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DATE: 7-25-00

TO: Susan Hugo

COMPANY: Alameda County Dept. of Environmental Health

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TOTAL NUMBERS OF PAGES INCLUDING COVER LETTER: 7

FROM PG&E: Sue Fandel

EXTERNAL#: (415) 972-5719

COMMENTS: Susan, Here is the letter with the
proposal for remediating the Emeryville
former AST area. I look forward
to receiving your approval.
Thank you,
Sue

IF YOU DO NOT RECEIVE ALL THE PAGES, OR IF YOU HAVE ANY QUESTIONS,
PLEASE CALL (415)973-9202.

Pacific Gas and Electric Company

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October 27 1999



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

Subject: Remedial Action Plan for PG&E's Emeryville Materials Facility,
4525 Hollis Street, Emeryville

Dear Ms. Hugo:

Per our meeting of October 14, 1999, this letter summarizes our discussion and numerates those steps we intend to take toward closure of the remedial investigation at our Emeryville Materials Facility at 4525 Hollis Street, Emeryville. As part of the closure process, PG&E will take action toward remediating the former aboveground storage tank (AST) area, as well as characterizing the groundwater in the former underground storage tank (UST) areas.

In our meeting on August 5, 1999, you requested the sampling of several monitoring wells located throughout the facility. The attached table summarizes the analytical results. None of the wells contained any of the tested analytes with the exception of Well MW-9, which contained toluene (1.8 ug/l) and xylenes (3.0 ug/l). Each well was analyzed for gasoline, benzene, toluene, ethylbenzene, xylenes, mineral oil, and polychlorinated biphenyls (PCBs). Methyl tertiary butyl ether (MtBE) was also analyzed in two selected wells. The results from Well MW-9 are well below California drinking water standards for the detected constituents and are likely due to laboratory contamination given the absence of these compounds in Well MW-10 which is adjacent to MW-9.

In March 1997, EMCON prepared a Risk Based Corrective Action (RBCA) Report for the former AST area. The RBCA evaluated the presence of PCBs at concentrations up to 385 mg/kg and Total Extractable Petroleum Hydrocarbons (Mineral Oil) at concentrations up to 1600 mg/kg in the soil. Mineral oil was not identified as a chemical-of-concern (COC). Mineral oil is a highly refined substance, and studies have demonstrated the low toxicity of this substance to human receptors. The report titled, "Insulating Oil Characteristics Volume 1: Characterization Results" issued by the Electric Power Research Institute (EPRI TR-106898-V1, December 1996, Palo Alto, California) is included for your use during the remedial action project. Please return the report after you are finished using it.

The RBCA report identified site-specific threshold levels (SSTL) for PCBs for potential human receptors at the site including construction, utility, and industrial workers. This report determined that the sole COC at the site was PCBs. The RBCA determined

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that the SSTL for construction workers was 88 mg/kg of PCBs to a depth of 10 feet below ground surface (bgs) and was 1.3 mg/kg of PCBs for industrial workers to a depth of 2 ft. bgs. PG&E proposes to excavate selected soils within the former AST area such that remaining PCB concentrations do not exceed 25 mg/kg. Based on site data, this will require removal of soils to a depth of 9 ft bgs in selected areas. Subsequent addition of clean fill to the excavation and addition of fill to site grade (approximately 4 feet across the site) will ensure that SSTL-soil concentrations will be met for all evaluated human receptors. ✓

PG&E will conduct specific remedial actions outlined in the July 1999 Remedial Action Plan, which was submitted to your office in a letter dated July 19, 1999, including:

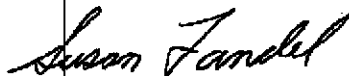
1. Removal of the plastic liner covering the former AST area; ✓
2. Destruction of Well ESE-1 by pressure grouting per California Well Standards (Bulletin 74-90);
3. Excavation of the soils within the AST area where PCB concentrations exceed 25 mg/kg in soil; ✓
4. Import clean fill into the excavated area of the former AST area to site-grade elevation with compaction to 95 percent;
5. Cap the former AST area with an impermeable material such as asphalt or concrete; ✓
6. Collection of grab groundwater samples in the vicinity of each of the former USTs, including the former 500-gallon UST to be tested for the presence of MIBE. ✓

Once these tasks are completed, a report will be prepared describing the results of the remedial efforts. This report will include a Site Conceptual Model and a Risk Management Plan. This report, combined with a deed restriction of the parcel, should allow the site to proceed toward conditional closure. } 6

Your acceptance of this letter will allow PG&E to proceed with these remedial tasks with no further requirements of source removal in the AST area. Please sign in the space provided and return this document to my office at your earliest convenience.

Should you have any questions please contact me at 415.972.5719 or Fred Flint at 925.866.5808.

Sincerely,



Susan Fandel
Environmental Coordinator

Attachment

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Accepted by: _____
Susan Hugo
Alameda County Department of Environmental Health

Date: _____

Table 1

Emeryville Materials Facility - E&E Wells MW-4 through MW-10
Groundwater Monitoring Data

| Sample Designation | Sampling Date | Depth to Groundwater (ft) | TPH Gasoline ug/L | Benzene ug/L | Toluene ug/L | Ethylbenzene ug/L | Xylenes ug/L | MDEB ug/L | TEPH Mineral Oil ug/L | Polychlorinated Biphenols - Aroclor | | | | | | |
|--------------------|-----------------|---------------------------|-------------------|--------------|--------------|-------------------|--------------|-----------|-----------------------|-------------------------------------|-----------|-----------|-----------|-----------|-----------|-----------|
| | | | | | | | | | | 1016 ug/L | 1221 ug/L | 1232 ug/L | 1242 ug/L | 1248 ug/L | 1254 ug/L | 1260 ug/L |
| MW-4 | 10/01/99 | 12.05 | <50 | <0.5 | <0.5 | <0.5 | <0.5 | <5.0 | <100 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 |
| MW-5 | 08/27/99 | 10.70 | <50 | <0.5 | <0.5 | <0.5 | <0.5 | -- | <100 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 |
| MW-6 | no well present | | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| MW-7 | 08/27/99 | 10.75 | <50 | <0.5 | <0.5 | <0.5 | <0.5 | -- | <100 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 |
| MW-8 | 10/01/99 | dry | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| MW-9 | 08/26/99 | 11.23 | <50 | <0.5 | 1.8 | <0.5 | 3.0 | -- | <100 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 |
| MW-10 | 08/26/99 | 12.33 | <50 | <0.5 | <0.5 | <0.5 | <0.5 | <5.0 | <100 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 |

TEPH = total extractable petroleum hydrocarbons.
 TPH = total petroleum hydrocarbons
 ug/L = micrograms per liter.

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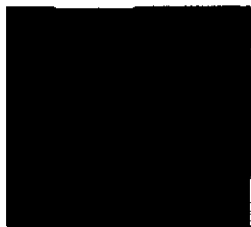
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Keywords:
Insulating oils
Groundwater
Transformer oils
Leaching
Contamination

Please return to:

David Harnish, R.G.
Senior Environmental Scientist
Environmental Support
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Hi Susan!



Insulating Oil Characteristics

Volume 1: Characterization Results

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