CBS Corporation

Russell P. Cepko
Vice President
Environmental Projects
20 Stanwix Street, 10th Floor
Pittsburgh, PA 15222

Telephone: (412) 642-2569
Facsimile: (412) 642-3014
E-Mail: russ.cepko@cbs.com

Via Electronic and First-Class Mail
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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: Planned Industrial Cleaning and Sampling Activities
Former Westinghouse Facility, Rancho Dominguez, California

Dear Ms. Santos:

CBS Corporation (CBS) would like to conduct industrial cleaning and sampling activities for the interior of the former Westinghouse Electric Corporation facility in Rancho Dominguez, California. These 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 regulations for polychlorinated biphenyls (PCBs). These activities are specifically intended to remove the bulk of the accessible dust and surficial dirt, which may contain PCBs, from overhead perch surfaces, walls, and the facility floor. CBS' plans also include collecting data for the subsequent development of PCB characterization and remediation plans. CBS is submitting this letter to the U.S. Environmental Protection Agency (USEPA), Region 9, and the California Department of Toxic Substances (DTSC) to apprise the agencies of the planned activities and provide the anticipated schedule for this work.

SCOPE OF WORK

The scope of the planned industrial cleaning and sampling activities is based on the following:

- Results of prior facility sampling;
- Observations made during the site inspection conducted on behalf of CBS by WSP Services, Inc. (WSP) on September 12, 2013;
- Discussions among CBS, the property owner (Hager Pacific Properties), and the site tenant;
- Communications with USEPA and the California DTSC personnel, including the conference call discussion on November 19, 2013; and
- Bids received from remediation contractors in response to a solicitation from WSP on behalf of CBS.

The following paragraphs describe the planned activities. All work will be conducted in accordance with a site-specific health and safety plan developed in accordance with U.S. Department of Labor, Occupational Safety and Health Administration regulations at 29 CFR 1910.120.

INDUSTRIAL CLEANING

The planned industrial cleaning is not designed to achieve specific numerical cleanup standards for surfaces but rather to remove accumulations of potential PCB-containing dust, dirt, and debris from such surfaces.

Cleaning of the non-porous surfaces will be accomplished by an initial vacuuming to remove loose dust and vacuums used for this purpose will be equipped with high-efficiency particulate air (HEPA) filters. After vacuuming, the non-porous surfaces will be wiped with a clean cotton rag saturated with a surfactant, followed by a wipe of the surface with a clean dry cotton rag. 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.

Cleaning of visually stained porous surfaces will be accomplished by lightly spraying the surface with a surfactant, and scrubbing the surface with brooms to loosen oily dirt. The cleaning solution will be removed by an 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 will be accessed to manually remove accumulated solids. 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.

Temporary decontamination areas will be set up near the work areas to control the potential spread of contaminants. Final equipment and personnel decontamination will be conducted following contact with PCB-impacted materials and prior to demobilization from the site.

Solid waste generated in cleaning (*e.g.*, soiled rags, HEPA vacuum filters, used absorbent, disposable personal protective equipment) will be placed in plastics bags and loaded into a covered and lined roll-off container for on-site staging in accordance with 40 CFR 761.65. These materials will subsequently be sampled and characterized for off-site transportation and disposal as bulk PCB remediation waste at the U.S. Ecology facility located in Beatty, Nevada, in accordance with the requirements of 40 CFR 761.75. Off-site transportation will be conducted in accordance with applicable U.S. Department of Transportation regulations and 40 CFR 761.40.

The planned cleaning activities are not expected to generate liquid wastes.

SAMPLING

As cleaning is completed in various portions of the building, WSP will collect samples to assess building conditions. These data will be used to supplement previous developed data and will be used in subsequently developing PCB characterization and, as necessary, remediation plans.

For non-porous surfaces, approximately 100 wipe samples will be collected from columns, roof trusses, crane rails, sheet metal walls, utility pipes, and hand railings. A 100-square centimeter template will be used to outline the sample area, and the sample will be collected by wiping the sample area using laboratory-provided swatches of cloth soaked with hexane in the manner specified in 40 CFR 761.123. Samples will be analyzed for PCB Aroclors using USEPA Method 8280.

For the concrete plant floor (porous surface), bulk samples will be collected using a 20-foot grid overlain on the 80,000-square foot building area, resulting in approximately 200 samples to be collected. Samples will be collected as described in the "Draft Standard Operating Procedure for Sampling Concrete in the Field." Collected samples will be extracted using USEPA Method 3540C (Soxhlet Extraction) and analyzed for Aroclor PCBs using USEPA Method 8082. Additionally, up to 50 bulk samples will similarly be collected and analyzed from masonry block walls and other porous surfaces.

SCHEDULE

CBS is currently completing its procurement process in anticipated of contractor mobilization in early January 2014. Cleaning and sampling activities are expected to be conducted over a 10-week period, concluding in mid-March 2014.

CLOSING

CBS believes the planned industrial cleaning and sampling activities are prudent steps that can promptly and substantially remove the bulk of the accessible PCBs in the facility. We trust that USEPA and California DTSC will concur and we will continue to keep you apprised of our progress. If you have any question about this work, please do not hesitate to contact me.

Very truly yours,

Russell P. Cepko

cc (via electronic mail):
J. Groy, Esq., CBS
W. D. Wall, Esq., CBS
L. M. Brausch, CBS
R. Krug, California DTSC
Diana Olsen, Hager Pacific Properties
M. S. Cousineau, HMC, Inc.
Rick Freudenberger, WSP
D.A. Rykaczewski, WSP
Glen Rieger, WSP