

Carnation

FILE COPY

RECEIVED

2:35 pm, Jan 04, 2008

Alameda County
Environmental Health

Inter-office Communication

Corporate Offices Los Angeles, California

August 24, 1990

NOTE TO FILE

cc: Jim Person I-4
M. Wood L-7

FR: Rick Flaget I-4
Environmental Affairs



RE: OAKLAND UST - AGE TERMINATION
(PHONCON WITH JIM WALLACE, AGE ON AUG 14, 90:
REWRITTEN FROM NOTES TAKEN AUG 14, 90)

I spoke with Jim Wallace in the early afternoon with Mac Ewing present. Jim advised me that he was under strict direction to have "no contact with Carnation." I said fine, but asked him to listen to me and talk with his supervisors and attorneys and get back to me.

I advised Jim that Andy Dong of General Electric (GE) had contacted me regarding AGE's request to have GE pick up and dispose of PCB material. Mr. Dong was not entirely sure what AGE was proposing to send off-site and wanted confirmation that Carnation was authorizing this work.

GE stated that they had been requested by AGE to pick up 53 drums of PCB contaminated material and possibly contaminated carbon media from filter units. GE had concerns about the possible PCB material and wanted tests to confirm the PCB content or GE must assume the maximum level of contamination.

I informed Jim Wallace that I instructed GE not to remove anything from the Oakland site without confirmation from me and that I would not authorize anything unless AGE could explain what it was.

Jim stated that there were 53 drums containing safety gear, piping, filter units, the oil water separator, and steam cleaning liquids which were all suspected of being PCB contaminated. also AGE wanted the carbon units disposed of and that AGE was performing at the time a wipe test to determine if the carbon units were contaminated.

When asked if Carnation would receive these results and if AGE would have someone on-site to show Carnation what AGE wanted to dispose of, Jim said he would check.

Jim Wallace called in the late afternoon of August 14, after talking with Michael Geary and AGE's attorneys.

August 24, 1990

Jim stated that he was advised he could not meet or talk with Carnation unless AGE received a letter from Carnation's attorneys explicitly stating AGE would be paid for the time spend for the meeting. He also said he was unable to provide any technical data to Carnation as it all has been turned over to AGE's attorneys for "protection ."

I said I would discuss it with Carnation's Legal Department but that unless he heard otherwise not to expect any authorization from Carnation to dispose of the suspected PCB material.

Mr. Wallace, however, indicated that even if Carnation were to come up to the site after AGE left it would be easy to see what was to be disposed of, as all barrels are clearly marked and labeled for PCB destruction.

Mr. Wallace indicated piping and equipment from known PCB wells was disposed of in the barrels. All other material was cleaned and disposed of "otherwise." If there was no reason to suspect it to be PCB contaminated then it was not disposed as such.

Jim indicated that he thought if the PCB results came back showing PCB in the carbon units, he would guess AGE would leave the entire unit on-site. Jim sounded like, however, he was not longer really involved in this project or its shutdown and did not know how it would be handled.

RF/sd
RF3-66



Inter-office Communication

Corporate Offices Los Angeles, California

September 6, 1990

NOTE TO FILE

cc: Jim Person - 15
M. Wood - 20
M. Ewing - 20

FR: Rick Flaget - 15
Environmental Affairs

RE: REMOVAL OF SUSPECTED PCB MATERIAL OAKLAND UST PROJECT

I spoke with Andy Dong of General Electric (GE) today. I advised Andy that Jim Person and I had been at the Oakland site on August 21, 1990. I advised Andy that we saw approximately 120-140 barrels labeled "PCB - Contaminated." This is considerably more than the 53 drums AGE had indicated needed disposal when AGE spoke with GE. I told Andy that many of the barrels were labeled as containing carbon media so it was likely the large carbon units AGE had requested GE dispose of were emptied and the carbon media was placed in the drums.

GE needs to know how much of the material is liquid and how much is solids. The liquids will be incinerated and the solids are disposed of in a Class I landfill. I estimated 75% were solids but advised that GE go to the facility and confirm this as well as let Carnation know what testing would be necessary to dispose of the material. I told GE Carnation did not want to accept a blanket "greater than 25,000 ppm" classification for untested material.

Andy said he would check on what sort of composite or representative sampling could be employed to avoid testing all drums.

Andy will contact Geno Dimaggio at the Oakland facility to arrange a visit of the site to get an actual breakdown of what needs to be disposed of. Geno is expecting the call either September 7 or 10.

The solid material would not necessarily need to be disposed of by GE as it is just going to a Class I landfill. GE's liability coverage however, might be reason to allow them to handle this as well though.

RF/sd
A-002

CARNATION



Corporate Offices

800 North Brand Boulevard
Glendale, California 91203
Telephone: (818) 549-6000

Date: September 26, 1990

TELEFAX

TO: Andy Dong
General Electric

TELEFAX NO.: (415) 639-5360

FROM: Rick Flaget
Environmental Affairs
Carnation

Telephone: (818) 549-6494

Number of pages (including this cover sheet): 10

Comment: per our conversation today

If you do not receive all of the pages, please call:

(818) 549-6111, 24-HOUR VOICE MAIL, MAILBOX NUMBER 6111.

Our Telefax Group 1-2-3 Number: (818) 549-6952 Automatic

Our Telex Number: 383-338 CARNETK UD

Our TWX Number: 910-997-3855 CARNETWX UD



FILE COPY

Corporate Offices

5045 Wilshire Boulevard
Los Angeles, California 90036
Telephone: (213) 932-6000

August 1, 1990

Richard Heberlein
PCB Facility Supervisor
General Electric Company
11855 White Rock Road
Rancho Cordova, California 95670

Re: PCB LOG REPORT CORRECTION: JOB NUMBER 86964B

Dear Mr. Heberlein:

Following up on our conversation last Friday, July 27, 1990, Carnation is requesting a correction to the referenced PCB Log Report.

As I expressed, the apparent discrepancies and unexplained PCB concentration levels are:

- 1) There is a weight difference between what was reported on Manifest Number 88647146 dated 1-11-90 and the weight reported on the PCB Log Report which accompanied our Certificate of Disposal. The weight of disposed materials shown on the PCB Log is 3826 pounds, 327 pounds more than recorded on the actual manifest signed upon receipt of the materials.
- 2) The concentrations of PCB contamination which are recorded on the PCB Log Report are extremely high and incorrect. The levels recorded are greater than the highest PCB measurements ever recorded at the facility in question.

You indicated that the weight listed on the original manifest is an approximation made by the field personnel based on conversion factors or amounts of liquid and soil and is only an approximate value. However, the number recorded on the PCB Log Report is an actual measurement.

You also indicated that the soils, safety equipment and miscellaneous items were not tested for PCBs so the worst case was assumed (>25,000 ppm). This was also the case for the empty drums which without documentation were listed at less than 500 ppm.

I understand now what has happened and appreciate the explanation. With regard to the concentrations of PCB listed on the waste disposed, I request the PCB Log Report be corrected to reflect the most accurate characterization of the waste as possible. To assist in this I am including the lab results and chain of custody reports for the highest PCB concentrations found at the Carnation site at 1310 14th Street, Oakland, California (0.870 ppm in the soil and 75 ppm in the oil (free product)). We have no reason to believe that the PCB concentrations in the oil and solids picked up by General Electric were higher

Page (2)
August 1, 1990

than these maximums. Therefore, we request that you correct the PCB Log Report accordingly and provide us with a copy of said corrected Report at your earliest convenience.

I appreciate your review of this matter.

Thank you.

Sincerely

A handwritten signature in cursive script that reads "Richard Flaget". The signature is written in dark ink and is positioned above the typed name and title.

Richard Flaget
Engineer/Environmental Affairs

Attachments

bcc: M. Wood - 7
J. Person - I-4

RF/nst
RF3-41

RECEIVED SEP 08 1989

 **CHEMWEST**
ANALYTICAL LABORATORIES, INC.

September 6, 1989

Anania Geologic Engineering
11330 Sunrise Park Drive, Suite C
Rancho Cordova, CA 95742

Attention: Mr. Jim Wallace

Subject: Report of Data - Case Number 4488

Dear Mr. Wallace:

The technical staff at CHEMWEST is pleased to provide our report for the analysis you requested: Organochlorine Pesticides/PCBs - EPA Method 8080.

One oil sample for Project Number 004-88-094 arrived August 25, 1989 in good condition. Results of the analysis, along with the appropriate reporting limits, are presented on the following page.

Thank you for choosing CHEMWEST Laboratories. Should you have questions concerning this data report or the analytical methods employed, please do not hesitate to contact your project manager. We hope that you will consider CHEMWEST Laboratories for your future analytical support and service requirements.

Sincerely,



Robert T. Hart
Data Control Manager

and



Kirk Pocan
Project Manager

KP:ba

cc: Joel Bird, President
File

EPA METHOD 8080
ORGANOCHLORINE PESTICIDES AND PCBs

Sample I.D.:	3411	Client:	ANANIA
Sample Received:	09/14/89	Client Ref. No.:	004-89-093
Sample Analyzed:	09/19/89	Lab Client Code:	78109
Sample Matrix:	Soil	Lab No.:	8909112-07

Compound	Concentration <u>µg/kg (ppb)</u>	Limit of Detection <u>µg/kg (ppb)</u>
alpha-BHC	ND	3
gamma-BHC (Lindane)	ND	3
beta-BHC	ND	3
heptachlor	ND	3
delta-BHC	ND	3
aldrin	ND	3
dieldrin epoxide	ND	3
endosulfan I	ND	3
4,4'-DDE	ND	3
dieldrin	ND	3
endrin	ND	3
4,4'-DDD	ND	3
endosulfan II	ND	3
4,4'-DDT	ND	3
endrin aldehyde	ND	3
endosulfan sulfate	ND	3
chlordane	ND	20
toxaphene	ND	200
PCB-1016	ND	30
PCB-1221	ND	30
PCB-1232	ND	30
PCB-1242	ND	30
PCB-1248	ND	30
PCB-1254	870	30
PCB-1260	ND	30

ND = Not detected at or above limit of detection

ANANIA GEOLOGIC ENGINEERING

AGE No 13

PROJECT NO. 004-89-093		LAB REPORT NO.		NO. OF CONTAINERS	ANALYSES							REMARKS	
P.O. NO.		SAMPLERS: (signature) Robyn McKinney			SAMPLE TYPE			8015 Mod (top)	8020 BTEX	8080 PCB's	Total lead		Total Cu + Zn + Pb
LAB LOG NO.	DATE	TIME	SAMPLE I.D.		SOIL		WATER						
					COMP	GRAB							
	9/13/89	1020	3405 RMK	1		✓		✓	✓	✓	✓		VERBAL REPORT ON
	9/13/89	1115	3406 RMK	1		✓		✓	✓	✓	✓		PCB ASAP
	9/13/89	1132	3407 RMK	1		✓		✓	✓	✓	✓		↓
	9/13/89	1150	3408 RMK	1		✓		✓	✓	✓	✓		
	9/13/89	1405	3409 RMK	1		✓		✓	✓	✓	✓		
	9/13/89	1415	3410 RMK	1		✓		✓	✓	✓	✓		
	9/13/89	1430	3411 RMK	1		✓		✓	✓	✓	✓		
RELINQUISHED BY: (signature) Robyn McKinney		DATE/TIME 9/13/89-1745		RECEIVED BY: (signature) James Perry		REMARKS: 5 day TAT		SEND RESULTS TO: ATTN: JIM WALLACE ANANIA GEOLOGIC ENGINEERING 11330 SUNRISE PARK DR. SUITE C RANCHO CORDOVA, CA 95742-6542 PHONE NO. (916) 438-0001					
RELINQUISHED BY: (signature) James Perry		DATE/TIME 9/14/89/1000		RECEIVED BY: (signature) Terry Saylor		4:00 PM							
RELINQUISHED BY: (signature)		DATE/TIME		RECEIVED BY: (signature)									

CHAIN OF CUSTODY

RECEIVED SEP 23 1989

Clayton Environmental Consultants, Inc.

P.O. Box 9019 • 1252 Quarry Lane • Pleasanton, CA 94566 • (415) 426-2600

September 22, 1989

Mr. Jim Wallace
ANANIA GEOLOGIC ENGINEERING
11330 Sunrise Park Drive
Rancho Cordova, CA 95742

Client Ref. No. 004-89-093
Work Order No. 8909112
Client Code No. 78109

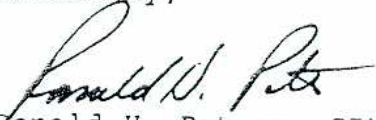
Dear Mr. Wallace:

Attached is our analytical laboratory report for the samples received on September 14, 1989. Results for EPA 8080 were reported verbally to you on September 21, 1989. A copy of the Chain of Custody form acknowledging receipt of these samples is attached.

Please note that any unused portion of the samples will be retained at our facility for approximately 30 days after the date of this report, unless you have requested otherwise.

We appreciate the opportunity to be of assistance to you. If you have any questions, please call Maryann Gambino, Client Services Representative, at (415) 426-2657.

Sincerely,


Ronald H. Peters, CIH
Manager, Laboratory Services

RHP/tb
Attachment

RECEIVED SEP 08 1989

CHEMWEST ANALYTICAL LABORATORIES
ORGANOCHLORINE PESTICIDES & PCBs

Client I.D.: 2112
Date Extracted: 08/28/89
Date Analyzed : 08/30/89

CHEMWEST I.D.: 4488-1
Matrix : Oil

Compound	Amount Detected (ug/g)	RL (ug/g)
Arochlor 1016	BRL	6
Arochlor 1221	BRL	6
Arochlor 1232	BRL	6
Arochlor 1242	BRL	6
Arochlor 1248	BRL	6
Arochlor 1254	75	12
Arochlor 1260	BRL	12
Surrogate	% Recovery	Acceptance Window
Dibutyl Chlorendate	*	24-150%

RL: Reporting Limit.

BRL: Below Reporting Limit.

*: No Dibutyl Chlorendate added to sample.

Approved By:

CHEM WEST ANALYTICAL LABORATORIES, INC.
600 West North Market Blvd.
Sacramento, California 95834
(916) 923-0840 FAX (916) 923-1938

CLIENT

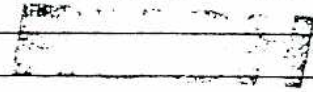
Order No. 4488
Date Rec'd. 8-25-89 @ 1604
Compl. Date
Section B. Hart / K. POCAN

CLIENT: Anahia Geologic Engineering
11330 Sunrise Park Drive Suite C
Rancho Cordova, CA 95742

Project Name:
Project No. 004-88-093
P.O. NO.
Contact Jim Wallace
Phone (916) 631-0154

ANALYSIS: One oil sample rec'd under chain of custody
in 40 ML vial (1) to be analyzed for PCBs.
5 Day T/A.

Sample Id	Date Time	ANALYSIS	MATRIX	Container
4488 2112	8-24-89 1745	PCBs	Oil	1-40ML vial.



C2
KERRI CHAFFIN

OTC

ANANIA GEOLOGIC ENGINEERING

PROJECT NO.		LAB REPORT NO.		NO. OF CONTAINERS	ANALYSES								REMARKS	
P.O. NO.	SAMPLERS: (signature)				SAMPLE TYPE			8080 RES						
	LAB LOG NO.	DATE	TIME		SAMPLE I.D.	SOIL	PRODUCER WATER							
004-88-093		Michael C. Hill												
	J. Perry													
	8-24-88	1745	2112	1			X	X						
RELINQUISHED BY: (signature)		DATE/TIME	RECEIVED BY: (signature)		REMARKS:			SEND RESULTS TO: JIM WALLACE						
James Perry		8-25-89 1604	Kerri Chapin		5 DAY TAT			ENVIRONMENTAL AGE ENERGY MINERALS						
RELINQUISHED BY: (signature)		DATE/TIME	RECEIVED BY: (signature)					ANANIA GEOLOGIC ENGINEERING						
								11330 Sunrise Park Dr., Suite C						
RELINQUISHED BY: (signature)		DATE/TIME	RECEIVED BY: (signature)					Rancho Cordova, CA 95742						
								PHONE NO. (916) 451-0921						

TRANSPORTED TO LAB IN CHEST W/ BLUE ICE

REMARKS: 5 DAY TAT

RELINQUISHED BY: (signature) James Perry

RELINQUISHED BY: (signature)

RELINQUISHED BY: (signature)

DATE/TIME 8-25-89 1604

DATE/TIME

DATE/TIME

RECEIVED BY: (signature) Kerri Chapin

RECEIVED BY: (signature)

RECEIVED BY: (signature)

CHAIN OF STUDY

White - AGE

Yellow - L

200K

200K

916-631

154

Corporate Offices
Glendale, CA 91203

September 28, 1990

NOTE TO FILE

cc: Jim Person

Fr: Rick Flaget - Environmental Affairs

RE: DISPOSAL OF POSSIBLY PCB-CONTAMINATED MATERIAL
OAKLAND DAIRY FACILITY
(PHONCON WITH ANDY DONG/GENERAL ELECTRIC ON SEP 20, 90)



I spoke with Andy to determine what had been completed at the Oakland site since our last conversation. General Electric (GE) has separated the barrels; there are 18 liquid containing barrels, 38 carbon media containing barrels, 79 barrels containing solids (wood, piping, safety gear, etc.), and 11 empty barrels. GE has also done a wipe test on some of the drums containing carbon. The results are not back yet.

Geno Dimaggio, Carnation also requested that GE test the soil laying on the asphalt covered with visqueen. I advised Mr. Dong that in the future to get clearance from me if Geno requested work be done with regard to the removal of any potentially contaminated material.

GE will be on-site September 21 to remove the liquid drums. The liquid will be incinerated.

To incinerate the carbon media will cost \$500-600 more per barrel than landfilling. To landfill will cost between \$150-200 per barrel. I asked Andy to advise me of the results of the wipe test on Monday and Carnation will make a disposition decision.

The PCB contaminated materials may still be landfilled. The RCRA land disposal restrictions do not affect PCB's unless the PCB contaminated material is mixed with or also contaminated with another RCRA regulated hazardous waste.

RF/sd
A-014

Corporate Offices
Glendale, CA 91203

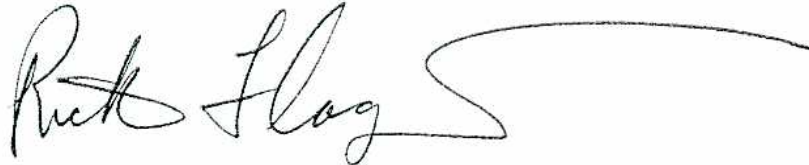
October 23, 1990

NOTE TO FILE

cc: Jim Person - 15
Merle Wood - 20

Fr: Rick Flaget - 15

RE: OAKLAND DAIRY UST PROJECT
INVENTORY OF MATERIALS/PCB TESTING
(PHONCON WITH BOB PEASE OCT 22, 90)



Bob Pease, Carnation employee at Oakland, called to advise me of what he had seen and information he obtained during and following the inventory of materials left at the Oakland site by AGE.

General Electric (GE) was on-site October 15 and 16 to inventory the material in the 79 barrels containing solids and run representative PCB wipe tests. GE took pictures as did Bob. Bob is sending his photos down to me. It will be another week or so before results are obtained from the PCB tests.

Bob indicated that there were a large number of pumps and "salvageable" equipment in the drums. In fact some of it appeared new and unused.

Bob stated that the impellers or gear drives on all of the pumps had been damaged or destroyed. It appeared they had been beaten with a hammer or something similar.

Bob checked the nameplates on some of the pumps and got the manufacturer's name, model, type, etc. One of the suppliers/manufacturers (Koker ?) was in Oakland. Bob called the supplier to ask what the prices on the pumps were. In fact, Bob asked and was sent the invoices for some of the pumps he had on-site.

One invoice showed an order for 2 pumps ordered in November 1989 at a cost of \$3972.00. Another for a pump ordered in '89 was listed as costing \$1348.00. Bob stated the date of the invoices both were October 16, 1990. It is unclear if this is the date Bob requested these invoices or if the date on them was the first time they were issued. Only wipe tests could be done on the pumps as they were damaged before being put into the barrels.

Bob also indicated that near the end of AGE's time at the site, he saw AGE personnel replacing all the well locks at the site. Bob asked why and said the AGE stated that for legal reasons they were required to change the locks. Bob then indicated that in the inventory of the drums the keys to all of the new locks were found at the bottom of one of the barrels.

I will await results from GE on inventory, lab results, and photos. I will take no further action at this time.

RF/sd: R-008