



Matthew Rodriguez  
Secretary for  
Environmental Protection

## California Regional Water Quality Control Board Lahontan Region

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Edmund G. Brown Jr.  
Governor

December 29, 2011

Tom Wilson  
Director, Remediation Program Office  
Pacific Gas and Electric Company  
3401 Crow Canyon Road  
San Ramon, CA 94105-1814

### **INVESTIGATIVE ORDER NO. R6V-2011-0105, REQUEST FOR INFORMATION ON LABORATORY QUALITY CONTROL DATA FOR 2007 GROUNDWATER BACKGROUND STUDY REPORT, PACIFIC GAS AND ELECTRIC COMPANY (PG&E), HINKLEY COMPRESSOR STATION, SAN BERNARDINO COUNTY**

This Investigative Order requires PG&E to submit a technical report concerning quality control procedures associated with groundwater sample analyses conducted by Emax Laboratories and Truesdail Laboratories, contracted by PG&E for its 2007 Groundwater Background Study Report. This investigative order is issued pursuant to California Water Code section 13267.

#### **Background**

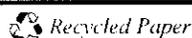
In response to direction by the Lahontan Water Board, PG&E's *2007 Groundwater Background Study Report, Hinkley Compressor Station, Hinkley, California* (hereafter, the 2007 Background Study Report) underwent scientific peer review in the summer of 2011. As a result of that peer review, quality control issues were identified related to the procedures used by Emax Laboratories and Truesdail Laboratories, the two chemistry laboratories that analyzed groundwater samples from the Hinkley Valley for the 2007 Background Study Report. The peer reviewer expressed doubt regarding the validity of the data from the labs due to certain quality control procedural irregularities.

#### **Requirement**

Pursuant to section 13267 of the Water Code, PG&E is hereby required to submit a technical report to the Water Board by **January 20, 2012** that includes the following items. Responses should include information for all samples analyzed for the 2007 Background Study Report:

- 1) For the continuing calibration verification (CCV) failures for EPA Method SW 7199, discuss what percentage out of range were the CCV recoveries.
- 2) Provide raw data, including calibration curves, CCVs, and quality control (QC) samples, from hexavalent chromium analysis.

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- 3) Provide information on matrix spike amounts and recoveries for hexavalent chromium.
- 4) A description of how samples were chosen for matrix spiking.
- 5) Provide evidence that Mid-Range Calibration Check Standards (MRCCSs) were prepared from a second source standard. Provide NIST (National Institutes of Standards Traceability) documentation for MRCCSs.
- 6) Verify which calibration curve was used for EPA Method 6010B (was the standard or low level calibration curve used?). Provide documentation showing calibration curve.
- 7) Provide valid Environmental Laboratory Accreditation Program certificates for each lab for total and hexavalent chromium analysis for the calendar year 2006.
- 8) Discuss why EPA Method 6800 was not used for chromium species identification.
- 9) Discuss why EPA Method 6020A was used instead of Method 6010 for total chromium.

The technical report required by this Investigative Order is necessary to determine whether the analytical data from the laboratories in question is valid and reliable for determining background chromium concentrations in the Hinkley Valley. The need for this information outweighs the burden on PG&E to produce the information it already possesses, including the costs to produce the technical reports.

Any failure to furnish the required technical or monitoring reports subjects PG&E up to \$1,000 a day in administrative civil liability for each violation pursuant to Water Code section 13268.

Please contact me at 530-542-5436, or Anne Holden at 530-542-5450 if you have any questions.



LAURI KEMPER  
ASSISTANT EXECUTIVE OFFICER

Enclosure: 13267 Fact Sheet

cc: Kevin Sullivan, Hinkley Remediation Project Manager

ALH/adw/T:Background Study QC information 13267.docx  
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