

SITE HISTORY

The 8.9-acre site was developed in 1963 when Texaco developed the property for the bulk storage of primarily gasoline and jet fuel. Around 1990, the facility was converted to a hazardous waste treatment and storage facility. Gibson Environmental, the operator of the facility, abandoned the site in 1995 leaving approximately 10 million gallons of hazardous waste, mainly oily wastewater and oily sludge, in tanks.

The Port of Redwood City (Port), the current owner of the property, assumed responsibility for the cleanup and closure of the site. Currently, the Port is in the process of closing the site and preparing for the future commercial/ industrial redevelopment of the property.

RCRA CORRECTIVE ACTION PROCESS

From 1990 to 1995, Gibson operated under an Interim Status Document (ISD) issued by DTSC. This authorization allowed the facility to store and treat hazardous wastes from offsite sources. Because of the abandonment by Gibson, the Port is required to investigate and address all historic releases of hazardous waste to the soil and groundwater that may have occurred at the facility. This investigation and cleanup is called the Resource Conservation and Recovery Act (RCRA) Corrective Action process and is conducted with oversight provided by DTSC. The RCRA Corrective Action process has five main steps. The Port has completed Steps 1 and 2 of the 5, and is currently on Steps 3 and 4 (See Corrective Action Process chart on page 5). These steps and how they relate to the former Gibson facility are described below.

STEP 1

RCRA FACILITY ASSESSMENT (RFA)

The RFA evaluates past operating practices and historical uses of the site, and identifies areas where spills, leaks, or other chemical releases either occurred or could have occurred. This process involves the review of facility records, management practices, government agency files, interviews, visual site inspection, and preliminary sampling.

Two RFAs have been conducted at the Gibson facility. In 1993 one was conducted by DTSC. In February 2001, the Port's consultant completed an additional RFA that included preliminary sampling of soil and groundwater. These reports and other facility documents are available for public review at the local information repository described on page 1.

RFA FINDINGS OF THE GIBSON

FACILITY: A total of 19 solid waste management units have been identified by DTSC. A solid waste management unit (SWMU) is a container, tank or a particular location where a chemical release has or may have occurred. Based upon the findings of the RFAs, DTSC concluded that further investigation was necessary to better understand the contamination at the site and required the Port to conduct a RCRA Facility Investigation (RFI) described in Step 2 below.

Interim Remedial Measures (IRMs):

Prior to and during the RFA and RFI phases, the Port implemented IRMs with approval from DTSC. IRMs are actions that can be taken at any time to reduce or eliminate imminent threats to human health or the environment. These

measures included removing the approximately 10 million gallons of oily wastewater and sludge between 1999 and 2003 that were abandoned in the tanks by Gibson.

STEP 2

RCRA FACILITY INVESTIGATION

(RFI): The RFI defines the source and extent of contamination at the site and helps in the decision of whether further action is needed. The 19 SWMUs identified by the DTSC were assessed during the RFI on a site-wide basis. The RFI Workplan was approved by DTSC in January 2003. This workplan outlined scientific methods to sample and analyze onsite and offsite soil, soil gas, and groundwater to determine the areas of contamination. The RFI Report was approved by DTSC in February 2004.

RFI FINDINGS: The RFI Report documents localized areas of petroleum-related contaminants such as gasoline, diesel, jet fuel, benzene, toluene, xylene, ethylbenzene, and metals. The petroleum-related contaminants have been found in soil, soil gas, and groundwater (Figure 2).

Site investigations show that total dissolve solids in the shallow aquifer exceed 3,000 mg/l (a mixture of seawater and fresh water). The San Francisco Regional Water Quality Control Board has determined that the groundwater in the shallow aquifer beneath the site is not considered a potential source of drinking water based on this finding.

RISK ASSESSMENTS: DTSC uses risk assessments to determine if chemicals at a site may be harmful to

people or the environment and to establish maximum allowable levels that may remain at each site where chemicals have been released into the environment.

There are two types of risk Assessments: Human Health Risk Assessments and Ecological Assessments. Both Assessments are described below.

Human Health Risk Assessment

(HRA): The HRA estimates the potential risks to human health from the chemical contamination in soil, soil gas, and groundwater. The HRA consists of four steps that include:

1. Identifying harmful chemicals in soil, soil gas and groundwater;
2. Examining the degree to which people might be exposed to the identified chemicals;
3. Assessing the toxicity or harmfulness of each chemical to determine health effects. Chemicals are evaluated in two categories: those known to cause cancer and those that do not cause cancer but could have other negative health effects; and
4. Combining the results of the first three steps to estimate the risk to human health.

This four-part process estimates the chance that contact with chemicals from a facility will harm people. The process gives DTSC a numerical way to show how great or small the risk. It also identifies who is most at risk and what is causing the risk. Potential human exposures could involve touching, eating or breathing contaminated soil, water and/or air.

Using the data collected during the RFA and RFI, a revised HRA was submitted to DTSC in February 2004 and approved in June 2004. The HRA results show that the site in its current condition may pose a risk to onsite workers during excavation activities if personal protective equipment is not used. The Corrective Measures Study in Step 3 evaluates the cleanup alternatives to reduce those risks to acceptable levels.

Ecological Assessment (EA): The EA is similar to the HRA except that its purpose is to evaluate the potential impacts from a contaminated site on the surrounding environments and animals. A revised scoping Ecological Assessment that presents the results of the evaluation of chemicals in the soil and groundwater was approved by DTSC in June 2004. This document states that there is no risk to surrounding environments and animals.

STEP 3

CORRECTIVE MEASURES STUDY (CMS):

The purpose of the CMS is to evaluate potential soil and groundwater cleanup options and methods, and decide which method would be the best choice, using the information contained in the RFI, the risk assessment and the ecological assessment. The CMS Report includes the evaluation of cleanup options and establishes cleanup standards based on the data collected in the RFA, RFI, risk assessment and ecological assessment phases. A CMS Report will be submitted to DTSC in the latter part of 2004.

STEP 4

PROPOSED AND FINAL REMEDY SELECTION

Based on the evaluation of the CMS Report, DTSC will propose specific corrective measures after considering public comments for implementation at the facility. The final approval of the corrective measures occurs after consideration of all public comments. The proposed corrective measure(s) will be evaluated using several criteria. Some of the criteria include:

- Being protective of human health and the environment;
- Attaining the environmental cleanup standards;
- Controlling the source of release(s) to reduce or eliminate, to the maximum extent practicable, further contamination that might pose a threat to human health and/or the environment; and
- Meeting all applicable waste management requirements.

This phase of RCRA Corrective Action process is subject to the California Environmental Quality Act (CEQA) requirements. The purpose of CEQA is to inform the public and government decision-makers about the potential significant environmental impacts of the proposed site activities and allow for the use of alternatives or mitigation measures to reduce or eliminate the impacts. The CEQA process will be conducted by the Port as the lead agency. The public will be able to

review and comment on these processes during a 30-day public comment period. You will receive a fact sheet informing you of the dates of the 30-day public comment period and a public notice will be placed in the local newspaper.

STEP 5

CORRECTIVE MEASURES IMPLEMENTATION (CMI):

The facility will implement the corrective measures (remedy) selected and approved by DTSC.

Corrective Action Process

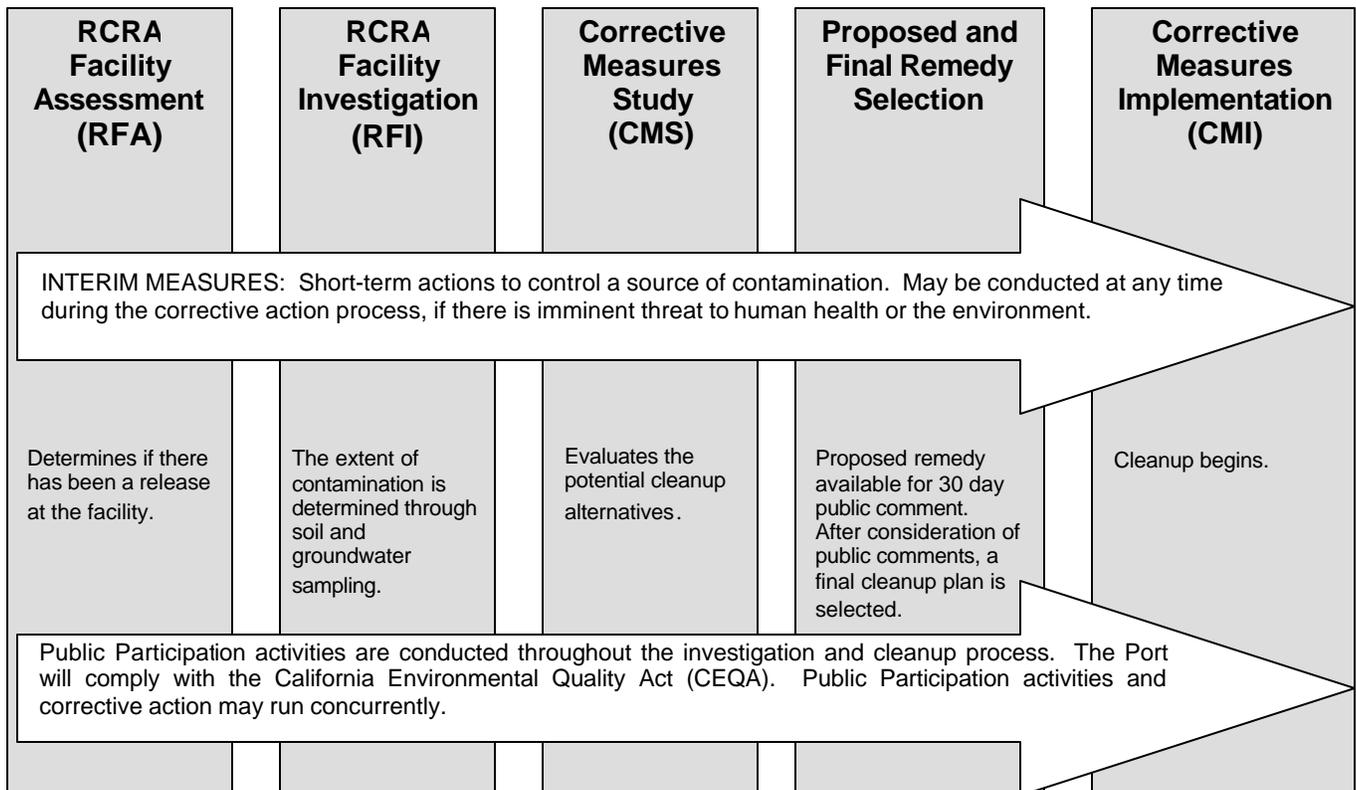
STEP 1

STEP 2

STEP 3

STEP 4

STEP 5



RCRA CLOSURE PROCESS

In addition to the corrective action process for the SWMUs, the Port also needs to close the ISD units under a closure process. The Port shall prepare a closure plan and implement the closure activities. The Closure Plan describes the steps necessary to formally close the facility. The closure activities will address removal of any remaining wastes, decontamination, and demolition of the facility tanks, equipment and structures. Samples will be collected and analyzed to confirm that structures remaining onsite are clean. In addition, soil underlying select units will be sampled and analyzed to assess impacts from facility operations.

The draft Closure Plan will be submitted to DTSC in the latter part of 2004. The closure plan approval is also subject to CEQA requirements.

Future Opportunities for Public Involvement

DTSC will hold a 30-day public comment period to provide the community with an opportunity to review and comment on the CMS Report, the Closure Plan and the CEQA document. Public involvement will allow the community to provide DTSC with input prior to making a final decision. A public notice of the comment period and public meeting date will be published in a local newspaper and also distributed by mail to the Gibson facility mailing list. In addition, community members will be able to provide written comments through U.S. or electronic mail. A Responsiveness Summary will be prepared summarizing comments received and the response to the comments. The Responsiveness Summary is distributed to all parties on the mailing list.

Mailing List Coupon

Over the life of this project, the Port and DTSC have put together a mailing list of interested members of the public. If you did not receive this notice in the mail and would like to be placed on the mailing list, you can either complete this coupon and mail to Ms. Rachele Maricq, DTSC Public Participation Specialist, 700 Heinz Avenue, Suite 200, Berkeley, 94710 or contact Ms. Maricq at (510) 540-3910 or send an email to rmaricq@dtsc.ca.gov.

Name: _____
Address: _____
City, State, Zip Code: _____
Phone Number: _____
Fax Number: _____
E-Mail: _____

DTSC mailing lists are solely for the purpose of keeping persons informed of DTSC activities. Mailing lists are not routinely released to outside parties. However, they are considered public records, and, if requested, may be subject to release.

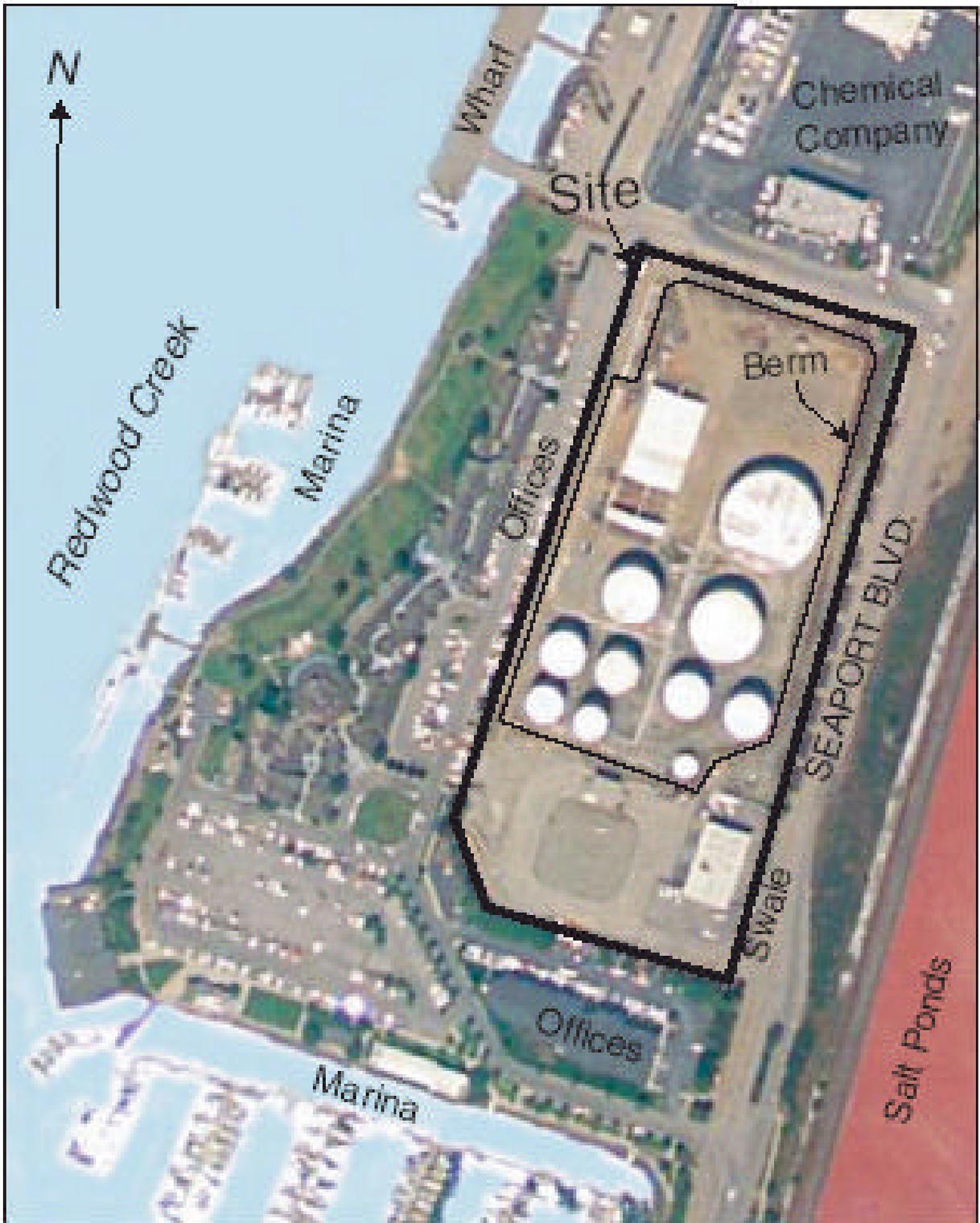
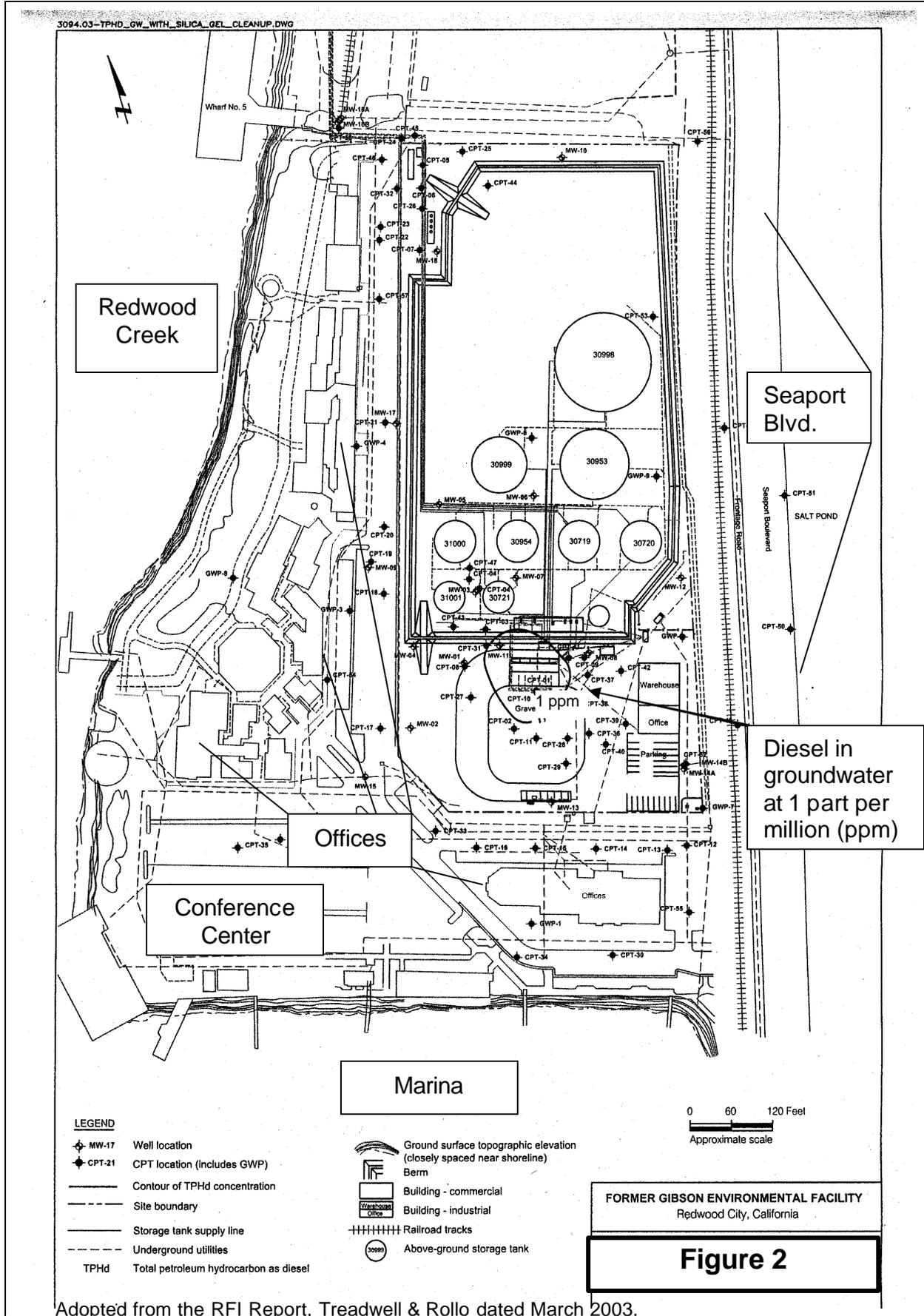


FIGURE 1. SITE and SURROUNDING LAND USE



Adopted from the RFI Report, Treadwell & Rollo dated March 2003.

Notice to Hearing Impaired Individuals

TDD users can use the California Relay Service at 1-888-877-5378 and ask to speak to Ms. Rachelle Maricq at (510) 540-3910



**Department of Toxic Substances Control
Attn: Rachelle Maricq
700 Heinz Avenue, Suite 200
Berkeley, California 95826-3200**

**PORT OF REDWOOD CITY
(FORMER GIBSON ENVIRONMENTAL)
FACILITY INVESTIGATION REPORT FINDINGS**