

From: Carmela Spasojevich
Sent: Friday, August 10, 2012 6:26 AM
To: Kemper, Lauri@Waterboards
Subject: Public Comments on Draft Cleanup and Abatement Order to PG&E

Re: Public Comments on Draft Cleanup and Abatement Order to PG&E

Dear Ms. Kemper,

Whereas I appreciate the Lahontan Water Board's draft cleanup and abatement order to PG&E issued on July 25, 2012, to ensure environmental justice for the residents of Hinkley, the draft order would need to address other deficiencies in PG&E's chromium plume maps. In addition, any request to remove or water-down the orders section of the draft order should absolutely not be allowed.

First, review of the second quarter 2012 chromium plume map on your office's website shows that the 3.1 ppb Cr(VI)/3.2 ppb Cr(T) plume contour line is not being accurately drawn to wells having chromium. At well MW-152S with 3.2 ppb Cr(T), the plume line is drawn over 2,000 feet to the west and not to the well where it is supposed to be. The same goes for well MW-97S which has 3.1 ppb Cr(T). Finally, I've noticed that in 3 of the past 4 plume maps, PG&E has not drawn the chromium plume line close to well MW-57 when Cr(T) has reached 30 ppb. It's obvious that chromium in this well is from PG&E's past discharge and the plume line needs to be drawn close to MW-57 to reflect this.

Second, I see another area on PG&E's chromium plume maps where contour lines are not be correctly drawn around wells showing chromium concentrations above maximum background levels. On figure 3-3, the chromium plume line for the deeper portion of the upper aquifer is drawn north to Alcurdia Road but three wells farther north (G-1R, G-2R, G-5R) show total chromium at levels up to 5.1 ppb Cr(T). These wells should have been included inside the plume line since they are not domestic wells. If it hasn't been required to date, I request that chromium plume lines be drawn around all wells, regardless of type, showing greater than maximum background levels and this be a requirement in the draft order.

Third, I'm also wondering why the second quarter 2011 plume map does not connect the chromium contour lines for all monitoring wells along Dixie Road and east on Sante Fe showing chromium above maximum background levels? The wells in question are MW-145, MW-151, MW-115, and MW-152. Since chromium in these wells should all be connected by one contour line, I request this be added as a requirement in the draft order to PG&E. This eastern chromium plume should be connected to the main chromium plume at MW-95 since there are no monitoring wells between this well and MW-145 to reflect that they are not connected.

In closing, request a 1,000 ppb chromium contour line be added to plume maps. PG&E consistently reports chromium detections greater than 1,000 ppb in wells by the compressor station. To ensure environmental justice, the public should be able to readily see the size of this hot spot and how, or if, it changes in subsequent quarters. It is requested the 1,000 ppb chromium contour line be added to the draft order.

The Board's willingness to accept public comments on important documents, such as the subject cleanup and abatement order is very much appreciated.

Sincerely,
Carmela Spasojevich