

June 1, 1998

ENVIRONMENTAL  
PROTECTION

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Dr. Ravi Arulanantham  
California Regional Water  
Quality Control Board  
2101 Webster Street, Suite 500  
Oakland, CA 94612

Project 98-2172

Ms. Susan Hugo  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Second Floor  
Alameda, CA 94502

Subject: Risk Management Plan for Site Construction Activities and Tank  
Closure Reports for Former Westinghouse Site at 5815 Peladeau  
Street, Emeryville, California

Dear Ravi and Susan:

The following is the minutes of our meeting, which was held on May 13, 1998 at the subject property. As you requested during that meeting this letter also acts as a workplan for preparation and submission of the risk management plan submitted on behalf of Wareham Development (Wareham), the developer of the property, and tank closure reports prepared on behalf of CBS Corporation, the owner of the property.

On Wednesday May 13, the following individuals:

1. Dr. Ravi Arulanantham of San Francisco Bay, Regional Water Quality Control Board (RWQCB)
2. Ms. Susan Hugo, of Alameda County, Environmental Health Agency
3. Mr. Ignacio Dayrit of City of Emeryville, Redevelopment Agency
4. Mr. Dan Nourse of Wareham Development
5. Mr. Rick Trudell of WEBCORE BUILDERS
6. Dr. Mansour Sepehr, SOMA Environmental Eng., Inc.
7. Mr. Dalton DeOmellas, DECON Environmental

met at the former Westinghouse Emeryville facility (the "Site") to discuss the risk management and regulatory compliance issues to be addressed by Wareham at the subject property during its construction activities. The meeting was held at the request of Ms. Susan Hugo of Alameda County and Dr. Ravi Arulanantham

of (RWQCB) over their concern in connection with recent UST discovery, and Wareham's risk management plan for site construction activities. Based on the Alameda County Environmental Health and RWQCB requirement the risk management plan should have been prepared and approved by both agencies before Wareham initiated construction activities at the Site. As a part of construction permit requirements the approved risk management plan, should have been submitted to the City of Emeryville, Planning Department. Apparently, due to the lack of communication between Wareham, the City of Emeryville Planning Department and agencies, Wareham did not prepare the risk management plan for the Site prior to commencement of construction activities.

Currently, the Site is under construction by WEBCORE BUILDERS. During the first phase of construction activities, significant amount of soils have been excavated, stockpiled and or transported for off-site disposal. Over 200 piles have been driven to a total depth of 100 feet below surface. The results of laboratory analysis on excavated soils indicate that petroleum hydrocarbons, polychlorinated biphenyls (PCBs) and heavy metals, specifically, lead are the major chemicals detected in surficial soils at the Site. The results of laboratory analysis on shallow groundwater samples collected during dewatering activities have shown minor concentration of petroleum hydrocarbons and PCBs.

During the recent construction activities, three underground storage tanks (USTs) have been discovered and removed by DECON Environmental for CBS Corporation. Two of the USTs were 18,000 gallon, while the other one was 5,000 gallon. Based on the results of laboratory analysis, the contents of all three tanks were mineral oil.

On May 15, 1998, in order to protect the environment and ensure the construction workers health and safety, Wareham's construction activities were temporarily stopped per RWQCB and the Alameda County Environmental Health's requirements. The decision was made based on the regulatory agencies concern over Wareham's lack of better documentation of the soil and groundwater chemical analysis data and possibility of presence of additional underground storage tanks beneath the Site. Both agencies requested that before the resumption of the construction activities, CBS Corporation should conduct a geophysical investigation such as ground penetrometer radar (GPR) testing to ensure that no more underground storage tanks are present beneath the Site. It was further decided that the Wareham should submit a risk management plan to both agencies in the near future. Wareham's risk management plan will be 1) satisfactory to RWQCB and Alameda County Department of Environmental Health, 2) protective of human health and the environment and 3) consistent with planned future land uses. The risk management plan for construction activities at the Site should include:

1. Summary of risk assessment results conducted by CBS Corporation;
2. Soil management plan during Wareham's construction activities;
3. Groundwater management plan and impact of pile driving on deeper groundwater quality conditions;
4. Surface water runoff/sediment management plan during Wareham's construction activities;
5. Dust control management plan and;
6. Health and safety plan.

The soil management plan should include the documentation of recent soil and groundwater sampling and analysis results during the construction activities and justification for removal and disposal of the soil to the off-site areas along with the manifest of transported soils to different landfills. In accordance with the agencies approved document entitled "Baseline Human Health Risk Assessment" dated March 15, 1996, PCBs are the only chemicals of concern that should be removed from certain locations beneath the Site. The removal of the identified PCBs impacted soils to levels specified in the risk assessment document has already been conducted by the CBS Corporation.

In addition to Wareham's risk management report, the tank closure report will also be submitted by CBS to the Alameda County Environmental Health after completion of the tank removal activities.

This concludes our May 13, 1998 meeting. Thank you very much for your time and meanwhile please call me at (925) 244-6600 if you have any questions or comments in connection with the issues that will be discussed in the risk management plan.

Sincerely;



Mansour Sepéhr, Ph.D., P.E.  
Principal Hydrogeologist

cc: Ms. Marlene Jackson, Babst, Calland, Clements and Zomnir  
Mr. Gordon Taylor, Principal Engineer, CBS Corporation  
Mr. Dan Nourse, Wareham Development

# **SITE CLOSURE PLAN**

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**Former Westinghouse  
Facility  
5815 Peladeau Street  
Emeryville, California**

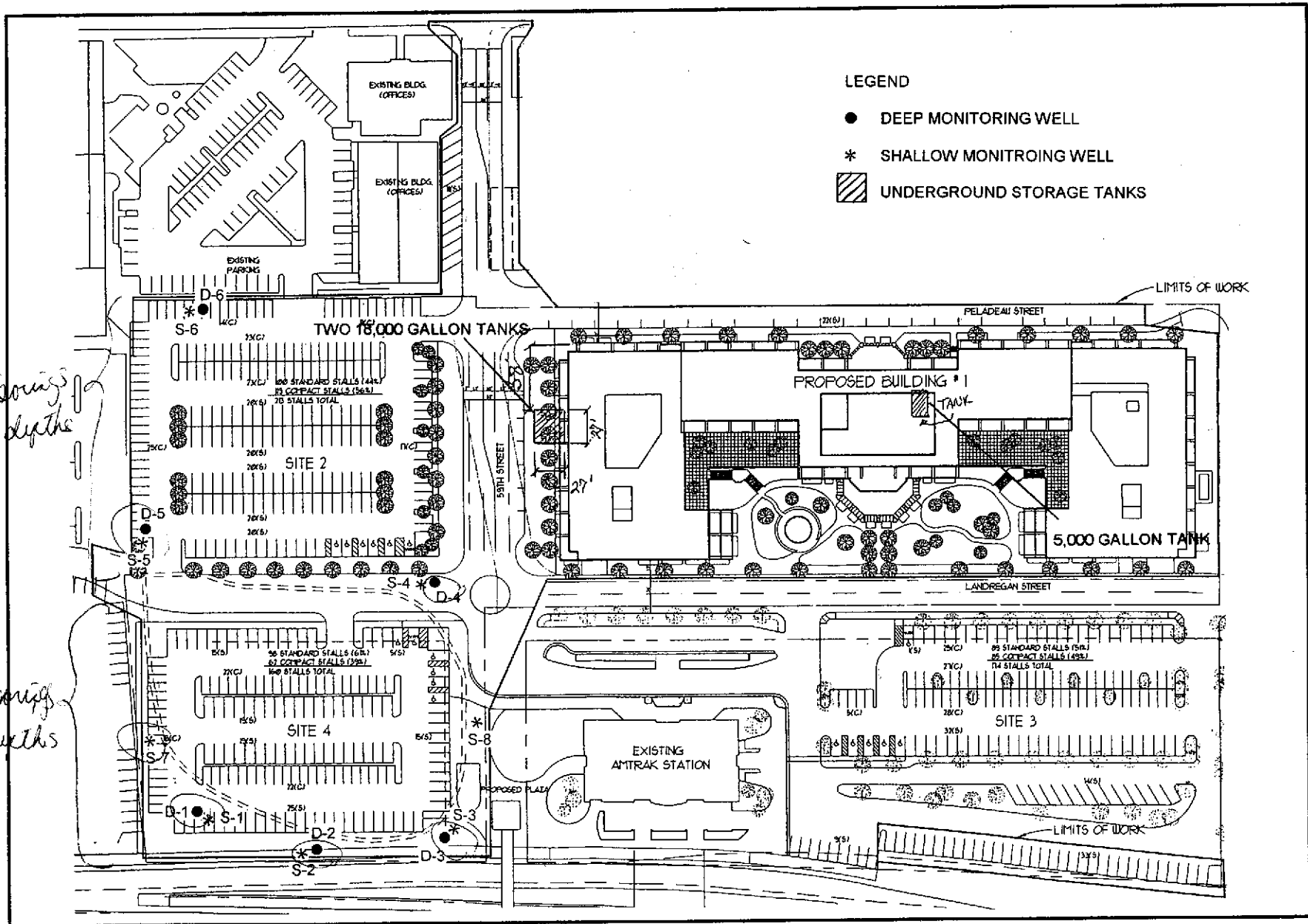
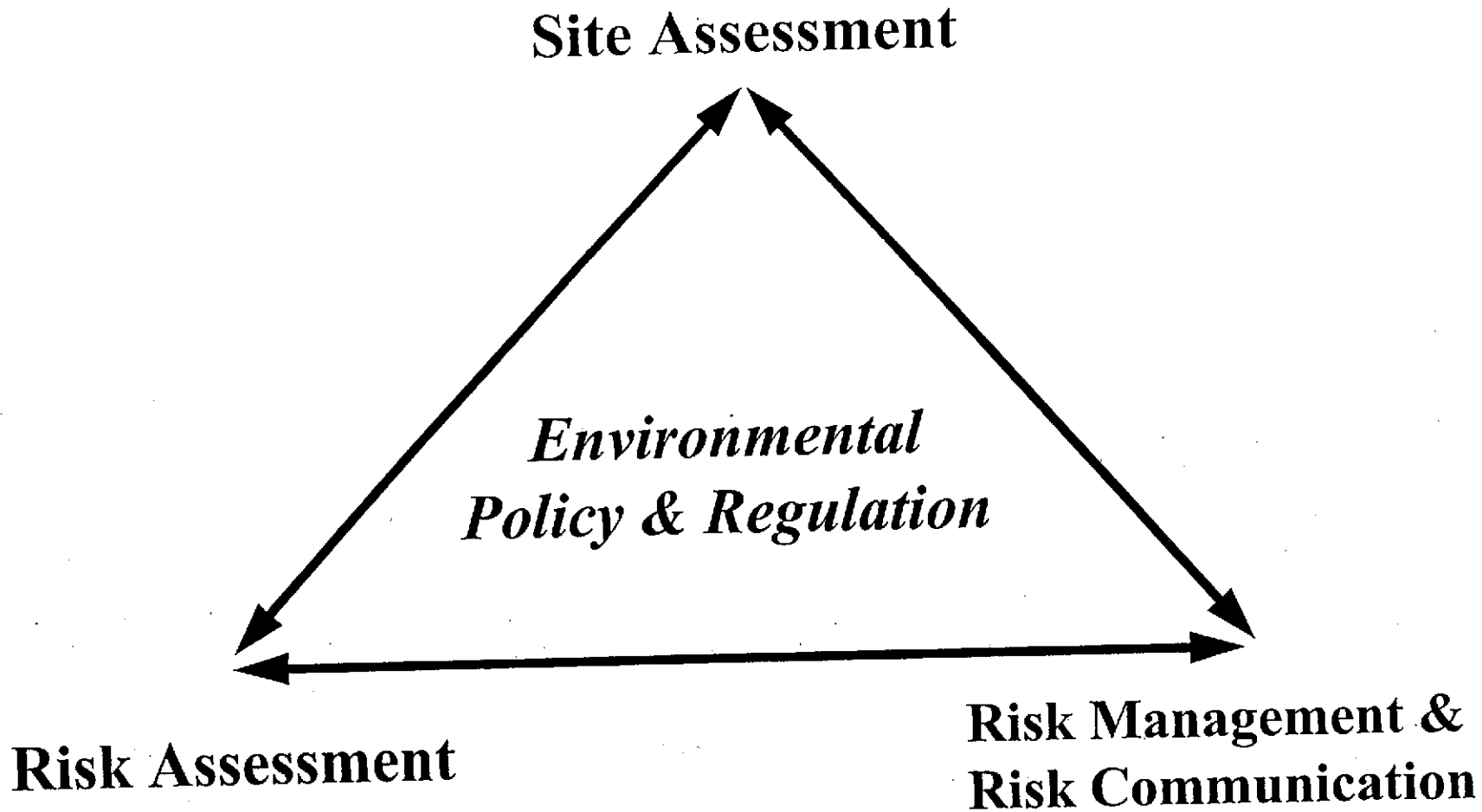


Figure 1: Locations of Groundwater Monitoring Wells and Underground Storage Tanks



**The Key Elements of Risk-Based Decision Making**

# ELEMENTS OF SITE CLOSURE PLAN

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- 1-Has site adequately investigated?
- 2-Has source (primary) been removed?
- 3-Do you have a stable plume?
- 4-Any current /future public health threat?
- 5-Any current/future ecological threat?
- 6-Any current/future water resources threat?
- 7-Is Risk Management Plan in Place?

# Has Site Been Adequately Investigated?

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- Summary of Site Investigation Since 1981 ●
- Results of Groundwater Monitoring  
Activities Conducted by CBS Corporation
- Recent Soil and Groundwater Sampling  
Results by SOMA
- Recent Ground Penetrometer Radar Tests  
Conducted by SOMA ●



# Has Source Been Removed?

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- Recent Tank Removal Activities by SOMA ●
- Tank Closure Report
- Additional Investigation Including GPR Tests by SOMA
- Secondary Source Removal by ALTA Geosciences, Consultant for CBS ●

# Is Groundwater Chemical Plume Stable?

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- Results of Chemical Fate and Transport Modeling Conducted by SOMA in 1995;
- Presence of a slurry wall around the site;
- Results of Groundwater Monitoring Program Under Direction of USEPA

# **Current or Future Public Health Threat?**

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- Current construction worker health threat is being addressed by site's health and safety plan prepared by SOMA.
- Future Site's workers long term health risk was addressed in SOMA's 1996 health risk assessment document for the planned land use, industrial/commercial apartment dwelling. No single family residential dev.

# **Current/Future Ecological Threat?**

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- No exposure pathway for ecological receptors; refer to SOMA 1996 risk assessment document, including the results of fate and transport modeling.
- Groundwater monitoring reports under USEA.

# Current/Future Water Resources Threat?

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- No; There is no apparent downward flow component, see site groundwater monitoring reports;
- Based on State Water Board Resolution 88-63, <sup>SHALLOW</sup> water bearing zone beneath the site is not a drinking water source.

# Risk Management Plan in Place?

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● No, It is being Prepared

The Risk Management Plan Will Include:

1-Summary of risk assessment results

2-Soil management plan during construction

3-Groundwater management plan

4-surface water/sediment management plan

5-Dust control plan

6-Health and safety plan for construction

6/8/98

SOMA Environmental Eng., Inc

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7- Deed Restriction