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January 10, 1991

RECEIVED

2:36 pm, Jan 04, 2008

Alameda County
Environmental Health

Mr. Rick Flaget Carnation Company 800 North Brand Blvd. Glendale, CA 91203

SUBJECT: DISPOSAL OF CONTAMINATED WASTE

Dear Rick

This letter serves to document the transactions between the Carnation Company and General Electric with regards to the disposal of the contaminated waste generated by Carnation's 1340 - 14th street, Oakland, CA facility. Enclosed is a summary of past activities associated with the disposal work.

Presently there exists approximately a combined total of forty barrels of spent carbon and charcoal granules, eighty barrels of miscellaneous solid waste that included equipment that was used in the remediation work, and thirteen emptied, contaminated barrels in the storage area of the warehouse at the Oakland facility. In addition to the above listed solid waste, eighteen barrels of liquid were transported away, on September 21, 1990, from the facility and disposed in accordance to our proposed terms, quotation 474X1163 dated November 9, 1989.

The approximate one hundred and twenty barrels of waste in the storage area were subjected to several thorough inspections. The barrels were first inspected for waste contents and free standing liquid, which we found; And the second inspection was in search for equipment used in the remediation process; And the third and final inspection was accomplished during the selection of waste for wipe samples. Random samples were withdrawn from three spent carbon barrels, one from the spent charcoal granules and a total of fourteen wipe samples were taken on the solid waste and the used equipment. A sample was withdrawn from each of the eighteen barrels of the liquid that were transported away from the facility on Sept. 21,1991. And were being temporarily stored at the PCB decommissioning center. The samples were forwarded to a laboratory

for analysis. Results of the laboratory analysis are as follows: Group A - Liquid waste - four samples have PCB content levels between 50 and 500 PPM; three between 5 and 49 PPM; eleven have levels below 0.05 PPM; Group B - Spent carbon and charcoal granules - the three carbon and the one charcoal samples have PCB content of less than 1 PPM; Group C - Solid waste and used equipment - all fourteen wipe samples from this group have less than 1 PPM of PCB contamination. The barrels containing the solid waste are marked in numeric sequence and the sampled barrels were identified at the time when the samples were withdrawn. Based only upon the laboratory analysis on the random samples, the waste in the sampled barrels could probably be disposed in any landfill disposal facility, providing that all of the waste in those barrels does not contain other chemicals that require special handling and that you have supporting documents that show the waste was, in fact, free from chemical contaminations, including PCB. Based upon our thorough inspection, it appeared that AGE may have randomly mixed the contaminated waste generated from the various remediation locations within the facility. Prior to selecting a disposal facility, you should consider the following:.

- The samples collected may not be the true representative of all of the waste that is contained in the barrel.
- Samples used may not be of sufficient quantity needed for the determination of disposal method and/or site.
- 3) Laboratory analysis indicated that PCB does exist at the Oakland facility.
- The remediation contractor, potentially, had containerized waste generated from different locations into common barrels.
- 5) Was the equipment used in the remediation process de-commissioned (cleaned & rinsed)?
- 6) Future liability consideration on the present waste composition may affect the disposal site (non chemical landfill) selection. Future regulatory actions might require the removal of the waste from the site a liability consideration.

Thorough inspection of the barrels containing the solid waste and equipment used in the remediation process revealed that the equipment has been purposely rendered inoperable when it was removed from service. The enclosed photographs document the equipment and its condition found during the inspection.

Laboratory analysis on the wipe samples taken from the equipment indicated that the equipment can be re-used after it has undergone the de-contamination process.

At this time, it is our recommendation that you dispose of the waste in an EPA approved chemical waste landfill site. Disposing of the waste in a chemical landfill removes potential future lability & the need for further testing of the waste material. Although the laboratory analysis on the random samples indicated the waste has an almost non detectable level of PCB, we feel that the analysis on the liquid as well as test results of past laboratory analysis on previously disposed waste cast sufficient doubts to rely on the sample results. Additionally, analysis on the 18 barrels of liquid indicated that four barrels had PCB contamination levels between 50 & 500 PPM. The equipment and material used to extract the liquid from the ground are mixed in with the waste. These items should either be removed from the barrels and tested prior to disposal or must be disposed in an EPA approved chemical waste landfill.

Please contact me if you have any questions or comments concerning any of the foregoing.

Sincerely,

Andrew K. Dong

Area Engineer

CC G.A. Wenzl file 474X1163

andrew KLong

Dick Peters - Denver, CO

January 10, 1991

Carnation Company FSR 474X1163 Summary of Activities

Summary of Meet.	10100
Jan 11, 1990	Transported contaminated liquid and solid for disposal.
Feb 7, 1990	transported contaminated liquid and solid for disposal.
April 23, 1990	Transported contaminated solid for disposal - found standing liquid on top of some of the barrels contained solid wastes.
Sept 11, 1990	Preliminary on site inspection to assess disposal requirments.
Sept 17,18&19	Thorough inspection of the 100 plus barrels of waste material for content. Transferred liquid into 17E barrels for transport and removed free
	standing liquid from the barrels containing solids - Prepared the waste for disposal - Collected random samples for hydro carbon & PCB analysis.
Sept 21, 1990	Transported liquid waste to PCB servicing facility - At the last minute Carnation decided not to dispose of the solid waste. Per instruction, samples were withdrawn from the liquid waste and were analyzed for PCB contamination level.
Oct 15,16&17	Thorough inspection of the barrels containging solid waste for equipment used in the remediation work and to obtain random wipe samples for laboratory analysis.
Nov 20, 1990	On site meeting to inspect work completed and to discuss final disposition of the remaining waste material.

Jan 7-10, 1991 Draft final report/recommendations.

Summary of Activities

Final Bill - invoice to be issued

A	Travel & living expenses 12 days at \$60.00/day	720.00
В	Laboratory Analysis 18 liquid samples at \$125/samples 14 wipe samples at \$125/samples	2250.00 1750.00
С	PCB servicing craftsman (Oct 15, 16, 17) 32 hrs at \$88/hr	2816.00
D	PCB servicing supervisor (Oct 15, 16, 17, Nov 11 & Jan 7-10, 52 hrs at \$125/hr	1991) <u>6500.00</u>
Total	Amount Due	\$14036.00

Industry Services Engineering General Electric Company 7777 Pardee Lane, Oakland, CA 94621 415 639-5301

October 18, 1990

Mr. Rick Flaget Carnation Company 5405 Wilshire Blvd. Los Angeles, CA 90036

Subject: Laboratory analysis of waste material samples.

Dear Rick,

Enclosed are the original and revised laboratory analysis reports on samples collected from the spent carbon and charcoals and from soil in front of the former truck servicing area.

Representative samples of the carbon granules and charcoal were randomly selected from the thirty eight barrels that are destined for disposal. The soil samples were collected from the dirt covered area of the parking lot in front of the truck servicing/warehouse facility. The samples were tested for total hydrocarbon products and PCB contamination levels.

Also included with this letter are the descriptions of methods used for the analysis and the analysis detection level. Please contact me if you have any questions of comments concerning the analysis.

Sincerely,

Andrew K. Dong
Area Engineer

cc. R. L. Johnson
file 474X1163
Ted Evans - Service Shop
Gino DiMaggio - Carnation, Oakland

Analytical Keport

LOG NO: E90-09-356

Received: 19 SEP 90 Reported: 25 SEP 90

Mr. Andrew Dong General Electric Company 7777 Pardee Lane Oakland, California 94621

Purchase Order: 834X003406474X1163

REPORT OF ANALYTICAL RESULTS

Page 1

LOG NO SAMPLE DESCRIPTION,	SOIL SAMPLE	ES		DA	TE SAMPLED
09-356-1 N. West 09-356-2 S. West 09-356-3 S. East 09-356-4 N. East 09-356-5 Center					19 SEP 90 19 SEP 90 19 SEP 90 19 SEP 90 19 SEP 90
METER	09-356-1	09-356-2	09-356-3	09-356-4	09-356-5
Polychlorinated Biphenyls Date Analyzed Date Extracted Aroclor 1016, mg/kg Aroclor 1221, mg/kg Aroclor 1232, mg/kg Aroclor 1242, mg/kg Aroclor 1248, mg/kg Aroclor 1254, mg/kg Aroclor 1254, mg/kg Aroclor 1260, mg/kg Aroclor 1262, mg/kg Total PCB's, mg/kg TPH - Modified 8015	09.21.90 09.20.90 <0.01 <0.01 <0.01 <0.01 <0.01 <0.01 <0.01	<0.01 <0.01 <0.01 <0.01 <0.01 <0.01	<0.01 <0.01 <0.01 <0.01 <0.01 <0.01 <0.01	<0.01 <0.01 <0.01 0.02 <0.01 <0.01 0.02	09.20.90 <0.01 <0.01 <0.01 <0.01 <0.01 0.02 <0.01 <0.01 0.02
Date Analyzed	09.23.90				12
Dilution Factor, Times	1	1	1	1 <10	<10
Total Fuel Hydrocarbons, mg/kg	g <10	<10	<10	\10	10
Other TPH - Modified 8015		25.5.5			

J- Wessley, Ph.D., Laboratory Director



Analytical Report

LOG NO: E90-09-312

Received: 18 SEP 90 Reported: 25 SEP 90

Mr. Andrew Dong General Electric Company 7777 Pardee Lane Oakland, California 94621

Purchase Order: 034X0033964X1163

REPORT OF ANALYTICAL RESULTS

Page 1

LOG NO	SAMPLE DESCRIPTION			DAT	re sampled
09-312-2 09-312-3	Drum 1 - Carbon Granules Drum 2 - Carbon Granules Drum 3 - Carbon Granules Drum 4 - Charcoal Granules				18 SEP 90 18 SEP 90 18 SEP 90 18 SEP 90
PARAMETER			09-312-2	09-312-3	09-312-4
Date Analyst Date Extract Aroclor 10: Aroclor 12: Other Pol:	ated Biphenyls zed cted 16, mg/kg 21, mg/kg 32, mg/kg 42, mg/kg 48, mg/kg 54, mg/kg 60, mg/kg 60, mg/kg ychlorinated Biphenyls	09.20.90 09.18.90 <1 <1 <1 <1 <1 <1 <1 <1			
TPH - Modif Date Analy	zed	09.22.90	09.22.90	09.22.90	09.22.90
Carbon Ran Total Fuel Fuel Chara	Hydrocarbons, mg/kg cterization, .	<10	50 DIESEL	<10 	<10
Other TPH	- Modified 8015				

This Fuel Characterization is a qualitative identification based upon a visual comparison of sample chromatograms with those from authentic standards.

Sim D. Lessley, Ph.D., Laboratory Director

1255 Powell Street Emeryville, CA 94608 415/428-2300 Fax: 415/547-3643



Analytical Report

LOG NO: E90-09-312

Received: 18 SEP 90 Reported: 25 SEP 90

REVISED 10/3/90

Mr. Andrew Dong General Electric Company 7777 Pardee Lane Oakland, California 94621

Purchase Order: 034X0033964X1163

REPORT OF ANALYTICAL RESULTS

Page 1

LOG NO SAMPLE DESCRIPTION			DA'	TE SAMPLED
09-312-1 Drum 1 - Carbon Granules 09-312-2 Drum 2 - Carbon Granules 09-312-3 Drum 3 - Carbon Granules 09-312-4 Drum 4 - Charcoal Granules				18 SEP 90 18 SEP 90 18 SEP 90 18 SEP 90
PARAMETER		09-312-2	09-312-3	09-312-4
Pc'vchlorinated Biphenyls le Analyzed Date Extracted Dilution Factor, Times Aroclor 1016, mg/kg Aroclor 1221, mg/kg Aroclor 1232, mg/kg Aroclor 1242, mg/kg Aroclor 1248, mg/kg Aroclor 1254, mg/kg Aroclor 1260, mg/kg Aroclor 1260, mg/kg	09.20.90 09.18.90 100 <1 <1 <1 <1 <1 <1 <1 <1 <1 <1 <1 <1 <1	09.18.90	09.20.90 09.18.90 100 <1 <1 <1 <1 <1 <1 <1 <1 <1 <1 <1 <1 <1	
TPH - Modified 8015 Date Analyzed	09.22.90	09.22.90 1	09.22.90	09.22.90
Dilution Factor, Times Carbon Range, . Total Fuel Hydrocarbons, mg/kg Fuel Characterization, . Other TPH - Modified 8015	<10 	50 DIESEL	<10 	<10

This Fuel Characterization is a qualitative identification based upon a visual comparison of sample chromatograms with those from authentic standards. Report revised to include dilution factor for 8080 results.

T. Blake 10.02.90

Sim D. Lessley, Ph.D., Laboratory Director

1255 Powell Street Emeryville, CA 94608 415/428-2300 Fax: 415/547-3643



BATCH QC REPORT: Definitions and Terms

Accuracy

The ability of a procedure to determine the "true" concentration of an analyte

Precision

The reproducibility of a procedure demonstrated by the agreement between analyses performed on either duplicates of the same sample or a pair of duplicate spikes

Batch

A group of samples analyzed sequentially using the same calibration curve, reagents, and instrument

Laboratory Control Standard (LCS)

Laboratory reagent water spiked with known compounds and subjected to the same procedures as the samples. The LCS thus indicates the accuracy of the analytical method and, because it is prepared from a different source than the standard used to calibrate the instrument, it also serves to double-check the calibration

Matrix QC

Quality control tests performed on actual client samples. For most inorganic analyses, the laboratory uses a pair of duplicate samples and a spiked sample. For most organic analyses, the laboratory uses a pair of spiked samples (duplicate spikes)

LC Result

Laboratory result of an LCS analysis

LT Result

Expected result, or true value, of the LCS analysis

R1, R2 Result:

Result of the analysis of replicate aliquots of a sample, with R1 indicating the first analysis of the sample and R2 its corresponding duplicate; used to determine precision

S1, S2 Result

Result of the analysis of replicate spiked aliquots, with S1 indicating one spike of the sample and S2 the second spike; used to determine precision and accuracy

R Bar Result

The average of replicate analysis results

S Bar Result:

The average of spike analysis results

True value

The theoretical, or expected, result of a spike sample analysis

Percent Recovery The percentage of analyte recovered.

For LCS, the percent recovery calculation is: LC + LT x 100 For spike recoveries, the percent recovery calculation is:

(S Bar - Sample Concentration) x 100

Spike Amount

Relative Percent Difference (RPD) Calculated using one of the following:

 $(R1 - R2) \times 100$ (R1 + R2) + 2

 $(S1 - S2) \times 100$ $(S1 + S2) \div 2$

Blank Result

The result of the analysis of a method blank, which is reagent water that is analysed using the same reagents, instruments and procedures as the samples in a batch; used to determine laboratory contamination

Reporting Detection Limit (RDL)

BCA-assigned limit based on—but not the same as—method detection limits (MDLs) determined using EPA guidelines

RC ANALYTICAL : EMVL LAB : 13:24:52 02 OCT 1990 - P. 1 :

AMPLES	SAMPLE DESCRIPTION	DETERM CODE	DATE ANALYZED	METHOD	EQUIP.	BATCH	ID.NO
06 .2*1	Drum 1 - Carbon	8080.PCB	09.20.90	8080	516-09	132	7833
	Granules	8015	09.22.90	8015	516-08	219	7754
009312*2	Drum 2 - Carbon	8080.PCB	09.20.90	8080	516-09	132	7833
009312*3	Granules Drum 3 - Carbon	8015 8080.PCB	09.22.90 09.20.90		516-08 516-09	219 132	7754 7833
009312^3	Granules		00 00 00	0015	516-08	219	7754
009312*4	Drum 4 - Charcoal	8015 8080.PCB	09.22.90		516-09	132	7833
	Granules	8015	09.22.90	8015	516-08	219	7754

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Notes: Equipment = BC Analytical identification number for a particular piece of analytical equipment.

BATCH QC REPORT ORDER: E9009312

DATE REPORTED: 10/02/90

Page 1

METHOD BLANKS AND REPORTING DETECTION LIMIT (RDL)

	DATE	BATCH	BLANK		
ARAMETER	ANALYZED	NUMBER	RESULT	RDL	UNIT
'olychlorinated Biphenyls			0 00 00		D-+-
Date Analyzed	09.20.90	132	9.20.90	NA	Date
Date Extracted	09.20.90	132	9.18.90	NA	Date
Aroclor 1016	09.20.90	132	0	0.01	mg/kg
Aroclor 1221	09.20.90	132	0	0.01	mg/kg
Aroclor 1232	09.20.90	132	0	0.01	mg/kg
Aroclor 1242	09.20.90	132	0	0.01	mg/kg
Aroclor 1242 Aroclor 1248	09.20.90		0	0.01	mg/kg
Aroclor 1254	09.20.90	132	0	0.01	mg/kg
Aroclor 1260	09.20.90	132	0	0.01	mg/kg
Aroclor 1262	09.20.90	132	0	0.01	mg/kg
TPH - Modified 8015				1907	227 738
Date Analyzed	09.23.90	219	9.23.90	NA	Date
Dilution Factor	09.23.90	219	1	NA	Times
Total Fuel Hydrocarbons	09.23.90	219	0	1	ug/L

Analytical Report

LOG NO: E90-09-356

Received: 19 SEP 90 Reported: 25 SEP 90

REVISED 15/3/96

Mr. Andrew Dong General Electric Company 7777 Pardee Lane Oakland, California 94621

Purchase Order: 834X003406474X1163

REPORT OF ANALYTICAL RESULTS

Page 1

LOG NO SAMP	LE DESCRIPTION,	SOIL	SAMPLE	S		DA	TE SAMPLED
09-356-1 N. W 09-356-2 S. W 09-356-3 S. E 09-356-4 N. E 09-356-5 Cent	est ast ast						19 SEP 90 19 SEP 90 19 SEP 90 19 SEP 90 19 SEP 90
'AMETER		09-3	56-1	09-356-2	09-356-3	09-356-4	09-356-5
Polychlorinated Date Analyzed Date Extracted Dilution Factor Aroclor 1016, m Aroclor 1221, m Aroclor 1232, m Aroclor 1242, m Aroclor 1248, m Aroclor 1254, m Aroclor 1260, m Aroclor 1260, m Aroclor 1262, m Aroclor 1262, m	Times g/kg g/kg g/kg g/kg g/kg g/kg g/kg ng/kg ng/kg	09.2	(0.01 (0.01 (0.01 (0.01	1 <0.01 <0.01 <0.01	09.20.90 1 <0.01 <0.01 <0.01 <0.01 <0.01 <0.01	09.20.90 1 <0.01 <0.01 <0.01 <0.01 <0.01 <0.01 <0.01 0.02 <0.01	09.20.90 1 <0.01 <0.01 <0.01 <0.01 <0.01 <0.01 <0.01 <0.01
TPH - Modified & Date Analyzed Dilution Factor Total Fuel Hydrother TPH - Modified & Date & D	r, Times rocarbons, mg/kg		23.90 1 <10	09.23.90 1 <10	1	1	09.23.90 1 <10

Report revised to include dilution factor for 8080 results.

T. Blake 10.02.90

Sim D. Lessley, Ph.D., Laboratory Director

1255 Powell Street Emeryville, CA 94608 415/428-2300 Fax: 415/547-3643



BATCH QC REPORT: Definitions and Terms

The ability of a procedure to determine the "true" concentration of an analyte Accuracy

The reproducibility of a procedure demonstrated by the agreement between Precision

analyses performed on either duplicates of the same sample or a pair of

duplicate spikes

A group of samples analyzed sequentially using the same calibration curve, Batch

reagents, and instrument

Laboratory reagent water spiked with known compounds and subjected to the Laboratory same procedures as the samples. The LCS thus indicates the accuracy of the Control Standard (LCS)

analytical method and, because it is prepared from a different source than the standard used to calibrate the instrument, it also serves to double-check the

calibration

Quality control tests performed on actual client samples. For most inorganic Matrix QC

analyses, the laboratory uses a pair of duplicate samples and a spiked sample.

For most organic analyses, the laboratory uses a pair of spiked samples

(duplicate spikes)

Laboratory result of an LCS analysis LC Result

Expected result, or true value, of the LCS analysis LT Result

Result of the analysis of replicate aliquots of a sample, with R1 indicating the R1, R2 Result:

first analysis of the sample and R2 its corresponding duplicate; used to

determine precision

Result of the analysis of replicate spiked aliquots, with S1 indicating one S1, S2 Result

spike of the sample and S2 the second spike; used to determine precision and

accuracy

The average of replicate analysis results R Bar Result

The average of spike analysis results S Bar Result:

The theoretical, or expected, result of a spike sample analysis True value

The percentage of analyte recovered. Percent

For LCS, the percent recovery calculation is: LC ÷ LT x 100 Recovery For spike recoveries, the percent recovery calculation is:

(S Bar - Sample Concentration) x 100

Spike Amount

Calculated using one of the following: Relative Percent

 $(S1 - S2) \times 100$ $(R1 - R2) \times 100$ Difference (RPD) $(R1 + R2) \div 2$ $(S1 + S2) \div 2$

The result of the analysis of a method blank, which is reagent water that is Blank Result

analysed using the same reagents, instruments and procedures as the samples

E CHIEFFTEEL

in a batch; used to determine laboratory contamination

BCA-assigned limit based on—but not the same as—method detection limits Reporting Detec-(MDLs) determined using EPA guidelines tion Limit (RDL)

\MPLES	SAMPLE DESCRIPTION	DETERM CODE	DATE ANALYZED	METHOD	EQUIP.	ВАТСН	ID.NO
1*6درو)(N. West	8080.PCB 8015	09.21.90 09.23.90	8015	516-09 516-08	135 222	7833 7754
009356*2	S. West	8080.PCB 8015	09.21.90 09.23.90	8015	516-09 516-08		7833 7754
009356*3	S. East	8080.PCB 8015	09.21.90 09.23.90	8015	516-09 516-08	222	7833 7754
)09356*4	N. East	8080.PCB 8015	09.21.90 09.23.90	8015	516-09 516-08	222	7833 7754
)09356*5	Center	8080.PCB 8015	09.21.90 09.23.90		516-09 516-08		5 1000000000000000000000000000000000000

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Notes: Equipment = BC Analytical identification number for a particular piece of analytical equipment.

BATCH QC REPORT ORDER: E9009356

ATE REPORTED: 10/02/90

Page 1

METHOD BLANKS AND REPORTING DETECTION LIMIT (RDL)

ARAMETER	DATE ANALYZED	BATCH NUMBER	BLANK RESULT	RDL	UNIT
Date Analyzed Date Extracted Aroclor 1016 Aroclor 1221 Aroclor 1242 Aroclor 1248 Aroclor 1254 Aroclor 1260 Aroclor 1262	09.21.90 09.21.90 09.21.90 09.21.90 09.21.90 09.21.90 09.21.90 09.21.90 09.21.90	135 135 135 135 135	9.21.90 9.20.90 0 0 0 0 0 0	NA NA 0.01 0.01 0.01 0.01 0.01 0.01 0.01	Date Date mg/kg mg/kg mg/kg mg/kg mg/kg mg/kg mg/kg mg/kg
PH - Modified 8015 Date Analyzed Dilution Factor Total Fuel Hydrocarbons	09.23.90 09.23.90 09.23.90	222	9.23.90 1 0.16	NA NA 10	Date Times mg/kg