CBS Corporation

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Via Electronic and First-Class Mail

February 20, 2014

Ms. Carmen D. Santos, PCB Coordinator
U.S. Environmental Protection Agency, Region 9
Waste Management Division
RCRA Corrective Action Office
75 Hawthorne Street
San Francisco, CA 94105

Re: Notification and Cleanup Plan
Former Westinghouse Facility
Rancho Dominguez, California

Dear Ms. Santos:

At the request of the U.S. Environmental Protection Agency (USEPA), CBS Corporation (CBS) is submitting this letter and the attached summary work plan as its application for agency approval for building cleaning and sampling activities at the former Westinghouse Electric Corporation apparatus repair plant in Rancho Dominguez, California. CBS understands that USEPA Region 9 will approve this submittal as a Notification and Cleanup Plan under Toxic Substances Control Act regulations for polychlorinated biphenyls (PCBs) at 40 CFR 761.61(c), recognizing that CBS will submit a final PCB Notification and Cleanup Plan under 40 CFR 761 following the activities completed as part of this current scope of work.

CBS believes the planned building cleaning and sampling are prudent and necessary steps toward completing the characterization and remediation of this facility and is prepared to implement this work in the near term. We trust that USEPA concurs and looks forward to your prompt approval.

Very truly yours,

Russell P. Cepko

cc (via electronic mail):
J. Groy, Esq., CBS
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BUILDING CLEANING AND SAMPLING WORK PLAN
FORMER WESTINGHOUSE APPARATUS REPAIR PLANT
RANCHO DOMINGUEZ, CALIFORNIA
FEBRUARY 20, 2014

1.0 INTRODUCTION

At the request of the U.S. Environmental Protection Agency (USEPA) Region 9, CBS Corporation (CBS) has prepared this Building Cleaning and Sampling Work Plan for the former Westinghouse Electric Corporation apparatus repair plant in Rancho Dominguez, California. These planned activities are designed to serve as a prefatory step to the characterization and, as necessary, remediation of the interior of this facility in accordance with the Toxic Substances Control Act (TSCA) regulations for polychlorinated biphenyls (PCBs). CBS understands that USEPA Region 9 will approve this plan as a PCB Notification and Cleanup Plan under TSCA regulations at 40 CFR 761.61(c), recognizing that CBS will submit a final PCB Notification and Cleanup Plan under 40 CFR 761 following the activities completed as part of this current scope of work.

2.0 BUILDING CLEANING

Building cleaning includes vacuuming of dust, dirt, and debris from non-porous surfaces using vacuums equipped with high-efficiency particulate air (HEPA) filters and wiping or scrubbing of porous and non-porous surfaces with a surfactant. The planned cleaning is not designed to achieve specific numerical PCB cleanup standards for surfaces but rather to remove accumulations of dust, dirt, and debris from such surfaces so that representative samples of building materials can be obtained.

2.1 CLEANING METHODS

This work plan is based, in part, on observations made during a site inspection conducted by WSP Services, Inc. (WSP) on September 12, 2013 and reviewed with CBS. In that inspection, accumulations of dust and debris were observed on perch surfaces and stains and residues were present on the surfaces of concrete and sumps. Concrete staining was primarily located within and around the former transformer detank pit in the northeast portion of the facility. These observations are consistent with the results of prior facility sampling that suggested PCBs were present on the floor surface, but comparatively low PCB concentrations were found within the concrete floor.

Building cleaning will be sequenced using a top-to-bottom approach such that the cleaning of elevated surfaces (*e.g.*, beams or trusses) does not re-contaminate lower surfaces (*e.g.*, floor) that have already been cleaned. Coordination with the owner and tenant will be required to relocate stored goods and provide access to the surfaces to be cleaned. Building cleaning will be performed in 8 to 10 phases covering 8,000 to 10,000 square feet of warehouse space

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at a time. Plastic sheeting or other barriers will be installed to isolate the work areas from the ongoing facility operations.

2.1.1 Non-Porous Surfaces

Non-porous surfaces at the facility may include steel columns and bracing, sheet metal siding and roofing, metal pipes and utility conduit, electrical and control boxes, crane and crane rails, stairways and railings, floor grates and metal floor coverings, and windows. Cleaning of non-porous surfaces will be accomplished by an initial vacuuming to remove loose dust. Vacuums used for this purpose will be equipped with HEPA filters, and care will be taken to prevent release of dusts to ambient air or to warehoused materials. After vacuuming, the non-porous surfaces will be wiped with a clean cotton rag saturated with Simple Green®, a biodegradable surfactant, followed by a wipe of the surface with a clean dry cotton rag. Manual scrubbing of the surfaces will be performed as necessary to remove residuals. This cleaning approach is designed to maximize removal efficiencies without generating large volumes of liquid wastes. Wipe sampling of the non-porous surfaces will be performed contemporaneous with the work to assess the effectiveness of the cleaning effort.

Overhead perch surfaces and upper walls will be accessed using a combination of electric-driven man-lifts, boom lifts, and scissor lifts, as required. Overhead work will require the use of personal fall arrest systems (*i.e.*, harnesses with rated lanyards). It is expected that 27 working days will be needed to clean the estimated 150,000 square feet of non-porous surfaces in the building.

2.1.2 Porous Surfaces

Porous surfaces at the facility include concrete floors, walls, sumps, and pits, and masonry walls. Cleaning of visually stained porous surfaces will be accomplished by lightly spraying the surface with Simple Green® and scrubbing the surface with brooms to loosen oily dirt. The cleaning solution will be removed by applying Solid-a-Sorb® absorbent, to soak up free liquids, and the absorbent will be swept up and placed in plastic bags that will be staged on-site awaiting off-site disposal. The surfaces will then be vacuumed with HEPA vacuums to remove any remaining loose dust and debris. As part of this work, floor drains and sumps will be accessed and bulk residuals manually removed before general concrete cleaning begins. It is expected that 14 working days for will be needed to clean the estimated 30,000 square feet of visually stained porous surfaces in the building.

2.2 Health and Safety Protection

The work will be performed in accordance with a site-specific health and safety plan (HASP) that will be designed to protect cleaning workers as well as the building tenant personnel. The HASP will be prepared and implemented in accordance with U.S. Department of Labor, Occupational Safety and Health Administration regulations at 29 CFR 1910.120.

Personnel and equipment decontamination stations will be established in the contamination reduction work zone. Reusable equipment that has contacted materials that potentially contain PCBs will be decontaminated before leaving the work areas. Disposable or non-reusable materials will be staged on-site in secure containers for subsequent off-site disposal with other building cleaning wastes.

2.3 WASTE MANAGEMENT

Solid wastes generated during cleaning will include vacuumed residuals, vacuum filters, soiled cotton cloths, absorbent materials, investigation-derived wastes, and used personal protective equipment. These materials will be placed in plastic bags and transferred to secure storage containers and staged on site during accumulation. The solid wastes will be assumed to contain greater than 50 parts per million PCBs and are subject to the storage requirements under 40 CFR 761.65. The bulk PCB remediation wastes will be transported under manifest in accordance with 40 CFR 761.40, 40 CFR 761 Subpart K, and applicable U.S. and state Department of Transportation (DOT) regulations to the U.S. Ecology facility in Beatty, Nevada for direct disposal in accordance with 40 CFR 761.75.

Liquid wastes are not expected to be generated during the cleaning or subsequent sampling.

3.0 SAMPLING AND ANALYSIS PLAN

The data collected during implementation of this work plan will be used for the following purposes:

- Assess the effectiveness of the non-porous surfaces cleaning methods and the need for more aggressive decontamination procedures;
- Determine whether PCBs have penetrated the surface of concrete floors, pit walls and floors, and masonry walls; and
- Determine whether the bulk dusts or concrete residues contain PCBs.

These sampling data will be supplement the data from previous site investigations and serve as a basis for subsequent development of CBS' PCB Notification and Cleanup Plan that will be prepared pursuant to 40 CFR 761.61(a) or 761.61(c) as determined by CBS to be appropriate based on site conditions.

Sampling will be conducted in phases as the cleaning work progresses as described below. Sampling work will be conducted in accordance with TSCA regulations, WSP Standard Operating Procedures (SOPs), and relevant USEPA guidance.

3.1 AIR MONITORING

Four indoor air monitoring events are planned. Baseline air monitoring will be performed before any intrusive cleaning activities begin, two events will be conducted during the conduct of the cleaning work, and a final event is planned after the cleaning work is completed. In all four events, one sample will be collected in the office area and two in the warehouse. For the samples collected during cleaning, one of the warehouse sample locations will be inside the active work area and the other outside the active work area.

Air samples will be collected in accordance with USEPA Compendium Method TO-10A (USEPA 1999; Appendix B). The sampler will be positioned in an unobstructed area, and the intake will be positioned downward or horizontal 3 to 6 feet above the floor. Samples will be collected over a 48-hour period to ensure that sufficient sample volumes are collected to obtain laboratory reporting limits (RLs) less than the Regional Screening Level (RSL) of 0.021 micrograms per cubic meter ($\mu g/m^3$). Air samples will be extracted by SW-846 Method 3540C (Soxhlet method) and analyzed by SW-846 Method 8082A to quantify PCBs by Aroclor (including Aroclor 1268) and total PCBs.

3.2 PRE-CLEANING SAMPLING

Pre-cleaning sampling will include up to 10 bulk dust samples, 1 sediment sample per floor drain, and one sample of suspect Galbestos material will be collected if identified at the facility. Samples will be collected using decontaminated stainless steel sampling equipment. Bulk samples will be extracted by SW-846 Method 3540C (Soxhlet method) and analyzed by SW-846 Method 8082A with expected RLs of 0.033 milligrams per kilogram (mg/kg), *i.e.*, less than the RSL of 0.74 mg/kg. Results will be reported on a dry-weight basis for all Aroclors (including Aroclor 1268) and total PCBs.

3.3 POST-CLEANING SAMPLING

Post-cleaning sampling will include wipe sampling of non-porous surfaces and bulk sampling of porous concrete and masonry surfaces.

3.3.1 Wipe Sampling of Non-Porous Surfaces

CBS anticipates collecting up to 100 wipe samples to assess the cleaning effort. Wipe samples will be collected as defined in 40 CFR 761.123 using a standard 10 centimeter (cm) by 10 cm template. Using a hexane soaked gauze pad, samples will be collected by wiping the template area with moderate pressure in horizontal strokes, folding the pad in half, and wiping the template area in vertical strokes. Wipe samples will be extracted by USEPA SW-846 Method 3540C and analyzed by USEPA SW-846 Method 8082A for all Aroclors (including Aroclor 1268) and total PCBs. The laboratory reporting limit for wipe samples is 2 μg per wipe (*i.e.*, 2 μg/100 square centimeters [2 $\mu g/100\ cm^2$]). The minimum detection

limit (MDL) is 1 μg per wipe (*i.e.*, 1 μg/100 cm^2) and detections above the MDL but below the RL will be reported as estimated values.

3.3.2 Bulk Sampling of Porous Surfaces

Concrete floors, sumps, pits, and concrete/masonry walls will be sampled following cleaning of the surfaces as described in Section 2.2. On behalf of CBS, WSP will collect bulk samples of concrete and masonry across the entire footprint of the facility and the vertical surfaces of the walls and pits. Samples will be collected at each node of a 20-foot grid overlaid onto the horizontal surface. A similar grid pattern will be overlaid onto the vertical surfaces of masonry walls and concrete pits. Samples from small or irregular shaped vertical surfaces will be collected at a rate of 1 sample per 400 square feet, with a minimum of 1 sample per wall face. Samples will be collected in general accordance with the procedures described in the "Standard Operating Procedure for Sampling Porous Surfaces for PCBs" (USEPA Region 1, May 2011; Appendix C). Bulk samples will be extracted by USEPA SW-846 Method 3540C and analyzed by USEPA SW-846 Method 8082A with an expected RL of 0.033 mg/kg (*i.e.*, less than the RSL of 0.74 mg/kg). Results will be reported on a dry-weight basis for all Aroclors (including Aroclor 1268) and total PCBs.

The maximum depth of drill bit penetration for sample collection will be 0.5 inches. Multiple drill holes may be required to obtain sufficient sample mass for laboratory analysis and collection of quality control samples.

3.4 Decontamination Procedures

Sampling equipment that comes in contact with potentially contaminated media will be decontaminated. Decontamination will be performed before first use, between sample locations, and after final use. The following decontamination sequence will be used:

- Non-phosphate detergent and potable water wash;
- Potable water rinse;
- Distilled/deionized water rinse;
- Hexane rinse;
- Air dry; and
- Distilled/deionized water rinse.

Sampling equipment will be wrapped in clean aluminum foil and placed in a plastic bag if it is not to be used immediately after decontamination.

Single-use (*i.e.*, disposable) equipment will not be decontaminated. After use, disposable equipment will be managed with other solid wastes as described in Section 2.4.

3.5 QUALITY CONTROL SAMPLING

Field quality control activities for the PCB sampling activities include collection of duplicate samples and equipment rinsate blanks:

- Blind duplicate samples will be collected at a frequency of 1 sample for every 20 bulk samples. Bulk samples and their associated duplicate will be thoroughly homogenized before transferring the aliquots to the sample containers. Wipe sample duplicates will not be collected.

- Equipment rinsate blanks will be collected at a frequency of 1 sample for every 20 bulk samples. Rinsate samples will be comprised of the final analyte-free rinse water (deionized water) after decontamination of equipment. The blank is prepared by pouring deionized water through or over the sampling equipment and into the sample container after equipment decontamination. The equipment rinsate blank serves as a check to verify the effectiveness of decontamination procedures.

- One wipe sample blank for the project will be collected by freely handling the hexane-soaked gauze pad with gloved hands and returning the pad to the sample container.

Quality control samples will be extracted by USEPA SW-846 Method 3540C and analyzed by USEPA SW-846 Method 8082A. Level IV data deliverables will be obtained for laboratory analyses. Laboratory quality control activities will be in accordance with the analytical method and laboratory SOPs. Data that are representative of post-cleaning building conditions will be independently validated.

3.6 SAMPLE DOCUMENTATION

WSP will maintain a field log book to document the procedures followed, sample locations, and sample identifications.

3.7 SAMPLE PACKING AND SHIPMENT

Samples shipped for laboratory analysis will be packed in accordance with DOT regulations. Sample containers will be placed in a sample cooler and maintained at 4 degrees Celsius using wet ice to comply with preservation requirements. WSP will complete a chain-of-custody form for each sample shipment to the laboratory. The chain-of-custody program will document the possession and handling of all samples from the time of field collection through laboratory analysis.

4.0 REPORTING

With the assistance of WSP, CBS will prepare a report to document the building cleaning activities and results of sampling. The report will include the following:

- Narrative of the building cleaning and sampling procedures.
- Quantities of wastes generated and disposed of off-site;
- Summary tables of wipe and bulk sample analytical data organized by media type;
- Figures showing the areas of cleaning, sample locations, and results;
- Copies of analytical laboratory reports;
- Copies of waste manifests and certificates of destruction; and
- Selected photographs of the site work.

5.0 SCHEDULE

CBS is prepared to initiate the building cleaning work is within 14 days of this submittal. The field work is expected to be completed within 75 days of mobilization. The report of activities will be prepared within 60 days after completion of the field activities.