

DECEMBER 22, 2009
STATE DEPARTMENT OF TOXIC
SUBSTANCES CONTROL (DTSC)
RESPONSE TO
MALCOLM PIRNIE



Department of Toxic Substances Control

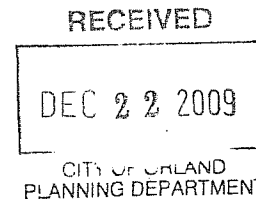


Maziar Movassaghi
Acting Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Arnold Schwarzenegger
Governor

Linda S. Adams
Secretary for
Environmental Protection

December 21, 2009



Ms. Nancy Sailsbery, Director
Community Services Department
City of Orland
815 Fourth Street
Orland, California 95963

Dear Ms. Sailsbery:

The Department of Toxic Substances Control (DTSC) has reviewed the November 16, 2009 letter (Letter) prepared by Malcolm Pirnie (MP) on behalf of Crystal Geysers Water Company (Crystal). This Letter is responding to our November 5, 2009 letter recommending Crystal to explore another deeper aquifer as an option for source of groundwater and to perform modeling to determine if any potential impacts may exist that could affect the PCE plume during long term extraction of groundwater. Crystal has submitted an application for a bottling plant, located at 1507 County Road 200, with the City of Orland. The proposed facility will be located about 2,000 feet cross gradient of the leading edge of the PCE plume. Crystal has proposed to extract about 160 acre-feet of groundwater annually for their operations. Groundwater will be extracted from the water bearing zone at approximately 130 to 170 feet below ground surface since it meets the regulatory minimum threshold of 250 milligrams per liter (mg/L) of total dissolved solids (TDS) for mineral water.

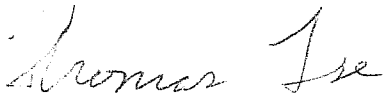
MP conducted an assessment, using groundwater modeling, of the potential impacts of the planned groundwater pumping on the existing PCE plume and concluded that pumping at the proposed site would not cause the plume to arrive at the well within the timeframe simulated in the model, and that the effect of pumping on the plume in the D-zone would be minimal over the same time period. The assessment highlighted the influence of the PCE plume due to the increased pumping rate in the city wells. It should be noted that the groundwater model present the hypothetical assessment of the groundwater movement. Crystal should consider implementing long term monitoring program to confirm the result of the modeling. As stated in the previous letter, it is Crystal's responsibility to ensure their activities do not significantly spread the contamination or exacerbate the problem. If their action (future and present) has been determined to negatively affect the plume, DTSC could consider Crystal as a potentially responsible party for the groundwater contamination. Also, City of Orland is the lead agency for approval of this project and should consider this assessment in support of the permit decision.

00595

Ms. Nancy Sailsbery, Director
December 21, 2009
Page 2

If you have additional questions, please contact me at (916) 255-3643 or Mr. Michael Finch, Senior Engineering Geologist, at (916) 255-3583.

Sincerely,



Mr. Thomas Tse
Project Manager
Brownfields and Environmental Restoration Program

Enclosure

cc: Mr. Kevin Backus, Director
Glenn County Environmental Health
257 N. Villa Avenue
Willows, California 95988

Mr. Fernando Amador, P.E.
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