Janet Napolitano
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Stephen A. Owens
Director

March 14, 2005

Mr. B.B. Blevins, Director
California Environmental Protection Agency
Department of Toxic Substance Control
5796 Corporate Avenue
Cypress, CA 90630

RE: PG&E Topock Compressor Station and Data from New Wells

Dear Director Blevins:

On February 14, 2005 ADEQ was notified by PG&E's consultant that hexavalent chromium was detected at levels above California drinking water standards in newly installed well MW-34-100. In response, the California Environmental Protection Agency Department of Toxic Substances Control (DTSC) has required Pacific Gas & Electric to implement contingency plans, including installation of a second groundwater extraction well. We are pleased with DTSC's action, but wish to express our concerns about the potential implications of the well sample results.

In my letter to the California Regional Water Quality Control Board dated September 9, 2004, a copy of which was provided to DTSC, I expressed my concern "that the plume of hexavalent chromium may have already moved beneath the Colorado River and may now be contaminating Arizona's groundwater." Given that well MW-34-100 is located approximately 60 feet from the Colorado River and concentrations of hexavalent chromium exceeding the chromium drinking water standard were detected at a depth of 90 to 100 feet below ground surface in this new well, the potential threat to Arizona groundwater and surface water resources from the plume has increased significantly.

Because of our great concern, ADEQ will perform a study, to be funded by PG&E, to determine whether the plume has contaminated Arizona groundwater. This study is expected to begin in the next 6 to 8 weeks and will last for a number of months. We will keep DTSC informed of the results.

The new findings in MW-34-100 also raise additional concerns about the potential surface water impact to the Colorado River. Consequently, we urge you to conduct depth-specific surface water sampling, river sediment sampling, and surface water sampling at the entrance of the Colorado River to Topock Gorge in response to the new data. We believe these steps are needed to ensure that public health and the environment are protected.

We will continue to participate in the Consultative Workgroup and the Technical Workgroup to assist with finding solutions to our ongoing concerns.

Thank you for your consideration. We look forward to continuing to work with you.

Sincerely,

Stephen A. Owens
Director