Appendix A Groundwater and Remediation Supporting Documentation

1	Appendix A
2	Groundwater and
3	Remediation Supporting Documentation

4 A.1 Introduction

5 The purpose of this appendix is to supplement the EIR Section 3.1, *Water Resources and Water* 6 *Quality* and provide readers a more detailed and technical understanding of groundwater in the 7 Hinkley Valley, groundwater modeling efforts, characteristics of the chromium plume, and the 8 existing and proposed remediation efforts to treat the chromium plume.

9 A.2 Hinkley Valley Groundwater Aquifer

The Hinkley Valley Groundwater basin is located north of the Mojave River between Hodge and
 Barstow. Based on the topography of the surrounding mountains, the Hinkley Valley groundwater
 basin is estimated to cover about 40 square miles (35,600 acres). Figure A-1 shows a conceptual
 diagram of the hydrogeology and groundwater in the Hinkley Valley.

14 The basin is located in an alluvial valley filled with about 100 to 200 feet of unconsolidated sands 15 and clays from watershed erosion from the surrounding mountains and sediment transported into 16 the valley by the Mojave River flood events. There is evidence of a blue clay layer below portions of 17 the Hinkley chromium plume that is likely the remnant of a playa lake deposit that separates the 18 alluvial deposits into an upper and a lower layer. The blue clay does not extend below the Mojave 19 River fluvial deposits, so water enters both the upper and lower aquifers from the river (fluvial) 20 deposits. Historically, the Mojave River may have periodically flowed towards the north into Harper 21 Valley, which is indicated by alluvial deposits connecting these two valleys. The best indication of the alluvial materials that form the Hinkley groundwater basin (i.e., clay, silt, sand, and gravel sizes) 22 23 comes from well drilling logs. The alluvial deposits are similar to the soil material that is evident at 24 the surface in the Hinkley Valley; finer silt and clay materials are found along the mountain 25 boundaries, with more sand and gravel material along the Mojave River and in the valley leading 26 north to Harper Lake.

27 A.2.1 Groundwater Movement

Groundwater movement through the Hinkley Valley alluvial channel is controlled by the aquifer
geology, hydraulic conductivity and changes in groundwater elevations (groundwater inflows and
outflows). If there were no sources of water (i.e., recharge) into the Hinkley Valley groundwater
basin, and no outflows from the basin, the groundwater elevation would be uniform across the basin
and there would be no movement of groundwater.

- 33 Groundwater in the Hinkley Valley groundwater basin generally flows in a north-northwesterly
- 34 direction, from the Compressor Station to the northern end of the valley. This is because the Mojave
- River is located along the southern end of the Hinkley Valley, and provides a majority of this
- 36 recharge water that flows to the north toward the Harper Dry Lake which is at a lower elevation. As

1 recharge water moves through the Hinkley Valley, it raised groundwater elevations. The alluvial

- 2 channel at the north end of the Hinkley Valley is the other basin feature that is important for
- groundwater movement as it acts like a narrow funnel that increases flow movement to Water
 Valley (Harper Dry Lake).

5 A.2.2 Groundwater Elevations

Groundwater elevations are raised during recharge events from the Mojave River and lowered when
 overall pumping rates exceed groundwater recharge rates in the Hinkley Valley. It may take several
 years or more for a river recharge event to raise groundwater levels throughout the Hinkley Valley.
 The Mojave River alluvial channel is periodically recharged (every 5 to 10 years) during major
 runoff events. The water levels along the Mojave River channel may be recharged by as much as 20

11 to 40 feet during these surface flow events (Stamos et al 2001).

- 12 Water elevations near the Compressor station have been general stable between 2,100 feet and
- 13 2,130 feet above mean sea level (msl).

14 A.2.3 Groundwater Pumping in the Hinkley Valley

Because the Mojave River alluvial channel is the only major source of recharge water, pumping in
 the Hinkley Valley will generally move groundwater north from the Mojave River towards the

- 17 pumping. When pumping near the center of the valley occurs during periods between river recharge
- 18 events, groundwater likely moves away from the mountain boundaries. The opposite is also likely
- 19 true. When pumping near the center of the valley occurs following river recharge events,
- 20 groundwater likely moves towards the mountain boundaries due to groundwater elevation
- increases. The groundwater elevations of the surrounding area will control the amount of thegroundwater pumping that will be drawn from each direction around the well.
- groundwater pumping that will be drawn nom each direction around the well.
- There is not a complete record of the locations and volumes of historical pumping for irrigation for
 the Hinkley Valley. However, the location and magnitude of existing groundwater pumping rates are
- 25 used to approximate the expected future movement of the chromium plume. An additional
- 26 complication is that there is an outcrop of bedrock between the town of Hinkley and the Desert View
- 27 Dairy (DVD). Northward groundwater flow in the valley occurs both to the east and west of the
- 28 bedrock outcrop on Mountain View Road. Pumping can modify (increase) the regional groundwater
- 29 movement in the Hinkley Valley and change the groundwater elevation patterns.
- 30 Groundwater pumping in the Hinkley Valley is primarily used for domestic and agricultural supply.
- 31 These wells vary in size and associated pumping capacity. **Table A-1** gives some typical well
- 32 diameters with corresponding estimated pumping capacities.





California Regional Water Quality Control Board, Lahontan Region

1

Well Diameter (inches)	Pumping Capacity (gpm)
2	4
4	16
6	36
8	64
10	100
12	144
18	324
24	576
Notes:	
Well pumping velocity of 5 ft/sec a	assumed

Table A-1. Well Size and Pumping Capacity Estimates

Many of the wells in the Hinkley Valley are for individual domestic supply. Domestic wells are
generally small, with diameters of 4 to 6 inches, and pump small amounts of water (usually less than
1 gpm). The domestic well capacity is usually greater than the needed water supply except possibly
during the heat of summer. So during most of the year, domestic wells therefore pump only as
needed each day to fill a small tank.

7 Agricultural supply wells are larger, with diameters of 12 to 24 inches. As shown in Figure 3.1-12 of 8 Section 3.1, *Water Resources and Water Quality*, a typical agricultural well supplying a 40-acre parcel 9 with a pivot irrigation system (irrigating about 30 acres) would generally pump a maximum of 10 about 250 gpm to supply a maximum of 1.10 acre-foot of water per day onto the 30-acre irrigated 11 field. This would be approximately 0.45 inches of applied water per day across the field. On an 12 annual basis, the well would deliver an average of about 150 gpm or 240 acre-feet of water per year. 13 This would provide about 8 feet of applied water per year for the 30-acre irrigated area, but would 14 withdraw about 6 feet of groundwater from below the 40-acre parcel. However, some of the applied 15 water will infiltrate through the soil and the unsaturated zone back to the groundwater. About 5 feet 16 of water will be used for evaporation and plant transpiration, known as evapotranspiration (ET). 17 The remainder of the applied water will ultimately infiltrate and recharge the aquifer below the 18 irrigation field. If the 6 feet of water for the 40-acre parcel came exclusively from the aquifer 19 beneath the 40-acre parcel, the reduction in the groundwater level (drawdown) under the 40-acre 20 parcel would be about 30 feet per year. The calculation is as follows:

$$\frac{6 \frac{\text{ft applied water}}{\text{yr}}}{0.20 \text{ [soil porosity]}} = 30 \frac{\text{ft. drawdown}}{\text{yr}}$$

21 Historically, agricultural activity was larger than today and pumping for irrigated agriculture could

- not be sustained across the entire Hinkley Valley, because the average aquifer saturated thickness is
- 23 less than 100 feet. But if only one 40-acre parcel were irrigated within each square mile (640 acres),
- the groundwater level would decline by about 1.88 feet per year (i.e., 30/16). The calculation is as
 follows:

$$\frac{\frac{30 \frac{\text{ft. drawdown}}{\text{yr}}}{\frac{640 \text{ acres}}{40 \text{ acres}}} = 1.88 \frac{\text{ft. drawdown}}{\text{yr}}$$

1 The total pumping in the Hinkley Valley for irrigation was estimated from irrigated acreage to be 2 about 5,000 af/yr in 1940, about 15,000 af/yr in 1950 and about 15,000 af/yr in 1960 (DWR 1967). 3 Assuming 8.00 feet of applied water per acre, this would represent an irrigated area of about 1,875 4 acres (about 7% of the Hinkley Valley). Some of the estimated pumping would return to the aquifer 5 as recharge. About 5 to 6 feet of applied water would be lost to ET. Therefore, the 15,000 af/yr 6 maximum estimated pumping would represent about 9,500 af/yr to 11,250 af/yr of water 7 ultimately removed from the groundwater. Pumping for irrigation would cause the groundwater 8 elevation below the wells to decline and this would cause groundwater from adjoining parcels to 9 move towards the wells. Distributed groundwater pumping will therefore cause a rate of 10 groundwater movement equal to the pumping flow lost to ET (about 60% to 75% of the total 11 pumping).

12 There is also considerable pumping for irrigation north of the Mojave River to the east of the PG&E 13 Compressor Station. As shown in Figure 3.2-2, Section 3.2, Land Use, Agriculture, Population and 14 Housing, there are numerous pivot irrigation fields located east of Summerset road and south of 15 Community Blvd (est. 450 acres), east of Summerset Rd and north of Community Blvd (est. 150 16 acres), and east of Dixie Rd and south of Community Blvd (est. 350 acres). Pumping in these areas 17 will have a large effect on the groundwater flow from the Mojave River alluvial sands towards these 18 irrigation wells located just 1-2 miles north. Since each acre of irrigation will require about 5 feet of 19 water per year, the pumping in the area east of Summerset and north of Community Blvd would be 20 approximately 750 af/yr and the pumping in the area east of Summerset and south of Community 21 Blvd could be approximately 1,750 af/yr.

22 Besides the areas of pumping mentioned above, a large area of declining water levels (cone of 23 depression) is present in the upper aquifer in the area of the DVD LTU (Pacific Gas and Electric 24 2011a). Figure 3.1-4 in Section 3.1, Water Resources and Water Quality, shows the measured 25 groundwater elevation contours for the contaminated Cr[VI] plume. The extraction wells for the 26 DVD land treatment are shown north of Santa Fe Avenue. There are four extraction wells for the DVD land treatment (EX-01 to EX-04). According to the PG&E Fourth Quarter 2010 DVD Monitoring 27 28 Report, pumping from EX-01 averaged about 185 gpm, pumping from EX-02 averaged 125 gpm, 29 pumping from EX-03 averaged 45 gpm, and pumping from EX-04 averaged about 5 gpm during 30 2010, for a combined total average rate of 360 gpm. As shown in **Table A-2**, daily responses of 31 water elevations, or drawdown, to increased pumping rates are highest at the closest well to the east 32 of the EX-01 and EX-02 and downgradient of EX-01 and EX-02. Whereas, an up-gradient well, 33 further away from EX-01 and EX-02 only had a small decline of about 3 feet over the year with no 34 noticeable responses to the changes in extraction pumping during the year.

1 Table A-2: Daily Drawdown Response for Increases in Pumping Rates at Monitoring Wells nearby 2 DVD Extraction Wells EX-01 and EX-02

Monitoring Well	Increase in Pumping Rate (gpm)	Daily Drawdown Response in 2010 (ft/yr)
The up-gradient well (28B-located 3,000 feet southwest from EX-01 and EX-02)	Various	3
The closest well (21B-located 300 feet east of EX- 02 and 700 feet east of EX-01)	300	4
	450	7
	600	10
The down-gradient well (62A-located 1,600 feet	300	3
from EX-02 and 2000 feet from EX01)	450	5
	600	10

A.3 Groundwater Modeling 3

4 This section discusses general conceptual approaches to groundwater modeling and the specific 5 groundwater modeling that has been done to support development of the PG&E remediation project to date.

6

General methods for Groundwater Modeling A.3.1 7

8 This subsection discusses general conceptual approaches to groundwater modeling of movement 9 and drawdown.

10 A.3.1.1 **Methods for Estimating Groundwater Movement**

11 Groundwater movement can be estimated using three methods: groundwater elevations, chromium 12 concentrations, and groundwater pumping. These methods are described below.

13 **Groundwater Elevations Method**

14 The measured groundwater elevations in the existing wells (i.e., water elevation contours) are used 15 for the primary method in determining the direction and the magnitude of groundwater movement 16 in the Hinkley Valley. Groundwater elevations from PG&E's 4th Quarter 2011 Monitoring report are 17 shown in Figure 3.1-4 of Section 3.1, Water Resources, and Water Quality. Groundwater will move 18 along pathways of the least resistance (highest conductivity), and will flow preferentially along 19 gravel and/or sand deposits. Silt and clay layers or lenses within the sand and gravel will retard or 20 reduce groundwater movement. Based on the available groundwater measurements (i.e., water 21 elevations) and well logs (aquifer materials) to describe the depth and thickness of the Hinkley 22 Valley groundwater basin (i.e., aquifers) and the corresponding groundwater movement. However, 23 the magnitude of the groundwater elevation contours are also an important factor when considering 24 groundwater movement; steeper water elevation gradients (i.e., closer contour lines) may indicate 25 either greater groundwater movement or more resistance to water movement (i.e., smaller size 26 material with lower hydraulic conductivity).

27 Groundwater movement can be calculated by the hydraulic gradient (i.e., water elevation slope), the 28 hydraulic conductivity, and the thickness of the aquifer (i.e., saturated thickness). Groundwater

movement (i.e., volume/day) is described by Darcy's Law and can be calculated for a given width of
 an aquifer as shown in equation [1].

12

4 GW Movement
$$\left[\frac{\mathrm{af}}{\mathrm{day}}\right] = \left(\frac{(\mathrm{aquifer thickness [ft]})(\mathrm{width [mi]})}{(43,560 \left[\frac{\mathrm{ft}^2}{\mathrm{acre}}\right])}\right) x \left(\left(\mathrm{water elevation gradient }\left[\frac{\mathrm{ft}}{\mathrm{mi}}\right]\right) x \left(\mathrm{hydraulic conductivity }\left[\frac{\mathrm{ft}}{\mathrm{day}}\right]\right)\right)$$

As shown in equation [1], groundwater movement will increase with a greater saturated thickness, a
greater hydraulic conductivity, or a greater elevation gradient. As an example, for an aquifer width
of 1 mile with a saturated thickness of 75 feet, a water elevation gradient of about 20 ft/mile and a
hydraulic conductivity of 50 ft/day, the groundwater movement across a mile of the aquifer (flowing
north) would be 1.72 af/day, equivalent to 0.567 million gallons of water per day (mgd) or about
395 gallons per minute (gpm). This calculation is shown as follows:

$$\left(\frac{(75ft)(1\ mi)}{\left(43,560\ \frac{ft^2}{acre}\right)}\right) \mathbf{x}\left(\left(20\ \frac{\mathrm{ft}}{\mathrm{mi}}\right)\mathbf{x}\ \left(50\ \frac{ft}{day}\right)\right) = 1.72\ \frac{\mathrm{af}}{\mathrm{day}} = \ 0.567\ \mathrm{mgd} = \ 395\ \mathrm{gpm}$$

11 Table A-3 provides some conversion factors for these different groundwater units of measure. Table

A-4 provides estimated water movement values for a range of hydraulic conductivities and

13 groundwater gradients.

14 Table A-3. Groundwater Volume and Flow Unit Conversions

Volume of Water in Aquifer below 1 acre (acre-foot):				
		Porosity		
Saturated Thickness (feet)	10%	20%	30%	40%
25	2.5	5.0	7.5	10.0
50	5.0	10.0	15.0	20.0
75 ^a	7.5	15.0	22.5	30.0
100	10.0	20.0	30.0	40.0
Conversions:				
1 mile =	5,280 feet			
1 cubic foot =	7.48 gallons	S		
1 acre-foot (af) =	43,560 ft ³			
1 million gallons (MG) =	3.06 acre-fe	eet (af)		
1 gallon per minute (gpm) =	1,440 gallo	n per day (gpd) = 19	2.5 ft³/day	
Кеу				
^a The saturated thickness for	r the Hinkley	groundwater model	is assumed to be 75	feet and is shown in

Bold.

1 Table A-4. Groundwater Movement Estimates

Groundwater flow beneath 1 acre (210 feet wide) cell (gpm):					
	Groundwater Gradient (ft/mile)				
Hydraulic Conductivity (ft/day)	5	10	15	20	
20	1.5	3.1	4.6	6.2	
40 ^a	3.1	6.2	9.2	12.3	
60 ^a	4.6	9.2	12.3	18.5	
80	6.2	12.3	18.5	24.6	
100	7.7	15.4	23.1	30.8	

Notes:

Saturated thickness of 75 feet assumed

Key:

^a Hydraulic conductivity for the Hinkley groundwater model is assumed to be 50 ft/day, which would be between these two values of 40 and 60 ft/day as shown in **bold** above.

Tracer studies can also help determine groundwater movement along an aquifer. A tracer study
involves the injection of a safe and non-toxic chemical or compound which movement can be
followed with groundwater flow. Common types of tracers are dyes, salts, and fluorescent
compounds. Figure A-2 provides a schematic on how tracer studies can be used to describe
groundwater movement. The physical movement of water (i.e., tracer velocity) through the aquifer
pore spaces (sometimes called Darcy's velocity) can be estimated from the water movement and
assumed porosity with Equation [2]:

Groundwater tracer velocity
$$\left[\frac{\text{ft}}{\text{day}}\right] = \left(\frac{\left(\left(\text{Groundwater movement}\left[\frac{\text{af}}{\text{day}}\right]\right)\right) \times \left(43,560\left[\frac{\text{ft}^2}{\text{acre}}\right]\right)}{\left(\text{saturated thickness [ft]}\times(\text{width [ft]})\times(\text{mobile porosity (fraction)})\right)}\right)$$

For the average porosity of 0.2 estimated for the Hinkley Valley aquifer (Stamos et al. 2001), with the groundwater movement estimated for the previous example, the tracer velocity would be about

12 0.95 ft/day, or about 345 ft/year. This calculation is shown as follows:

$$\left(\frac{\left(1.72\frac{\text{af}}{\text{day}}\right)\left(43,560\frac{\text{ft}^2}{\text{acre}}\right)}{(75\text{ ft})x(5,280\text{ ft})x(.2)}\right) = 0.95\text{ ft./day} = 345\text{ ft/year}$$

- 13 A similar calculation is provided in box C of **Figure A-2**, which provides a calculation for
- 14 groundwater flow of 1,000 af/yr, which results in a tracer movement flow of 550 af/yr. If some of
- 15 the total porosity is in pockets of silt and clay that is not involved in groundwater movement, this
- 16 porosity value would be reduced and the tracer movement velocity would be increased. Table A-5
- 17 gives the estimated groundwater tracer movement for a range of porosities and hydraulic
- 18 conductivities.

1 Table A-5. Tracer Movement Estimates

	Mobile Porosity			
Hydraulic Conductivity (ft/day)	5%	10%	15%	20%
20	35	70	105	140
40	70	140	210	280
60	105	210	315	420
80	140	280	420	560
100	175	350	525	700

2 If the chromium plume was dissolved and moving with the groundwater, this would be the distance 3 that the edge of the plume would move downgradient (in the direction of decreasing water 4 elevation) each year. This would be the expected velocity of the chromium plume within the upper 5 aquifer. The measured groundwater elevations in the Hinkley Valley indicate that this flow would 6 generally be northward, away from the Mojave River and towards the Harper Valley divide (i.e., 7 underflow). Using the calculations above, tracer dye injected below the Compressor Station in 1961 8 would have moved approximately 3.27 miles to the north under natural conditions by 2011 (50 9 years) if these estimated groundwater conditions (e.g., 20 ft/mile gradient with hydraulic 10 conductivity of 50 ft/day with a thickness of 75 feet and a mobile porosity of 20%) had remained the 11 same. However, due to pumping influences by agricultural wells at the three dairies to the north of 12 the Compressor Station and other agricultural fields, the chromium plume likely moved at a greater 13 rate in groundwater than under normal conditions. This may explain current chromium detections 14 above background levels at the far north end of the Hinkley Valley. At present, the plume is thought 15 to be at least 5.5 miles north of the Compressor Station, but the northern boundary is still being 16 defined.

17 Chromium Concentrations Method

18 A second method for determining groundwater movement near Hinkley is to interpret the historical 19 chromium concentrations which record (i.e., track) the slow movement and spreading of the 20 chromium plume that originated below the PG&E Hinkley Compressor station. This method may be 21 useful for evaluating the likely future movement and spreading of the existing chromium plume. 22 Because the only places where the chromium concentrations can be measured are in existing water 23 supply wells (agricultural or domestic) or in monitoring wells, the plume concentration contours are 24 sometimes inexact, and the slow movement of the chromium plume can be difficult to detect at 25 times. Each well has a screen that extends some distance along the well casing within the aquifer 26 saturated interval. Monitoring wells are usually screened with a short screen to measure water from 27 about 10-40 feet of the saturated interval, while agricultural or domestic wells are often screened 28 over the entire saturated interval which averages 75-100 feet in the Hinkley Valley. This 29 concentration tracking method will be more thoroughly discussed in the following sections to 30 explain the potential response of the chromium plume to injection and extraction (or pumping) in 31 wells that are proposed for various treatment alternatives.



D. Annual Groundwater Flow (af/yr) Across 1-Mile Width for Selected Water Elevation Gradients and Hydraulic Conductivities

Groundwater		Hydraulic Con	ductivity (ft/da	y)
Elevation Gradient	10	25	50	100
5 ft/mile	31	79	157	314
10 ft/mile	63	157	314	628
15ft/mile	94	236	471	943
20 ft/mile	126	314	628	1257

Source: Based on information from Pacific Gas and Electric 2010.



1 Groundwater Pumping Method

The third method for estimating groundwater movement is based on pumping records from the major agricultural and industrial (e.g., PG&E) supply wells and remedial wells located in the Hinkley Valley. Groundwater will move towards the wells to supply the water being pumped. Water will generally come from all directions, unless the well is near a basin boundary, the well is screened in a different aquifer, or there is a regional water elevation gradient away from the well. All of the pumping in the basin will tend to lower the ground water elevations, but the lowering will be

8 greatest near the wells.

9 A.3.1.2 Approaches to Modeling Groundwater Elevations (Drawdown)

10 Groundwater pumping will cause a localized drawdown of water elevations around the well because a pressure gradient (i.e., water slope) is needed for the groundwater to move through the aquifer 11 12 material to the well. This phenomenon is also known as a cone of depression. The aerial view is not 13 truly a circle or cone but more like a comet with a long tail in the upgradient groundwater flow 14 direction. But for modeling purposes, a circle is used to represent the shape of a cone of depression. The shape (i.e., depth) of the drawdown cone can be described based on Equation [1]. For example, 15 16 an irrigation well pumping 150 gpm would draw approximately 0.65 af of water from the 17 surrounding aquifer each day. A cylinder surrounding a well with a radius of 50 feet would have a 18 circumference of 314 feet (i.e., $(2\pi) \times (radius)$). For an assumed saturated thickness of 75 feet, with 19 an assumed hydraulic conductivity of 50 ft/day, equation [1] can be rearranged to estimate the 20 water elevation gradient (ft/mile) at a distance of 50 feet that would produce a flow (pumping rate) 21 of 0.65 af/day. The necessary water elevation gradient would be about 128 feet/mile (slope of 22 0.025).

$$\frac{\left(\left(0.65\ \frac{\mathrm{af}}{\mathrm{day}}\right)\mathrm{x}\left(43,560\ \frac{\mathrm{ft}^2}{\mathrm{acre}}\right)\right)}{\left(\left((75\ \mathrm{ft})\mathrm{x}\left(314\ \mathrm{ft}^*\frac{1\ \mathrm{mi}}{5280\ \mathrm{ft}}\right)\right)\mathrm{x}\left(50\ \frac{\mathrm{ft}}{\mathrm{day}}\right)\right)} = 128\ \frac{\mathrm{ft}}{\mathrm{mi}}$$

Figure A-3 provides a diagram of the effects of pumping for land treatment on groundwater
 movement. Table A-6 shows calculated water elevation gradients with a varying cone of depression
 radius using Re-arranged Equation [1].

Table A-6: Estimated Water Elevation Gradients with Varying Size of Cones of Depression 1

Radius of Cone of Depression	Estimated Water Elevation Gradient (ft/mile)
50 feet	128
100 feet	64
200 feet	32
400 feet	16
0.125 mile (660 feet)	10
0.25 mile	5
0.5 mile	2.5
N	

Notes:

A pumping rate of 150 gpm (0.65 af/day) with a thickness of 75 feet and a hydraulic conductivity of 50 ft/day assumed

2 The depth of the cone of depression below the saturated elevation can be calculated by integrating

- 3 the required water slope from a large radius to near the well. A reasonable estimate of the shape of
- 4 the drawdown can be calculated using the Thiem equation (Equation 3), assuming the drawdown at
- 5 2 miles (10,560 feet) would be small:

6 [3]

Drawdown (feet) at distance from well = $\frac{\left(\left(\text{flow } \left[\frac{\text{ft}^3}{\text{day}}\right]\right) \times \left(\ln\left(\frac{10,560 \text{ ft}}{\text{distance } [\text{ft}]}\right)\right)\right)}{\left((2\pi) \times (\text{thickness } [\text{ft}]) \times \left(\text{hydraulic conductivity } \left[\frac{\text{ft}}{\text{day}}\right]\right)\right)}$

- 7 Calculated drawdown levels with a varying cone of depression radius using Equation [3] are shown
- 8 in **Table A-7**. The drawdown cone would be deeper for a smaller groundwater thickness, a smaller
- 9 hydraulic conductivity, and for greater pumping.

10 **Table A-7: Calculated Drawdown Estimates**

Radius of Cone of Depression	Estimated Drawdown (feet)
1 mile	0.9
0.5 mile	1.7
0.25 mile	2.5
1/8 mile (660 feet)	3.4
50 feet	6.5
Notes:	
A pumping rate of 150 gpm with a thickn	ess of 75 feet and a hydraulic conductivity of 50 ft/day assumed

11 When there is a regional groundwater gradient, the well will intercept water only from the sides and

12 from up-gradient of the well. The radius of capture can be approximated as the distance from the

- 13 well where the drawdown gradient equals the regional gradient. For the pumping example given
- above (150 gpm) assuming a regional gradient of about 20 ft/mile, the capture zone radius would be 14
- 15 about 330 feet. The zone of capture would extend about 330 feet on each side of the well, but most



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1 of the water would move from up-gradient because the overall gradient would be stronger in this

- 2 direction. These groundwater elevation gradients, drawdown depths, and capture zones will
- 3 increase with the pumping rate. The effects of injection wells on the surrounding groundwater
- elevations, flows, and zone of influence will be the same magnitude but opposite in direction than
 with the extraction (pumping) wells. With this information, the effects of pumping and injection
- 6 wells can be used in a localized groundwater movement and plume movement accounting
- 7 framework.

28

29

8 A.3.2 Hinkley Remediation Project Groundwater Modeling

9 The Lahontan RWQCB asked PG&E to develop a groundwater model for tracking Hinkley Valley
10 groundwater elevations and the Cr[VI] concentrations in the contaminated plume. The model would
11 be used to track plume containment and clean-up efforts. Three versions of a groundwater flow and
12 chemical transport model have been developed: (1) SS. Papadopulos Model (Pacific Gas and Electric
13 1998); (2) CH2MHill Model (Pacific Gas and Electric 2007); and the (3) Arcadis Model (Pacific Gas
14 and Electric Company 2010). The Arcadis model is the current model being used for the Project.

15 Groundwater modeling was conducted by PG&E to characterize the Hinkley aquifer system, forecast 16 groundwater drawdown as a result of remedial pumping activities, and to simulate future Cr[VI] 17 concentrations (i.e., chromium plume) for each remediation alternative evaluated in the EIR. This 18 section describes the model parameter values, assumptions, and specified pumping and injection 19 patterns that were used to simulate future groundwater conditions for each remediation alternative. 20 It also provides an overview of the historical measurements and observations that were included in 21 the development and calibration of the groundwater models. The documents used to describe 22 groundwater modeling in this section include:

- Groundwater Flow and Chemical transport Modeling Report Prepared by Alisto Engineering
 Group (Pacific Gas and Electric 1998).
- Simulation of Ground-Water Flow in the Mojave River Basin, California. (Stamos et al. 2001).
- Groundwater Background Study Report, Hinkley Compressor Station, Hinkley California.
 Appendix B. Groundwater Flow Model. Prepared by CH2MHill (Pacific Gas and Electric 2007).
 - PG&E 2011 Feasibility Study Addendum #3, Appendix G Development of a Groundwater Flow and Solute Transport Model, Prepared by Arcadis (Pacific Gas and Electric Company 2011a).

30 The base model used to characterize the Hinkley aquifer is a USGS 3-D model, MODFLOW. 31 MODFLOW was used to describe hydrological characteristics of the aquifer, such as groundwater 32 volume, movement (i.e., flow rate, velocity, direction) and water elevation (i.e., depth to water), with 33 a time-step of one year. A 3-D chemical mass-transport model (MT3D) applied to MODFLOW to 34 characterize chromium concentrations in the aquifer. MT3D uses the MODFLOW results for the 35 water volumes and water movement was used to simulate changes in the concentration of Cr[VI] 36 and dissolved carbon (i.e., ethanol). These computer models are general tools that can be used to 37 study any groundwater basin.

MODFLOW simulates transient or steady-state, saturated groundwater flow in three dimensions.
 MODFLOW simulates groundwater flow in aquifer systems using the finite-difference method. Using
 this method, the model domain is divided into rows, columns, and layers that form cells. When
 overlain on a map of the study area, each cell represents a small part of the region. Each cell is
 assigned a series of parameters that relate to the average aquifer properties and stresses for that

1 particular region. As the cell size increases, the parameter values describing the actual aquifer

- 2 properties, which vary over the cell area, become more generalized. The finite-difference grid used
- 3 in this model consists of 386 rows, 384 columns, and six layers, totaling 763,185 cells. Both rows
- and columns have variable spacing and vary between 1,000 feet wide in the outer portions of the
 model and 25 feet wide in the central portion of the model. The model used a one-year timestep.

6 A.3.2.1 S.S. Papadopulos Model

7 The initial model, developed by PG&E consultants, S.S. Papadopulos (SSP), was used to evaluate 8 potential impacts from the proposed project and alternative treatment approaches. Because it was 9 the first model that characterized the chromium plume, it is described here as the basic tool for 10 understanding the historical plume movement and spreading, as well as the basic remediation 11 options. This computer model was applied to the chromium plume based on previous 12 measurements of groundwater elevations and chromium concentrations, as well as the measured 13 aquifer thickness and well bore materials (sand, silt, and clay). A conceptual model was initially 14 developed to define the site specific conditions and geologic characteristics that affect groundwater 15 flow and chemical transport mechanisms and provide the basis for the computer simulation (Pacific 16 Gas and Electric 1998).

17 Data on monitoring wells installed during previous site investigations and on existing irrigation 18 wells were reviewed to estimate the hydraulic parameters for the aquifer material. The vertical 19 variations in hydraulic parameters were incorporated into the model domain as structural layers. 20 The upper aquifer system was subdivided into two distinct units: a coarse grained unit overlying a 21 fine grained unit. The vertical layers together with the lateral area of the aquifer comprise the three-22 dimensional finite difference grid system used for the computer model. The thickness of each 23 vertical layer varies within the model domain based on interpolation of strata elevation data from 24 available boring logs for the existing water supply and groundwater monitoring wells.

It was assumed that chromium within the aquifer is a conservative constituent and that naturally
occurring attenuation processes have no effect on the fate and transport of chromium in the
subsurface. The rate of chromium transport or attenuation in the porous media is dictated by
several processes: advection, dispersion, partitioning, and geochemical reactions. Advection
represents the transport of dissolved contaminant caused by groundwater movement (tracer
velocity). Dispersion in porous media refers to the migration or spreading of contaminants within
the small scales of aquifer materials.

32 The geochemical processes of adsorption/desorption or the slow dispersion between clay and sand 33 layers or lenses can be described empirically as a partitioning process. For the groundwater model, this partitioning was described as the fraction of the total contaminant mass that will be transported 34 35 by advection. A partition factor of 1 indicates no partitioning, so that all the contaminant is dissolved 36 and moves with the water. A partition factor of 2 would indicate that $\frac{1}{2}$ of the contaminant mass will 37 move with the water, and half will remain associated with the aquifer material (i.e., adsorbed or in 38 clay lenses that are not moving). A partition factor of 4 indicates that only ¹/₄ of the mass would 39 move with the water. Because the highest concentrations of chromium remain below the PG&E 40 Compressor Station after more than 50 years of movement indicates that much of the chromium 41 mass remains in the sediments. Therefore, a very high partition factor of 8 or 16 was used for the 42 lower fine-grain layer to simulate the chromium plume. This indicates that only 1/8 (12.5%) or 43 1/16 (6.25%) of the estimated Cr[VI] mass will move with the groundwater velocity. The remaining 44 mass will remain in the aquifer matrix (sediment particles).

1 Most of the Cr[VI] was simulated to remain below the PG&E Compressor Station. The measured 2 chromium concentration being extracted for the East LTU, which had operated from 1992 to 1998 3 was about 200 to 300 parts per billion (ppb), and had removed a total of about 1,000 pounds (lbs) of 4 Cr[VI] while pumping about 500 million gallons (1,500 acre-feet [af]). However, the assumed 5 partition factor of 8 suggests that the remaining mass was 7 times the mass estimated from the well 6 concentrations. The calibration of the model to match the measured plume concentrations in 1994 7 suggested that the original Cr[VI] mass was about 10,000 lbs. The East LTU had therefore removed 8 about 10% of the initial mass of Cr[VI] by 1998.

9 A journal article describing this initial groundwater modeling (Andrews and Neville 2003) suggests 10 that the initial movement of the Cr[VI] plume was influenced by the regional drawdown of the 11 aquifer between 1950 and 1970. Because the irrigation pumping was reduced, the groundwater 12 movement and corresponding plume movement has also been reduced in the last 40 years. They 13 suggest that most (80%) of the Cr[VI] mass was partitioned in the clay deposits near the bottom of 14 the upper aquifer and that some might be trapped in the pore water remaining in the unsaturated 15 zone as the groundwater elevations were reduced from about 2,140 feet in 1950 to about 2,110 feet 16 in 1970.

17 **A.3.2.2 CH2MHill Model**

18 The second groundwater flow model was developed by CH2MHill. This model is based in part on a 19 combination the MODLFLOW model and the previous SSP groundwater flow model developed for 20 the Hinkley project area (Pacific Gas and Electric 1998). The 2007 Background Study refers to the 21 CH2MHill groundwater model. Water table contours from the Mojave River to the northern portion 22 of the site were developed from groundwater-level data collected in 2006 from project monitoring 23 wells to indicate the direction of groundwater movement. The depth to groundwater ranged from 24 approximately 75 to 102 feet below the ground surface (bgs). The saturated Upper Aquifer thickness 25 ranged from approximately 25 feet (northwest area along Mountain View Road) to approximately 26 100 feet (eastern areas north of Highway 58). Lateral gradients range from 10 ft/mile to 20 ft/mile 27 across the study area, generally flowing in a north-northwesterly direction from the compressor 28 station to the northern end of the study area. The water budget described below was developed as 29 part of this model.

The model was recalibrated after the 2006 drilling program (new well logs). The assumed properties of the regional groundwater flow model were adjusted locally such that simulated hydraulic heads matched measured groundwater elevations for the simulated period. During model calibration the assumed aquifer properties (e.g., hydraulic conductivity and storage coefficients) were further adjusted within reasonable bounds to match simulated drawdown with drawdown observed in numerous aquifer tests performed at the site.

36 A.3.2.3 Arcadis Model (Current Model)

The third groundwater model was a revised and updated groundwater model developed and utilized by Arcadis for the chromium transport modeling conducted for the 2010 Feasibility Study and subsequent Addenda. The model used three layers to represent the upper aquifer. Model layers are further described below under the discussion of layer thicknesses. The boundary conditions for the flow model (i.e., groundwater elevations and inflows and outflow at the model boundary as well as internal pumping rates) were specified, and the solute transport model simulated likely plume concentrations over the next 100 years.

- Each alternative was simulated with different well locations and flow rates at various time periods
 to optimize the effectiveness of the remedy in meeting project objectives. All types of remediation
 measures were simulated; extraction for agricultural land treatment, extraction and injection of
 ethanol for in-situ remediation zone, extraction for surface treatment and extraction of water from
 outside the plume for injection to provide plume containment along the sides of the plume.
- 6 The Arcadis transport model (MT3DMS) uses the flow terms and velocities computed by MODFLOW 7 in its transport calculations. MT3DMS also uses the same finite-difference grid structure and 8 boundary conditions as the groundwater flow model. MT3DMS has a comprehensive set of options 9 and capabilities for simulating advection, dispersion/diffusion, and chemical reactions of 10 contaminants in groundwater flow systems under general hydrogeologic conditions. Solute 11 transport was simulated using the dual-domain formulation. In a dual-domain model, mobile 12 porosity represents the fraction of the aquifer through which most groundwater flows (advection), 13 while the immobile porosity represents the less mobile portions of the formation where diffusion is 14 the dominant transport mechanism. Mass transfer into and out of the less mobile zone is generally 15 slow, since the process is controlled by diffusion. Mobile porosity was assumed to be 7% and 16 immobile porosity was assumed to be 28% in all regions and layers (Pacific Gas and Electric 2011a).
- 17 In this formulation, water tracer movement is much faster than would be expected if all of the 18 aquifer porosity were used. This is a convenient way to model a chromium plume that has moved 19 miles in length, while the high concentration Cr[VI] has moved a much shorter distance. The mass 20 transfer coefficient between the two zones and the porosity values were calibrated using detailed 21 performance data from the Central Area In-situ Remediation Zone, and adjusted based on the 22 historical plume measurements.
- The initial plume concentrations were based on the contours that were developed from February
 2010 data. For the mobile phase, the measured concentrations were used. But for the immobile
 phase, much higher Cr[VI] concentrations were assumed, and the slow exchange rate was adjusted
 to simulate a steady-state initial mobile phase plume concentration pattern.

27 Model Parameters

- In developing a model, the boundary and initial conditions need to be established first. Basic
 boundary conditions are shown in Figure A-4. These conditions are used to characterize the
 Hinkley Valley aquifer system. Boundary conditions include (1) aquifer aerial and vertical extent
 (model domain); (2) hydraulic properties of the aquifer (i.e., flow conditions, hydraulic conductivity,
 porosity and volume, groundwater elevations); (3) aquifer water budget (natural groundwater
 recharge and discharge zones and anthropogenic influence on groundwater). The initial conditions
 refer to initial values of elements that may increase or decrease in the course of the time inside the
- 35 model domain and they cover largely the same phenomena as the boundary conditions.

36 Model Domain

- 37 The model was designed to represent groundwater conditions over approximately 25 square miles
- 38 of Hinkley Valley. The main Hinkley valley is approximately 7 miles long and 3 miles wide extending
- 39 northwest from the river toward Harper Valley (Pacific Gas and Electric 2011a), extending
- 40 northwest from the Mojave River toward Harper Valley. The model extends from south of the PG&E
- 41 compressor station to north of Red Rock Canyon. **Figure A-5** shows the model domain.





1 The boundary conditions, which describe the exchange of flow between the model and the external 2 system, are located at the edges of the model domain. General head boundaries typically represent 3 heads in a model that are influenced by a surface water body, such as a river, outside the model 4 domain and require a record of water levels at a known distance from the model boundary. Based 5 on this conceptual model, groundwater enters the southwest model domain along the Mojave River 6 channel (Southern GHB) and from the alluvial fan or ancestral channel deposits west and southwest 7 from the compressor station (Western GHB) (Pacific Gas and Electric 2011a). Likewise, 8 groundwater exits the model domain along the Mojave River channel toward Barstow (Eastern 9 GHB) (Pacific Gas and Electric 2011a). Constant head boundaries are used to fix the head value in 10 the system that does not consider the influence of surrounding conditions, thus acting as an infinite 11 source of water entering the system, or as an infinite sink for water leaving the system. A constant 12 head boundary was used for the groundwater that exits the model domain in the north toward 13 Harper Lake, as a lack of water level records in this area prevented the use of a general head 14 boundary in this area (Pacific Gas and Electric 2011a). The remaining edges of the model domain 15 were assumed to be no-flow boundaries (Pacific Gas and Electric 2011a). These generally represent 16 the contact between alluvium and bedrock (Pacific Gas and Electric 2011a).

17 The full extent of the Hinkley Valley aquifer is included in the model, although the area of focus is on 18 the simulated groundwater movement and chromium concentrations. MODFLOW allows for a finer 19 grid in areas of interest where greater accuracy is required and a coarser grid in areas requiring less 20 detail, as shown in **Figure A-6**. The majority of grid cells are aligned with the direction of 21 groundwater flow. The boundaries of the model grid are based on natural hydrogeologic 22 boundaries, where possible. The aquifer model boundaries were identified from the areal (surface) 23 patterns of bedrock mountains surrounding the Hinkley Valley, as well as the outcropping ridges 24 and hills within the valley (i.e., from topographic maps). As described in Section 3.4, Geology and 25 *Soils*, the Mojave River groundwater basin consists primarily of unconsolidated alluvial deposits. 26 The limits of the basin are defined by nonwater-bearing consolidated rocks (i.e., bedrock) that 27 underlie the alluvial deposits of the basin and outcrop in the surrounding mountains and hills. In 28 some places, the confining rocks at the limits of the basin are buried by unsaturated alluvial 29 deposits. The southern model boundary is the relatively deep alluvial materials below the Mojave 30 River channel.

There are two major fault lines, the Lockhart fault and the Mount General Fault, that suggest vertical discontinuities in the aquifer materials which may impede and affect groundwater flow and thus provide internal boundaries with reduced water movement. In the model, the Lockhart fault is assumed to provide significant resistance to flow, but not to entirely prevent flow, and is simulated as a zone of low hydraulic conductivity (Pacific Gas and Electric 2011a). The Mount General fault also extends northwest-to-southeast along the northeast model boundary. There is no evidence of this fault extending into the north Hinkley Valley.

38 Aquifer Stratigraphy

The historical distribution of wells within the Hinkley Valley indicates the general extent of the aquifer stratigraphy, or layers. Drilled wells that did not provide sufficient water yield indicate the aquifer did not extend to the well location. Because there was extensive historical drilling and considerable domestic and agricultural pumping in the Hinkley Valley, the areal extent of the upper aquifer is well understood. The areal extent of the lower aquifer (e.g., below the blue clay) is less well known because only a few wells have been drilled into the lower aquifer. The information from the monitoring wells that have been installed by PG&E as part of the remedial investigation and

- 1 monitoring effort gives the most complete set of data on vertical sediment sequences. Because these
- 2 wells are located throughout and surrounding the existing chromium plume, the vertical definition
- 3 of the aquifer(s) are most accurate in this central portion of the Hinkley Valley.

Determining the areal extent of the "blue clay" layer that is assumed to separate the upper and lower
aquifers, and the "brown clay" layer that may separate the upper zone from the lower zone of the
upper aquifer is more difficult. The aquifer is assumed to be filled with many clay "pockets" or
"lenses" with limited extent; but these localized clay features do not limit water movement. The
computer model (layers of boxes) can be easily shown on a map of the Hinkley Valley; but the
internal boundaries that are assumed to limit the aquifer or reduce water movement are the most

- 10 important groundwater model features.
- 11 The general geological boundaries in the model were validated with the available well-drilling data, 12 including the sequence of vertical layers of materials (rock and sediment materials) and some 13 general characteristics of these sediments. The depth to bedrock is generally confirmed from a few 14 isolated deep wells. The sediment layers are assumed to be generally horizontal, although alluvial 15 materials will often trend with the land surface, and can be lifted or shifted geologically.
- Each box in the model grid system is divided into six layers consisting of three active layers, the
 upper and lower zones of the upper aquifer and the lower aquifer, interlain with two dividing clay
 layers. The upper aquifer has been separated into two layers because many of the PG&E monitoring
 wells with (multiple) sampling depths in the shallow (well A) and deep (well B) portions of the
 upper aquifer have shown different chromium concentrations. Figure A-7 shows groundwater
 elevations and Figure A-8 shows layer thickness for each groundwater model layer (Pacific Gas and
 Electric 2011a). The layers are described as follows:
- Layer 1 (shallow zone of the upper aquifer): The thickness the shallow zone of the upper aquifer (Layer 1) is controlled by the groundwater elevation and the top of the brown clay. The modeled thickness of layer 1 is about 20 feet in the vicinity of the compressor station, and increases to about 40 feet toward the north.
- Layer 2 (brown clay layer): The top of the brown clay (Layer 2) is shown to slope to the north,
 from an elevation of 2,100 feet above mean sea level (msl) at the compressor station to 2,040
 feet msl about 3 miles to the north, with a slope of about 20 ft/mile. The groundwater elevation
 also slopes at about 10 ft/mile toward the north, so the saturated thickness of model layer 1
 increases by about 10 ft/mile toward the north. The brown clay separating the shallow and deep
 portion of the upper aquifer is shown to have a thickness of about 20 feet at the station and
 about 30 feet at the north end of the plume.
- Layer 3 (lower zone of the upper aquifer): The lower zone of the upper aquifer (Layer 3) is
 shown to have the same thickness contours as Layer 2. The thickness of these layers were
 equally divided, using the top of the brown clay and the top of the blue clay elevation contours,
 based on multiple well logs.
- Layer 4 (blue clay): The blue clay (layer 4) is shown to be continuous, fully separating the upper and lower aquifers in the Hinkley Valley north of the river. The Blue Clay is about 20 to 50 feet thick in most of the Hinkley Valley, but pinches out within the distal end of the plume and is not present to the west, and is not present within a few to several hundred feet of the current Mojave River channel. The blue clay thickness is indicated to be about 30 feet at the station, but to be reduced to 10 feet in the vicinity of Hinkley and to the north. The thickness of the blue clay is shown to be 40 feet in the vicinity of the Mojave River and to extend to the southern boundary



Figure A-6 Hinkley Groundwater Model Grid Structure

..00122.11 (8-16-12) Graphics.







Figure A-7 Hinkley Groundwater Model Layer Elevations







Figure A-8 Hinkley Groundwater Model Layer Thicknesses

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of the aquifer. This, however, would isolate the lower aquifer from the river alluvial deposits and prevent Mojave River flood flows from recharging (filling) the lower aquifer. The blue clay does not likely extend across the Mojave River channel but the model structure requires the layers to extend to the boundaries.

- Layer 5 (lower aquifer): The lower aquifer (layer 5) is shown to have a thickness of 100 feet at the compressor station, and to increase to over 250 feet below the Mojave River channel. The thickness of the lower aquifer is shown to reduce to about 20 feet below Hinkley. The specified thickness of the lower aquifer may not be as important as determining the internal boundaries (faults and outcroppings) and the connections with the upper aquifer.
- Layer 6 (bedrock): This layer consists of consolidated bedrock which constricts flow and defines the deepest boundary, or limit, of the aquifer.

12 **Groundwater Elevations**

1

2

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The numerous well logs from across the Hinkley Valley reveal that the saturated thickness of the
 upper aquifer ranges from less than 25 feet to more than 100 feet. The average saturated thickness
 for existing conditions (2011) is assumed to be about 75 feet.

16 Short-term and long-term changes in groundwater levels were also accounted for in the model. 17 Pump tests involve monitoring the response of nearby wells to changed pumping from the target 18 well. PG&E operates several continuous water elevation monitoring wells in the DVD Land 19 Treatment Unit. The MODFLOW model results can be compared to the response in the various monitoring wells to confirm the hydraulic conductivity values (and aquifer thickness) in the vicinity 20 21 of these wells. Similar analysis of the long-term water elevation response to recent flood flows (i.e., 22 1997, 2005, 2010 recharge events) at several wells located at various distances from the Mojave 23 River can be used to confirm the aquifer thickness and hydraulic conductivity for the Hinkley Valley 24 aquifers.

25 Aquifer Hydraulic Properties

For groundwater analysis and modeling purposes, the size of the alluvial material is important for two reasons; (1) the porosity (i.e., water storage capacity) and (2) the hydraulic conductivity (i.e., water movement capacity) of the aquifer.

29 Table A-8: Assumed Porosity and Specific Yield for Groundwater Model Development

Porosity	
Average porosity	20%
Bulk porosity (sand, silt and clay)	30% to 40%
Bulk porosity for aquifer layers	35%
Specific Yield	
gravels and sands	20-25%
silt	10%
clay	5%

USGS modeling of the Mojave River groundwater basin (Stamos et al. 2001) has estimated an
average porosity of about 0.2 (20%) for the Hinkley Valley basin. The water in the saturated portion
of the aquifer layers can be estimated from the thickness of the layer and the assumed sediment
porosity (percentage of saturated volume filled with water). Sediment porosity (bulk porosity) is
often about 30% to 40% for a wide variety of sand, silt and clay, but the effective porosity (mobile
porosity) that is available for water movement may be considerably less than the bulk porosity.

7 The specific yield is the portion of the aquifer pore water that will drain from the material under 8 gravity. The specific yield is about 20-25% for gravels and sands, but is less than 10% for silt and 9 may be less than 5% for clay. An aquifer layer with a thickness of 20 feet and bulk porosity of 40% 10 would contain about 8 feet of water. If all of the water could be removed, a well would lower the 11 water level by 2.5 feet (i.e., 1/0.4) for every acre-foot of pumping (from an acre) of the aquifer. 12 However, pumping from a sand aquifer would remove 25% (specific yield) of the aquifer volume as 13 water (15% would remain in the pores), and the water level would decline by 4 feet for every foot of 14 water removed. Most of the pore water would remain within the sediments (bound by surface 15 tension) for silts and clays. The water level would decline faster than the bulk porosity would 16 indicate. For example, if half of the pore water (20% of volume) remained bound to the sediment 17 particles, the water level would decline by twice the anticipated amount (5 feet for each foot of 18 water extracted).

19 The groundwater model assumes that the total (bulk) porosity for each of the aquifer layers is 35%. 20 The model documentation does not state the assumed specific yield; this parameter is needed to 21 compare the water level decline with the historical or existing pumping. The MT3D model assumes 22 that the majority (80%) of this porosity is water that is trapped within clay lenses and other 23 features that are separated from the moving portion of the groundwater. A movement porosity of 24 7% with an immobile porosity of 28% is assumed for the chromium transport model. This 7% 25 mobile porosity might also be the specific yield, corresponding to silt or clay. These specific yield 26 and mobile/immobile porosity parameters have several important effects on simulated 27 groundwater movement and plume behavior.

28 Hydraulic Conductivity

Hydraulic conductivity describes the ease with which water can move through pore spaces or
fractures. The hydraulic conductivity is generally estimated for the USGS modeling (Stamos et al.
2001) to range from about 10 to 100 ft/day.

32 Hydraulic conductivity varies by aquifer layer. Because the hydraulic conductivity of Layer 2 (brown 33 clay) is much less than Layers 1 and 3, most of the groundwater flow will move towards the north in 34 Layers 1 and 3, in proportion to the layer thickness. The greater thickness shown to the east of the 35 PG&E Compressor Station, along the center or Hinkley Valley, indicate that more groundwater will 36 move in this portion of the aquifer (for a given water surface slope), unless there are variations in 37 the hydraulic conductivity. The greater thickness also suggests that water movement (velocity) will 38 decrease. Figure A-9 shows assumed hydraulic conductivity zones for each model layer. The highest 39 hydraulic conductivity values in each layer originate from near the Mojave River. Layers 1 and 3 40 show the highest general hydraulic conductivity zones, whereas the brown and blue clay layers 41 (model layers 2 and 4), as well as the bedrock (layer 6) show little to no hydraulic conductivity

42 values.







Figure A-9 Hinkley Groundwater Model Hydraulic Conductivity Zones for Model Layers 1-6

- 1 The drawdown response of monitoring wells to extraction pumping from nearby wells shown in
- 2 Table A-7 can be used to estimate the hydraulic conductivity, by matching the estimates of expected
- 3 drawdown to the measured drawdown. The observed responses to the DVD LTU pumping were
- comparable to the expected drawdown for the example calculations given above for pumping of 150
 gpm (28,879 ft³/day) with a thickness of 75 feet and a hydraulic conductivity of 50 ft/day. An
- 5 gpm (28,879 ft³/day) with a thickness of 75 feet ar 6 example calculation is as follows:
 - $\frac{\left(\left(28,879\left[\frac{\text{ft}^{3}}{\text{day}}\right]\right) \times \left(\ln\left(\frac{10,560 \text{ ft}}{\text{distance [ft]}}\right)\right)\right) (\text{Drawdown}) \times ((2\pi) \times (75 \text{ [ft]}))}{\text{Drawdown}} = \text{Hydraulic Conductivity } \left[\frac{\text{ft}}{\text{day}}\right]$
- 7 The Lockhart fault zone is shown with a very low hydraulic conductivity (0.1 ft/day) that trends to
- 8 the northwest from the Compressor Station. This model feature will block any groundwater flow
- 9 from the south, and force all movement from the Compressor Station along this northwest trend.
- 10 The outcropping hills to the west of DVD LTU will force any groundwater movement to turn
- 11 northeast towards the center of the Hinkley Valley. These structural boundaries are confirmed by
- 12 the water elevation gradients; a large drop across the Lockhart fault, and low gradient (indicating no
- 13 flow) towards the outcropping hills.

14 Aquifer Water Budget

- Modeling inputs and outputs within the aquifer system consist of sources of natural recharge and
 discharge and anthropocentric influences (i.e., groundwater withdrawals from pumping).
- The water budget for the Hinkley Valley provides a basis for understanding the sources and uses ofgroundwater in the Hinkley Valley and provides an overall view of the water movement within the
- groundwater system. The groundwater model domain is shown in Figure A-5. To quantify water
 budget components, the groundwater flow model was run for water-years 1997 through 2005.
- budget components, the groundwater flow model was run for water-years 1997 through 2005.
 Groundwater pumping rates for this period were obtained from the Mojave Watermaster. Domestic
- 22 pumping for some residential areas was estimated based on published values for typical single-
- family household domestic water use. Water budget values were calculated as the yearly average for
 the period. On average, about 7,000 acre-feet of groundwater entered the modeled area from the
 south each year. About 20 percent of this subsurface flow continued eastward toward Barstow, and
- south each year. About 20 percent of this subsurface flow continued eastward toward Barstow, and
 about 2 percent flowed out of the model boundary to the north toward Harper Valley. The bulk of
- the groundwater inflow was pumped for irrigation or domestic use.

28 Natural Recharge and Discharge

- Natural sources of recharge and discharge in the Hinkley Valley aquifer include the flow from
- 30 Mojave River and precipitation. Accurate representation of the Valley's natural boundaries in the
- 31 numerical model is required to accurately simulate the basin-wide groundwater flow patterns.

32 Mojave River

- Based on this conceptual model, groundwater enters the southwest model domain along the Mojave
 River channel and from the alluvial fan or ancestral channel deposits west and southwest from the
- 35 compressor station. Although the Mojave River is an intermittent stream, when it does flow, it can
- 36 deliver substantial amounts of water to the subsurface. These boundaries and the eastern portion of
- 37 the Mojave floodplain aquifer, where flow is directed towards Barstow, are represented as general

- head boundaries. Indeed, the sharp water level rises in the general head boundary well records
 occur in years of large discharge events on the Mojave River. The Mojave River periodically flows
 within the model domain, and recharge from the river is simulated using injection wells. A series of
 45 injection wells along the Mojave River channel was used to simulate this recharge from the
 riverbed. (Pacific Gas and Electric 2011a).
- 6 Groundwater exits the model domain along the Mojave River channel toward Barstow. Groundwater
- 7 also exits the model domain in the north toward Harper Lake via a constant head boundary,
- 8 representing subsurface outflow to the Harper Valley. A constant head boundary was used here, as a
- 9 lack of water level records in this area prevented the use of a general head boundary in this area.
- 10Based on extrapolation of water level gradients to the north, a steady-state value of 2050 ft was used
- 11 at the northern boundary. The remaining edges of the model domain were assumed to be no-flow
- 12 boundaries. These generally represent the contact between alluvium and bedrock.

13 Precipitation

- 14 The average annual precipitation at Barstow from 1889 to 2000 was 4.3 inches with a maximum
- 15 annual precipitation of less than 10 inches. Because these rates are low, and evapotranspiration
- 16 rates far exceed precipitation rates on an annual basis, recharge into the model from infiltrating
- 17 precipitation was not included in the model.

18 Anthropocentric Influences

- 19 The MODFLOW model considers the effects of groundwater elevations and pumping on 20 groundwater movement in the Hinkley Valley. The primary types of pumping in the valley are for 21 agricultural, domestic uses, and PG&E remedial purposes. The Hinkley Basin is agricultural in 22 nature, with several dairies and farms. Alfalfa and grass are the primary crops. Water is supplied to 23 irrigated fields from wells with the Hinkley Basin, including within the model domain. Quarterly 24 pumping rates from 1993 to 2004 provided by Mojave Watermaster reports were used as inputs to 25 the model for the relevant years, and the average quarterly distribution from 1993 to 2004 was used 26 to extrapolate pumping rates beyond 2004. Deep percolation and groundwater recharge from 27 agricultural irrigation was estimated at 20% of applied water based on climatic conditions and an 28 alfalfa crop under standard agricultural management practices.
- 29 The Mojave Watermaster typically does not collect or record use rates from domestic wells.
- 30 Therefore, domestic groundwater withdrawals were estimated using a population of about 1,000
- residents by assuming a use rate of 100 gallons per day per person. The total estimated average
 domestic demand over the model domain is thus 70 gallons per minute (gpm), and 10 domestic
 surrogate wells pumping 7 gpm were used to simulate domestic withdrawals. Return flow from
 septic systems was not included in the model.
- PG&E operates supply wells for the compressor station and for various site remedial actions. These
 flow rates were incorporated into the model.

37 Groundwater Flow Modeling

- 38 The MODFLOW model calculates groundwater flow using Equation [1], the basic groundwater
- 39 equation (Darcy's law). The movement of tracer (Darcy's velocity) will be faster than the water flow
- 40 divided by the aquifer cross-section would indicate. For a bulk porosity of 40%, the rate of
- 41 movement would be 2.5 times faster. However, only the mobile porosity (specific yield) is involved

- 1 in water movement. The water that remains immobile (bound to sediment particles) will increase
- 2 the water (or tracer) velocity. The groundwater model documentation indicates that a total porosity
- 3 of 35% was specified for each of the Hinkley Valley aquifer layers. Therefore the effective water
- 4 thickness is 35% of the overall layer thickness.

5 Total water volume equals water thickness times the surface area of the aquifer (or portion of the 6 layer).However, the mobile porosity was just 7%, so the tracer movement will be confined to just 7 7% of the aquifer volume and will be 5 times the water movement calculated from the bulk porosity. 8 Most of the water (28% of aquifer volume) will remain within the soil matrix. The precise rate of 9 transfer (exchange) of Cr[VI] and carbon between the mobile volume and the immobile volume 10 remains somewhat uncertain as it cannot be directly measured.

- 11 Aquifer flow conditions are characterized to predict the movement of chromium plume within the
- Hinkley aquifer. Two separate models are used for simulating the future distribution of Cr[VI]
 within the aquifer. The groundwater volume, movement (i.e., flow rate, velocity, direction) and
 water elevation (i.e., depth to water) are simulated using MODFLOW. The concentration of Cr[VI]
 and dissolved carbon (i.e., ethanol) are simulated with MT3D that uses the MODFLOW results for the
 aquifer volumes and water movement patterns.
- 17As previously described, Hinkley Valley groundwater flow conditions are characterized in grid cells.18The original model (Pacific Gas and Electric 1998) used a rectangular grid of MODFLOW cells that19were 264 feet on a side (1.6 acres). There were 17,500 cells in an area of 47.5 square miles. Many of20the cells were inactive (i.e., outside the aquifer). The current model has much smaller cells in the21region of the chromium plume (25 feet on a side, 0.015 acres) and the number of MODFLOW cells is22increased to about 250,000 in an area of about 55 square miles, with about half of the cells inactive23(outside the aquifer boundary).

24 Groundwater Movement Modeling

25 The MODFLOW model is calibrated by matching the measured water surface (saturated) elevations 26 with the available well measurements for a sufficient period of time to include changes in pumping, 27 recharge, and corresponding water elevations. The responses of the groundwater elevations to 28 recharge events and to changes in major pumping activities provide the best opportunity for 29 calibrating the basin parameters and confirming the movement of groundwater (hydraulic 30 conductivity) and the drawdown (specific yield) caused by pumping. As shown in **Table A-9**, the 31 highest conductivity values were assumed to be along the existing plume in Layers 1 and 3 (upper 32 aquifer). These assumed values will cause the majority of the groundwater flow to be directed along 33 this "conductivity channel". The fact that this "conductivity channel" ends abruptly near the DVD 34 (rock outcropping) will force the plume to spread east/west, as has been observed in the last 35 decade.

36 Recent particle tracking results provide an excellent visualization of the modeled water (tracer) 37 movement (mobile porosity). A series of comparative tracking diagrams are given in Appendix B of 38 the PG&E Feasibility Study Addendum No. 3 (Pacific Gas and Electric 2011a). Tracer studies were 39 conducted in the capture zone along Summerset Rd., which is more complex than other areas within 40 the aquifer. Movement from the south (Highway 58) is quite rapid, but movement from the north 41 (Thompson Rd) is very slow. There is a strong interplay between the pumping rates and the 42 hydraulic conductivity and the layer thicknesses needed to calculate the tracer movement. For 43 example, the velocity of the groundwater tracer movement will increase as the inverse of the mobile

- 1 porosity. It is relatively fast for the currently assumed 7% mobile porosity, but would be half as fast
- 2 (with a smaller capture zone) if the mobile porosity were actually 14%. It is likely that the assumed
- zones of hydraulic conductivity (Figure A-9, Table A-9) are the major factor controlling the particle
 movement patterns.
- 5 Pumping from an aquifer layer is the typical source of groundwater movement in a closed alluvial
- 6 basin. If there were no pumping, the groundwater volume would remain constant and there would
- 7 be no movement and no change in the water elevations. The amount (af/yr) and areal distribution of
- 8 pumping from each aquifer layer is therefore the most important required input for the GW flow
- 9 model (MODFLOW). Because pumping is from specific wells, the pumping rates for the known wells
- 10 are the required input.

11 Modeling of Groundwater Drawdown

12 The MODFLOW groundwater model was used by PG&E to forecast groundwater drawdown within 13 the project area for each Alternative based on various pumping rates. To evaluate the relative

14 amounts of drawdown beyond 5 years of pumping remedial activities, groundwater contour maps

- 15 were prepared from groundwater model outputs. These maps were provided in PG&E's Feasibility
- 16 Study No. 3 (Pacific Gas and Electric 2011a), and are shown in **Figures 3.1-14 to 3.1-18** in Section
- 17 3.1, Water Resources and Water Quality.

A.4 Modeling of Chromium Plume Concentrations

19 A.4.1 Existing Chromium Plume Concentrations

This section provides a summary of the existing (Fourth Quarter 2011) Cr[VI] concentrations within
 the chromium plume boundary.

22 A.4.1.1 Plume Extent and Scale

23 As of the 4th quarter 2011, the existing plume is thought to be at least 5.5 miles north of the 24 Compressor Station, but the northern boundary is not fully delineated yet. The chromium plume of 25 concentrations 3.1 ppb of Cr[VI] or greater currently covered approximately 2,950 acres in late 26 2011. The highest concentrations of Cr[VI] are greater than 1,000 ppb and are measured almost 27 directly below the previous settling ponds, although it has been nearly 50 years since the 28 contaminated Cr[VI] discharge (infiltration from ponds) was stopped. This may indicate that Cr[VI] 29 is trapped in pockets (called immobile porosity) within the aquifer material and that only a portion 30 of the aquifer water (called mobile porosity) is moving down-gradient towards the north.

31 The volume of groundwater (measured as acre-feet) in the contaminated plume can be estimated 32 from these plume areas by assuming that there is about 15 feet of water in the upper aquifer 33 (saturated thickness of about 75-feet with a total porosity of about 20%). Therefore, the water 34 volume in acre-feet (af) is simply 15 times the acreage of the plume. Because the plume covered 35 about 2,950 acres in late 2011, with an assumed effective water thickness of 15 feet, the total plume 36 volume can be estimated at about 44,250 acre-feet. The mass of Cr[VI] in the existing plume can be 37 calculated from the concentration contours, but there is uncertainty in this calculation if most of the 38 Cr[VI] remains trapped in pockets within the aquifer, in concentrations that are considerably higher 39 than the water pumped from the monitoring wells.

1 The ARCADIS/PG&E mass estimate (January 2011) of 4,700 lbs of Cr[VI] was calculated based on 2 the current plume concentrations of Cr[VI] and accounts for the mobile portion and immobile 3 portion of the Cr[VI] mass. It is true that monitoring wells sample only the mobile portion of 4 groundwater because that is all that flows to the well borehole. Evaluation of the data indicates 5 there is a shallow and deep plume in the Upper Aquifer, so separate plumes were delineated to 6 account for the variability in Cr[VI] concentrations in these two units of the upper aquifer. Although 7 the plume footprints reflect only the Cr[VI] concentrations in the mobile portion, equivalent plume 8 footprints are also initialized in the immobile portion. It was assumed there is equilibrium between 9 the mobile and immobile portions. Persistent source areas below the water table in the vicinity of 10 the Compressor Station were also accounted for in the model. Initial modeling showed that the high 11 concentration areas near the Compressor Station were flushing out too quickly. Historic 12 concentration trends in these areas indicate prolonged elevated concentrations which support the 13 existence of an immobile and mobile porosity within the aquifer. To account for these persistent 14 source areas, enhanced immobile portion concentrations were initialized that exceeded the 15 maximum observed Cr[VI] concentration. Specifically, in locations where the initialized mobile 16 portion plume exceeded 500 ppb Cr[VI], the immobile portion Cr[VI] concentrations were initialized 17 at 2,000 ppb. These concentrations were determined during calibration of the solute transport 18 model to historic plume distributions. This conceptual model of the upper aquifer is sensitive to the 19 assumed porosity values and the exchange of water between these two aquifer unit volumes.

20 The greatest uncertainties in the Cr[VI] plume distribution are the concentrations present in the clay 21 lenses (immobile porosity) of the Upper Aquifer. The majority of monitoring wells were screened in 22 the more permeable upper and lower portions of the Upper Aquifer (Layers 1 and 3). The 23 intermediate portion of the Upper Aquifer is the predominantly less permeable "Brown Clay", and 24 therefore likely contains less Cr[VI] that would have actively migrated into this unit. The few 25 monitoring wells that were screened in the Brown Clay indicated lower Cr[VI] concentrations, but 26 there were insufficient data points to delineate a specific plume distribution for the Brown Clay. The 27 Cr[VI] distribution from the deep portion of the Upper Aquifer (Model Layer 3) was assumed for 28 Model Layer 2. The Cr[VI] plume modeling results are therefore dependent on these important 29 assumptions about the initial Cr[VI] concentrations in each model layer, and the assumed porosity 30 for the mobile and immobile portions of each layer (Pacific Gas and Electric 2011b).

31 A.4.1.2 Existing Cr[VI] Plume Distribution by Layer

32 The main purpose for the groundwater models is to show the future plume concentrations using 33 various containment and remediation options presented by Alternative. The existing Cr[VI] plume 34 distribution is determined with Geographic Information System (GIS) tools from recent monitoring 35 well data. Many of the PG&E monitoring wells have multiple openings in the upper and/or lower 36 aquifer layers. The water samples provide good concentrations for the mobile porosity water, but 37 may not reflect (higher or lower) concentrations in the immobile porosity water (which is assumed 38 to be 80% of the pore water). The model uses initial concentrations for each aquifer layer (5) that 39 are specified with a GIS application on the 250,000 active cells. The movement (spreading) of these 40 initial Cr[VI] concentrations depends on the layer thicknesses (pore water volumes) and the 41 simulated movement of water between cells, as simulated with the MODFLOW portion of the GW 42 transport model. The assumed transfer between the mobile porosity (7%) and immobile porosity 43 (28%) water and exchange of water between the clay layers and the active aquifer layers is also 44 important. The simulation of the plume boundary depends on the water movement and exchange

between the mobile and immobile porosity. Cr[VI] mass is assumed to remain constant unless
 remediation measures (e.g., pumping for LTU or pumping/injection for In-situ Remediation Zone).

3 A.4.1.3 Sampling Wells and Vertical Concentration Patterns

4 PG&E has conducted extensive investigations to define the lateral and vertical limits of Cr[VI] in the 5 Hinkley Valley groundwater. Investigation has been completed primarily through the installation 6 and sampling of monitoring wells. Numerous groundwater monitoring wells have been installed in 7 the Upper Aquifer and are sampled periodically, not including in-situ treatment monitoring wells 8 which have generally been installed as pairs with a shallow and deep well at the same location. 9 Results from these wells are reported quarterly. PG&E has prepared Cr[VI] plume maps, using data 10 from the quarterly sampling of the shallow and deep wells in the upper aquifer. However, because 11 only a portion of monitoring wells are sampled each quarter, the number of wells with data for each 12 quarterly plume contour map is variable. Separate maps for the shallow and deep portion of the 13 upper aquifer should be compared because the source of Cr[VI] and subsequent plume movement 14 and spreading has been different in these two portions of the upper aquifer.

15 Results from existing supply wells and monitoring wells help characterize the nature and extent of the chromium plume in the aquifer. There about numerous locations with two monitoring wells (i.e., 16 17 pairs) that have been screened in the shallow and deep portion of the upper aquifer in the vicinity of 18 the chromium plume. The vertical distribution of Cr[VI] within the contaminated plume can vary 19 considerably. For example, the Cr[VI] concentrations tend to be higher in the deeper portion of the 20 upper aquifer in the core section of the plume. The shape of the plume concentrations in the shallow 21 and deep units appears to be somewhat different near the source of the Cr[VI] contamination. 22 However, at the north end of the plume, the Cr[VI] concentrations tend to be higher in the shallow 23 portion of the aquifer.

24 The blue clay has apparently been effective in separating the majority of the chromium plume from 25 the lower aquifer layer. Chromium migration from the upper aquifer into the lower aquifer appears 26 to have occurred where the regional blue clay layer is thin or not present. However, as shown in 27 **Figure 3.1-6** in Section 3.1, *Water Resources*, recent data shows chromium levels exceeding 10 ppb 28 in the lower aquifer in a small area extending from the southern portion of the DVD agricultural 29 treatment unit to near SR 58. The maximum detected Cr[VI] concentration was 41.6 ppb (PG&E 4th 30 quarter monitoring report). For now it appears that the area of contamination in the lower aquifer is 31 limited in extent.

32 A.5 Plume Treatment Methods

33 This section describes each treatment methods proposed as part of project alternatives for clean-up

- 34 of the chromium plume. A relatively simple accounting procedure (mass-balance) for the
- 35 groundwater movement and chemical processes within the plume is also provided to allow a clear
- 36 understanding of the basic results of agricultural land treatment, In-situ Remediation Zone
- 37 treatment and treatment.

1 A.5.1 Agricultural Land Treatment

2 A.5.1.1 Treatment Activities

Agricultural activities for chromium treatment involve groundwater extraction and irrigation of
 crops in agricultural treatment units (also called land treatment units). Figure 3.1-12 in Section 3.1,
 Water Resources and Water Quality, shows a diagram of an agricultural treatment unit. The Cr[VI] in
 the groundwater is treated as it passes through the soil and root zone, through the following
 mechanisms:

- 8 Cr[VI] in water interacts with electron donors in soil and organic matter and is reduced to 9 solid Cr[III]. The metabolic process used by bacteria to produce energy requires a "terminal 10 electron acceptor" to metabolize the carbon source to carbon dioxide (or methane). Microbes 11 are classified by the carbon and electron acceptor they use to carry out metabolic processes. 12 Bacteria that use oxygen as their electron acceptor are aerobic; those that use a compound other 13 than oxygen, (e.g., nitrate, sulfate), are anaerobic; and those that can utilize both oxygen and 14 other compounds as electron acceptors are facultative (USEPA 2000). More about the different 15 anaerobic electron acceptor compounds will be described in the next section on reduction by-16 products (Fe, Mn, As).
- Cr[VI] in water is taken up by plant roots and reduced to Cr[III]. Natural soil bacteria
 (anaerobic) in the root zone will result in the reduction of Cr[VI] in the extracted ground water
 by reducing the Cr[VI] to trivalent chromium (Cr[III]). Based on ground water and unsaturated
 zone monitoring data from the East LTU that operated for about 9 years (1992 to 2001), the
 estimated Cr[VI] reduction is expected to be approximately 95 percent.
- 22 Cr [VI] adheres (or "adsorbs") onto organic matter in the root zone, and subsequent 23 reactions involving soil microbes results in reduction to Cr[III]. Cr[III] will likely precipitate 24 and will predominantly remain in the soil column. The slightly alkaline pH and low natural 25 oxidants (manganese oxides) and presence of organics in the soil will assure that the Cr[III] will 26 not be re-oxidized to Cr[VI] at the agricultural treatment unit. Reduced Cr[VI] concentrations 27 would result in a minor loading of Cr[T] to the soil by the reduction process based on soil data 28 from the East and Ranch LTUs. According to the baseline soil data obtained at the DVD LTU in 29 April 2004, the average Cr[T] concentration is 12 mg/kg (Cr[T] ranges from 5 mg/kg to 20 30 mg/kg).
- 31 Cr[VI] forms compounds with organic elements and compounds involved in the 32 **reduction**. A comprehensive monitoring program was established for the DVD LTU. 33 Concentrations of Cr[T] and Cr[VI] detected during the Fourth Quarter 2011 (Pacific Gas and 34 Electric 2011b) are shown in Figures 3.1-5 and 3.1-6, Section 3.1 Water Resources and Water 35 *Quality*, and concentrations of nitrate as N and TDS, are shown in **Figures 3.1-7 and 3.1-8**, 36 Section 3.1 Water Resources and Water Quality. Concentrations in each extraction well have been 37 stable once the pumping was initiated, but depend on where in the plume the extraction well is 38 located. The average Cr[VI] concentration in the extracted ground water is about 20 ppb (blend 39 of the major extraction wells). Sixteen lysimeters are located at 5 feet below ground surface 40 (bgs), and 16 lysimeters are located at 20 feet bgs. Samples collected from the 5-foot-deep 41 lysimeters were analyzed for Cr[T] and Cr[VI], and samples collected from the 20-foot-deep 42 lysimeters were analyzed for TDS and nitrate (as N). Because the upper confidence limits of the 43 median Cr[VI] concentrations from these 5-feet depth (pore water) data were 0.73 ppb for

Cr[VI] and 1.40 ppb for Cr[T], about 95% the Cr[VI] is removed with the land treatment method.
 Groundwater monitoring data indicate that Cr[VI] and Cr[T] concentrations in most of the 44
 performance monitoring wells have shown a stable or decreasing trend since the startup of the
 DVD LTU in 2004.

5 Water from extraction wells sent to agricultural treatment units provide for plume containment 6 (hydraulic control) as well as treatment of the Cr[VI] in the root zone of irrigated crops. In general, 7 the large volume of pumping causes large cones of depression and thus large zones of hydraulic 8 control. Because summer pumping rates are greater than winter pumping rates, summer cones of 9 depression are larger than those in the winter. In unconfined alluvial systems, steady-state water 10 level conditions may take considerable time to develop, on the order of months or even years. Cones 11 of depression and capture zones in these areas change in response to variations in seasonal and 12 intraseasonal pumping rates, including changes in agricultural operations (Pacific Gas and Electric 13 2010).

14 Soil normally contains large numbers of diverse microorganisms including bacteria, algae, fungi, and 15 protozoa. Of these organisms, bacteria are the most numerous and biochemically active group, 16 particularly at low oxygen levels. Bacteria require a carbon source for cell growth and an energy 17 source to sustain metabolic functions required for growth. Bacteria also require nitrogen and 18 phosphorus for cell growth. Although sufficient types and quantities of microorganisms are usually 19 present in the soil, blending the soil with cultured microorganisms or animal manure serves to both 20 augment the microbial population and provide additional nutrients. Manure was applied at the DVD 21 by the dairy owner prior to starting agricultural treatment unit operations, but it has not been added 22 since then. The East LTU and Ranch LTU, the original agricultural land treatment units, were both 23 operated by farmers, and it is likely that manure was applied. At new agricultural treatment units, 24 application of manure and dairy hay prior to operation is likely to be recommended to establish and 25 build the soil organic material.

26 A.5.1.2 Model Simulation of Agricultural Land Treatment

General model assumptions for the simulation of agricultural land treatment include a constant
 pumping rate during 3-month increments. All of the Cr[VI] mass was assumed to be converted into
 Cr[III] in the root zone. The model did not assume any residual water was infiltrating back to the
 aquifer (Layer 1) during the summer period, but did not describe the Cr[VI] removal efficiencies for
 the winter period when the ET rate would be reduced and allow some water to percolate back to the
 aquifer.

33 A.5.2 In-situ Reduction Zone Treatment

Project in-situ treatment involves the injection of carbon-containing compounds (i.e., ethanol) to
 stimulate microbial and chemical processes which convert Cr[VI] to Cr[III] through a biological
 (microbial) and chemical reduction process.

37 A.5.2.1 Carbon Injection Process

- The initial dosing concentration of ethanol measured as total organic carbon (TOC) was estimated
 based on the amount required for the reduction of the aerobic electron acceptors (O₂ and NO₃) and
 to distribute organic carbon laterally from injection locations. Based on initial pilot testing, TOC
- 41 injection concentrations in the Central Area were targeted between 100 and 150 mg/L TOC.

- 1 Adjustments to carbon dosing can be made to take into account the changing Cr[VI] concentrations
- 2 around the wells, travel times, and the concentration of reduction byproducts (i.e., Fe, Mn, As). The
- 3 ethanol or other carbon source can be injected continuously or periodically. Periodic dosing is used
- 4 at the Hinkley Site because during the time that injection is not occurring, the continued
- 5 recirculation of groundwater reduces the potential for biofouling within the well screen and filter
- 6 pack (Pacific Gas and Electric 2010).
- 7 Because degradable organic carbon is the driver for the in-situ remediation zone treatment process,
- 8 the key factors for treatment are the adequate delivery and distribution of the ethanol to achieve full
- 9 treatment and carbon persistence within the mobile and immobile porosity. Distribution of the
- 10 injected carbon solution is dependent on the groundwater movement within the aquifer and the
- decay of the organic carbon (rate that the organic carbon is consumed by biological processes). The
- decay of the organic carbon and the groundwater flow within the aquifer (mobile and immobile porosity) determine the travel time for the carbon and the predicted extent of the in-situ
- remediation zone. The treatment zone will increase with ethanol concentration because the
- 15 persistence above the effective reduction concentration will be longer for higher initial
- 16 concentrations. The treatment zone will increase with higher injection rates (gpm).

17 A.5.2.2 Reduction of Cr[VI] to Cr[III]

- 18 Biological reduction of Cr[VI] to Cr[III] can occur under anaerobic reducing conditions (negative 19 oxidation-reduction potential). Soluble organic carbon (ethanol) can be injected into the 20 groundwater to stimulate microorganisms to create the reducing conditions to convert Cr[VI] to 21 Cr[III]. The soluble organic carbon is used by natural anaerobic microorganisms in the subsurface as 22 an electron donor for energy production. The carbon substrates are supplied to the subsurface using 23 active injection wells or passive infiltration galleries. Mixing in the subsurface can occur from the 24 natural hydraulic gradient (passive) or using a recirculation system consisting of pairs of injection 25 and extraction wells (recirculation). Extracted water is amended with the carbon substrates and 26 injected and drawn through the target treatment zone using extraction wells. Figure 3.1-13, in 27 Section 3.1, Water Resources and Water Quality, shows a diagram with the two basic methods for in-28 situ remediation zone treatment (passive and recirculation). Recirculation anaerobic (reducing) 29 treatment systems have been used for a number of years for the in-situ treatment of chlorinated 30 solvents.
- 31 An evaluation of the geochemistry using bench-scale microcosm testing is very useful to select the 32 most effective carbon substrate and estimate the carbon dose required. Microcosm testing is used to 33 evaluate carbon substrate efficiency and to generate transformation rate data, which is the time 34 required to reduce Cr[VI] to Cr[III] with each electron donor. Following laboratory testing, pilot 35 testing is often used to evaluate performance at the field level and to establish final design 36 parameters (e.g., carbon dose and the number of injection and extraction wells [if required]). In situ 37 treatment technologies (e.g., biological treatment) generally do not produce waste products that 38 require management or disposal.
- Microorganisms can support the reduction of Cr[VI] to Cr[III] by a variety of mechanisms. While
 direct microbial reduction is one potential mechanism, the primary mechanism may be through the
 reduction of naturally-occurring iron and sulfate (by microbial respiration) to produce ferrous iron
 (Fe[II]) and sulfides (H2S, HS-) that can react chemically with Cr[VI], reducing it to Cr[III]. The
 Cr[III] will form precipitates with other elements in the soil matrix, thus removing the mass of Cr[VI]
 from the groundwater. Analysis of post-operation soil samples collected in the Central Area in-situ

- remediation zone confirmed that the removal mechanism of Cr[VI] from groundwater was reduction
 and subsequent precipitation. The analyses indicated that reduced iron and sulfide minerals were
- 3 formed which can provide extended capacity for reducing Cr[VI] beyond the period of operation of
- 4 the in-situ remediation zones (Pacific Gas and Electric 2010).

5 The rate of microbial growth and the reduction conditions (biodegradation) are controlled by the 6 type of bacterial population present, which generally use different electron acceptor molecules. Site-7 specific differences in biodegradation rates are due to the presence of microbial communities 8 defined by the dominant electron acceptor present at that location and time. Microbial electron-9 accepting processes include oxygen reduction (aerobic respiration), nitrate reduction, Mn(IV) 10 reduction, Fe(III) reduction, sulfate reduction, and methanogenesis; each process is believed to be 11 facilitated by a different set of microbes. Dissolved oxygen is usually the preferred electron acceptor 12 for the degradation of organic compounds by microbes as it often provides the greatest energy yield. 13 Often, aerobic conditions are initially found in aquifer systems. However, many spills result in a 14 plume of contamination where dissolved oxygen is rapidly depleted due to aerobic respiration; once 15 the dissolved oxygen concentration has dropped sufficiently (to 0.5-1 mg/L), anaerobic bacteria are 16 able to function. Nitrate is often found in aquifers impacted by anthropogenic sources and is the next 17 most preferred electron acceptor. Once nitrate is depleted, manganese(IV), iron(III), and sulfate are 18 often sequentially used; these are generally naturally abundant in many aquifers. CO2 becomes the 19 terminal acceptor in the most reducing environments, producing methane during the process of 20 methanogenesis. It should be emphasized that within an aquifer, even along a single flow path in an 21 aquifer, the terminal electron-accepting process can vary with time and location resulting in several 22 different redox conditions for a single field study (Cozzarelli et al. 2000).

Biodegradation in aquifers is often evaluated by measuring dissolved chemical species that are
 characteristic of particular microbial processes; these include the concentration of dissolved
 electron acceptors, mainly O₂, NO₃, and SO₄, or the reduced products of electron acceptor utilization,
 such as NH₄, HS, Fe, Mn, and CH₄. The reduction of iron and manganese oxides in sediments by
 microbial processes can result in the accumulation of high concentrations of dissolved Fe and Mn in
 groundwater. (Cozzarelli et al. 2000).

29 A.5.2.3 PG&E Pilot Testing of In-Situ Remediation Zone Treatment

30 Two small in-situ remediation zone cells were pilot tested in 2005: (1) Cell 1 was located just north 31 of the PG&E Compressor Station industrial ponds (source area) and (2) Cell 2 was 1,000 feet north 32 of Community Boulevard. In recirculation mode, each test cell pumped about 10 gpm from an 33 extraction well and injected about 10 gpm (in two wells) located about 50 feet upgradient from the 34 extraction wells. Cell 1 tested lactate additions and Cell 2 tested emulsified vegetable oil (EVO). Six 35 monitoring wells were located about 10-40 feet downgradient. The cells were operated for about 3 36 months in passive mode and 3 months in active recirculation mode. The Cr[VI] concentrations in 37 nearby monitoring wells (10-20 feet away) were reduced during the passive mode, and the Cr[VI] at 38 the monitoring wells located 25-50 feet away were reduced during the active recirculation mode 39 (Pacific Gas and Electric 2005). Although these cells were very small (0.05 acre), monitoring for the 40 Cr[VI] reduction to Cr[III] and for anaerobic byproducts allowed the potential for in-situ treatment 41 to be evaluated.

42 After depletion of dissolved oxygen, anaerobic microbes use nitrate as an electron acceptor,

followed by iron (III) and manganese (IV), sulfate and, finally, carbon dioxide. Monitoring of these
parameters in the pilot testing helped to understand the fate of the Cr[VI], because the reduction of

nitrate, sulfate, manganese, iron, and arsenic with lower oxidation-reduction potential (ORP) values
 are correlated with the reduction of Cr[VI] to Cr[III]. The following results were noted:

- Nitrate reduction (to nitrogen gas) was found to be a beneficial result of the in-situ remediation
 zone. Baseline nitrate-N concentrations ranged from 2.88 to 4.30 mg/L at Cell 1. In order for
 Cr[VI] reduction to occur, nitrate must also be reduced. Comparison of Cr[VI] and nitrate data
 showed a direct correlation between the reduction of nitrate and Cr[VI].
- Baseline dissolved iron concentrations were below the reporting limit of 0.3 mg/L, indicating
 that background iron is relatively low in the aquifer at the site. Iron is typically present as ferric
 iron oxides or hydroxides under aerobic conditions. During the pilot study, dissolved iron was
 detected only at the Cell 1 injection wells at concentrations up to 5 ppm, a likely result of the
 reduction of solid-phase ferric iron to dissolved ferrous iron. The detection of dissolved reduced
 iron in these wells correlated with the lowest ORP levels observed during the pilot study.
- Baseline dissolved manganese concentrations ranged from less than 1 to about 30 ppb at Cell 1.
 Manganese is present as manganese (IV) oxides or hydroxides under aerobic conditions. During the pilot study, dissolve manganese concentrations increased to a maximum of 10 mg/L, a result of the reduction of manganese (IV) to soluble manganese (II). The increase of dissolved reduced manganese also correlated well with decreases in Cr[VI].
- Production of methane (final stage of anaerobic reduction) was observed primarily at wells near
 the injection zone, where excess biological substrate was present and ORP levels were the
 lowest.

21 A.5.2.4 Existing In-Situ Remediation Zone Treatment Areas

The current combined IRZ project comprises three IRZ treatment areas: (1) Central Area In Situ
Remediation Zone; (2) South Central Reinjection Area; and the (3) Source Area In-Situ Remediation
Zone. Most of the wells in the In-situ Remediation Zone have shallow and deep screened wells in the
upper aquifer.

26 Central Area In-Situ Remediation Zone

27 Remedial activities in the Central Area in-situ remediation zone include groundwater extraction, 28 amendment with organic carbon (that is, ethanol), and injection using 12 remediation wells to 29 create an in-situ remediation zone along 1,500 feet of Frontier Road, both east and west (500 feet) 30 of Fairview Road. From December 2007 to September 2009, the system was operated in a dipole 31 configuration, with recirculation completed by extracting groundwater from the even numbered 32 well in each pair and injecting the groundwater amended with organic carbon into the odd-33 numbered well in each pair. In October 2008, the substrate was changed from sodium lactate to 34 ethanol. In September 2009 the Central Area in-situ remediation zone system was modified to fill-in 35 treatment gaps observed downgradient of some in-situ remediation zone wells. The system changes 36 allowed injection into former extraction wells. The current full-scale operations plan consists of 37 monitoring Cr[VI] concentrations in 10 performance monitoring wells and modifying the injection 38 and pumping scheme to optimize carbon distribution and chromium reduction. Water is currently 39 extracted from 2 wells and injected into 5 wells within the Central Area in-situ remediation zone. A 40 total of 87 million gallons (MG) has been extracted and injected with carbon into the 12 injection 41 wells. Therefore a total of about 265 AF of aquifer water may have been treated with the in-situ 42 remediation zone injection from these wells.

1 The Central in-situ remediation zone wells are screened in the shallow portion of the upper aquifer 2 (above 120 feet bgs). If the injected water has moved just in the shallow portion of the aquifer, the 3 equivalent water thickness would be about 7.5 feet (50% of the entire aguifer effective water 4 thickness). The treatment area might therefore include about 35 acres (of the shallow upper 5 aquifer). The treatment zone has been observed by reduced Cr[VI] and reduced nitrate, as well as 6 increased iron and manganese at monitoring wells located 400 feet downgradient and at most of the 7 monitoring wells located 800 feet downgradient. This would suggest the treatment area is about 8 1,500 X 1,000 feet (35 acres).

9 South Central Reinjection Area

10 Remedial activities in the SCRIA include groundwater extraction from up to six wells within the 11 northwest portion of the chromium plume, amendment with ethanol, and injection using 12 12 injection wells located within the plume area south of the Central Area in-situ remediation zone. The 13 Northwest Area extraction wells EX-15, EX-16, EX-20, EX-21, and EX-22 are used to enhance plume 14 containment and provide water for the SCRIA. The 2008 CAO allows 110 gpm to be extracted, 15 amended with carbon, and injected into the South-Central in-situ remediation zone area. Full-scale 16 operations began in November 2009. The average concentration of Cr[VI] from the extraction wells 17 was about 40 ppb. The system is currently configured so that amended groundwater can be injected 18 into the shallow (approximately 80 to 110 feet bgs and/or deep (approximately 120 to 145 feet bgs) 19 intervals of the upper aquifer. Ethanol was added to give an initial ethanol concentration of 225-250 20 ppm (carbon concentration of about 115-125 ppm). These are relatively small injection wells, with a 21 total of about 50 million gallons (MG) injected during 2010. This is equivalent to about 150 af, and 22 would potentially have treated the Cr[VI] in about 10 acres of the plume (assuming the aquifer was 23 75 feet deep with 20% porosity). If the water was injected into just the shallow or deep upper 24 aquifer, the treated area might be twice as large. The overall injection rate into the SCRIA is often 25 maintained at a reduced rate to minimize potential lateral migration of the plume boundary (Pacific 26 Gas & Electric 2012).

27 Source Area In-Situ Remediation Zone

28 Remedial activities in the Source Area in-situ remediation zone include groundwater extraction, 29 amendment with ethanol, and injection using up to 21 remediation wells. Full-scale operation of the 30 Source Area in-situ remediation zone system began in May 2008. Injection and extraction locations 31 have been rotated, in response to decreased flow rates and/or increasing water levels in injection 32 wells. A total of about 52 MG has been pumped from the four wells and injected into the 12 injection 33 wells between May 2008 and December 2010. Therefore, during this time, the area potentially 34 treated an aquifer volume of 150 af, depending on the effective spreading of the injected carbon into 35 the immobile porosity of the aquifer. Because this is a recirculation in-situ remediation zone, the 36 area between the extraction wells (located along 750 feet) and the injection wells (located 400 to 37 1200 feet upgradient from the injection wells) has shown the greatest reduction of Cr[VI] 38 concentrations. The Source Area in-situ remediation zone system was underwent full expansion on 39 May 22, 2011. Expanded wells to the northwest, north, and northeast of the existing line of 40 extraction wells (SA-RW-01 to SA-RW-04) to treat the areas with some of the highest remaining 41 Cr[VI] concentrations. Four new extraction wells were constructed in a 1,500 feet east-west line 42 about 400 feet north of Community Blvd. The expanded system includes conversion of the four 43 existing extraction wells to injection wells, and installation of five new dual-screened recirculation 44 wells to the east and west of the current extraction wells. The injection wells are located along a

1 2,000 feet east-west line. The goal of the expanded Source Area in-situ remediation zone is to reduce

- 2 the Cr[VI] concentrations in the shallow and deep portion of the upper aquifer and eliminate the
- source of high Cr[VI] that is moving north with the regional groundwater movement past the south central and Central in-situ remediation zone.

5 A.5.2.5 Effectiveness of In-Situ Remediation Zone Treatment

6 The area of treated groundwater (i.e., area in which nitrate and Cr[VI] concentrations are reduced) 7 can be larger than the extent of the carbon distribution. In the Central Area in-situ remediation zone, 8 the carbon was distributed and utilized within the first few hundred feet, creating reducing 9 conditions near the first two rows of monitoring wells and reducing Cr[VI] concentrations to less 10 than 3.1 ppb. During initial operation of injection wells, when the microbial community was not yet 11 fully established, organic carbon traveled as far as 400 feet down gradient. As the microbial 12 community became established, the organic carbon was consumed closer to the injection wells and 13 was no longer detected in the monitoring wells 400 feet down gradient. Based on sampling results, 14 the treatment areas around the Central Area in-situ remediation zone injection wells range from 40 15 to 150 feet wide and extend 1,000 to 1,600 feet down gradient. This movement of the treated water 16 from the in-situ remediation zone to down gradient locations was caused by the regional 17 groundwater gradient (no recirculation). However, it is difficult to determine how much treatment 18 of the Cr[VI] in the down gradient immobile porosity will occur if the reducing conditions do not 19 persist (Pacific Gas and Electric 2010).

20 TOC was consistently distributed throughout the Source Area in-situ remediation zone 400 feet 21 down gradient of the injection wells (because this is a recirculation in-situ remediation zone). 22 Greater TOC distribution was a result of higher injected concentrations of ethanol, initially between 23 200 and 400 mg/L. In the case of the Source Area in-situ remediation zone, the treatment area is 24 approximately the same as the area of carbon distribution. It is difficult to determine how far the in-25 situ remediation zone will extend beyond the immediate vicinity of the injection-extraction wells. 26 Adjustments in the extraction and injection wells (location and pumping rates) and adjustments in 27 the ethanol concentrations have been made based on monitoring results for the Central in-situ 28 remediation zone and the Source Area in-situ remediation zone. Similar monitoring with 29 adjustments will be needed throughout the operation of all of the in-situ remediation zone areas for 30 the complete clean-up operations.

31 Temporary mobilization of reduced metals (arsenic, manganese, and iron) as well as sulfide and 32 methane (i.e., reduced byproducts) may occur as a result anaerobic groundwater conditions caused 33 by injecting ethanol into the aquifer. While the duration of mobilization is unknown, mobilized 34 metals are expected to precipitate once the ethanol has been depleted and the metals are exposed to 35 background aerobic groundwater conditions. Although the distance that byproducts may migrate 36 from the treatment zone is unknown, byproducts should precipitate before reaching receptors, such 37 as domestic and agricultural wells. The in-situ remediation zone contingency plan includes 38 monitoring with mitigation measures to be performed if threshold concentrations of remediation 39 byproducts (ethanol and reduced metals) are exceeded at designated sentry monitoring wells 40 within the project recovery zone. Mitigation measures will be initiated to prevent remediation 41 byproducts above the threshold concentrations from migrating beyond the recovery zone, and to 42 protect the water quality at nearby private wells. Ethanol injection will be scaled back or shut off. If 43 groundwater monitoring indicates that remediation byproducts are not attenuating within the 44 project boundaries, additional extraction wells for recirculation back to the in-situ remediation zone or air sparging (i.e., surface oxidation) and reinjection will be initiated to prevent migration to the
 contingency zone (Pacific Gas and Electric 2011a).

3 A.5.2.6 Stability of Reduced and Precipitated Chromium (Cr[III])

The stability of Cr[III] (relative to re-oxidation) that has been reduced and precipitated from
agricultural land treatment or in-situ reduction treatment is expected to be similar or greater than
naturally occurring Cr[III]. While the kinetics of Cr[VI] reduction are fairly rapid (days) in reduced
groundwater environments, the re-oxidation of Cr[III] is relatively slow. There are only a few
oxidants present in natural systems that are known to be capable of oxidizing Cr[III] to Cr[VI]. These
include oxygen and manganese oxide (Pacific Gas and Electric 2011a).

- 10Dissolved oxygen can oxidize Cr[III] to Cr[VI], but the kinetics are very slow at the neutral to slightly11acidic groundwater pH typical of most aquifer systems, such as Hinkley. As a result, dissolved
- 12 oxygen is more likely to react with other materials in the subsurface before reacting with aqueous
- 13 Cr[III]. This is particularly true in a former anaerobic reactive zone, where reduced minerals (such
- 14 as iron sulfides) are formed and stored in the aquifer. In addition, Cr[III] will have sufficient time to
- 15 be sequestered through precipitation and sorption reactions before oxygen can react with it. As a
- 16 result, the available literature concludes that the oxidation of Cr[III] by dissolved oxygen is not likely
- 17 in typical groundwater systems.
- 18 Manganese oxides are more effective in oxidizing Cr[III] than dissolved oxygen, and occur in the 19 subsurface primarily as coatings on soil grains. The rate at which they react with dissolved Cr[III] is 20 affected by both the reactive surface area of the manganese oxides, and the dissolved concentrations 21 of Cr[III]. For the oxidation reactions to proceed, Cr[III] must adsorb directly to the surface of the 22 manganese oxide minerals. Because aqueous Cr[III] concentrations will be effectively controlled by 23 low solubility Cr[III] hydroxides and mixed iron-Cr[III] hydroxides formed through treatment, the 24 amount of aqueous Cr[III] available for adsorption onto manganese oxide surfaces and subsequent 25 oxidation will be limited. A portion of the manganese liberated in the in-situ remediation zone will 26 precipitate as carbonate minerals. In addition, reaction of manganese with Cr[III] will be inhibited 27 by reduced iron minerals such as iron sulfide (FeS) that will be formed within the in-situ 28 remediation zone s in the same area where chromium is precipitated (Pacific Gas and Electric 29 2011a).

30 A.5.2.7 Model Simulation of In-Situ Remediation Zone Treatment Areas

31 Figure 3.1-13, Section 3.1 Water Resources and Water Quality, shows a diagram of the two different 32 types of In-situ Remediation Zones that can be used to help understand the in-situ remediation zone 33 monitoring results from the 2005 pilot testing and full-scale in-situ remediation zone areas (Central, 34 Source, and SCRIA) within the Hinkley chromium plume. This conceptual model was used to better 35 understand information, such as what the 3D groundwater flow (MODFLOW) and chemical 36 transport model (MT3DMS) would calculate within a representative model cell. The size of the 37 conceptual model example cell was an acre with a time-step of a month for a year. This allowed the 38 change in groundwater flow and Cr[VI] concentrations within the example cell to be tracked for a 39 year, to understand the likely effects of different in-situ remediation zone designs with various 40 assumed aquifer properties.

As described previously, model assumptions for the Hinkley Valley groundwater flow in the upper
aquifer include a saturated thickness of about 75 feet, with a porosity of about 20% and a hydraulic

1 conductivity of about 50 ft/day. There is a regional groundwater elevation gradient of 20 ft/mile, 2 which indicates a northward water tracer movement of about 1 ft/day through the aquifer 3 thickness. This regional water movement through the one acre example cell (about 210 feet wide) 4 can be specified as a regional flow rate (15 gpm based on model assumptions). The in-situ 5 remediation zone cell would include some injection of carbon-amended water into the cell, which is 6 specified as an injection rate (gpm). These flow parameters will provide the basic aquifer movement 7 and pumping rate required for in-situ remediation zone treatment within the cell. A higher regional 8 flow will move the plume faster, but will require increased carbon injection pumping to create the 9 necessary chemical conditions to cause the Cr[VI] to be reduced and precipitate as Cr[III].

- 10 The highest concentrations of Cr[VI] remain below the Compressor Station evaporation ponds, 11 suggesting that not all of the water in the aquifer is moving north with the groundwater elevation gradient (regional flow). Some portion of the aquifer porosity is trapped behind clay layers or lenses 12 13 that prevent movement in this portion of the aquifer. For the conceptual model, half of the porosity 14 (10%) will be assumed to be mobile (water moving with the groundwater gradient) and half will be 15 assumed to be immobile (trapped within the aquifer matrix). The water between these two porosity 16 units will exchange (mix) at a specified rate (% of the mobile volume mixing with the immobile 17 volume each month). The conceptual model will track the Cr[VI] concentration and the injected 18 carbon concentration, which will can be used to indicate reduced chemical conditions within the 19 one-acre example cell. The Cr[VI] in the mobile porosity will be transported by the regional 20 groundwater flow. The injection flow will replace some of the regional flow from the south. The 21 Cr[VI] in the immobile porosity will slowly exchange with the mobile porosity, and will cause the 22 concentrations of Cr[VI] in the cell to remain higher than if the entire cell porosity was mobile and being moved and diluted by the regional groundwater flow. 23
- 24 The MT3D model tracks the average Cr[VI] and carbon concentrations in the mobile and immobile 25 pore water within each model cell (25 feet by 25 feet). The exchange rate is apparently about 2% in 26 a month. But the carbon decay rate was assumed to be 0.05 per day (half the concentration in 14 27 days). The reduction of Cr[VI] and precipitation of Cr[III] in the aquifer was simulated in the 28 presence of injected carbon whenever it exceeds a concentration of 0.1 ppm. A carbon half-life of 14 29 days (0.05 per day) was estimated, to account for the degradation of the injected carbon over time. 30 For an injection of 100 ppm, the concentration would be 50 ppm in 14 days and would be 0.1 ppm in 31 about 150 days. The effective zone for the in-situ remediation zone would be the mobile volume 32 filled by the ethanol within 150 days of injection pumping. But the carbon would then be expected to 33 spread into the immobile porosity, diluting the carbon by a factor of 5, because total porosity of 35% 34 with mobile porosity of 7% was assumed. So the treatment zone would extend as far as 0.5 ppm in 35 the mobile porosity zone, which would be about 100 days of movement if the initial injection was 36 100 ppm.
- No byproduct formation or persistence is included in the MT3D model at the present time. Only
 Cr[VI] and carbon (ethanol) concentrations have been simulated with the chemical groundwater
 model, MT3D. Nitrate and sulfate concentrations would be much lower within the chemical reduced
 conditions that are expected in the in-situ remediation zone. With the lack of other chemicals, such
 as nitrate and sulfate, incorporated into the model, the anaerobic processes and development of
 lower redox conditions are only indirectly estimated with the injected carbon concentrations.

1 A.5.3 Above-ground Treatment

Above ground (ex-situ) treatment includes various physical-chemical and biological treatment processes that can be used to treat extracted groundwater containing chromium. The treatment process options include liquid-phase treatment to reduce toxicity, mobility, or mass of chromium in groundwater prior to reuse/injection. The physical-chemical methods that can be used to remove chromium from groundwater include chemical reduction/precipitation, electrochemical precipitation, coagulation/microfiltration, ion exchange, and reverse osmosis.

- 8 In general, chemical reduction/precipitation treatment is implemented by mixing treatment
- 9 chemicals with the water stream to promote a reduction/oxidation (redox) reaction. Redox 10 reactions involve the transfer of electrons from one compound to another. Specifically, one reactant is oxidized (loses electrons) and one is reduced (gains electrons). For the case of Cr[VI] treatment, 11 12 the chromate ion would gain electrons and be reduced to Cr[III], and iron would lose electrons and 13 be converted from Fe₂ to Fe₃. Reducing agents most commonly used for treatment of Cr[VI] are 14 ferrous sulfate, ferrous chloride, sodium bisulfite, and sodium hydrosulfite. Redox chemicals must 15 be added in quantities greater than the stoichiometric ratio because the chemicals will be consumed 16 by other oxidized chemicals. Unit processes for chemical reduction/precipitation systems for 17 chromium removal typically include a reactant feed system, reaction (reduction) vessel, aeration 18 tank for oxidation of excess iron, filtration system, and solids handling equipment for dewatering 19 and disposal of precipitated materials. The technology has been proven effective for chromium 20 removal in both bench and full-scale applications, has been implemented at a number of similar sites 21 for groundwater treatment, and could be implemented at the Hinkley site. The process does 22 generate a chemical waste sludge that will require disposal, possibly as a hazardous waste (Pacific 23 Gas and Electric 2010).
- Reduction and precipitation of Cr[VI] from groundwater involves at least two reactors. The ferrous
 iron reduction process is typically carried out with two reactors in series, the first for Cr[VI]
 reduction and the second, an aerated reactor to oxidize residual ferrous iron to the insoluble ferric
 state. Flocculants to aid settling of the Cr[III] and Fe₃ are added. The precipitated solids containing
 Cr[III] and Fe₃ hydroxides are removed by media filtration. Filter backwash is collected in a large
 tank where solids are settled, and clear liquid decanted for reuse/disposal.
- 30 There are generally two major limitations for surface treatment of Cr[VI] pumped from 31 groundwater. The treatment capacity needed to treat the Hinkley plume within a reasonable time 32 would be relatively large. Because there is an estimated volume of about 7,500 af with 33 concentrations of greater than 50 ppb, a facility with a capacity of 250 gpm would pump and treat 34 about 400 af per year, requiring 20 years to pump and treat the plume core (>50 ppb). A facility with 35 a capacity of 1,000 gpm would still require five years to pump the existing plume core (>50 ppb) 36 volume. The second limitation is that it is difficult to pump all of the contaminant from the 37 groundwater, because of immobile porosity zones within the aquifer material. The Hinkley Source 38 Area monitoring wells suggest that this is a characteristic of the chromium plume. Therefore, 39 pumping several times the existing plume volume may be required to remove the majority of the 40 Cr[VI] from the plume core. Pumping several times the core plume volume would require many 41 more years. The sludge will likely be considered a toxic waste and would need to be disposed of in 42 an appropriate landfill facility. However, unlike agricultural land treatment and in situ operations, 43 above-ground treatment will remove the Cr[VI] from the aquifer material, rather than leaving the 44 Cr[III] precipitated in the aquifer material.

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