8:30 - 150 cm yla/2,000 fgm Juis Coonegla 1800 280 W marather blod. 5/6/91 Historial Spirite - 2600 ppm Bengge - 0.4 ppm Tolvene - 1.0 ppgm Gradient been defined. John Rice)- Ettie alexander Reu I Wahehouse, su light 1:00 may 8, 1:00 P.M. A Alywood & Lunder Horton 94608 -20 fandall morrison 763-2000

5/14/91 POD Alameda Co. - 360 (sites)
324-325 money allocated to Co. LOP 302. per. perd - p not getting 2004 money 161- De Slic fund - DOD, DOE-1 position Core Recovery, IPA's - sharing for alamedoc Co - has I person for Reva CB but Lester was told - there's us I person but have to be absorbed by existing Staff Lester - Rich ? loguer geologist and health Specialed LOP 3 State Board - Closure? provide training? appeal to State Board?

Appeal Ja Cocal directly -> > Baccorat case - workshop in June

2004 - money kept by State Water Kersense Board Falenal & State money - to fund LOP Hate will be \$1099hr Co, charge \$67/hr Paries will be change \$4500 /An RI - Grant application SLIC Program new data base Site Clean up order for RWGCB Potential future problem-industrial asphalt EPA-do Hazard Ranking Hostoric wales liver 7 5 ft Enforcement action natur level Japan Luctuation 10 ft abone -15 ft below as long a there's 18 stabone 15ft below 18 ft sexuation

Where the mireral 10 40 15 ft 10

pulease continuing) Leater, Feldmen

remove source control + 1 }

Threat to ground water \

Levelop coet Siscerse w/ apprivate to do fearthility study because of the threat to ground water quality. Litter Deadline - R Lo Schedule Wor Calle -) mini flasibilety remedial involegation Frankisky Study - yarhane bengere Logod pauline rusk. Pisk assessment - wil always tell you Cot Benefit - protecting resource of ground 420

· 1 ppb bengne I pus TCA Laberal Superfund Suidance: Orchea Process RIFS -V not a threat to Has quality Alameda Co-Ruidance Document LA County- Ruidance Document RIFS Remedial Pump & Treat

Clear up q abatement order

280 W. Macarthen Bluck. 94611 Kaiser Oakland Rich Hiett - (464-4359) 2/01 Webster Co. Oakland 94612 5/31/91 MW1-D Doed Restrictions - Bo 07 DHS? 2) Lenching Jul?

D When do up start pounduater remediation

Rec'd manifest of PCP Nosposal Ly classified 2037 9 2081 9/2/190 Reid litter fr. Kauser request meeting to discuss change in amediations pla of mineral spirite contaminations Oct 4, 1998, 91-25/98 Letter out request for adellional \$ 500 D/R 10/9/90 Leid Jr. Gelomatriax Modification)

workplans for mineral Species

- will file w DA

- proposed 4 GH W5

- WDR not approximat will preserve

conclusioning recommendations

for abditional remedia action poid kyston por sail penediation 11/90 Rec'd \$5000 all ditrond D/R 12/6/96

mondos B-1.0 gapt water (0.3 pgm Sail
T=100 apt Total cum BTKE Kaner 280 Whit machether Blod. 50 KgGTPH Maniferés recid - how many 16s dispose iff site how much?. Sandwater to countered Sangle q malysis grandwater - 480,000 lbs 3-4 wells - loventions to be identified D find of there is a significant threat to Helquality contain the problem & clear-upe soit sangles 2100TPH but 7 in BTXGE clack for Her quality equel for defait /refund

TPH= 10 years

Had

RWGCB

mox CL

2/28/90 Kee'd. Prox. 65 Natification - Mineral Spirite (Staddard Solvente) & Mentachlorogeneral 3/12/96 Lettes fr. Kaiser notification 25 wyle soil contaminated of mineral spirite Boo yen - 2600 pm partachtorofteral 9 2,45 trichlorsphend in Soil (25 cuyde) 3/14/90 Little fr. Karsin isoluda ? 0 - Report of mitial Sail compling (11/20/89) tolethis mineral search from sever bie trench in merhanical bldg. 15 ppm - 8 ppm at 4.5 ft 9 9.5 ft. diesel- 12 jan 929 ppm. at 14.5thid, - Site Safity plan (PCP contamination) 3 - Pat. aralycie confirming PEP · Forans (HXCDF's 3/ ppm, Hp CDF & 160 pm g OCDF (20 jun) OCDD - Do ppm Pontachlors phinol - 300 jpm, 600 pm 2, 4.5 In chlowpherof - 1000 jpm, 2000 pgm Letter out to Kaiser request to do julinimary in Vestigation Letter fr. Ken agen request for meeting May 2, 1990 4/23/90

ns S. combra of also submitted 8/6/98 Jolley for Haven - dispersed Elle for pell 5/29/96 Juth out oppions to workfor or renoduster - stalls state for something of the forther - dungs blowds Aydre outener.

- soil to forther outener.

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Thomas DeMartino Administrator

Robert S. Klein, M.D. Physician-in-Chief



December 6, 1990

Ms. Susan Hugo Alameda County Department of Environmental Health 80 Swan Way, Room #200 Oakland, CA 94621

Dear Susan,

Enclosed is a check for \$500.00 as deposit for the Department of Environmental Health's oversight of the hazardous materials clean-up project at Kaiser Permanente Medical Center in Oakland. Please let me know if you have any questions or require anything further from us. Thank you.

Sincerely,

Kenneth U. Ayers Safety Director

KUA:gml enclosure

Thomas DeMartino Administrator

Robert S. Klein, M.D. Physician-in-Chief

596 —



October 25, 1990

Ms. Susan Hugo Division of Hazardous Materials 80 Swan Way, Room 200 Oakland, CA 94621

Dear Susan,

Enclosed is a check for \$500.00 for deposit with your department for your oversight of the hazardous materials remediation that is ongoing at the Kaiser Permanente Medical in Oakland. Please let me know if you require anything further. Thank you.

Sincerely,

Kenneth U. Ayers Safety Coordinator

KUA:gml enclosure снеск пимвен **3137835**

CHECK 3137835

KAISER PERMANENTE Kaiser Foundation Health Plan, Inc.

P.O. Box 12912

Oakland, California 94604-2916

DISBURSING AGENT FOR KAISER FOUNDATION HEALTH PLAN, INC.

KAISER FOUNDATION THE PERMANENTE MEDICAL GROUP, INC. 3137835

CHECK DATE AMOUNT

PAY FIVE HUNDRED AND NO/100 DOLLARS

COUNTY OF ALAMEDA 333 FIFTH STREET ORDER BAKLAND

GENERAL ACCOUNT

KAISER FOUNDATION HEALTH PLAN, INC.

™3137835™

:PO5 1 100 209:

38735651

October 9, 1990

DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

Mr. Kenneth Ayers
Safety Coordinator
Kaiser Permanente Medical Center
280 West MacArthur Blvd.
Oakland, California 94611

Dear Mr. Ayers:

As we had discussed during our meeting on October 4, 1990, the Alameda County Department of Environmental Health, Hazardous Materials Division has exhausted its deposit for the oversight of remediation at Kaiser Permanente Medical Center on 280 West MacArthur Boulevard in Oakland. Please submit an additional deposit of \$500, made payable to Alameda County, for our continued oversight of this case. We will draw upon these funds at a given hourly rate whenever a Hazardous Materials Specialist works on the case.

If you have any question about the Division's deposit/refund system, please contact me at 271-4320.

Sincerely,

Susan L. Hugo

Susan Z. Hugo

Hazardous Materials Specialist

cc: Rafat A. Shahid, Asst. Agency Director, Department of

Environmental Health

 $\sqrt{\text{Files}}$

Thomas DeMartino Administrator

Robert S. Klein, M.D. Physician-in-Chief



September 25, 1990

Ms. Susan Hugo Department of Environmental Health Hazardous Materials Program 80 Swan Way, Room 200 Oakland, CA 94621

Dear Susan,

pot 4,1990 10:00 My

As agreed upon during our recent telephone conversation, I have scheduled a meeting at the Oakland Medical Center for Thursday, October 10, 1990 at 10:00 am in the Engineering Conference Room. We'd like to discuss a change in our remediation plan for the mineral spirits contaminated soils.

Please feel free to call me at 596-6603 if you have any questions. Thank you.

Sincerely,

Kenneth U. Ayers Safety Coordinator

KUA:gml

cc: J. Adams

T. Graf

S. Rohlfing, RN

T. Wilkes

Thomas DeMartino
Administrator

Robert S. Klein, M.D. Physician-in-Chief



September 21, 1990

Ms. Susan Hugo Hazardous Materials Specialist Department of Environmental Health 80 Swan Way, Room 200 Oakland, CA 94621

Dear Susan,

Enclosed are photostatic copies of the hazardous waste manifests for the pentachlorophenol contaminated soils that were removed from the Broadway construction site at the Kaiser Permanente Medical Center - Oakland.

The soil was transported to ThermalKEM, Inc. in South Carolina for disposal. We have been informed by ThermalKEM that all of the soil has subsequently been incinerated.

If you have any questions, please call me at 596-6603. Thank you.

Sincerely,

Ken Ayers

Xe.

Safety Coordinator

KA:gml enclosures

South Carolina Department of Health and E vironmental Control

Bureau of Soild & mazardous Wasse Mgs 2500 Bull Sireet Columbia, SC 25201 Phone; (803) 734-5200 Emergency & Holidays: (803)253-6488

PLEASE PRINT of T	YPE (Form designed for use on	elite (12-onchi typew	rrner)	Form /	Approved OMB N	a. 2050-	-0029 Expires 9-30-9	
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6. GENERATOR'S CERTIFICATION: I hereby decided, and are in all respective laws of the State of South Carolina. If I am a large quantity generator, I certify that I had practicable and that I have selected the practicable and that I have selected the practicable and that I have selected the small during that is available to me and that I can afford.	tive a program in place to reduce the vo	Hume and loxicity of w	vaste gene	rated to	the degree i have	getermir	ned to be economical future threat to hum:	
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and Environmental Control

2500 Buil Sireet, Columbia, SC 29201

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Month Cav 1941 08-30-90

and E vironmental Control

Bureau of Solid & Hazarobus Waste Mgt 2600 Bull Street, Columbia, SC 29201

Phone. (803) 734-5200

Emergency & Holidays: (803)253-5488

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and Environmental Control

Phone. (803) 734-5200

Emergency & Holidays: (803)253-6488

Form Approved, OMB No. 2050-0039 Expires 9-30-91 (Form designed for use on elite [12-pitch] typewriter) PLEASE PRINT or TYPE 2 Page 1 Information in the shaded areas is not UNIFORM HAZARDOUS Manufast 1. Generator's U.S. EPA IO No. C, A, D, 9, 8, 1, 4, 2, 7, 1, 3, 1, 0, 0, 0, 0, 16 1 required by Federal law, but is by State law. WASTE MANIFEST A. State Manifest Document Number 3. Generator's Name and Mailing Address
KAISER PERMANENTE MEDICAL CENTER
280 W. McARTHUR BOULEVARD B. State Generator's ID OAKLAND, CA 4. Generator's Phone (4 15 596-6603 C. State Transporter's ID 6. U.S. EPA ID Number 5. Transporter 1 Company Name , G A D Q 6 3 5 4 7, 9 9 6 D. Transporter's Phone 759-4211 (800)STAMCO, INC. E. State Transporter's ID 8. U.S. EPA ID Number 7. Transporter 2 Company Name F. Transporter's Phone G. State Facility's ID 10. U.S. EPA ID Number 9. Designated Facility Name and Site Address ThermalKEM Inc. H. Facility's Phone 2324 Vernesdale Road 803-324-5310 1S1C1D101414141412131313 Rock Hill, SC 29730 12. Containers 13. Total Quantity 14. Unit L Waste Number 11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) Yn.∕\ol No. Type MAZARDOUS MATERIAL SOLID, N.O.S. T 7, 7, 7, 7, ORM-E, NA9188 K. Handling Codes for Wastes Listed Above J. Additional Descriptions for Materials Listed Above 2 |SIT |- | 0, 0, 0, 0, 6 |- 3, 6, 1, 2 b. [S:T]-[; , , ,]-[4 SITI-I ruone reporting burden for this collection of information is estimated to arerage, 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and discount for the storage and sto EMERGENCY & BILLING CONTACT Public reporting burden for this collection of information is esti- Special Handing Instructions and Additional Information average, 3r minutes for generators, 13 minutes for variablement, and minutes for treatment storage and disposal lackless. The includes limited for reviewing instructions, gathering delts, and completing and reviewing HAZARDOUS MATERIAL SERVICES As of 9-25-90 this will be torm, Send comments reparting the burden estimate, including pessions for reducing this burden, to Chief, information Points non, PM-223, U.S. Environmental Protection Agency, 401 M.S.L.S.W. P. O. BOX 705 classified as DO37.& DO41 COALINGA, CA Washington, D.C. 20450; and to the Office of Information and Regulation Attains, Office of Management and Budget, Washington, D.C. 20503. #10033 SAN 9 4 1 5 0 (209) 935-1508 6. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified. packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. HI am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Year Month Day Printed/Typed Name Signature 10.81261910 KENNETH U. HUENS 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature 01 Transporter 2 Acknowledgement of Receipt of Materials Day Month Signature Printed/Typed Name Discrepancy Indication Space 1 50000 10s c 11111 11s 20. Facility Owner or Operator, Certification of receipt of hazzardous materials covered by this manifest except as noted in item 19. Day Enhied/Typed Name

Project/Typed Name

South Carolina Department of Health and E /ironmental Control

2600 Bull Street, Columbia, SC 29201

Phone. (803) 734-5200

Emergency & Holidays: (803)253-6488

Form Approved, OMB No. 2050-0039 Expires 9-30-91 (Form designed for use on eine [12-pitch] typewriter) PLEASE PRINT & TYPE Information in the shaded areas is not Manifest 1. Generator's U.S. EPA ID No. L. Generator's U.S. EPA ID No. Cocument No. C. A. D. 9.8.1.4.2.7.11.3.1.0.0.0.0.7 required by Federal law, but is by State law. UNIFORM HAZARDOUS WASTE MANIFEST A. State Manifest Document Number 1 Generator's Name and Mailing Address
KAISER PERMANENTE MEDICAL CENTER
280 W. MCARTHUR BOULEVARD 8. State Generator's 10 . OAKLAND, CA 596-6603 4. Generator's Phone (415 C. State Transporter's ID 6. U.S. SPA ID Number 5. Transporter 1 Company Name (800) 759-4211 1 G A D Q G 3 5 4 7 9 9 9 6 D. Transporter's Phone STAMCO, INC. E. State Transporter's 10 8, U.S. EPA ID Number 7. Transporter 2 Company Name F. Transporter's Phone G. State Facility's ID 10. U.S. EPA ID Number 9. Designated Facility Name and Site Address ThermalKEM Inc. H. Facility's Phone 2324 Vemesdale Road 803-324-5310 S1C1D101414141412131313 Rock Hill, SC 29730 L Waste Number 13. Total Quantity 14. Unit 12. Containers 11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) Wt/No! , Type 1 1 1 1 HAZARDOUS MATERIAL SOLID, N.O.S. , 7, 7, 7, 7, 7, ORM-E, NA9188 C. K. Handling Codes for Wastes Listed Above J. Additional Descriptions for Materials Listed Above. a |ST |- | 0, 0, 0, 0, 6|-13 6, 1, 2 Public reporting burden for this optimizion of information is estimated to average, 37 minutes for generators, 15 minutes for transponers, and 10 EMERGENCY & BILLING CONTACT 15. Special Handing Instructions and Additional Information utes for treatment storage and orsposal lacrities. This includes time HAZARDOUS MATERIAL SERVICES As of 9-25-90 this will be minutes for treatment storage and crinical statement and re-e-eight for reviewing state, closure, gathering data, and completing and re-e-eight fine form. Send comments reparding the burden estimate, including his burden, so Chief, information Policial Send Comments of the Chief, information Policial Send Comments of the Chief C P. O. BOX 705 classified as D037 & D041 COALINGA, CA SAN 9 4 1 5 2 (209) 935-1508 6. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified. packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to numary health and the environment; OR, it I am a small quantity generator, I have made a good taith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Signature Printed/Typed Name 10,8,2,6,9,0 KENNETH U. Hyers 17. Transporter 1 Acknowledgement of Receipt of Materials Signature _ A Printed/Typed Name VIR911 617501 8. Transporter 2 Acknowledgement of Receipt of Materials Year Signature Printed/Typed Name 19. Discrepancy Indication Space 120. Facility Owner or Operator, Certification of receipt of hazardous materials covered by this manifest except as quied in Item 19.

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2500 Bull Street, Columbia, SC 29201

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Phone: (803) 734-5200

Emergency & Holidays: (803)253-6488 Form Approved, OMB No. 2050-0039 Expires 9-30-91 (Form designed for use on elite [12-prich] typewriter) - " PLEASE PRINT OF TYPE 2 Page 1 Manifest Information in the shaded areas is not 1. Generator's U.S. EPA ID No. UNIFORM HAZARDOUS C, A, D, 9, 8, 1, 4, 2, 7, 1, 3, 1, 0, 0, 0, 0, 0, 8 required by Federal law, but is by State law. WASTE MANIFEST A. State Manifest Document Number 3. Generator's Name and Mailing Address
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and Environmental Control

2600 Bull Street, Columbia, 5C 29201

Phone. (803) 734-5200 Emergency & Holidays: (803)253-6488

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South Carolina Department of Health and E rironmental Control

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20. Facility Owner or Operator, Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed Tiped Name



South Carolina Department of Health and E. rironmental Control

Sureau of Solid & materiodus Waste Mgt. 2600 Bull Sireet, Columbia, SC 25201 Phone: (803) 734-5200

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54-453

Thomas DeMartino Administrator

Robert S. Klein, M.D. Physician-in-Chief



August 6, 1990

Certified Return Receipt Requested

Ms. Susan Hugo Hazardous Materials Specialist Division of Hazardous Materials Department of Environmental Health 80 Swan Way, Rm. 200 Oakland, CA 94621

Dear Susan,

We recently have located a disposal facility in South Carolina that is able to accept the pentachlorophenol contaminated soil from our construction site on Broadway. The name and address of the firm is:

> ThermoKem 454 S. Anderson Rd. BTC 532 Rockhill, South Carolina 29730

We anticipate that we will be starting the packaging process of the soils for transport on or about August 18, 1990 and that the process will take approximately five (5) days. The firm of Crosby and Overton will be handling the project for us and will be taking the required safety precautions. Shipments of the waste will be manifested and copies of the manifest provided to you.

I trust that this process is acceptable to your office. Please notify me if otherwise or if I can answer any questions.

Thank you.

KUA:gml

Sincerely,

Kenneth U. Ayers

Safety Coordinator

of Conformed of ten agers regarding alingosal

May 29, 1990

DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

Mr. Kenneth Ayers Kaiser Permanente Medical Center 280 West MacArthur Blvd. Oakland, California 94611

RE: Review of Remediation Plan for Soil Affected by Mineral Spirits at 280 W. MacArthur Blvd., Oakland 94611

Dear Mr. Ayers:

We have reviewed the report entitled "Site Characterization - Mineral Spirits in Soil, Kaiser Permanente Medical Center, 280 W. MacArthur Boulevard, Oakland, California", prepared by Geomatrix Consultants dated May 8, 1990. Per our telephone conversation of May 17, 1990, the proposed Phase I excavation plan is acceptable to us and may be carried out provided the following items are done:

- 1. Submit to our office a letter documenting that the disposal site of the excavated soil has been changed from Forward, Inc., to Nevada Hydrocarbons in Sparks, Nevada.
- 2. A site safety plan is submitted to our office and a copy of this site safety plan must be kept onsite at all times during the work.
- 3. Provide our office with a copy of the Workers' Compensation Insurance.
- 4. Soil sampling must be collected at a minimum of one sample per 200 square feet from the base and sidewalls of the excavation for confirmation analysis by a certified laboratory.

We have received all these documents including a copy of the analytical results (EPA Method 8240) of soil samples taken from the proposed Phase I excavation.

Mr. Kenneth Ayers Kaiser Permanente Medical Center 280 West MacArthur Blvd. Oakland, CA 94611 Page 2 of 2

Per our telephone conversation of May 22, 1990, you have our approval to proceed with the proposed Phase I soil excavation affected by mineral spirits.

Should you have any questions, please contact Susan Hugo, Hazardous Materials Specialist at (415) 271-4320.

Sincerely,

Edgar B. Howell III, Chief Nazardous Materials Division

EBH:SH:sh

cc:

N.Debra Favre, Geomatrix Consultants, Inc.

Lester Feldman, Regional Water Quality Control Board,
San Francisco Bay Region

Howard Hatamaya, State Department of Health Services
Gil Jensen, Alameda County District Attorney, Consumer
and Environmental Protection

Rafat Shahid, Director, Alameda County Environmental
Health Department

Files

DEPARTMENT OF HEALTH SERVICES TOXIC SUBSTANCES CONTROL DIVISION 2151 BERKELEY WAY, ANNEX 7 BERKELEY, CA 94704



May 10, 1990

Debra Favre Geomatrix Consultants, Inc One Market Plaza Spear Street Tower, Suite 717 San Francisco, CA 94105

Dear Ms. Favre:

STORAGE EXTENSION REQUEST BEYOND THE 90 DAY STORAGE LIMIT

On April 13, this office received your letter dated April 9, 1990, requesting a storage extension beyond the 90 day storage limit in order to locate a treatment facility for contaminated soil.

The request is for the storage of a 120 cubic yards of soil contaminated with pentachlorophenol (PCP) and 2,4,5-trichlorophenol. You mentioned that dioxins were also detected. The contaminated soil is identified as EPA Hazardous Waste No. F027.

In accordance with Section 66508(b), Title 22, California Code of Regulations (CCR), your request is hereby granted under the following conditions:

- 1. This extension expires on June 29, 1990.
- 2. A legible photocopy of the manifest showing that the waste was removed within the allotted time shall be submitted to this Department by July 9, 1990.

RCRA waste No. F027, under the Code of Federal Regulations, Title 40, Section 268.31, is restricted from land disposal. This office is not aware of a known facility in the United States that will accept F027 for treatment. Therefore, you may not be able to resolve your problem within the 30 day extension. The Department suggests that you contact the EPA for a resolution on this matter. The person to speak to is Jim Breitlow, chief. His address is listed below and his number is (415) 744-1795.

A storage extension application, outlining our policies for granting extensions is enclosed for future requests.

Debra Favre Page 2 May 10, 1990

If you have further questions, please contact Daisy Lee at (415) 540-3933.

Sincerely,

Michael R. James, Chief Facility Permitting Unit

Region 2

Toxic Substances Control Program

CC: Jim Breitlow
U.S. EPA, Region IX
1235 Mission Street, H-3-2
San Francisco, CA 94105

Rafat Shahid Environmental Health Director Alameda County Hazardous Waste Program 80 Swan Way, Room 200 Oakland, CA 94621

Thomas DeMartino Administrator

Robert S. Klein, M.D. Physician-in-Chief



May 9, 1990

Ms. Susan Hugo Division of Hazardous Materials Department of Environmental Health Alameda County Department of Health Services 80 Swan Way, Suite 200 Oakland, CA 94621

Dear Susan:

Enclosed is a check for \$500.00, payable to the County of Alameda; Health Care Services Agency. The check is to cover your departments' costs for overseeing and reviewing reports and proposals concerning the contamination soils remediation project at the Kaiser Permanente Medical Center in Oakland.

The final remediation plan for the site has been sent to you under separate cover. Please call me at 415-596-6603 if I can be of further assistance. Thank you.

Sincerely,

Kenneth U. Ayers Safety Coordinator

KUA:gml enclosure

200

cc: J. Adams

S. Rohlfing, RN

Thomas DeMartino Administrator

Robert S. Klein, M.D. Physician-in-Chief



May 8, 1990

Ms. Susan L. Hugo Division of Hazardous Materials Department of Environmental Health Alameda County Department of Health Services 80 Swan Way, Room 200 Oakland, CA 94621

Subject:

Remediation Plan for Soil Affected by Mineral Spirits

Kaiser Permanente Medical Center

Oakland, California

Dear Susan:

This letter transmits our report entitled "Site Characterization - Mineral Spirits in Soil, Kaiser Permanente Medical Center, Oakland, California" prepared by our consultants, Geomatrix Consultants, Inc. (Geomatrix). The report summarizes Geomatrix's work to define the limits of soil affected by spirits at the hospital construction site behind the main hospital building on Broadway. The results of Geomatrix's work were discussed with you at our meeting on May 2, 1990.

Based on the results of site characterization, we have chosen a plan for remediating the site involving removal of soil affected by mineral spirits greater than 10 mg/kg, the limit of detection. Other options involving limited excavation and in situ treatment were evaluated; however, even though the soil affected by mineral spirits did not appear to significantly endanger the environment, excavation proved to be the most practical option based on our development plans for the site. As we discussed in our meeting, the area affected by mineral spirits adjacent to the existing mechanical building and paint shed has been excavated to allow construction of the basement and foundation of a new mechanical building. The removal of soil was documented by the collection of samples from the excavation floor and side walls.

The remaining areas affected by mineral spirits will be removed in two phases to accommodate our building construction schedule. Phase I of our excavation plan covers only the portion of the entire area affected by mineral spirits, shown on Figure I, immediately impacting building foundation construction. We are scheduled to begin excavation of the soil identified for Phase I in one month, pending your approval. Results of our investigation in the Phase I proposed excavation area indicate that concentrations of mineral spirits in soil are expected to be in the range of 100 to 500 parts per million (ppm) and extend only to approximately 5 to 7 feet deep as shown on Figure 2.

As currently planned, the excavation will be monitored by Geomatrix to document removal of the affected soil. Geomatrix will sample the excavation bottom and sidewalls to document such removal.

As discussed in our May 2, 1990 meeting, Phase II will involve excavation of the remaining soil affected by mineral spirits on the hillside and beneath the existing mechanical building. We are scheduled to initiate the Phase II excavation in 10 months, pending your approval.

If the soil affected by mineral spirits has an average concentration less than 1,000 ppm, the soil will be transported to Forward, Inc. landfill in Stockton, California. At the landfill, the soil will either be aerated and disposed as Class III, or directly disposed of as Class II. If concentrations are greater than 1,000 ppm, the limit set by San Joaquin County, the soil will either be aerated and disposed at Forward under special permit, or aerated on-site and Class II disposal will be considered.

Geomatrix will monitor vapor concentrations during excavation with a photo ionization detector (PID). Vapor control measures such as limiting extent of excavation, or covering of soil, will be implemented if PID results indicate elevated vapor concentrations above the excavation. Additionally, a health and Safety Plan for excavating soil affected by mineral spirits has been prepared and is on file for your review.

The proposed excavation area is outside of the zone affected by pentachlorophenol (PCP). Based on the work performed by Geomatrix, the area affected by PCP was limited to the area within the hillside adjacent to the drum location as shown on Figure 3. Excavation of the PCP affected soil began on March 6, 1990 and was completed on April 4, 1990. Approximately 160 cubic yards of soil were removed and samples were collected from the excavation floor and sides to document the removal. With Geomatrix's assistance, we are currently identifying the available options for disposal of the PCP affected soil. A report summarizing the characterization of PCP affected soil, its removal, and a plan for disposal is currently being prepared and will be submitted for your review.

If you have any additional questions, please feel free to contact me. Otherwise, we hope to receive your approval of our remediation plan at your earliest convenience.

Sincerely,

Ken Ayers Safety Coordinator

KA:gml Enclosure

cc: Lester Feldman, California Regional Water Quality Control Board Thomas DeMartino, Medical Center Administrator Sandra K. Rohlfing, RN, Assistant Medical Center Administrator John Adams, Project Manager

Thomas DeMartino Administrator

Robert S. Klein, M.D. Physician-in-Chief



April 23, 1990

Ms. Susan Hugo Department of Environmental Health Hazardous Materials Program 80 Swan Way, Room 200 Oakland, CA 94621

Dear Ms. Hugo:

This letter confirms our telephone conversation on April 19, 1990 regarding the hazardous materials soil contamination issue at the Kaiser Permanente Medical Center - Oakland. Previously, I received a letter from your department requesting that a written investigation/remediation plan for your review and approval be submitted to your office within 15 days. During our telephone conversation, we agreed to meet with our consultant and our project manager to verbally discuss and review the investigation/remediation plan. I have scheduled a meeting at the Oakland Medical Center for Wednesday, May 2, 1990, at 1:00 p.m in room #1161. As discussed, the intent of the meeting is to update you on our plans for remediation, to answer any questions you may have and to acquire verbal approval of those plans. I believe you will find that our investigation/remediation plan is not only comprehensive but acceptable to your department.

If I can provide further information, please call me at (415) 596-6603. Thank you.

Sincerely,

Kenneth U. Ayers Safety Coordinator

KUA:gml

cc: J. Adams

T. DeMartino

T. Graf

S. Rohlfing, R.N.

T. Wilkes

Certified Mailer

April 10, 1990

Mr. Kenneth Ayers Safety Coordinator Kaiser Permanente Medical Center 280 West MacArthur Blvd. Oakland, CA 94611

RE: Hazardous Materials Soil Contamination at 280 West MacArthur Blvd., Oakland

Dear Mr. Ayers:

This letter confirms the telephone conversation you had with Susan Hugo of this office on April 6, 1990 regarding the mineral spirits and pentachlorophenol soil contamination at the above shown facility. Previously, we received a letter dated March 12, 1990 from your office which provided additional information concerning the Section 304 Emergency Release Follow-Up Notice reports you submitted to OES. Another letter dated March 14, 1990 with three attached documents pertaining to the soil contamination issue at the above site was received by this office.

We have reviewed all these documents. Before any additional work is to commence, you have to submit to this office a plan of correction for our approval. Your investigation - remediation plan must include, but shall not be limited to:

- 1. Background history on the site.
- 2. Methods that will be used to determine the lateral and vertical extent of contamination.
- 3. Contaminates that will be tested for by the laboratory.
- Name of your hazardous waste hauler.
- 5. Name of your disposal site.
- Schedule of the investigation remediation and the estimated date of completion.

Kaiser Permanente Medical Center April 10, 1990 Page 2 of 2

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to this office and to:

Lester Feldman
Regional Water Quality Control Board, San Francisco Bay Region
1800 Harrison Street, Suite 700
Oakland, California 94612
(415) 464-1255

You should be aware that this Division is working in conjunction with the SFRWOCB.

Please submit your plan of correction for the above site within 15 days upon receipt of this letter along with a \$500 fee to cover our costs for overseeing and reviewing reports and proposals. Should you have any further questions, please call Susan Hugo at (415) 271-4320.

Sincerely,

Edgar B. Howell III, Chief Hazardous Materials Division

EBH:SH:sh

CC: Rafat A. Shahid, Assistant Director, Alameda County
Department of Environmental Health
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Lester Feldman, Regional Water Quality Control Board
San Francisco Bay Region
Howard Hatamaya, State Department of Health Services
Files

Kaiser Permanente Medical Center 280 West MacArthur Boulevard Oakland, California 94611-5693 (415) 596-1000 Thomas DeMartino Administrator

Robert S. Klein, M.D. Physician-in-Chief





March 12, 1990

CERTIFIED MAIL

Chemical Emergency Planning and Response Commission (CEPRC) Local Emergency Planning Committee (LEPC) Attn: Section 304 Reports 2800 Meadowview Road Sacramento, CA 95832

To Whom It May Concern:

Enclosed is the Section 304 Emergency Release Follow-up Notice to the verbal notice given to the National Response Center, the State Office of Emergency Services; the Regional Water Quality Board; and the Alameda County Health Department, Toxics Division of a release of hazardous materials which was reported on February 28, 1990, with a supplemental follow-up report on March 5, 1990. This letter is to provide additional background information.

During soils testing of a planned construction site on Kaiser Permanente property, an area of soils contamination was noted. Follow-up laboratory analysis indicated the contaminant to be mineral spirits. Core sampling undertaken to determine the extent of the contamination determined that only a small area of approximately twenty five cubic yards of soil was involved and that there was no threat to ground water. A firm was contracted to excavate and haul the expected twenty five yards of soil to a Class I landfill. During this excavation, the extent was found to be larger than expected. Additionally, on February 28, 1990, at approximately 1240 hours, a fifty five (55) gallon drum of an unknown liquid was found. The drum ruptured and released approximately forty (40) gallons of liquid into the soil. Believing that we might have a reportable situation, the release of mineral spirits and the unknown liquid was reported immediately.

Samples of the unknown liquid were taken for immediate laboratory analysis which identified the substance as pentachlorophenol (PCP) and 2,4,5-trichlorophenol. Sample concentrations ranged from 1300 mg/kg to 2600 mg/kg. This information was communicated orally on March 5, 1990.

Clean-up of the pentachlorophenol tainted soil has been undertaken by Crosby and Overton, a hazardous materials clean-up firm, under the direction of Geomatrix. All workers involved in the clean-up are fully protected from exposure utilizing personal protective equipment. Exposure and environmental monitoring is being conducted by an on-site Industrial Hygienist. There have been no known significant exposures and no harm to human health or the

Chemical Emergency Planning & Response Commission March 12, 1990
Page 2

environment is anticipated as a result of the release.

Disposal of the excavated soil containing pentachlorophenol is pending. Disposal options are being investigated and any disposal will be through appropriate means. Thus far approximately 25 cubic yards of PCP contaminated soils have been contained.

Characterization of the area for mineral spirits is continuing. Thus far, approximately 300 cubic yards of soils tainted with mineral spirits have been identified.

If additional information is required, please contact me at (415) 596-6603. Thank you.

Respectfully yours,

Kenneth U. Ayers Safety Coordinator

KUA:pt

Enclosure

cc: Alameda County Health Agency: Hazardous Materials Division
Tom DeMartino



ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY DEPARTMENT OF ENVIRONMENTAL HEALTH HAZARDOUS MATERIALS DIVISION

80 SWAN WAY, ROOM 200 - OAKLAND, CA 94621 415/271-4320

DE	HAZARDOUS	MATERIALS	RELEASE	AND	NOTIFICATION	REPORT	(H&SC	25180.7)
(1	EMERGENCY	RESPONSE						

1.	INFORMATION RECEIVED BY: Ken ayers.
	DATE: 02/38/90 TIME: 3:00 pm
2.	CITY: Ochland ZIP CODE: 99611
3.	DATE OF INCIDENT: 82 28 90 TIME OF INCIDENT: 12:40
4.	REPORTED BY: Ken ayers. ADDRESS: 280 (1) Mac Onthus TELEPHONE: 596-6603 CONTACT: Same PHONE:
5.	TYPE OF DISCHARGE: [] Discharge from vehicle License Plate No
6.	ESTIMATED QUANTITY DISCHARGED: QUANTITY THREATENED TO BE RELEASED:
7.	NATURE OF MATERIAL: [] Solid [M] Liquid [] Gas [] Powder [] Granular [] Radioactive [] Other Chemical Name: part is mirred SputsCommon Name:
8.	HAZARDOUS PROPERTIES: [] Corrosive [] Ignitable [] Toxic [] Reactive [] Other
9.	HAZARDOUS MATERIAL WAS RELEASED TO: [] Air [] Storm Drain [] San Francisco Bay [] Sanitary Sewer [] Other Natural Waterway (creek, lake, reservoir) [] Groundwater [] Groundsurface (soil, road, etc.) [] Other (specify) Unset
10.	WEATHER CONDITIONS:
11.	NUMBER OF INJURED PERSONS REQUIRING HOSPITALIZATION: NAMES AND ADDRESSES OF HOSPITALS UTILIZED:

12.	PERSONS PRESENT AT SCENE: NAME: Geo matrix Hay Mat. Firm - Sherry Yeung. 957-9557.
13.	RESPONSIBLE PARTY: NAME: Laiser Hospital PHONE NO ADDRESS: 280 W. Maearthur.
	EVIDENCE COLLECTED (SAMPLES, PHOTOGRAPHS, ETC.) Soil Samples, Charse & Bulk.
15.	CLEAN-UP ACTIONS: Havilling to Class T Landfell - Lottleman Held NAMES AND ADDRESSES OF PERSONS DOING CLEAN-UP: Oreo Matrix Kaiser Hosp
	DESCRIPTION OF CLEAN-UP ACTIONS: Hauling, Excavation
16.	TIME INCIDENT CLOSED:
17.	ELAPSED TIME: Unknown maybe 3 mos.
18.	DISCHARGE NOT TO BE NOTIFIED: Unlikely to Cause Substantial Injury to Public Health & Safety Public knowledge (ngoing criminal investigations gations) Permitted Discharge Other
19.	[] DISCHARGE TO BE NOTIFIED: FACTORS DETERMINING THAT THIS HAZARDOUS WASTE DISCHARGE OR POTENTIAL DISCHARGE IS LIKELY TO CAUSE SUBSTANTIAL INJURY TO THE PUBLIC HEALTH OR SAFETY:
20.	NOTIFICATION: Board of Supervisors Health Officer Alameda County Press Room California Department of Health Services Reporting Agency or Individual
emp Sec thi	copy of this report to the above listed agencies and officials, we hereby submitting this information on behalf of all designated cloyees of the Department of Environmental Health, according to ction 25180.7, Health & Safety Code. The information submitted in a report is based upon the best available information at the time a report was completed.
Ins	spector's Name: 5USAN L. HUGO Date: 3/2/90 spector's Signature: Musa X. Hugo
Ins	spector's Signature: May & Moy) EH/mam/88

14.

REPORTING FORM

A	BUSINESS NAME FACILITY EMERGENCY CONTACT & PHONE NUMBER KASER PERMADENTE MEDICAL CENTER KEN AVEYS (415) 596-6603
В	INCIDENT MO DAY YR TIME OES OES OES ONTROL NO DO 431
C.	INCIDENT ADDRESS LOCATION CITY/COMMUNITY COUNTY ZIP 280 W. MALANTHUR Blod. OAKLAND Alameda 94611
	CHEMICAL OR TRADE NAME (print or type) Mineral Spirits (Stoddard Solvents) CAS NO. 8052413
	CHECK IF CHEMICAL CHECK IF RELEASE IS REPORT ABLE UNDER CERCLA 103 (A)
D	PHYSICAL STATE CONTAINED PHYSICAL STATE RELEASED QUANTITY RELEASED 1 gal. gal. solid 2 Liquid 3 GAS UNKNOWD 3 cu.ft.
	ENVIRONMENTAL CONTAMINATION STIME OF RELEASE DURATION OF RELEASE 1 AIR 3 WATER (7 GROUND) 9 OTHER DAYS HOURS MINUTES
	ACTIONS TAKEN 41X REMOVE HAZARD 47_DECONTAMINATE 73_SHUT DOWN SYSTEM AREA
	42 X ID OF HAZMAT 61 X CROWD CONTROL 82X SECURE PROPERTY
E	31_RESCUE 43_EVACUATION 62X_TRAFFIC CONTROL 92_REFER TO AUTHORITY 33 EMERGENCY 44X ESTABLISH 63X NOTIFY OTHER AGENCY 98_NO ACTION TAKEN
	33 EMERGENCY 44X ESTABLISH 63X NOTIFY OTHER AGENCY 98 NO ACTION TAKEN SAFE AREA 35 SEARCH 45 MONITOR 64 PROVIDE PUBLIC INFO 99 OTHER
	38 X TRANSPORT 48_DECONTAMINATE 71 X INVESTIGATE PERSONEQUIP
	KNOWN OR ANTICIPATED HEALTH EFFECTS (Use the comments section for additional information) 1 X ACUTE OR IMMEDIATE (explain). Dizziness, irritant to eyes, nose and tweat
F	2_ CHRONIC OR DELAYED (explain)
-	
G	ADVICE REGARDING MEDICAL ATTENTION NECESSARY FOR EXPOSED INDIVIDUALS (Use the comments section for additional information)
	COMMENTS INDICATE SECTION (A-G) AND NUMBER WITH COMMENTS OF ADDITIONAL INFORMATION
	D-Ground water not to be significantly impacted but further investigation
1	E-41 - Approximately B4 yds removed to Class I landfile.
Н	E-71 - INVESTIGATION INTO EXTENT OF CONTAMINATION CONTINUING.
	F-1 - No personnel exposure to significant levels known or anticipated.
	© CERTIFICATION: I certify under penalty of law that I have personally examined and amifamiliar with the Information submitted and believe the submitted information is true, accurate, and complete.
1	REPORTING FACILITY REPRESENTATIVE (print or type) Kenneth U. Ayers
L	SIGNATURE OF REPORTING FACILITY REPRESENTATIVE DATE: TYTALC 12,177

REPORTING FORM

A	BUSINESS NAME KAISEY Permanente medical Center Ken Agers (415) 596.6603
B C	INCIDENT MO DAY YR OES
D	CHEMICAL OR TRADE NAME (print or type) Pentachloro phenol CHECK IF CHEMICAL CHECK IF RELEASE IS REPORT- IS ON 302 LIST ABLE UNDER CERCLA 103 (A) PHYSICAL STATE CONTAINED PHYSICAL STATE RELEASED OUANTITY RELEASED SERVIRONMENTAL CONTAMINATION TIME OF RELEASE 1 AIR 3 WATER 7 GROUND 9 OTHER CAS NO. 9 7 8 6 5 CAS NO. 9 7 8 6 5 CHECK IF CHEMICAL CHECK IF RELEASE IS REPORT- CHECK IF CHEMICAL CHECK IF RELEASE IS REPORT- CHECK IF CHEMICAL CHECK IF RELEASE IS REPORT- CHECK IF CHEMICAL CHECK IF CHEMICAL ABLE UNDER CERCLA 103 (A) CUANTITY RELEASED DURATION OF RELEASE 1 AIR 3 WATER 7 GROUND 9 OTHER CAS NO. 9 7 8 6 5 CHECK IF CHEMICAL CHECK IF RELEASE IS REPORT- CHECK IF RELEASE IS REPORT- CHECK IF RELEASE IS REPORT- CHECK IF CHEMICAL CHECK IF RELEASE IS REPORT- CHECK IF RELEASE IS REPORT- CHECK IF CHEMICAL CHECK IF RELEASE IS REPORT- CHECK IF RELEASE IS REPORT- CHECK IF RELEASE IS REPORT- CHECK IF CHEMICAL CHECK IF RELEASE IS REPORT- CH
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F	KNOWN OR ANTICIPATED HEALTH EFFECTS (Use the comments section for additional information) 1 X ACUTE OR IMMEDIATE (explain) Resolvatory symptoms; dizziness 2X CHRONIC OR DELAYED (explain) CDS & CVS (NOOL) CMENT 3_ NOT KNOWN (explain)
G	ADVICE REGARDING MEDICAL ATTENTION NECESSARY FOR EXPOSED INDIVIDUALS (Use the comments section for additional information)
Н	COMMENTS INDICATE SECTION (A-G) AND NUMBER WITH COMMENTS OR ADDITIONAL INFORMATION D - argumally reported as an unknown substance; subsequently identified and reported availy. E-71 - Investigation of extent of contamination continuing: E-99 - Area Secured & Spill contained F-142 - No personnel exposure Known or anticipared. Symptoms specified are health effects as reported in the Interature for PCP.
1	CERTIFICATION: I certify under penalty of law that I have personally examined and am familiar with the Information submitted and believe the submitted information is true, accurate, and complete. REPORTING FACILITY REPRESENTATIVE (print or type) SIGNATURE OF REPORTING FACILITY REPRESENTATIVE DATE: MAR 12,199

Information in the shaded areas

State EPA/Other HON - RER

Day

Year

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Year

Year

Month

UNIFORM HAZARDOUS

1. Generator's US EPA ID No.

Manifest

2. Page 1

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DHS 8022 A (1/88) EPA 8700—22

(Rev. 9-88) Previous editions are obsolete.

1-800-424-8802;

CENTER

RESPONSE

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CALL

SPILL,

OR

EMERGENCY

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6

Do Not Write Below This Line

YELLOW: GENERATOR RETAINS

1-800-852-7550

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DHS 8022 A (1/88) EPA 8700—22 (Rev. 9-88) Previous editions are obsolete.

Printed/Typed Name

Signature

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Day

Year

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IN CASE OF AN EMERGENCY

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NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

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Please print or type. (Form designed for use ılite (12-pitch typewriter). 1. Generator's US EPA ID No. Manifest 2. Page 1 UNIFORM HAZARDOUS Information in the shaded areas Document No WASTE MANIFEST CAD 9 8 1 4 2 7 1 3 1 2 2 3 7 is not required by Federal law. A. State Manifest Document Number 881223 3. Generator's Name and Mailing Address KAISER FOUNDATION HOSPITAL B. State Generator's ID 280 W. MacARTHUR BLVD., OAKLAND, CA 94611 4. Generator's Phone (415) 596-6603 ATTN: KEN AYERS H Y H O 3 6 | O O 8 9 8 7 C. State Transporter's ID 5. Transporter 1 Company Name US EPA ID Number D. Transporter's Phone ERICKSON, INC. CAD0094563 E. State Transporter's ID 7. Transporter 2 Company Name US EPA ID Number F. Transporter's Phone 9. Designated Facility Name and Site Address US EPA ID Number G. State Facility's ID KETTLEMAN HILLS TREATMENT FACILITY H. Facility's Phone 35251 OLD SKYLINE RD. KETTLEMAN HILLS. CA | CATOOO6|4|6|1|1|7 209-386-97 13. Total Quantity 12. Containers 14. Unit 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Waste No. No. State WASTE HYDROCARBON CONTAMINATED SOIL: 611 CALIFORNIA REGULATED WASTE ONLY EPA/Other State EPA/Other d. State EPA/Other J. Additional Descriptions for Materials Listed Above K. Handling Codes for Wastes Listed Above MINERAL SPIRITS AND DIESEL CONTAMINATED SOIL 15. Special Handling Instructions and Additional Information Una calle wo = or CHAN WASTE PROFILE IN KRIEHO 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name Month Day Year Carlo LA LA VERS 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Day Signature 18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Dav Year 19. Discrepancy Indication Space 20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Dav Signature Month

HAZARD TO TO TO TO THE STATE OF
800-233-3360

HEALTH INFORMATION FOR HAZARDOUS MATERIALS EMERGENCIES

VOLUME 3 NUMBER 1, 1986

PENTACHLOROPHENOL (PCP)

Frank J. Mycroft, Ph.D. and Robert Schlag, M.Sc.

Chemical Formula

C₆Cl₅OH

Physical Properties

Molecular Weight

266.3

IUPAC Name:

Pentachlorophenol

Chemical Abstracts Serial (CAS) NIOSH Registry of Toxic Effects (RTECS) United Nations Identification (UN) # 87-86-5 # SM6300000

2020

Synonyms

PCP
Penta
2,3,4,5,6-pentachlorophenol
Pentachlorohydroxybenzene
Penchlorol

NOTE: As PCP is a weak acid, it reacts with bases to form salts. The related wood preservative sodium pentachlorophenate is derived from the reaction of PCP with sodium hydroxide.

Tradenames

Chem-Tol Chlorophen Dowicide 7 Dowicide G Penchlorol Pentachlorol Penta-Kil Pentasol

Santophen 20

Weedone Woodlife Woodtreat

Exposure Guidelines

Cal/OSHA Permissible Exposure Level (PEL): 0.5 mg/m³ ACGIH Threshold Limit Value (TLV): 0.5 mg/m³ California Drinking Water Action Level: 30 ug/l

Appearance: When pure, pentachlorophenol is a white crystalline solid with a characteristic and pungent phenolic odor.

Technical grade PCP is dark-grey to brown in color. Warning properties: PCP dusts are irritating to the eyes and

nose at concentrations above 1 mg/m³.

Vapor Pressure: 0.00017 mmHg at 20°C (68°) 0.12 mmHg at 100°C (212°F)

40.0 mmHg at 211°C (412°F)

Concentration in saturated air at 20°C : 0.22 ppm (2.5 mg/m³)

Specific density of solid: 2.0 Melting point: 190°C (374°F)

Boiling point: 310°C (590°F, decomposes) Auto-ignition temperature: Not combustible.

Water solubility: 14 ppm at 20° C. Note that the sodium salt of pentachlorophenol is highly water soluble, up to 33 g/100 g.

Conversion factor: 1 mg/m³ = 0.088 ppm

Physical Description

Pure pentachlorophenol is a white crystalline substance at room temperature. Depending upon the degree of purity, technical grades of the material may have a gray to brown color. The characteristic odor and irritant properties of PCP are sufficient to warn of an acute overexposure. Despite a very low vapor pressure, PCP vapors can approach and exceed the permissible exposure levels set by Cal/OSHA. At 20°C, the saturating air concentration of PCP is 2.5 mg/m³ (0.22 ppm)(1,2).

Pentachlorophenol is commercially available in technical grades. It is available in flakes, pellets, and 5-30% solutions made with a variety of organic solvents. The usual working concentration is about 5%. Technical PCP is typically composed of PCP (88.4%), tetrachlorophenol (4.4%), trichlorophenol (<0.1%), and higher chlorinated phenoxyphenols (6.2%). Chlorinated dibenzofurans and dibenzodioxins are also found in commercial grades of PCP. The levels of these contaminants vary with the manufacturing process and from batch to batch. The chlorinated dioxins which are usually found in commercial grades of PCP are the hexa-, the hepta-, and the octa- chlorodibenzo-p-dioxins. The chlorinated

Hazard REVIEW

Toxic Info Center, Frank J. Mycroft, Ph.D., Director San Francisco General Hospital, 1E86 1001 Potrero Avenue, San Francisco, CA 94110 (415) 821-5338 A service of the San Francisco Bay Area Regional Poison Control Center; Kent R. Olson, MD, Director Medical Advisory Committee: Charles E. Becker, MD Neal L. Benowitz, MD Kent R. Olson, MD furans usually found are the tetra-, penta-, hexa-, hepta-, and octa- chlorodibenzofurans. The dioxin precursor hydroxy-chlorodiphenylether is also present in amounts reported to range from 1 to 5 percent. However, the highly toxic 2,3,7,8-isomers of tetrachlorodibenzodioxin and tetrachlorodibenzofuran have **not** been found in commercially available grades of PCP (1,3,4,5).

These highly chlorinated dibenzofuran and dibenzodioxin contaminants are potent experimental carcinogens and teratogens. In a recent regulatory decision, the Environmental Protection Agency has set limits on the amounts of these compounds that may occur as contaminants in PCP. The maximum amount of the total hexachlorodibenzo-p-dioxin contaminants permitted has been set at 1 ppm. No contamination with the more highly toxic 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD) is allowed (6,7).

Hazardous Chemical Properties

Pentachlorophenol itself has little chemical reactivity. Being a weak acid, it reacts with strong bases to yield the corresponding water-soluble salts. It is decomposed by strong oxidizing agents and, when in solution, by ultraviolet light or sunlight. The chemical stability of PCP makes it a relatively persistent environmental pollutant (8).

Pentachlorophenol is nonflammable. However, it is often formulated as a liquid by mixing it with flammable hydrocarbon solvents such as mineral spirits, No. 2 fuel oil, and kerosene. Isopropyl ether may be used as a co-solvent. These mixtures are flammable. PCP-treated materials should not be burned. In a fire, they have the potential to generate a toxic smoke laden with volatilized PCP, its contaminants, and their combustion products. When heated to moderately high temperatures (200°C), PCP can react to form octachlorodibenzodioxin. The reaction proceeds through an intermediate phenoxyphenol, or "predioxin", which is present in technical grades of PCP. Polymeric phenylene ethers may also be formed. Results of experiments show that octachlorodibenzodioxin can be formed when treated wood and paper products are burned. Hydrochloric acid, chlorine, and chlorinated hydrocarbons are also released (2,3,8,9).

Sources of Human Exposure

There is a large potential for workers and the public to be exposed to PCP. Since its introduction in the 1930's as a timber preservative, PCP has become one of the most widely used pesticides. In 1980, 50 million pounds of PCP were produced in the United States. Pentachlorophenol and its sodium salt are used as wood preservatives, contact herbicides, fungicides, insecticides, antimicrobial agents, and molluscicides. PCP is the second most commonly used wood preservative in the United States. Together with creosote and arsenic, PCP accounts for 97% of the wood preservatives used. In contrast to arsenic and creosote treated lumber, wood treated with PCP retains its natural appearance, possesses little residual odor, and can be painted as readily as natural wood. In California, sales of PCP have more than doubled since 1980 (Table 1). Pentachlorophenol is not a naturally occurring substance (3,7,8).

Table 1: Amounts of Pentachlorophenol Sold in California.

Year	Quantity (Pounds)	(10)
1980	771,794	
1981	613,095	
1982	1,719,545	
1983	2,006,017	
1984	1,880,166	

Occupational posures. Workers are the population at greatest risk of overexposure. The uses of PCP provide an indication of those industries in which opportunities for worker exposure exist. About 80% of the PCP produced is consumed in treating wood and wood products such as pulp and paper. The remaining 20% is used as a control for algae and fungi in cooling towers at electricity generating plants; a preservative in paints, adhesives, and photographic solutions; a mold and fungus control agent in leather tanning operations; a water-proofing agent for plywood and fiberboard; and a preservative for rope, twine, burlap, cable coverings, and canvas in the textile industry. In 1980, the United States Department of Agriculture estimated that approximately 3 to 6 million applicators were exposed each year to PCP (3,8).

There are two major processes for treating wood with PCP. The first process involves immersing the wood in a PCP solution within a pressure chamber. This process achieves a deep penetration of the treated wood and extends its useful life at least five-fold. Railroad ties, construction lumber, plywood, timbers, foundation materials, fence posts, and utility poles, as well as landscape materials are often treated in this way. The non-pressure processes involve surface application of PCP by spraying, brushing, dipping, or soaking of the treated wood and provide a less durable protection. These latter processes were often used to treat lumber used around the home, yard, and farm such as wooden fences, millwork, decks, playground equipment, and lawn furniture (8).

As PCP is a toxic substance, its use is regulated by federal and state agencies responsible for protecting the public and workers. Federal and state laws require that pesticides be used in accordance with their labeling which describes the allowed uses and some of the mandatory safety precautions. The California Department of Food and Agriculture, Cal/ OSHA, and the EPA require that workers handling PCP be trained in safe work practices. State law further requires that physicians report all cases of suspected pesticide related illness to their local health officer within 24 hours. Of well over 10,000 total pesticide cases reported from 1975-1984, only 116 were PCP related (Table 2). The moderate volatility and high skin penetration of PCP makes both inhalation and skin contact important routes for exposure. The maximum average air concentration to which a worker can be legally exposed over an eight hour shift is 0.5 mg/m3. Personal protective gear must also be worn to protect workers when eye or skin contact is possible (2,11).

Table 2: Summary of Pentachlorophenol Associated Occupational Illnesses Reported to the California Department of Food and Agriculture by Physicians (11).

	Туре	of Injury	<u> </u>		
Year	Systemic	Еуе	Skin	Eye/skin	Total
1975 1976 1977 1978 1979 1980 1981 1982 1983 1984	1 3 2 11 1 4 4 9	8 7 3 5 6 7 6 3 3 2	3 2 2 6 3 1 1 4 2	1 0 1 1 0 0 0 1	12 13 7 23 11 12 11 17 6 4
10 Year Totals	37	50	25	4	116

Consumer exposures. In the past, PCP was widely available to consumers. As PCP readily evaporates from treated materials, its excessive use in the home can lead to serious overexposures. In 1984, the EPA proposed to restrict the use of PCP to certified applicators. The EPA also proposed to further restrict its domestic uses: PCP should not be applied indoors or to wood whose intended use is in interiors. If PCP is applied to wood intended for use where it will contact bare skin, two coats of an appropriate sealer should be applied. Urethane, shellac, latex epoxy enamel, and varnish are acceptable sealers for PCP-treated wood. The application of PCP to logs for construction of log homes is prohibited (6,7).

Environmental Contamination. Widespread use and improper disposal have made pentachlorphenol an occasional contaminant of ground water supplies. In one federal survey, PCP was reported to occur in low ppb (parts per billion) levels in 2 out of the 105 water systems investigated. In California, the highest domestic well water concentration reported was 370 ppb. The contamination is persistent since this pollutant has a long half-time in groundwater. The health hazards associated with drinking contaminated groundwater are dependent upon both the concentration of PCP in the drinking water and its intrinsic toxicity. The taste threshold for PCP in drinking water is around 30 ppb. The California drinking water standard (Action Level) for PCP is also 30 ppb. This standard is set on the basis of of toxicity (12).

Adverse Health Effects

Pentachlorophenol is a metabolic poison that has also been found to adversely affect the developing fetus in test animals. It is a very toxic substance. The minimum lethal oral dose for humans is estimated to be 29 mg/kg. For a 22 pound child, this is equivalent to 1/100th of an ounce of the pure compound (13).

The likelihood and severity of any injury from exposure to PCP is dependent upon the route, duration, and level of exposure. PCP can be toxic if it is inhaled, ingested, or comes into contact with the skin. PCP is so well absorbed through the skin that dermal exposure is frequently implicated in cases of systemic poisoning (2,13).

Contact organ toxicity. Pentachlorophenol is a strong irritant of the eyes, skin, nose, throat, and lungs. In unacclimated individuals, sneezing, cough, and tearing of the eyes can result from PCP exposures as low as 1.0 mg/m³. In the eye, severe PCP exposures can cause an inflammation that may progress to permanent corneal injury. Skin contact with even dilute solutions of PCP can cause dermatitis or chemical burns. Repeated or prolonged exposures can result in chloracne, a persistent acneform dermatitis which is thought to be due to the impurities present in commercial grades of PCP (2,13).

Systemic toxicity. Pentachlorophenol stimulates cellular oxidative metabolism by uncoupling oxidative phosphorylation in mitochondria. This effect of PCP greatly increases tissue oxygen demand and short-circuits the process by which the body harnesses the vital energy produced by catabolism. The lost energy appears as heat. The signs and symptoms of PCP poisoning are attributable to both the loss of this usable energy and the production of heat. Intoxication with PCP is characterized by profuse sweating; other common symptoms are headache, intense thirst, weakness, nausea, and vomiting. Fever is usually, but not always, present. Metabolic acidosis is accompanied by rapid breathing and shortness of breath. Fast heart rate, anoxia, and chest pain are often prominent. Restlessness, seizures, and coma can occur early following severe poisoning. The body temperature is frequently extremely high in fatal cases. There can be a rapid progression in symptoms. Death, usually due to cardiovascular collapse, has occured as early as three hours after the

onset of symptoms. The risk of poisoning is increased during hot weather. Persons with impaired liver or kidney function are more susceptible to the effects of PCP. Chronic exposure to PCP can itself cause liver and kidney injury (13-19).

Weightloss is secondary to the effect of PCP on basal metabolism and can result from chronic poisonings. The dibenzo-p-dioxin and dibenzofuran contaminants in commercial grades of PCP do not importantly contribute to the acute toxicity of PCP. They may contribute, however, to the chronic toxicity of commercial grades of PCP and may account for the neurologic lesions and the increased susceptibility to infection reported in some workers with prolonged exposure to PCP (19,20).

Carcinogenicity. Insufficient information is available to allow an unequivocal evaluation of PCP's potential to cause cancer. While the results of several cancer tests have been negative or ambiguous, they were each inadequate in some aspect of their study design (too few animals used, too short duration, or uncertain purity of the tested material). These studies provide assurance only that PCP is not a potent carcinogen. The National Toxicology Program is currently testing PCP for its carcinogenic potential in the mouse. The results of the NTP cancer bioassays are expected to be released later this year. Commercial grades of PCP are contaminated with small amounts of such recognized carcinogens as trichlorophenol (0.1%) and the higher chlorinated dibenzo-p-dioxins and dibenzofurans (1,21).

Mutagenicity. PCP produces weak responses in some tests used to detect mutagens. It was weakly positive in the bacteria Bacillus subtilis, the yeast Saccharomyces cerevisiae, and cultured human lymphocytes. It was negative in a number of other test systems (12,22,23,24).

Reproductive Toxicity. PCP is toxic to the developing fetus in test animals. Schwetz found both pure and commercial grades of PCP to have adverse developmental effects on the offspring of treated rats. At a 5 mg/kg/day dose, PCP delayed ossification of the skull bones. At higher doses, the incidence of fetal resorptions, subcutaneous edema, dilated ureters, and skeletal abnormalities was increased. Other researchers have reported adverse effects of PCP on the reproduction of test animals. Hexachlorodibenzodioxin, a contaminant of commercial grades of PCP is a potent teratogen and fetotoxin in animals. The EPA requires that labels for all PCP products include a warning that exposure to women during pregnancy should be avoided because pentachlorophenol has been shown to cause defects in the offspring of laboratory rodents(3,6,7,25,26).

Disposition in Man. PCP is rapidly absorbed upon inhalation, dermal, and oral exposure. Fatal amounts can be absorbed through intact skin. Once absorbed, PCP is distributed throughout the body and accumulates in the liver, kidneys, brain, spleen, and fat. PCP undergoes enterohepatic recirculation and is highly protein bound in plasma. It is only slowly excreted. In one human study, an average of 74% of a single test dose was eliminated in the urine as free PCP and 12% was eliminated as conjugated PCP over a 7 day period. The half-lives for the urinary excretion of PCP and conjugated PCP in that study were 33 and 13 hours respectively. Studies on exposed workers suggest that the corresponding half-times can be much greater, up to 20 days, in chronically exposed persons (27,28).

Emergency First Aid Instructions

For immediate assistance call the TOXIC-INFO CENTER (800) 233-3360 or your regional poison control center.

Management of severe poisoning requires aggressive supportive therapy, preferably in a well equipped Emergency Department or Intensive Care Unit. There is no specific

Emergency First Aid, Continued

antidote. Remove the victim from exposure immediately and seek medical attention (13).

Eye exposure. Immediately flush eyes with running water for 15 minutes. If eye irritation persists after washing seek prompt medical attention including a fluorescein exam of the corneal surface.

Skin exposure. Remove all contaminated clothing promptly and dispose of clothing in a well-ventilated area, preferably outdoors or in doubled, secured plastic bags. Wash skin immediately with soap or mild detergent and water. Seek medical attention.

Inhalation. Remove to fresh air, give oxygen, and assist breathing if needed. Get medical attention if symptoms are

Ingestion. Seek medical help immediately. If person is awake and alert, induce vomiting by giving syrup of ipecac (30 cc orally) or by lavaging the stomach. Follow with activated charcoal (50-100 gm orally).

Personal Protection Information

Protective gear and clothing should be selected and used in consultation with a trained industrial hygienist to ensure that they are adequate and used safely. Users of pesticides should also consult and follow product labels (2).

Eye protection. Dust- and splash-proof safety goggles are required where PCP or PCP-treated materials such as saw dust from pressure-treated lumber might contact the eye. Contact lenses should not be worn.

Skin protection. Impervious clothing, aprons, gloves, coveralls, and face shields should be worn to prevent frequent or prolonged contact with PCP and PCP-contaminated surfaces. Polyvinyl chloride is a recommended material for gloves. Use gloves when handling and dust masks and coveralls when sawing PCP pressure-treated wood. Wash contaminated work clothes separately from other household laundry (2,29).

Respiratory protection. Respirators are required in situations where the PEL is exceeded. The type of respirator required depends upon the actual PCP air concentration. environments should be designed so as to not require the routine use of a respirator.

For further information call

Toxic-Info Center. (800) 233-3360

Worker Health and Safety Unit, California Department of Food and Agriculture. (916) 445-8474

Hazard Evaluation System and Information Service (HESIS) Call collect with questions regarding (415) 540-3014. occupational exposures.

Cal/OSHA (800) 652-1476

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lalkylene."544 Trademark for biodegradable detergent alkylates made from straight-chain hydrocarbons. Available in molecular-weight ranges to replace branch-chain dodecylbenzene or tridecylbenzene; the linear alkylbenzenes sulfonate readily with SO3 or oleum by batch or continuous processes to form low-viscosity "soft" sulfonic acid; neutralization gives soft LAS slurries.

lorphine (N-allylnormorphine). C19 H21 NO3. The allyl (-CH2-CH=CH2) derivative of morphine. It is able to "antagonize" or neutralize most of the effects of narcotic drugs (morphine, codeine), but not those of other types of depressants. Nalorphine is used as a biochemical research tool for studying the mechanism of narcotic action; also as an antidote for acute morphine poisoning. See also narcotic.

aMBT. See sodium MBT.

meplate. The officially rated capacity of a chemical plant, as opposed to effective or actual maximum.

me reaction. A chemical reaction, usually organic, that is commonly identified by the name of its discoverer(s), for example, Friedel-Crafts, Fischer-Tropsch, Claisen, Clemmensen, Willegerodt, Diels-Alder, etc. Some 400 of these are described in the Merck Index. Many have important industrial applications. For details, see specific name.

ano-. Prefix meaning 10⁻⁹ unit (symbol n). 1 ng = 1 nanogram = 0.000000001 gram; 1 nanometer = 1 millimicron.

Nanograde."329 Trademark for a grade of chemical purity. Impurities guaranteed to be no more than ten parts per trillion.

nometer (nm). One billionth (10⁻⁹) meter, equal to 1 millimicron or 10 Angstrom units.

Nap-All."480 Trademark for liquid naphthenates of calcium, cobalt, copper, iron, lead, manganese, and

Uses: Drier for paint and printing inks.

apalm. An aluminum soap of a mixture of oleic, naphthenic and coconut fatty acids.

Properties: Granular powder; mixed with gasoline, it forms a sticky gel that is stable from -40° to 100° C.

Hazard: Flammable, dangerous fire risk.

Uses: Incendiary agent.

(1) petroleum (petroleum ether). A generic term applied to refined, partly refined, or unrefined, petroleum products and liquid products of natural gas not less than 10 percent of which distil below 347° F (175° C), and not less than 95 percent of which distil below 464° F (240° C) when subjected to distillation in accordance with the Standard Method of Test for Distillation of Gasoline, Naphtha, Kerosine, and Similar Petroleum Products (ASTM D 86). F.p. -73°C; b.p. 30-60°C; flash point -57°F (-50° C); autoignition temp. 550° F (287° C). sp. gr. 0.6.

Hazard: Flammable, dangerous fire risk. Explosive limits in air I to 6%.

Uses: Source (by various cracking processes) of gasoline, special naphthas, petroleum chemicals, especially ethylene. Cracking for ethylene also produces propylene, butadiene, pyrolysis gasoline and fuel oil; source of synthetic natural gas (q.v.). Shipping regulations: (Rail, Air) Flammable Liquid

label. (a) V. M. & P (Varnish makers and Painters);

(petroleum spirits; petroleum thinner).

Any of a number of narrow-boiling-range fractions of petroleum with boiling points of about 93 to 204°C, according to the specific use; distillation range 119 to 143°C; sp. gr. 07543; density 6.280 lb/gal; pour point below -70°F (-56°C); flash point 20°F (-6.6°C) (TCC). Autoignition temp. 450° F (232° C).

Hazard: Flammable, dangerous fire risk. Uses: Thinners in paints and varnish.

Shipping regulations: (Rail, Air) Flammable Liquid

(b) blending. A petroleum fraction with volatility similar to the higher boiling fractions of gasoline. It is used primarily in blending with natural gasoline to produce a finished gasoline of specified volatility.

(c) cleaners'. A dry-cleaning fluid derived from petroleum and similar to Stoddard solvent (q.v.), but not necessarily meeting all its specifications. Flash point 100° F (37.7° C).

(2) coal-tar

(a) heavy (high-flash naphtha)

Properties: Deep amber to dark red liquid; a mixture of xylene and higher homologs; sp. gr. 0.885-0.970; b.p. 160-220° C (about 90% at 200° C); flash point 100° F (37.7° C); evaporation 303 minutes.

Derivation: From coal-tar by fractional distillation.

Containers: Drums; tank cars.

Hazard: Toxic by ingestion, inhalation, and skin

absorption. Moderate fire risk.

Uses: Coumarone resins; solvent for asphalts, road tars, pitches, etc.; cleansing compositions; process engraving and lithography; rubber cements (solvent); naphtha soaps; mfg. of ethylene and acetic acid, (b) solveni (160° benzol). hypatha salus

Properties: A mixture of small percentages of benzene and toluene with xylene and higher homologs from coal-tar. (a) Crude: dark straw-colored liquid. (b) Refined: water-white liquid. Sp. gr. (a) 0.862-0.892, (b) 0.862-0.872; b.p. (a) about 160°C (80%), (b) about 160°C (90%); flash point (a) and (b) about 78° F (25.5° C).

Derivation: From coal-tar by fractional distillation.

Grades: Dark straw; water-white.

Containers: Drums; tank cars. Hazard: Flammable, dangerous fire risk.

Uses: Solvent; xylene, cumene; nitrated, for incorporation in dynamite.

Shipping regulations: (Rail, Air) Flammable Liquid label.

naphthacene (tetracene; rubene) C18 H12. The n cule consists of four fused benzene rings.

Properties: Orange solid; sp. gr. 1.35; m.p. a 350° C; not easily soluble; slight green fluoresc

Occurrence: In commercial anthracene and coa Hazard: Explodes when shocked; reacts with oxic materials.

Uses: Organic synthesis.

naphthalene (tar camphor) C₁₀ H₈.



Properties: White crystalline, volatile flakes; s coal-tar odor. Soluble in benzene, absolute al and ether; insoluble in water. Sp. gr. 1.145 (20/ m.p. 80.2°C; b.p. 217.96°C; flash point (80° C). Sublimes at room temperature. Autoig temp. 979° F (526° C). Combustible.

Derivation: (a) From coal-tar oils boiling be 200 to 250°C (middle oil) by crystallizatio distillation. (b) From petroleum fractions various catalytic processing operations.

Grades: By melting point, 74° C min (crude) to 79°C (refined); scintillation (80-81°C).

Forms: Flakes, cubes, spheres, powder. Containers: Cans; drums; tank cars.

Hazard: Toxic by inhalation. Tolerance, 10 1 air.

Uses: Intermediate (phthalic anhydride, na "Tertralin," "Decalin," chlorinated naphth naphthyl and naphthol derivatives, dyes) repellent; fungicide; smokeless powder; cuttir lubricant; synthetic resins; synthetic tannir servative; textile chemicals; emulsion breakers lation counters; antiseptic.

Shipping regulations: (Air) Crude or refined mable Solid label.

alpha-naphthaleneacetic acid (1-naphthylace C10 H7 CH2 COOH. A plant growth regulato Properties: White crystals, odorless; m.p. 132-Soluble in acetone, ether, and chloroform; soluble in water and alcohol.

Grades: Usually supplied in dilute form, eit powder or liquid solution ready for use. Containers: Powder; fiber cans or multiwa

sacks; solution: glass bottles and carboys. Hazard: Moderately toxic; skin irritant. Uses: Inducing rooting of plant cuttings; apple trees to prevent early drop; fruit thir

alpha-naphthaleneacetic acid, methyl ester (C₁₀ H₇ CH₂COOCH₃. A plant growth regula for delaying sprouting of potatoes, weed thinning of peaches, etc.

naphthalene, chlorinated. See chlorinate

naphthalenediamine. See naphthylenedian

SENDER: Complete items 1 and 2 when additiona 3 and 4. Put your address in the "RETURN TO" Space on the revicand from being returned to you. The return receipt fee will to and the date of delivery. For additional fees the following for fees and check box(es) for additional service(s) reques 1. Show to whom delivered, date, and addressee's a (Extra charge)	erse side. Failure to do this will prevent th provide you the name of the person delivere g services are available. Consult postmaste
AR Kenneth AYERS PAFETY COORDINIQHON CAISER PERMANENTE 280 W. Mac AKENN Blue	4. Article Number PO62 /23 920 Type of Service:
Signature — Address Signature — Agent Date of Delivery — 13 - 98 Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212	or agent and DATE DELIVERED. 8. Addresses Address (ONLY if requested and fee paid)

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ELF-INSURANCE PLANS THE ARDEN WAY, SUITE 105 EACRAMENTO, CAMPORNIA PERTE P16) 924-4846



ADDRESS REPLY TO 2848 Arden Way, Suite 105 Sacramente, CA 95825

Ms. Florence Green KAISER FOUNDATION HOSPITALS Regional Workers' Compensation P.O. Box 12927 Oakland, California 94604

CERTIFICATE OF SELF-INSURANCE

WORKERS' COMPENSATION

To whom it may concern:

THIS CERTIFIES THAT CERTIFICATE OF CONSENT TO SELF-INSURE NO. 1054

WAS ISSUED TO:

	KAISER FOUNDATION HOSPITALE	-
UNDER	AS SECTION 3700, LASOR CODE OF CALIFORNIA	r
	NUARY 1, 1965 , AND BAID CERT	,
	TORER AND EFFECT SINCE THAT DATE.	

MARK B. ASHCRAFT



KAISER PERMANENTE

Kaiser Foundation Hospitals

10: Susav Hugo AT: Alanda Courty Halth Dept FAXT: 568-3706

FROM: HEN SYERS - ONK. HOISER HOS

CONSTRUCTION SERVICES

280 WEST MAS ARTHUR

OAKLAND, CA. 94611

: (415: 596-6832

MONE#: (415) 596-6831

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