

Lahontan Regional Water Quality Control Board

September 11, 2013

REQUEST FOR PUBLIC COMMENTS

Modification of Whole House Replacement Water Program Cleanup and Abatement Order R6V-2011-0005A2

The Lahontan Regional Water Quality Control Board (Water Board) received correspondence requesting modifications to the Whole House Replacement Water Program (Program) in Cleanup and Abatement Order R6V-2011-0005A2 and potentially to 2008-0002-A4, which defines how the contiguous plume of hexavalent chromium is drawn. The Water Board Executive Officer is soliciting comments on these modifications proposed by two individuals and PG&E. These comments are requests for changes on who is eligible for the Program.

Deadline and Recipient

Comments are due by noon on October 21, 2013. Please submit the comments to Sue Genera, Executive Assistant, by way of either email (sue.genera@waterboards.ca.gov) or mailed/hand delivery to the South Lake Tahoe office. Please place the phrase "comment on PG&E modification" in the subject line of the email. If you have any questions, please contact Richard Booth, Senior Engineering Geologist, at richard.booth@waterboards.ca.gov or (530) 542-5574.

Background

Between 1952 and 1966, PG&E used hexavalent chromium, also known as chromium 6, to fight corrosion in cooling tower water near Hinkley. The wastewater from the cooling towers was discharged to unlined ponds at the site. Some of the wastewater percolated to the groundwater, resulting in hexavalent chromium pollution. The chromium affects an area of groundwater more than five miles long and nearly two miles wide.

On June 7, 2012, the Water Board issued an amended Cleanup and Abatement Order (R6V-2011-0005A2) (Order) to PG&E requiring the utility company to implement an expanded whole house replacement water program for households. Under the terms of that Order, PG&E provides whole house replacement water to those whose wells are located laterally within one mile downgradient or cross-gradient from the contiguous plume boundaries, and which have detectable levels of chromium 6 at any time during the most recent four consecutive quarters. Order 2008-0002-A4 sets out how the contiguous plume is to be drawn, and requires that "plume boundary lines be drawn to connect any monitoring well located within one-half mile (2600 feet) of any other monitoring well having chromium concentrations of 3.1 [parts per billion] ppb chromium 6 or 3.2 ppb total chromium."

Requests for Modification of Board Order(s)

On July 11, 2013, the Water Board Executive Officer issued a letter to PG&E to clarify whether domestic wells were entitled to be included within the Program when they were within one mile of monitoring well (MW) 145-S, which had detections of chromium 6 above 3.1 ppb, but which was not drawn as part of the contiguous plume because it was more than one-half mile from other wells with detections above 3.1 ppb chromium 6 or 3.2 ppb total chromium. The letter concluded that MW-145S was isolated from the chromium plume and not part of the plume, hence domestic wells at issue were not within the one-mile buffer zone from the contiguous plume, and not eligible for the Program, as it was defined by the Order. **At the July Board meeting, several members of the public asked the board to reconsider that conclusion, and to include within the Program all wells within one mile of any monitoring well with detection of chromium 6 that exceed 3.1 ppb, regardless of whether the wells are within the contiguous plume.** These requests were followed by email requests dated September 9, 2013 (attached).

On September 3, 2013, the Water Board also received a proposal from PG&E to modify the Program (attached). **That proposal requests that in the future potentially eligible residents of the Program be defined as being within the contiguous plume boundary, and having domestic wells with levels of chromium 6 above the current background level of 3.1 ppb. Bottled water would be offered to residents with domestic well detections below 3.1 ppb within the contiguous plume boundary. No changes are being proposed for individuals that are currently eligible for the program.** The basis for the request is based, in part upon the draft drinking water standard of 10 ppb for chromium 6 issued by the California Department of Public Health last month.

- Attachments:
1. [July 11, 2013 letter from Water Board](#)
 2. [September 3, 2013 letter from PG&E](#)
 3. [September 9, 2013 email from Daron Banks](#)
 4. [September 9, 2013 email from Theresa Schoffstall](#)