

**PROPOSED**

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LAHONTAN REGION**

**AMENDED CLEANUP AND ABATEMENT ORDER  
NO. R6V-2008-0002-A4**

**WDID NO. 6B369107001**

**REQUIRING PACIFIC GAS AND ELECTRIC COMPANY  
TO CLEAN UP AND ABATE WASTE DISCHARGES  
OF TOTAL AND HEXAVALENT CHROMIUM TO THE  
GROUNDWATERS OF THE MOJAVE HYDROLOGIC UNIT**

San Bernardino County

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The California Regional Water Quality Control Board, Lahontan Region (Water Board), finds:

**Discharger**

1. The Pacific Gas and Electric Company owns and operates the Hinkley Compressor Station (hereafter the "Facility"), located at 35863 Fairview Road, Hinkley in San Bernardino County. For the purposes of this Order, the Pacific Gas and Electric Company is referred to as the "Discharger."

**Regulatory History**

2. On August 6, 2008, the Water Board issued Cleanup and Abatement Order (CAO) No. R6V-2008-0002 to the Discharger to clean up and abate the effects of waste discharges and threatened discharges containing hexavalent chromium and total chromium to waters of the State. The CAO required the Discharger to take additional corrective actions to contain chromium migrating with groundwater, to continue to implement groundwater remediation in the source area and central plume area, and to develop and implement a final cleanup strategy. The CAO also modified the monitoring and reporting program for permitted projects.
3. Paragraph 3 of the Order provisions of the CAO required the Discharger to contain the hexavalent and total chromium plumes to locations where hexavalent chromium was below the interim background level of 4 parts per billion (ppb) and the total chromium was below 50 ppb.
  - a. The Discharger was required to achieve containment of the hexavalent chromium plume in the ground water by December 31, 2008, using the Discharger's *Boundary Control Monitoring Program and Updated Site-Wide Groundwater Monitoring Program* (submitted July 2, 2008 and prepared by Secor International) as described in Finding 16 in the CAO.

- b. The Discharger was required to achieve containment of the total chromium plume in the ground water by December 31, 2008, also based on the *Boundary Control Monitoring Program and Updated Site-Wide Groundwater Monitoring Program* as described in Finding 16 in the CAO.
4. Paragraph 4 of the Order provisions of the CAO required the Discharger to continue implementing full-scale in-situ corrective actions in the source area and central area of the chromium plume, or an alternate but equally effective method, to remediate the elevated chromium concentrations in groundwater.
5. The CAO required the Discharger to clean up and abate the chromium plume to background levels and set an interim amount of 4 ppb. Amended Order No. R6V-2008-0002A1 (Amended Order No. 1), effective November 12, 2008, adopted average and maximum background levels for hexavalent chromium of 1.2 ppb and 3.1 ppb, respectively. The adopted average and maximum background levels in Amendment Order No. 1 for total chromium are 1.5 ppb and 3.2 ppb, respectively. These background levels were adopted for the purposes of establishing background water quality conditions to be used later to consider cleanup strategies and to support future decisions regarding cleanup levels. For plume containment, the level remained at 4 ppb for both hexavalent chromium and total chromium.
6. Amended Order No. R6V-2008-0002A2 (Amended Order No. 2), effective April 7, 2009, allowed lateral migration of the 4 ppb hexavalent chromium plume boundary east of the South Central Reinjection Area (SCRIA) from discharges to groundwater piped from extraction wells in the northwest plume area. Lateral plume expansion of 1,000 feet was allowed as long as it could be shown that the chromium would be captured by the existing groundwater extraction system in the downgradient flow direction.
7. Amended Order No. 3 R6V-2008-0002A3 (Amended Order No. 3), effective March 14, 2012, revised Paragraph 3 described above in Finding No. 3 by requiring the Discharger to contain the hexavalent and total chromium plumes of 3.1 ppb and 3.2 ppb, respectively, to locations south of Thompson Road. In addition, it required that the Discharger take all practicable actions to extract the hexavalent and total chromium plumes north of Thompson Road where concentrations exceeded 10 ppb.
8. On April 9, 2008, the Water Board adopted General Waste Discharge Requirements (Board Order No. R6V-2008-0014) for the Hinkley chromium contamination to facilitate groundwater remediation. Board Order No. R6V-2008-0014 allows the discharge of various products to facilitate cleanup of groundwater contamination in the area from the Compressor Station in the south to almost Thompson Road in the north. To be authorized to initiate discharge, the Discharger must submit a Notice of Intent describing the proposed remedial project and discharges to land and/or groundwater. Following a public comment period, the Executive Officer was

authorized to issue a Notice of Applicability (NOA) that allow the discharge or discharges and prescribed an appropriate monitoring and reporting program.

9. On April 7, 2009, the Water Board Executive Officer issued an NOA allowing the Discharger to implement the South Central ReInjection Area (SCRIA) and Northwest Freshwater Injection project (NWFJ). The SCRIA project involves the pumping of up to 110 gallons per minute (gpm) of chromium-contaminated groundwater from up to six extraction wells in the northwestern plume area. Groundwater is piped southward, amended with ethanol, and discharged into injection wells in the SCRIA. The project intent was to hydraulically contain plume migration in the northwestern plume area and to reduce chromium injected to the SCRIA from the dissolved hexavalent form Cr(VI) to the solid form Cr(III). The SCRIA project began discharges to groundwater in October 2009. But beginning in early 2011, discharges were scaled back to 55 gpm when monitoring data indicated that plume spreading described in Finding No. 6 threatened to exceed the 1,000 feet distance allowed on the southeastern boundary.

#### **Undefined Chromium Plume in Upper Aquifer**

Pursuant to orders from the Water Board, the Discharger has undertaken multiple investigations for defining the chromium plume in the upper aquifer to background levels. The document *Second Quarter 2012 Groundwater Monitoring Report* describes the results of groundwater and domestic well sampling during April to June 2012. A map in the report shows the extent of chromium in groundwater at concentrations exceeding background levels as being greater than 5 miles in length and about 2 miles in width. In a majority of cases where new monitoring wells have been installed, detected chromium concentrations exceed those in nearby domestic wells by up to four times.

The quarterly report shows that the chromium plume continues to be undefined to the south, east, and north of the plume core area. Further investigations are needed to assess the chromium plume and assess groundwater flow in the upper aquifer in order to evaluate threats to beneficial uses and to plan future corrective actions.

10. On July 9, 2012, the Discharger submitted a workplan to install additional wells for chromium plume definition. The workplan, prepared by Stantec, proposed installing wells at eight locations in the northern plume area by the Hinkley Gap. Monitoring well pairs and triplets are being proposed to monitor for the evidence of chromium. The proposed well locations however are not adequate to fully define the chromium plume boundaries at monitoring points within one-quarter mile of other monitoring locations or the prior plume boundary. In addition, the workplan does not account for domestic wells containing chromium concentrations at 2.0 ppb or greater, which may be indicative of the threatened chromium discharge. While the workplan does not state reasoning for large gaps in sampling locations, PG&E has stated in the

past its inability to gain access to certain private property. A revised workplan is being requested by Water Board staff.

11. On July 30, 2012, the Discharger submitted the Second Quarter 2012 Groundwater Monitoring Report and Domestic Well Sampling Results document. The document confirmed first quarter 2012 monitoring well sampling results for chromium in the northern-most plume area at the Hinkley Gap. Southeast of the Hinkley Gap, monitoring well MW-154S1 increased in hexavalent chromium concentration to 12.1 ppb in second quarter from 10.0 ppb in first quarter 2012. Northwest of the Hinkley Gap, monitoring well MW-130S1 contained 5.0 ppb Cr(VI) and 5.7 ppb Cr(T) during second quarter 2012. Groundwater data indicate that chromium concentrations in groundwater north of the Hinkley Gap continue to contain chromium levels exceeding maximum background levels, suggesting that the plume boundary is undefined heading northwest into the Harper Dry Lake Valley (also called Water Valley). Furthermore, monitoring well data in the document show that 95 percent of the 16 monitoring well locations north of Salinas Road in the northern plume area contained higher chromium concentrations compared to chromium concentrations in nearby domestic wells (within one-quarter mile). At these same locations, chromium concentrations exceed maximum background levels 62 percent of the time compared to nearby domestic wells showing chromium at concentration of 2.0 ppb or greater. The document does not include a potentiometric map using water table elevation data showing an interpreted groundwater flow direction in the upgradient and downgradient directions.
12. An August 20, 2012 Technical Memorandum by the Discharger cites groundwater investigation activities during the first six months of the year. The Memorandum contains a map showing that the Discharger was unable to gain access to private property for installing additional monitoring wells at five of the eight locations proposed in the July 9, 2012 workplan. Furthermore, the map shows that the Discharger was also not able to gain access to an additional six private properties, as proposed in the September 1, 2011 Groundwater Investigation Report. These latter well locations are needed to define the northern chromium plume along the western and eastern boundaries, while the former well locations were proposed to define the northern plume extent.
13. Subsequent data submitted by the Discharger on September 18, 2012 shows that chromium in domestic wells exceed the maximum background levels along Hinkley Road, 1.6 miles north of MW-130S1 in the Harper Dry Lake Valley. Water samples contained 4.0 ppb Cr(VI) and 3.8 ppb Cr(T) in the domestic well at 41717 American Avenue. Additionally, water samples from the domestic well at 42584 Hinkley Road contained 4.6 ppb Cr(VI) and 4.3 ppb Cr(T). These detections confirmed chromium results taken by private owners and submitted to the Water Board. Monitoring wells are necessary along the distance from MW-130S1 to the latter residence to define the chromium plume in the Harper Dry Lake Valley, which exists at a lower elevation than the Hinkley Valley, influencing groundwater flow.

14. Lahontan Water Board has evidence to show that PG&E let chromium impacts to groundwater migrate unchecked for more than 30 years and then migrate during the next 21 years during intermittent plume containment actions. Consistent hexavalent chromium detections along the length of the plume from the compressor station to the northernmost monitoring well (MW-154S1) in the Hinkley Valley showing 12.1 ppb is, in all likelihood, associated with the Discharger's historical releases (except where those monitoring wells are affected by remedial actions that have acted to decrease chromium concentrations). Along that same line of logic, hexavalent chromium detected at 6.2 ppb in MW-130S1, located in the southeast area of the Harper Dry Lake Valley and downgradient of the Hinkley Valley, is also likely related to the Discharger's historical releases.
15. This Order amends CAO No. R6V-2008-0002 to require the Discharger to define the entire chromium plume in the upper aquifer where it is still unknown. The Order includes requirements for chromium plume mapping and potentiometric maps showing groundwater flow direction in monitoring reports.

#### **Alternate Water Supply**

16. On January 7, 2011, the Water Board issued Cleanup and Abatement Order R6V-2011-0005 to the Discharger in response to the rising levels of hexavalent chromium detected in Hinkley domestic wells. This Order required that PG&E provide interim uninterrupted replacement water, such as bottled water, to residences and businesses in which hexavalent chromium had been detected at concentrations exceeding 3.1 ppb or total chromium had been detected at 3.2 ppb.
17. Amended Order R6V-2011-0005A1, effective October 11, 2011, required the Discharger, in part, to provide whole house replacement water to those served by domestic wells that are within the affected area and determined to be impacted by its discharge. Amended Order R6V-2011-0005A2, issued June 7, 2012, suspended the requirements in Paragraph 2 of the first Amended Order for having the Discharger determine if the hexavalent chromium at levels above non-detect in a domestic well was due to its discharge. Instead, the second Amended Order accepted the Discharger's April 9, 2012 Feasibility Study offering whole-house replacement water to all domestic wells owners with detectable levels of hexavalent or total chromium.
18. In June 2011, the Discharger submitted information showing that domestic well 34-65, at address 21928 Community Boulevard, 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, the Discharger 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.

19. Based upon the newer groundwater monitoring data near domestic well 34-65, Water Board staff is no longer convinced that these are anomalous detections of natural chromium in an upgradient groundwater flow direction. Because the Discharger has offered bottled water and whole-house water replacement supply to the owners of the properties of the three additional domestic wells having the recent chromium detections without any explanation why these well locations are different from well 34-65, these items must also be offered to the property owner of well 34-65. Therefore, hexavalent chromium concentrations exceeding the maximum background level in well 34-65 are considered valid detections and the property must be added to the program of affected domestic wells eligible for bottled water and whole house replacement water. The Discharger may provide additional information to support its conclusion and the Water Board staff may reconsider its current position.

#### **Expansion of Chromium Plume Boundary**

20. Chromium in groundwater downgradient of the Facility continues to adversely affect groundwater quality.
21. This Order amends CAO No. R6V-2008-0002A2 to allow additional lateral migration of the 3.1 ppb (previously 4 ppb) hexavalent chromium eastern plume boundary during implementation of cleanup projects in other areas of the chromium plume. This action will enable the Discharger to resume groundwater extraction in the northwestern plume area to the 110 gpm volume described in Finding No. 8. The additional plume expansion is not expected to adversely affect groundwater receptors, such as domestic wells. Corrective actions proposed by the Discharger are the only feasible methods available at this time until the Environmental Impact Report is certified and general waste discharge requirements are issued allowing additional options to the Discharger for disposal of chromium-contaminated groundwater.

#### **CEQA**

22. This enforcement action is being taken by this regulatory agency to enforce the provisions of the California Water Code, and as such is exempt from the provisions of the California Environmental Quality Act (Public Resources Code section 21000 et seq.) in accordance with California Code of Regulations, title 14, section 15321. The implementation of this CAO Amendment is an action to assure the restoration of the environment and is exempt from the provisions of the California Environmental

Quality Act, and in accordance with the California Code of Regulations, title 14, sections 15301 and 15303. The existing monitor well pairs and triplets and infrastructure are subject to section 15301 because there is negligible or no expansion of their existing uses.

## EFFECT OF PRIOR ORDERS

23. This Order amends CAO No. R6V-2008-0002. All findings in prior Orders of the Water Board not directly superseded by findings in this Order remain in effect. This Order shall not be construed to preclude enforcement against the Discharger for failure to comply with any requirement in any other Order issued by the Water Board.

**IT IS HEREBY ORDERED** that, pursuant to the Water Code sections 13267 and 13304, the Discharger shall clean up and abate the effects of the discharge and threatened discharge of chromium to waters of the State, and shall comply with the provisions of this Order:

### I. Alternate Water Supply

- A. **Within 7 calendar days of the date of this order**, the Discharger must provide interim water supply, such as bottled water, to the owner/tenant of domestic well 34-65 at address 21928 Community Boulevard in Hinkley.
- B. The Discharger must add the property owner of well 34-65 to its Voluntary Whole House Replacement Water Program (Program) and complete whole-house replacement water supply for all indoor uses by **August 31, 2013**.

### II. Chromium Plume Definition in the Upper Aquifer

The Discharger must define the extent of chromium in the upper aquifer within the targeted areas of the Hinkley Valley shown on the chromium plume maps in the Second Quarter 2012 Groundwater Monitoring Program, 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. **Within 28 calendar days of the date of this Order**, the Discharger must submit a workplan proposing sampling locations in the upper aquifer in the following areas that will allow for the definition of the chromium plume to at least maximum background concentrations of 3.1 ppb Cr(VI) and 3.2 ppb Cr(T) and to verify groundwater flow.

- Proposed monitoring well locations shall not exceed one-quarter mile distance from other monitoring wells in accessible areas.
- Eastern boundary: east of wells MW-115 and MW-145 on Dixie Road.
- Northern boundary: north of wells MW-154 and MW-130 to at least domestic well 21N-04 on Hinkley Road in the Harper Dry Lake Valley; west of Mountain View Road (north of Salinas Road); and east of Fairview Road extension (north of Sonoma Road).
- Within one-quarter mile radius of all locations where domestic wells contain concentrations of 2.0 ppb or greater for hexavalent or total chromium, with the exception of upgradient locations between Riverview Road and the Mojave River to the south.

The proposed sampling locations must be previously scoped to assure a reasonable probability of success in gaining access and likelihood of well installation or temporary groundwater sampling. The workplan shall discuss and mark on the map areas where previous attempts to gain access to private properties and desert tortoise habitat have been unsuccessful.

**B. By April 15, 2013**, the Discharger must submit a report that is able to define the extent of chromium in groundwater for hexavalent chromium and total chromium to at least the maximum background levels of 3.1 ppb and 3.2 ppb, respectively, and be able to determine the direction of groundwater flow. The report must contain the following additional information:

**1. Maps:**

- a. Extent of chromium in groundwater in the upper aquifer:
  - i. A map showing the maximum plume boundary throughout the uppermost saturated zone.
  - ii. A separate map showing the plume boundary in the lowermost saturated zone.
- b. Extent of chromium in groundwater in the lower aquifer:
  - i. A map showing the maximum plume boundary.
- c. Potentiometric map showing the groundwater flow directions and calculated gradients, along the length of the mapped chromium plume and beyond where water table data exist.

**2. Map Content:**

- a. Text font size on maps shall be 9 points or greater.
- b. Street names must be shown in black color to be easily legible.
- c. Location of all active supply wells used for remedial actions and the compressor station operations.
- d. Approximate location of the Lockhart Fault.
- e. Chromium boundary lines on plume maps must reflect the reported data for the maximum concentration in monitoring wells and extraction wells at all locations. Monitoring wells showing 3.1 ppb

Cr(VI) or 3.2 ppb Cr(T) must have plume lines drawn through the monitoring well.

- f. Plume boundary lines must show monitoring and extraction well concentration contours representing the maximum extent of the following: 1,000 ppb Cr(VI) or Cr(T), 50 ppb Cr(T), 10 ppb Cr(VI) or Cr(T), 3.1 ppb Cr(VI) or 3.2 ppb Cr(T). Plume boundary lines must be drawn to connect any monitoring well located within one-half mile (2,600 ft) of any other monitoring well having chromium concentrations of 3.1 ppb Cr(VI) or 3.2 ppb Cr(T) or greater. The dashed line representing the inferred chromium boundary of 3.1 ppb Cr(VI) or 3.2 ppb Cr(T) shall be a dark color so as to stand out.
  - i. Where access to private property or endangered species habitat has not been granted for six months or more, the chromium plume boundary shall be drawn around any domestic well containing chromium concentrations exceeding 3.1 ppb Cr(VI) or 3.2 ppb Cr(T) for at least two consecutive quarters and within one-half mile distance of the prior quarter's plume boundary.
- g. Domestic wells having chromium concentrations exceeding maximum background levels and which recently become inactive can be removed from maps only if a monitoring well exists within one-quarter mile distance.
- h. If chromium data in groundwater is not believed to be related to historic chromium discharges and drawn in to the plume boundary, the burden of proof is on the Discharger to make this case with recent data (within past three years).

### 3. Report Content:

- a. Description of methods and actions for installing wells.
- b. Laboratory results:
  - i. Sample results showing a difference of 25% or greater between Cr(VI) and Cr(T) concentrations shall be re-tested and the ensuing results described.
- c. Interpretation of chromium plume boundary.
- d. If the chromium plume boundary is undefined in certain areas (sampling locations are more than one-quarter mile distance), propose additional sampling locations and implementation schedule.
- e. Include boring logs and well designs.
- f. Geologic cross sections across the northern plume extent (from Salinas Road and north).

### 4. Plume Map Submittals:

- a. Chromium plume maps must be submitted to the Water Board in digitized form (such as a pdf document) within one working day of

the report due date. At least one of the submitted maps shall be printable on 8 1/2 in by 11 inch paper.

**5. Geotracker Submittals:**

- a. Report must be uploaded to the State Water Resources Control Board's Geotracker database, within one working day of the report due date.

**III. Groundwater Monitoring Reports**

Beginning with the fourth quarter 2012 quarterly groundwater monitoring report for site-wide and domestic well monitoring, due by January 30, 2013, and every quarter (three months) thereafter, the Discharger must include applicable information for maps and reports as described above in Paragraphs B.1., B.2., and B.3. Chromium plume maps and Geotracker submittals shall be implemented according to the due dates described in Paragraphs B.4. and B.5.

**IV. Expansion of Chromium Plume Boundary**

This Order amends CAO R6V-2008-0002 to allow lateral spreading of the 3.1 ppb Cr (VI) (previously 4 ppb) eastern plume boundary from 1,000 feet now to no more than 2,000 feet and south of Acacia Street, as shown on the attached map, and shall not extend to areas of existing groundwater use. Lateral spreading of the plume must be monitored and described in monitoring reports required pursuant to Board Orders No. R6V-2008-0002 and R6V-2008-0014. Lateral plume expansion out to 2,000 feet is allowed as long as the Discharger shows that the chromium is being captured by the existing groundwater extraction system in the downgradient flow direction. If the Discharger is unable to prove that chromium in the expanded plume is not being captured in the downgradient flow direction, it will constitute a violation of this Order.

**V. Laboratory Analysis**

All future analysis of water samples must utilize the most recent testing methods. Testing for Total Chromium analysis must be done using US EPA Methods 6010B or 6020A to a reporting limit of 1 ppb. Testing for Hexavalent Chromium must be conducted in accordance with US EPA Method SW 218.6 with a reporting limit of 0.1 ppb. The laboratory used must be certified by the California Environmental Laboratory Accreditation Program (ELAP).

**VI. Liability for Oversight Costs Incurred by the Water Board**

The Discharger shall be liable, pursuant to Water Code 13304, to the Water Board for all reasonable costs incurred by the Water Board to investigate unauthorized discharges of waste, or to oversee cleanup of such waste,

abatement of the effects thereof, or other remedial action, pursuant to this Order. The Discharger shall reimburse the Water Board for all reasonable costs associated with site investigation, oversight, and cleanup. Failure to pay any invoice for the Water Board's investigation and oversight costs within the time stated in the invoice (or within thirty days after the date of invoice, if the invoice does not set forth a due date) shall be considered a violation of this Order. If the Property is enrolled in a State Water Board-managed reimbursement program, reimbursement shall be made pursuant to this Order and according to the procedures established in that program.

#### **VII. Certifications for all Plans and Reports**

All technical and monitoring plans and reports required in conjunction with this Order are required pursuant to Water Code section 13267 and shall include a statement by the Discharger, or an authorized representative of the Discharger, certifying (under penalty of perjury in conformance with the laws of the State of California) that the workplan and/or report is true, complete, and accurate. Hydrogeologic reports and plans shall be prepared or directly supervised by, and signed and stamped by a Professional Geologist or Civil Engineer registered in California. It is expected that all interpretations and conclusions of data in these documents to be truthful, supported with evidence, with no attempts to mislead by false statements, exaggerations, deceptive presentation, or failure to include essential information.

#### **VIII. No Limitation of Water Board Authority**

This Order in no way limits the authority of this Water Board to institute additional enforcement actions or to require additional investigation and cleanup of the site consistent with the Water Code. This Order may be revised by the Executive Officer or Water Board representative as additional information becomes available.

#### **IX. Enforcement Options**

Failure to comply with the terms or conditions of this Order will result in additional enforcement action that may include the imposition of administrative civil liability pursuant to California Water Code sections 13268 and 13350 or referral to the Attorney General of the State of California for such legal action as she may deem appropriate.

- X. **Right to Petition:** Any person aggrieved by this action of the Lahontan Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, section 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: [http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

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Patty Kouyoumdjian  
Executive Officer

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Date

Attachment: Map of Area of Allowable Plume Expansion

PROPOSED

Filename: PGE%20Final%20CAO2[1].docx  
Directory: D:\My Documents  
Template: C:\Documents and Settings\staff\Application  
Data\Microsoft\Templates\Normal.dotm  
Title:  
Subject:  
Author: Laura Drabandt  
Keywords:  
Comments:  
Creation Date: 10/25/2012 12:26:00 PM  
Change Number: 10  
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As of Last Complete Printing  
Number of Pages: 12  
Number of Words: 4,423 (approx.)  
Number of Characters: 25,213 (approx.)