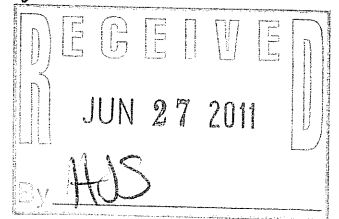


Harold Singer, Executive Offices  
2501 Lake Tahoe Blvd.  
South Lake Tahoe, Ca 96150

June 24, 2011



Dear Mr. Singer

The attached are comments with regard to:  
Draft Cleanup and Abatement Order  
Pacific Gas and Electric Company  
Winkley Compressor Station  
San Bernardino County

Submitted by

Joan D. Bird

24664 State Hwy. 58  
Winkley, Ca 92347

## Rational for requiring whole-house replacement water.

- 1) Studies have shown that there are health risks connected to inhalation of hexavalent chromium.
- 2) Because of the above the OEHHA released a draft PHG of .06 ug/L and revised that to .02 ug/L of hexavalent chromium (paragraph 16) as a health hazard indicator, taking into account risks from hexavalent chromium in domestic water based on typical household uses.
- 3) The Discharger (P.G.+E) has been ordered, since August 2008, to clean up and abate the effects of waste discharges containing hexavalent chromium and prevent the contaminated water plume from migrating (paragraph 9).
- 4) As of June 2011 the Discharger has not cleaned up or abated the migration of the hexavalent chromium plume despite being ordered to back in 2008. All of the Discharger's methods of trying to contain the migration have not been effective.
- 5) The Water Board staff found that the 2010 draft PHG for hexavalent chromium at .02 ug/L is an appropriate standard to protect the public from contaminated drinking water and that hexavalent chromium levels above .02 ug/L posed an immediate health risk to Hinkley residents and so required the Discharger to provide replacement water to persons using impacted wells in the affected area. (paragraphs 25, 26, 28).

Whole-house replacement water is the only rational way to provide safe drinking water and water used

for bathing or showering, preparing food and beverages, flushing toilets, and other household water uses. — Bottled water alone for drinking cannot lessen the health risks of hexavalent chromium from other household water uses, therefore all water going into a house needs to be replaced.

Criteria defining the parties to whom P.G.+E. be required to provide whole-house replacement water.

The June 10, 2011 Draft of Amended Clean-up and Abatement Order (No. R6V-2011-005A1) defines impacted wells as domestic wells in the affected area containing hexavalent chromium concentrations above 3.1 ug/L. Yet the OEHHA released a draft PHG of .02 ug/L, stating levels above this posed an immediate health risk. The Water Board agreed with this standard, therefore any well in the affected area with levels above .02 ug/L should be provided with whole-house replacement water.

This order also defines the affected area as wells located within one mile from the 3.1 hexavalent chromium boundaries based upon monitoring well data (paragraph 29). Since these plume boundaries are dynamic the affected area keeps changing and it seems P.G.+E. cannot contain the migration of hexavalent chromium. Therefore it is only logical that all Henkley wells are impacted above the safe water level of .02 ug/L for hexavalent chromium.

In my opinion P.G.+E. should be required to provide whole-house replacement water to all Henkley residents (preferably in the form of above-ground tanks as who can trust treated (?) water or new deeper wells) and not just offer to purchase contaminated well property (many residents do not want to sell and move).

P.G. + E.'s plans for clean-up and abatement have proven ineffective so far and will take way too long to actually be effective (anywhere from 40 to 200 years!). Other means of corrective action are more effective and should be used - ASAP.

### Other Comments :

Hexavalent chromium does not occur naturally. It is a man-made chemical.

P.G. + E. should have learned from prior lawsuits against them for contaminating Winkley groundwater that they had better get their mess cleaned up ASAP. Yet even with the Water Board order to do so in August 2008 they have not done so and the plume of contaminated water keeps migrating further out in all directions.

It has gotten to the point that you, the Water Board has ordered P.G. + E. to provide interim, uninterrupted replacement water to residences and businesses with detected 3.1 ug/L hexavalent chromium levels or above (paragraph 14). This is not enough. The detection level should be .02 ug/L since above this level is now considered a health risk.

Our house is just outside the one mile from the "affected area" boundary on the old highway 58 before it curves and becomes Santa Fe Rd. Because we are outside the "affected area" we are not eligible for replacement water yet our well water tested at 1.2 ug/L for hexavalent chromium - above the .02 ug/L level now considered a health risk level indicator. We don't want to be using contaminated water! The Water Board needs to be more aggressive in its sanctions with P.G. + E. We will be having our

water tested periodically to keep check on the hexavalent chromium level.

Joan D. Bird