

RECEIVED

10:50 am, Apr 13, 2009

Alameda County
Environmental Health

April 10, 2009

Ms. Barbara Jakub, PG
Alameda County Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Re: Fuel Leak Case No. RO0000447 and Geotracker Global ID TO600101608,
USPS, and 6121 Hollis Street, Emeryville, CA 94608

Dear Ms. Jakub:

On behalf of CBS Corporation (CBS), formerly known as Westinghouse Electric Corporation (Westinghouse), SOMA Environmental Engineering, Inc. (SOMA) submits this letter report to clarify issues you mentioned in your letter dated January 30, 2009. The letter was addressed to Hollis R&D Associates and the United States Postal Service (USPS) and sought information on the above referenced site. The letter was referred to CBS since your inquiry seems to confuse two separate and distinct sites: (1) the USPS site, which is actually located at 62nd Street and Horton Street and (2) the adjacent Westinghouse property which includes the Heritage Square parcel which is located at 6121 Hollis Street.

US Postal Service property:

The Fuel Leak Case you seek information about is clearly associated with the USPS property. According to the information posted on the Alameda County web site, the USPS property historically was an oil and fuel distribution center (CBS believes the previous owner was Shell Oil Company of California as shown in Figure 1) containing two underground storage tanks (USTs) and 14 aboveground storage tanks (ASTs). In 1993, the two USTs were removed. One had multiple holes and apparently caused unauthorized release of petroleum hydrocarbons. Figure 4 shows UST locations. In July 1993, approximately 460 cubic yards of fuel-impacted soils were removed from the southeastern corner of the property. In August 1993, an additional 260 cubic yards of fuel-impacted soils were removed along the western property boundary. However, results of the confirmation soil samples showed elevated levels of petroleum hydrocarbons (17,000 mg/kg) in a soil sample collected from the southern excavation sidewall. Because of the proximity of the excavation to the southern property boundary and the presence of the Westinghouse slurry wall, further excavation could not be conducted. Laboratory analysis of soil samples collected from the southeastern corner of the property did not detect any polychlorinated biphenyls (PCBs). Only petroleum hydrocarbons up to 170 mg/kg were detected in post-excavation soil samples.

In 1993 while conducting remediation and then constructing its current facility, USPS apparently had offices in Heritage Square and used the mailing address of 6121 Hollis Street, which has led to the confusion between the sites. CBS has never owned or

operated the USPS site and is not responsible for petroleum hydrocarbons at this property. To the knowledge of CBS, PCBs are not an issue at the USPS property.

Westinghouse Electric Corporation property

Your letter of January 30, 2009 referred to two SOMA reports relating to work done at Heritage Square which is part of the larger Westinghouse remediation project. Following is a brief summary of site history and environmental cleanup activities conducted by CBS at the Westinghouse property. The majority of site investigation and cleanup activities were conducted under regulatory oversight of Regional Water Quality Control Board, San Francisco Bay Region (SFRWQCB) and Alameda County Environmental Health Care Services (ACEHCS).

The former Westinghouse Apparatus Service Plant is located at 5815 Peladeau Street, Emeryville, California. Originally, the site consisted of three parcels: Parcels I, II and III. Figures 1 through 4 show the boundary of the former Westinghouse property from 1942 through the present time. As these figures show, the site has undergone major changes in recent years. The site is bordered on the north by Heritage Square, an office building unit, on the west by the AMTRAK Station, on the South by Powell Street and on the east by Peladeau Street. It is located approximately 2,000 feet east of the eastern shore of San Francisco Bay. In recent years, the site has undergone extensive redevelopment for commercial uses.

Currently, Parcel I contains EmeryStation I, a sizeable commercial building built in 1999. Parcel II contains EmeryStation II, built in 2000. Both buildings were built and owned by Wareham Development Group. Parcel III is referred to as "mound area", which is currently being used as a parking lot. Elevated levels of PCB-containing materials have been disposed and buried under the mound area. The presence of these elevated levels of PCB contamination in soil and groundwater beneath the mound area led to the construction of a slurry wall and engineered-cap in fall 1985 under an order from USEPA Region 9, with the purpose of limiting migration of PCBs in groundwater. Figure 3 shows the slurry wall around the mound area in Parcel III. Per the USEPA order, a number of groundwater monitoring wells have been installed around the mound area to monitor the status of the PCB plume beneath this area. CBS continues to conduct an annual groundwater monitoring program at the site.

Westinghouse operations began in 1924 at what is currently the location of EmeryStation I and II. In early days of operation, limited manufacturing of transformers and other electrical apparatuses occurred at the site (Figure 1). Operations have included regional and district administration, engineering services, warehousing, and repair of electrical apparatuses. Westinghouse stopped using the Emeryville facility for repair of electrical apparatuses in 1982, and stopped using the entire facility in 1992. Beginning in 1981, a number of environmental investigations were conducted to assess soil and groundwater conditions at the site. Results of investigations conducted by

Westinghouse revealed the presence of elevated levels of PCBs in surface soils. In 1995, Westinghouse retained SOMA to conduct a human health risk assessment at the site and evaluate soil cleanup levels with respect to PCBs protective of future residents and commercial workers. In 1996, based on the recommendation of SOMA's human health risk assessment report (February 1996), Westinghouse retained Alta Geo-Sciences to remove PCB-impacted soil from the northern portion of the property. During this process, PCB-impacted soils up to 5-6 feet depths were excavated and off-hauled. SOMA's recommended cleanup levels for PCB-impacted soils, detailed in SOMA's human health risk assessment document of February 1996, were applied by Alta Geosciences and SOMA during remediation of PCB-impacted soils at the Westinghouse facility and neighboring properties.

In 1998, during construction of Emery Station I and II, CBS retained SOMA to remove three USTs discovered by the construction crew during site preparation. SOMA's report dated July 23, 1998 includes details of UST closure at the site. In addition, a concrete sump containing minor concentrations of PCBs and petroleum hydrocarbons was excavated and off-hauled during the construction period. Stockpiles of residual amounts of PCB-impacted soils generated by the construction crew were tested and off-hauled. SOMA was also involved in implementing components of the risk management plan during the entire construction period at the site. In 1998, CBS filed with the Alameda County Recorder of Deeds a document entitled "Declaration of Covenants, Conditions and Restrictions" which restricts Parcels I and II to commercial/industrial uses.

In June 1998, in an attempt to evaluate the extent of Westinghouse historical activities and potential impact of their operation on neighboring properties, SOMA reviewed available historical aerial photos. The review uncovered stockpiles of unidentified materials and ground discoloration at the Heritage Square site from 1931 through 1950. In November 1950, Westinghouse sold the Heritage Square property to ITT Grinnell Company. Sometime between 1950 and 1959, ITT paved over the soil discoloration area. Currently, Wareham Development Group is owner of the Heritage Square property. To verify potential impact from Westinghouse operations indicated by the aerial photos, SOMA drilled eight soil borings using hollow stem auger. Four were drilled along the northern boundary of the Westinghouse property and Heritage Square, while the other four were drilled within the USPS property. Soil samples were collected at depths of 0.5 and four feet below ground surface (bgs). This work was done under direction of ACEHCS and SFRWQCB. Soil samples were analyzed for PCBs using EPA Method 8080. Laboratory analysis results for soil samples from the USPS property did not reveal PCB concentrations above the laboratory-detection limit. Accordingly, no further investigation was conducted at the USPS site. However, laboratory analysis results for soil samples from the Heritage Square site showed elevated levels of PCBs ranging between 4.1 mg/kg and 134 mg/kg.

During January and February 2000, at the request of ACEHCS, SOMA drilled 25 shallow soil borings (up to 4 feet bgs) within the Heritage Square property and collected

soil samples at depths of 0.5 and 4 feet. The soil samples again were analyzed for PCBs. In July 2000, SOMA drilled an additional 22 soil borings within the Heritage Square property and collected soil samples for complete delineation of PCB-impacted soils within the north parking lot of the Heritage Square property. SOMA's report of August 28, 2000 includes horizontal and vertical delineation of the PCB distribution within the Heritage Square property parking lot.

In late 2000, due to extension and widening of Horton Street next to the western boundary of Heritage Square, CBS retained WRS, Inc. to excavate and off-haul PCB-impacted soils during this operation. Meanwhile, CBS retained SOMA to segregate PCB-impacted soils and facilitate their removal and off-site disposal. SOMA's April 11, 2001 report includes a detailed description of construction and soil excavation activities during the Horton Street construction between 59th and 62nd Streets. The work was conducted under regulatory oversight of SFRWQCB and ACEHCS.

On October 1, 2002, SOMA prepared a workplan to characterize and remove PCB-impacted soils beneath the north and east parking lots of the Heritage Square property. The workplan was submitted to and approved by SFRWQCB and ACEHCS. It provided for profiling of soils excavated during remediation of PCB-impacted soils as required by Altamont and U.S. Ecology Landfills. As such, SOMA advanced 21 additional soil borings within the north parking lot and collected composite soil samples for waste profiling purposes.

On July 15, 2003, based on Wareham's request, and to evaluate the extent of PCB-impacted soils in adjacent properties, SOMA conducted extensive soil investigation within the east parking lot. During this investigation, SOMA drilled 24 soil borings and collected soil samples at 0.5 and 3.5 feet bgs. Investigation results indicated that only the northwestern corner of the east parking lot had been impacted by PCBs, at 8.1 mg/kg at 0.5 feet bgs.

On September 23, 2003, remediation of the north and east parking lots began. On September 27, 2003, the PCB-impacted area within the east parking lot was excavated, with an approximate dimension of 45 feet by 45 feet, to an approximate depth of 2 feet bgs. During these activities a total of 1,860 tons of soil containing PCB concentrations lower than 50 mg/kg were disposed of at Altamont Landfill in Livermore, California. A total of 3,685 tons of soil containing PCB concentrations between 50 mg/kg and 1,000 mg/kg were disposed of at Chemical Waste Management, a Class I landfill facility in Kettleman City, California. In addition, a total of 1,658 tons of soil containing PCB concentrations higher than 1,000 mg/kg were disposed of at the U.S. Ecology, Inc. facility in Beatty, Nevada. Soil removed from the site totaled 7,203 tons. SOMA's report dated March 1, 2004 includes details of soil remediation activities at the Heritage Square north and east parking lots. In accordance with SOMA's risk assessment recommendations, the PCB target cleanup level was 2.85 mg/kg for soils between 0-2 feet bgs and 59.5 mg/kg for soils between 2-4 feet bgs. Comparison of remaining PCB

Ms. Barbara Jakub, PG
Alameda County Environmental Health
April 10, 2009
Page 5 of 5

levels at different depths with recommended soil cleanup levels per SOMA's risk assessment document established that the site had been cleaned up beyond recommended levels.

Upon submitting the soil remediation report dated March 1, 2004, SOMA requested SFRWQCB to adopt a no further action (NFA) status for Heritage Square and the former Westinghouse facility (Emery Station I and II). Currently, SFRWQCB and Wareham, the present owner of the properties, are negotiating deed restriction language for the Heritage Square parcel.

Figure 4 shows the extent of soil remediation activities conducted by CBS in a chronological order. As becomes clear, PCBs were the only chemical of potential concern at the former Westinghouse property and surrounding areas.

I hope this letter assists you in evaluating environmental conditions at the site and illustrates the considerable resources expended by our client in restoring environmental quality at the Heritage Square and other former Westinghouse properties. Please do not hesitate to call me at (925) 734-6400, if you have any questions or comments.

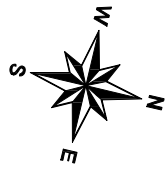
Sincerely,

Mansour Sepehr, PhD, PE
Principal

Attachments:

Figure 1: Site Vicinity Map (1942)
Figure 2: Site Vicinity Map (1951)
Figure 3; Site Vicinity Map (1998)
Figure 4: Site Vicinity Map (Present Time)

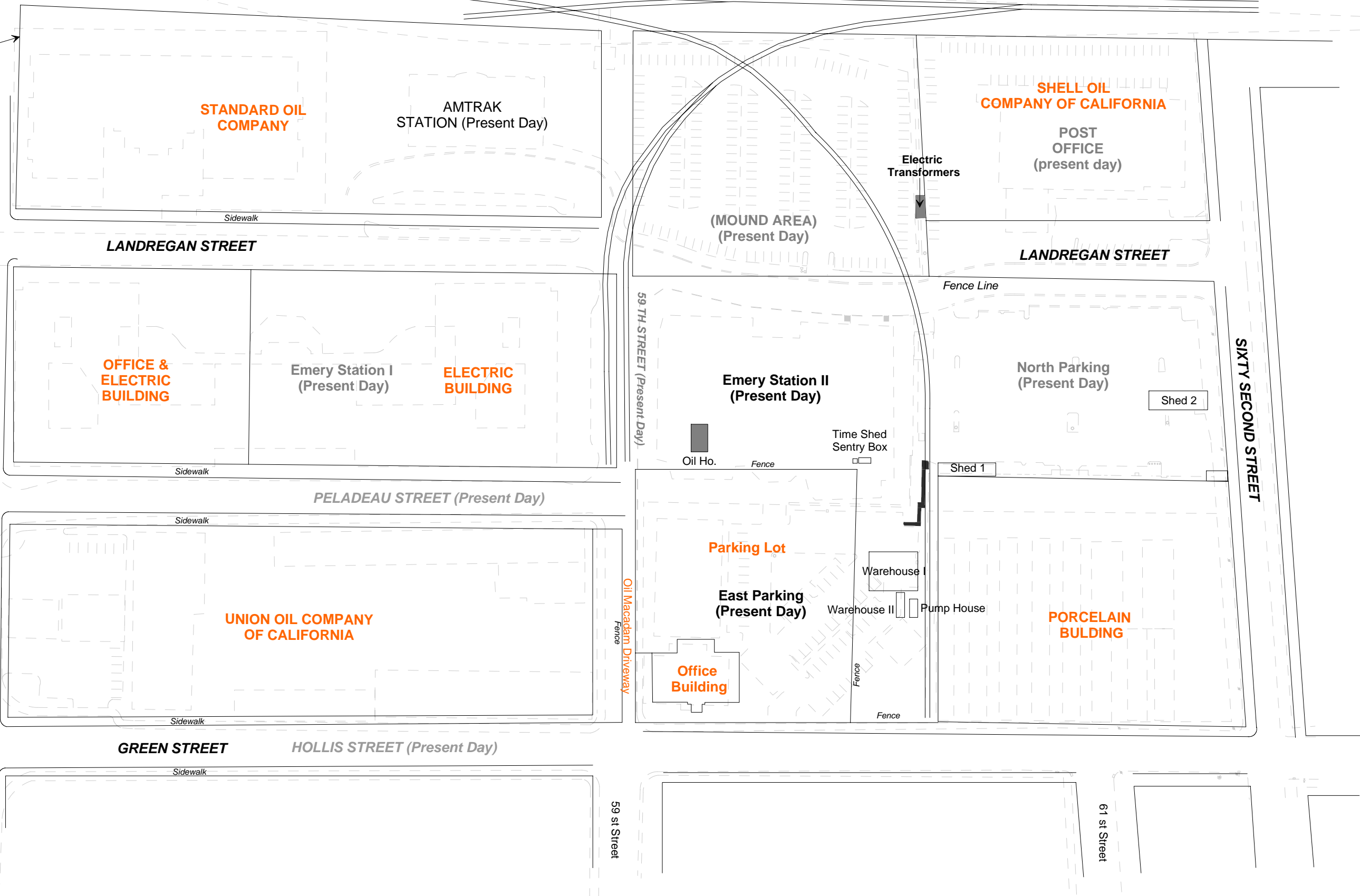
cc: Mr. Richard Smith, CBS Corporation
Ms. Elizabeth Allen, SFRWQCB
Mr. Geoff Sears, Wareham Development Group
Mr. Jerry Atkins, USPS



To Oakland ←

SOUTHERN PACIFIC COMPANY MAIN LINE RAILROAD (1000 feet wide)

Site Layout in 1942



Present Day Layout

approximate scale in feet

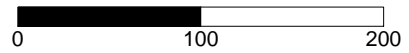
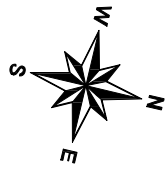


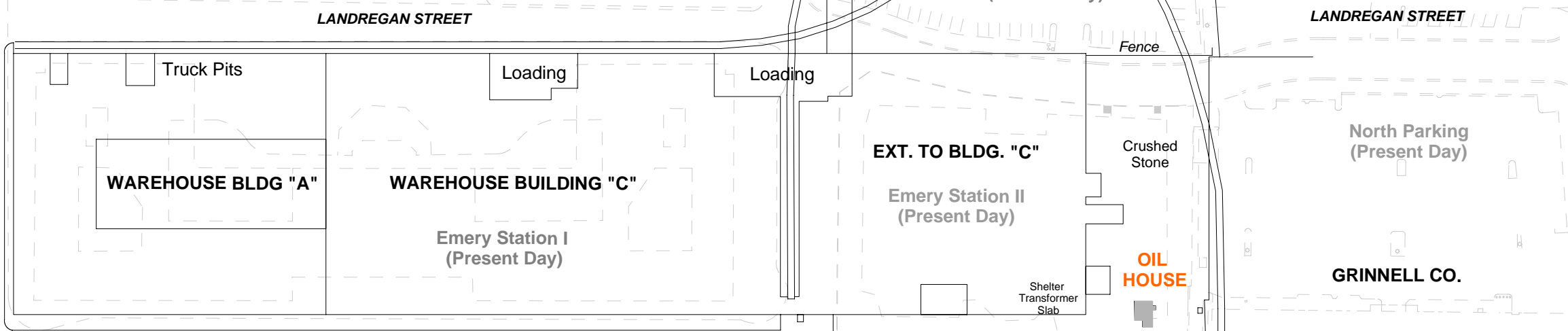
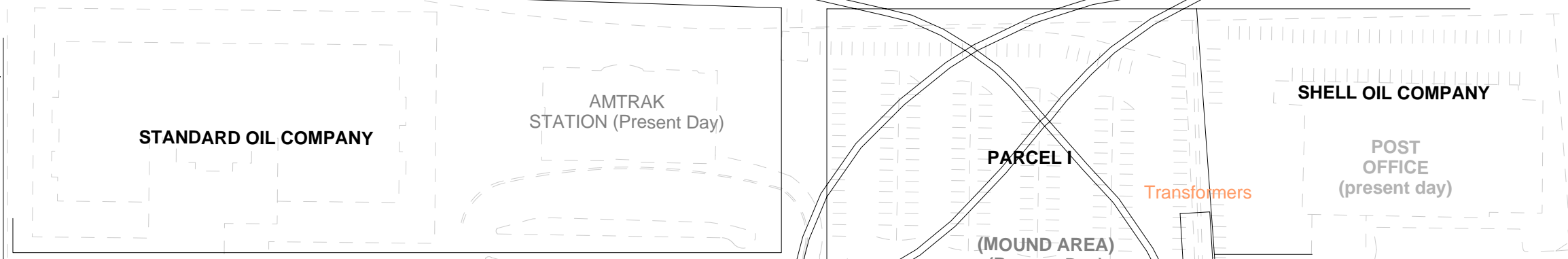
Figure1: Site vicinity map (year 1942)





Site Layout
in 1951

SOUTHERN PACIFIC RAILROAD CO.



Present Day
Layout

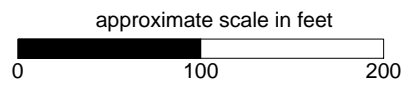
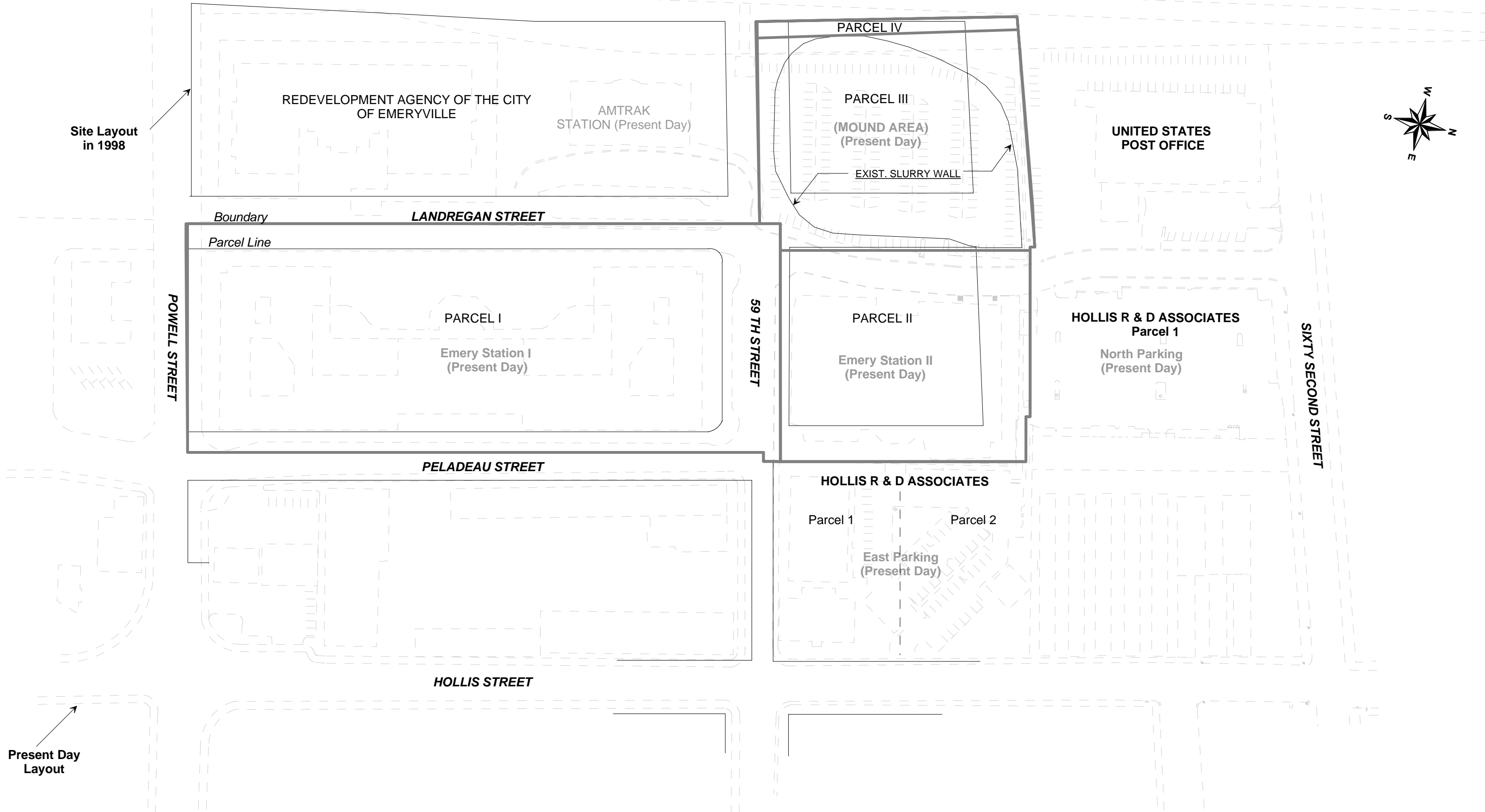


Figure 2: Site vicinity map (year 1951)



Site Layout in 1998

Present Day Layout

approximate scale in feet

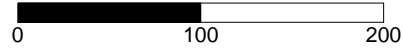
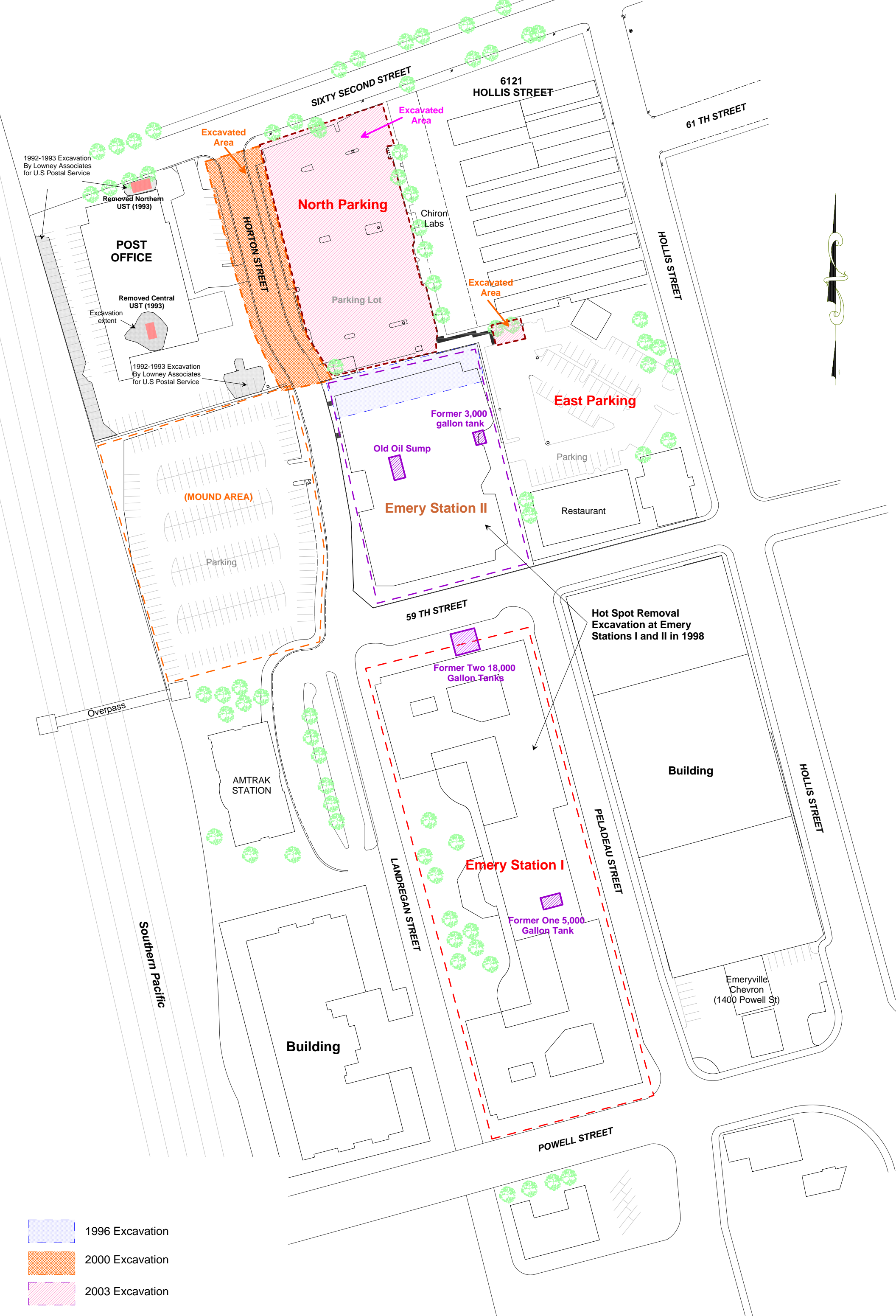


Figure 3: Site vicinity (year 1998)



- 1996 Excavation
- 2000 Excavation
- 2003 Excavation

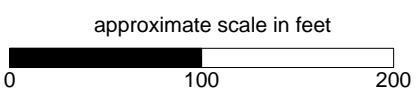


Figure 4: Site vicinity map (Present Time)