PG&E RESPONSE: The text has been changed as requested for the first two items.

No response is required for the other two items.
Response to Comment S2-68(RS_101805_29)

DTSC RESPONSE: PG&E has already performed a significant historical information search and have compiled sufficient chemical usage and waste disposal information to support the identification of potentially affected areas and contaminants of concern, and the development of conceptual site models. However, PG&E shall make a reasonable attempt to address the additional requested information. See also the response to Comment S2-1.

PG&E RESPONSE: Additional employee interviews indicate that some of the waste oil may have been sprayed for dust control on station roads. This information is provided in Section 3.1.5.2. No other new information was identified.
Response to Comment S2-69(RS 101805 11)

DTSC RESPONSE: PG&E has already performed a significant historical information search and have compiled sufficient chemical usage and waste disposal information to support the identification of potentially affected areas and contaminants of concern, and the development of conceptual site models. However, PG&E shall make a reasonable attempt to obtain the additional requested information. See also the response to Comment S2-1.

PG&E RESPONSE: Based on the available information, batteries were either returned to the manufacturer or Wiley Wrecking for salvaging. No additional information was identified.

Text was added to Section 3.1.5.2 to briefly discuss steam cleaning. Discharge from steam-cleaning area was routed to the oil/water separator.