

ENVIRONMENTAL
PROTECTION
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March 28, 2000

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Ms. Susan Hugo
Senior Hazardous Materials Specialist
Alameda County Health Care Agency
Dept. of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Dear Susan:

The attached report is a second addendum to our Risk Management Plan dated March 17, 2000 for EmeryStation 2. Please review the second addendum and call me at (925) 244-6600, if you have any questions.

Sincerely,

Mansour Sepelr, Ph.D., P.E.
Principal

cc: Mr. Gordon Taylor, CBS Corporation
Mr. Rich Robbins, Wareham Development Group
Mr. Lee Sehon, WEBCOR

Attachment

SOMA Environmental Engineering, Inc.

March 28, 2000

**Second Addendum to Risk Management Report
for EmeryStation 2 Located at
5815 Peladeau Street, Emeryville, California**

INTRODUCTION

This report has been prepared as a second addendum to our March 17, 2000 report entitled "Addendum to Site-Specific Risk Management Plan for EmeryStation 2, Former Westinghouse Electric Facility 5815 Peladeau Street, Emeryville, California". The revised procedure for soil disposal set forth in this addendum report replaces the procedure for disposal of PCB-impacted soils contained in our March 17, 2000 report. The reason for modification of the current soil disposal procedure is based on the results of the recent soil investigation activities at the site followed by our negotiation with Waste Management, Inc. and their acceptance of PCB-impacted soils into their Class II Landfill. This addendum summarizes the procedure for off-site disposal of PCB-impacted soils during the excavation of pile caps at the site.

RESULTS OF THE RECENT SOIL INVESTIGATION

As described in our Risk Management Plan dated March 17, 2000 for further evaluation of the PCB distribution in soil, SOMA drilled six 20-foot deep soil borings, (see Section 6.0 Of March 17, 2000). The soil borings were drilled by a hollow-stem auger and samples were collected at 2.5, 5, 10, 15 and 20-foot depth intervals. During the soil sampling event, PCB screening kits called "COLOR-N-SOIL" was used to conduct a screening analysis for identification of approximate levels of PCB in the excavated soils. The results of the field screening test did not indicate elevated levels of PCBs (above 50 mg/kg) in the soil samples collected from different soil borings. The soil samples were placed in an ice-chest containing blue ice and delivered to Curtis & Tompkins, Ltd., Analytical Laboratories. The soil samples were

SOMA Environmental Engineering, Inc.

analyzed for PCBs using EPA Method 8082. Table-1 shows the results of the laboratory analysis. As the results of laboratory analyses indicate, the Aroclor 1260 was generally detected beneath the site. However, in certain soil samples besides Aroclor 1260, Aroclor 1016 was detected. The results of our investigation showed that the total PCBs concentration in soils ranges between non-detect (ND) and 24,048 microgram per kilogram ($\mu\text{g}/\text{kg}$).

Management of the Excavated Soils

This section is a revised section of 6.1 in our March 17, 2000 report. As described earlier, the maximum PCB concentration detected in soils is about 24 mg/kg, which occurs at 20 feet below the surface. Per WEBCOR Builders (WEBCOR) the maximum excavation depth at the pile cap areas will not exceed 13 feet below the ground surface. Although the soils beneath the site might be highly heterogeneous, it appears that the PCB concentrations may not exceed 50 mg/kg. Based on our negotiation with Waste Management Inc. (WMI), and given the fact that all of the soil samples collected from 6 soil borings at different depths are below 50 mg/kg, no additional composite soil samples will be collected from the stockpiled soils as described in our previous report dated March 17, 2000. Therefore, the excavated soils will directly be transported to the Altamont Class II Landfill of WMI. However, at each excavation area, multiple PCB field screening test kits will be utilized in order to ensure that the PCB levels in the excavated soils are below 50 mg/kg. If the results of the field screening test on the soil samples at certain excavation areas indicate that the PCB levels in the excavated soils may be above 50 mg/kg, then the excavated soils in that area will be stockpiled separately. A composite sample will be collected from the stockpiled soils and submitted to Curtis & Tompkins Laboratories for PCB analysis using EPA Method 8082. Based on our experience, the PCB screening test kit is a relatively reliable tool for segregation of PCB-impacted soils. The stockpiled soils, which may contain elevated levels of PCBs (above 50 mg/kg), will be covered by a tarp and clearly labeled in order to minimize human contact. In

addition to the PCB screening kit, SOMA field crew will use a hand held photo-
ionization detector (PID) to monitor the excavation pits. Depending upon the PID
readings, representative soil samples will be collected to analyze for certain
chemicals, if any. Depending upon the PCB levels in the stockpiled soils (based on
laboratory results), they will be disposed of in an appropriate landfill. The soils
containing above 50 mg/kg PCB will be disposed of in TSCA landfill located in
Kettleman Hills. The soils containing less than 50 mg/kg will be disposed of in a
Class II landfill.

It is important to note that the excavated soils will not be reused in the field by
WEBCOR for any construction purposes. The excavated soils will be disposed of in
a Class II or in a TSCA facility depending upon their PCB content.

TABLE-1
PCB Concentration (µg/kg) Detected in Soil Samples
Collected From 6 Soil Borings at Emery Station 2,
5815 Peladeau Street, Emeryville, California

Sample I.D.	Depth (in feet)	1016	1221	1232	Analyte 1242	1248	1254	1260	Total
E10	2.5	79	ND	ND	ND	ND	ND	1,400	1,479 ✓
E10	5	230	ND	ND	ND	ND	ND	3,100	3,330 ✓
E10	10	ND	ND	ND	ND	ND	ND	45	45 ✓
E10	15	ND	ND	ND	ND	ND	ND	ND	ND ✓
E10	20	ND	ND	ND	ND	ND	ND	ND	ND ✓
F8	2.5	3,200	ND	ND	ND	ND	ND	11,000	14,200 ✓
F8	5	3,400	ND	ND	ND	ND	ND	9,500	12,900 ✓
F8	10	290	ND	ND	ND	ND	ND	760	1,050 ✓
F8	15	86	ND	ND	ND	ND	ND	200	286 ✓
F8	20	4,000	ND	ND	ND	ND	ND	10,000	14,000 ✓
G15	2.5	ND	ND	ND	ND	ND	ND	30	30 ✓
G15	5	ND	ND	ND	ND	ND	ND	ND	ND ✓
G15	10	ND	ND	ND	ND	ND	ND	ND	ND ✓
G15	15	ND	ND	ND	ND	ND	ND	630	630 ✓
G15	20	ND	ND	ND	ND	ND	ND	23	23 ✓
J1	2.5	ND	ND	ND	ND	ND	ND	610	610 ✓
J1	5	27	ND	ND	ND	ND	ND	1,600	1,627 ✓
J1	10	38	ND	ND	ND	ND	ND	390	428 ✓
J1	15	40	ND	ND	ND	ND	ND	140	180 ✓
J1	20	ND	ND	ND	ND	ND	ND	160	160 ✓
J3	2.5	180	ND	ND	ND	ND	ND	1,200	1,380 ✓
J3	5	ND	ND	ND	ND	ND	ND	3,200	3,200 ✓
J3	10	ND	ND	ND	ND	ND	ND	35	35 ✓
J3	15	ND	ND	ND	ND	ND	ND	720	720 ✓
J3	20	48	ND	ND	ND	ND	ND	24,000	24,048 ✓
M14	2.5	ND	ND	ND	ND	ND	ND	200	200 ✓
M14	5	ND	ND	ND	ND	ND	ND	430	430 ✓
M14	10	ND	ND	ND	ND	ND	ND	34	34 ✓
M14	15	ND	ND	ND	ND	ND	ND	ND	ND ✓
M14	20	ND	ND	ND	ND	ND	ND	49	49 ✓
Blank		ND	ND	ND	ND	ND	ND	ND	ND
Blank		ND	ND	ND	ND	ND	ND	ND	ND

ND = Not Detected