

## CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

2101 WEBSTER STREET, SUITE 500

OAKLAND, CA 94612

(510) 286-1255



March 31, 1994  
File No. 2223.09(RHB)

Dr. Victor C. Furtado  
Director - Environmental Operations  
Pacific Gas and Electric Co.  
Room 2437  
77 Beale Street  
San Francisco, Ca. 94120

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LGT.

ENVIRONMENTAL SERVICES

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SUBJECT: Cleanup And Abatement Order No. 94-033

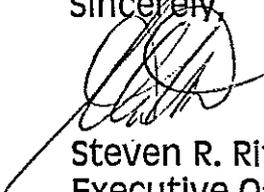
Dear Dr. Furtado:

Enclosed is a copy of the Cleanup and Abatement Order No. 94-033 relating to the discharge of smelter slag leachate into Alameda County Flood Control Channel in Union City, Alameda County. The incident has impacted the channel sediments and surface waters which is in violation of the California Water Code.

I urge you to take immediate measures necessary to comply with this Order. In view of the magnitude of the problem and the lack of measures to prevent further impacts to Waters of the State, I will not hesitate to pursue further enforcement action should this Order be violated.

If you have any questions relating to this Order, please contact Mr. Ray Balcom of my staff at (510) 286-1036.

Sincerely,

  
Steven R. Ritchie  
Executive Officer

Enclosure: Cleanup and Abatement Order No. 94-033  
cc: David Safreno, Alameda County Flood Control District  
Robert P. Kevo, Dept. of Fish & Game

STATE OF CALIFORNIA  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

CLEANUP AND ABATEMENT ORDER NO. 94- 033

PACIFIC GAS AND ELECTRIC COMPANY

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter Board) finds that:

1. Pacific Gas and Electric Company (here in after called the discharger) allowed smelter slag wastes from the Pacific States Steel Foundry to be placed or disposed of on their property located at 7th and Decoto Road in Union City in the mid 1970's. The site consists of a power line corridor, a substation and an old parking area partially covered with asphalt. Smelter slag wastes cover a significant portion of the site.
2. Staff received a complaint from Alameda County Flood Control District (ACFCD) and subsequently on February 11, 1994 conducted a joint inspection of this site with Hans Lemech of Pacific States Steel. During the site inspection, staff observed high pH discharges from two storm drains and from two seeps into ACFCD Channel. Water samples were collected from the four sources and from three locations in the ACFCD Channel. Smelter slag samples were also taken. The precipitate sample from the ACFCD Channel shows metals and high pH leaching out of the smelter slag wastes to the channel. The leachate appears to be impacting the channel biota as it enters the water course. Metal and pH levels appear to increase along the water course. The pH of the seeps tested were between 12-13. Lead and zinc concentrations of the sediments in the ACFCD Channel appear to increase at the locations where seeps entered the ACFCD Channel.
3. PG&E immediately initiated corrective measures by installing a leachate collection system for two of the four sources and the other two were capped with cement. Approximately 2,800 gallons of leachate per day is collected in an above ground tank and is hauled off-site as a hazardous waste. Union Sanitary District has agreed to accept the leachate wastewater provided some metals levels are reduced and pH is adjusted to comply with their pretreatment requirements.

4. PG&E has estimated 50,000 cubic yards of smelter slag wastes were disposed of on their site in the mid 1970's.
5. Based on the above findings, the Board finds that the discharge has impacted the waters of the State. The Discharger has permitted smelter slag leachate to be discharged where it has adversely impacted and continues to threaten beneficial uses and has created a condition of pollution and nuisance.
6. This Order contains tasks for cleanup of smelter slag wastes leachate discharge into the Alameda County Flood Control Channel, completion of subsurface characterization, and immediate implementation and evaluation of the interim remedial actions.
7. This Order is an action to enforce State law and the Water Quality Control Plan and as such is exempt from the California Environmental Quality Act pursuant to Section 15321 of the Resource Agency Guidelines.

IT IS HEREBY ORDERED pursuant to California Water Code Section 13304 that the Discharger shall cleanup the waste discharged, abate the effects of the discharge, prevent further discharge and take other remedial actions as follows:

A. Prohibitions

1. Discharge of waste or hazardous materials to the waters of the State is prohibited.
2. Migration of waste through the subsurface media to waters of the State is prohibited.
3. Activities associated with the subsurface investigation and cleanup that will cause a discharge of waste to waters of the State are prohibited.

B. Interim Remedial Actions

1. Take immediate action to investigate all sources of smelter slag waste leachate entering the ACFCF Channel. All seepage must be contained on site and disposed at an appropriate facility.
2. Submit by April 8, 1994 a technical report which should include but not be limited to the following:

- a) A site diagram defining the lateral and vertical extent of deposited slag wastes including the contaminated soil beneath the slag wastes
- b) Number of seeps and corrective measures undertaken, including conclusions and recommendations

**C. SPECIFICATIONS**

1. The Discharger shall immediately conduct a subsurface investigation necessary to define the lateral and vertical extent of soil and groundwater contamination beneath the slag wastes. A detailed workplan shall be submitted to the RWQCB for review and approval.

WORKPLAN DUE DATE: April 20, 1994

2. Final cleanup goals for impacted soils beneath the slag waste pile and polluted groundwater shall meet the applicable standards, including Maximum Contaminated Levels, acceptable to the Board and shall be based on an evaluation of the cost, effectiveness and a risk assessment to determine the effects on human health and the environment. If the discharge to waters of the State is an alternative for treatment of the polluted groundwater, an NPDES permit application must be completed and submitted. An acceptable workplan for groundwater cleanup must be submitted within 15 days of completion of the field investigation.

SOIL AND GROUNDWATER REPORT DUE DATE: May 20, 1994

3. On a monthly basis, the Discharger shall submit a progress report on soil and groundwater investigations and cleanup due by the tenth (10th) of the subsequent month, commencing with a report for the month of April, due by May 10, 1994.
4. All excavated waste materials shall be disposed of in an appropriate manner and if stored temporarily on land then it shall be in a location sufficient to prevent erosion and subsequent discharge to the Waters of the State.
5. All hydrological reports, documents, plans and specifications shall be certified by either a State Registered Geologist, a certified Engineering Geologist or a Civil Engineer registered pursuant to Section 6762 of the Business and Professions Code, who has experience in groundwater hydrology.

6. All samples shall be analyzed by State certified laboratories accepted by the Board using approved EPA methods for the type of analysis to be performed.
7. If the Discharger is delayed, interrupted or prevented from meeting one or more of the completion dates specified in this Order, the Discharger shall promptly notify the Executive Officer in writing of the revised completion dates. The Board may consider revision to this Order.
8. Copies of all correspondence, reports, and documents pertaining to compliance with the Prohibitions, Interim Corrective Measures, and Specifications of this Order, shall be provided to the following agencies:

Department of Fish and Game -Attention- Bob Kevo  
Union City Fire Department - Attention- Chris Boykin  
Alameda County Flood Control District - David Safreno  
Alameda County Health Services - Attention- Arieu Levi  
Alameda County Water District - Attention Michael Lerner  
State Department of Health Services/TSCD

9. The above requirements do not exempt the discharger from compliance with any other laws, regulations or ordinances which may be applicable, and they leave unaffected any other restraints on this project which may be contained in other statutes or required by other agencies.
10. The Discharger shall immediately notify the Regional Board and ACWD by telephone whenever any discharge of waste to waters of the State occurs as a result of any soil excavation and groundwater related activities. A written confirmation on the incident shall follow within five working days.

Pursuant to section 13304 of the Water Code, the Discharger(s) is hereby notified that the Regional Board is entitled to, and may seek reimbursement for, all reasonable costs actually incurred by the Regional Board to investigate unauthorized discharges of wastes and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this Order. Upon receipt of a billing statement for such costs, the Dischargers shall reimburse the Regional Board.

Pursuant to California Water Code sections 13304, 13350 and 13385 if a Discharger fails to comply with the provisions of this order, the Board may schedule a hearing to consider assessing civil monetary penalties and to consider requesting the Attorney General to take appropriate enforcement action against the Dischargers, including injunctive and civil monetary remedies.



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Steven R. Ritchie  
Executive Officer

3/31/94  
Date