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FILE COPY

Ms. Susan Hugo
County of Alameda
Department of Environmental Health
Hazardous Materials Division
1131 Harbor Bay Parkway
Alameda, CA 94502

RE: Electro-Coatings Inc
1401-1421 Park Ave., Emeryville, Ca

Dear Ms. Hugo:

Thank you for giving Peter McGaw and me the opportunity to review the Electro-Coatings file. It is apparent that your file contains none of the analytical reports that have been prepared by the company over the years. One explanation may be that when this project started the only agency involved was the Regional Water Quality Control Board.

Therefore, in order to supplement your file we are forwarding to you under separate cover the following:

Woodward-Clyde Report, July 1977

Woodward-Clyde Report, September 1977

Woodward-Clyde Report, March 1981

Kleinfelder Preliminary Report, July 1982

Kleinfelder Progress Report, November 1983

Conclusions of U.S. Environmental Protection Agency report by FIT Investigators, June 1985

*Kleinfelder Data Summary Report, April 1991

International Technology Report, August 1991

*American Environmental Report, January 1992

Conclusions of U.S. Environmental Protection Agency report by Bechtel Engineering, September 1993 (to follow)

The two reports highlighted by * each provide a historical tabulation of the groundwater analysis performed. Of particular interest should be the American Environmental Report Table 3 which shows that chromium concentrations in all samples are decreasing over the years. One exception is two off site wells downgradient from the Chromex facility which show elevated levels of chromium at the last round of sampling.

TCE is a contaminant that was first reported in 1985 when the Regional Water Quality Control Board requested sampling for purgeable halocarbons for the first time. The last round of sampling would indicate that a TCE plume is moving from an east to westerly direction across the property, with an upgradient source. TCE concentrations in the upgradient wells and the wells at Catellus adjacent to the back of the Electro-Coatings property are falling during each round of sampling. For instance, the Catellus well LF-10 showed concentrations of 760 ppb in 1990, but by July 1993 that concentration had dropped to 150 ppb. Similar reductions can be seen in Electro-Coatings sampling wells 8 and 15, which in 1985 showed TCE concentrations of 93 and 1200 ppb, respectively, and in 1991 those concentrations had dropped to 38 and 650 ppb, respectively.

As was reported at the pre-enforcement review panel, the Electro-Coatings site has been reviewed by the state Department of Toxic Substances and the federal EPA. Both have determined that there is no risk to human health, that there is no beneficial use of the groundwater and that the site rates a low priority of concern. The property is totally capped with either concrete slab or asphalt. Ground water movement is slowly toward the Bay, but the levels of concentration at that point are so low as to not be a health risk even if human contact with the water were possible. The mud flats of the Bay at that location more or less prohibit even that type of contact. See conclusion of EPA report by FIT Investigators, June 1985.

Our review of your file also indicated that an error was made in a submission of the Electro-Coatings hazardous materials management plan in 1989. The chemical 1,1,1 trichloroethane was reported as being used at the facility, but it was incorrectly reported as having the common name of TCE. The common name for the chemical is TCA, and this correction should be noted in case anyone reads the material who is not technically oriented. I am going to ask Electro-Coatings to formally amend the report.

Attached to this letter is a table summarizing all of the groundwater analyses for chromium which have been performed on the wells, including some recent data that has become available. With

the exception of one well sample, I believe that these tables bear out the position that there is chromium contamination, but its level is consistently lower, and there is no threat to human health. The TCE contamination no doubt is an area-wide problem, with some unidentified upgradient, off-site source.

As soon as you have had a chance to review the material we have submitted, which in Mr. Gil Jensen's words should "supplement the record," we would appreciate meeting with you and Mr. Graves to discuss a future course of action.

Sincerely,

Kathleen U. Poling

KATHLEEN U. POLING

cc: Gil Jensen, Deputy District Attorney
Kevin Graves, RWQCB

bcc: Peter McGaw
Gary Garvens
Kent Garvens
Dick Mohr

TABLE 3

SUMMARY OF ANALYTICAL RESULTS - METALS
SHALLOW WELLS

Well No.	Date	Total Chromium (ug/l)	Hexavalent Chromium (ug/l)	Analytical Lab (a*)
1	8/24/77	200	--	unknown
	9/15/81	<1	--	B&C
	10/11/81	1	--	B&C
	11/24/81	2.5	--	B&C
	12/21/81	32	--	B&C
	2/26/85	<20	<20	Anlab
	11/15/91	<50	50	AELC
2	8/24/77	60	--	unknown
	9/15/81	<1	--	B&C
	10/11/81	4	--	B&C
	11/24/81	1.1	--	B&C
	12/21/81	2	--	B&C
3B	8/24/77	60	--	unknown
	9/15/81	<1	--	B&C
	10/11/81	480	--	B&C
	11/24/81	2,000	--	B&C
	12/21/81	190	--	B&C
	10/29/91	110,000	100,000	AELC
3C	8/18/77	18,000	12,000	unknown
	8/24/77	7,100	6,700	unknown
	9/15/81	30,000	--	B&C
	10/11/81	28,000	--	B&C
	11/24/81	22,000	--	B&C
	12/21/81	17,000	--	B&C
	2/26/85	7,250	6,300	Anlab
	10/29/91	2,300	1,600	AELC
4	8/18/77	90,000	67,000	unknown
	9/15/81	57,000	--	B&C
	10/11/81	61,000	--	B&C
	11/24/81	56,000	--	B&C
	12/21/81	55,000	--	B&C
	2/26/85	59,000	59,000	Anlab
	11/4/91	22,000	22,000	AELC
5	8/24/77	360,000	295,000	unknown
	7/21/81	--	--	B&C
	10/11/81	880,000	2,240	B&C
	11/24/81	610,000	--	B&C
	12/21/81	280,000	--	B&C
	2/26/85	480,000	480,000	Anlab
	11/4/91	260,000	250,000	AELC

* See Table 8 for explanation

TABLE 3

SUMMARY OF ANALYTICAL RESULTS - METALS
SHALLOW WELLS

Well No.	Date	Total Chromium (ug/l)	Hexavalent Chromium (ug/l)	Analytical Lab (a*)
6	9/15/81	630	--	B&C
	10/11/81	80	--	B&C
	11/24/81	790	--	B&C
	12/21/81	630	--	B&C
	2/19/85	3,330	3,300	Anlab
	11/5/91	31,000	25,000	AELC
7	9/15/81	<1	--	B&C
	10/11/81	<1	--	B&C
	12/21/81	3	--	B&C
8	9/15/81	<1	--	B&C
	10/11/81	2	--	B&C
	11/24/81	2.5	--	B&C
	12/21/81	70	--	B&C
	2/19/85	<20	<20	Anlab
	11/5/91	<50	<10	AELC
9	1/15/81	258,000	185,000	Ultrachem
	2/26/85	892,000	877,000	Anlab
	10/30/91	140,000	130,000	AELC
10	1/15/81	17,000	14,000	Ultrachem
	2/14/85	746,000	740,000	Anlab
	11/7/91	490,000	450,000	AELC
11 (d)	1/14/81	98,000	90,000	Ultrachem
(d)	1/14/81	127,000	98,000	Ultrachem
(d)	1/14/81	137,000	120,000	Ultrachem
(d)	1/14/81	145,000	124,000	Ultrachem
(d)	1/14/81	116,000	101,000	Ultrachem
(d)	1/14/81	122,000	122,000	Ultrachem
(d)	1/14/81	154,000	135,000	Ultrachem
(d)	1/14/81	134,000	134,000	Ultrachem
	7/21/81	340	34	B&C
	2/26/85	2,440	2,410	Anlab
	11/15/91	470	410	AELC
12	1/15/81	32,000	12,000	Ultrachem
	2/26/85	240,000	240,000	Anlab
	11/11/91	44,000	39,000	AELC
13	1/15/81	381,000	325,000	Ultrachem
	2/14/85	676,000	676,000	Anlab
	11/8/91	510,000	430,000	AELC

* See Table 8 for explanation

TABLE 3

SUMMARY OF ANALYTICAL RESULTS - METALS
SHALLOW WELLS

Well No.	Date	Total Chromium (ug/l)	Hexavalent Chromium (ug/l)	Analytical Lab (a*)
14	2/26/85	654,000	632,000	Anlab
	11/11/91	320,000	310,000	AELC
15	2/19/85	<20	<20	Anlab
	11/12/91	<50	<10	AELC
16	2/14/85	460,000	460,000	Anlab
	11/19/91	240,000	290,000	AELC
17	2/14/85	90,000	38,200	Anlab
	11/19/91	250,000	300,000	AELC
18	2/19/85	60,500	55,000	Anlab
	11/19/91	31,000	24,000	AELC
19	6/22/83	<20	<20	Anlab
	2/19/85	20	20	Anlab
21	6/22/83	20	<20	Anlab
	2/19/85	40	<20	Anlab

* See Table 8 for explanation

SUMMARY OF ADDITIONAL ANALYTICAL RESULTS

Well No.	Date	Total Chromium (ug/l)	Hexavalent Chromium (ug/l)	Analytical Lab
4	6/26/91	17,000	17,800	ITAS
	7/28/94	--	6,300	SPA, Inc
5	6/26/91	390,000	454,000	ITAS
6	7/28/94	--	4,800	SPA
12	6/26/91	38,000	29,700	ITAS
13	7/28/94	--	130	SPA
15	6/26/91	30	<0.01	ITAS
16	7/28/94	--	320	SPA
17	7/28/94	--	200	SPA

TABLE 4

SUMMARY OF ANALYTICAL RESULTS - METALS
DEEP WELLS

Well No.	Date	Total Chromium (ug/l)	Hexavalent Chromium (ug/l)	Analytical Lab (a*)
3A	8/18/77	50	--	unknown
	9/15/81	<1	--	B&C
	10/11/81	<1	--	B&C
	11/24/81	230	--	B&C
	12/21/81	14	--	B&C
	2/14/85	770	80	Anlab
	10/29/91	130	<500	AELC
18A	6/22/83	20	<20	Anlab
	2/26/85	<20	<20	Anlab
	11/19/91	<50	<10	AELC
20	6/21/83	1,300	1,200	B&C
	6/22/83	1,300	530	Anlab
	8/11/83	90	40	Anlab
	2/26/85	<20	<20	Anlab
	11/15/91	<50	14	AELC

See Table 8 for explanation