
Lahontan Regional Water Quality Control Board

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Concurrence with Water Conservation Program: Basin Wide Approach to Mitigate Potential Groundwater Impacts Associated with Operation of Agricultural Treatment Units (ATUs) and Managing Potential ATU Byproducts, Pacific Gas & Electric Company Hinkley Compressor Station, San Bernardino County

Lahontan Regional Water Quality Control Board (Water Board) staff received the *Water Conservation Program: Basin Wide Approach to Mitigate Potential Groundwater Impacts Associated with Operation of Agricultural Treatment Units (ATUs) and Managing Potential ATU Byproducts* (Water Conservation Program), dated November 21, 2018 (Enclosure). Pacific Gas and Electric (PG&E) is proposing the Water Conservation Program to mitigate potential impacts to groundwater quality that could occur as a result of operation of the ATUs in the remediation of hexavalent chromium in the Hinkley aquifer. The program would provide financial incentive to farmers and dairymen in the Hinkley Valley to convert from less water efficient irrigation methods to more efficient Low Energy Precision Application (LEPA) methods; the net result should be a reduction in total dissolved solids concentrations in irrigation return flows by at least 10 percent. PG&E is seeking Water Board concurrence on (1) the program concept, and (2) the proposed method for quantifying mitigation credit for implementing the Water Conservation Program; specifically, mitigation credit for mitigation measure WTR-MM-4 of the 2013 Final Environmental Impact Report (EIR) for *Comprehensive Groundwater Cleanup Strategy for Historical Chromium Discharged from the Compressor Station*.

I appreciate PG&E's innovative approach to improve the quality of groundwater in the Hinkley Valley through water conservation efforts and concur with the concept of the proposed Water Conservation Program. The LEPA concept was one of several identified in the 2013 EIR as potential basin-wide mitigation strategies to address adverse impacts to the Hinkley aquifer from remedial byproducts, and I would like to recognize PG&E for putting forth the LEPA concept here.

PETER C. PUMPHREY, CHAIR | PATTY Z. KOUYOUMDJIAN, EXECUTIVE OFFICER

PG&E's proposal to earn 0.1 credit of mitigation for every 1 acre of LEPA conversion is intended to measure compliance, on an acre-by-acre basis, with mitigation measure WTR-MM-4 (2013 EIR) for ATU byproducts. I concur with this method for the Water Conservation Program and recognize that this is just one of several different strategies PG&E is either proposing or implementing to restore the Hinkley aquifer. Full compliance with mitigation measure WTR-MM-4 will be met when PG&E shows that the Hinkley aquifer has been restored to "pre-remedial reference conditions" for all remedial byproducts (ATU and In Situ Remedial Zone byproducts), including groundwater baseline levels.

Mitigation measure WTR-MM-4 (2013 EIR) requires PG&E to conduct an assessment to evaluate adverse impacts or potential adverse impacts to the Hinkley aquifer from its remedial actions no later than 10 years prior to the conclusion of the chromium remediation project. If the results of that assessment indicate that pre-remedial conditions will not be met by the end of the project for all remedial byproduct constituents, then PG&E will propose to the Water Board additional mitigation to restore the aquifer for beneficial uses. PG&E has yet to perform this assessment. However, proactive management of ATU byproducts and early intervention to mitigate potential impacts, now and in the future, will have a positive effect on water quality and may avoid the need for PG&E to perform post-chromium remediation activities to address remedial byproducts.

I see the Water Conservation Program as a proactive approach to improve water quality in the Hinkley aquifer and as one part of a larger mitigation program to restore the aquifer to pre-remedial reference conditions. I encourage PG&E to actively seek partnerships with local dairymen and farmers to convert to more efficient LEPA irrigation methods and to move forward with implementing the Water Conservation Program.

If you have any questions or comments, please contact me at (530) 542-5414, patty.kouyoumdjian@waterboards.ca.gov or Jan Zimmerman, Senior Engineering Geologist, at (760) 241-7333, jan.zimmerman@waterboards.ca.gov.



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Enclosure PG&E Water Conservation Program Letter, dated November 21, 2018

cc: PG&E Lyris List/Mail List
Patrice Copeland, Lahontan Water Board