



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

NOV 27 1992

H-8-1

Dear Sir/Madam:

Enclosed please find the Site Assessment report prepared for EPA concerning the CERCLA evaluation for the site.

EPA encourages your written comments on this report. Your comments should be sent to Rachel Loftin, Site Assessment Manager, EPA mail stop H-8-1. If you have any question please contact her at (415) 744-2348.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Mix".

Thomas A. Mix, Chief
Site Evaluation Section

Enclosure

Bechtel

50 Beale Street
San Francisco, CA 94105-1895
Mailing address: P.O. Box 193965
San Francisco, CA 94119-3965

Site Inspection Summary Report

Site: Williams Street Site
1964 Williams Street
San Leandro, California 94577

Site EPA ID Number: CAD 983566761

Work Assignment Number: 60-15-9J00, ARCSWEST Program

Submitted to: Rachel Loftin
Work Assignment Manager
EPA Region IX

Date: November 4, 1992

Prepared by: Thomas Genolio *TG*

Review and Concurrence: Susan Naughton *SN*



SI SUMMARY REPORT

WILLIAMS STREET SITE

INTRODUCTION

The U.S. Environmental Protection Agency (EPA), Region IX, under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA), has tasked Bechtel Environmental, Inc. (BEI) to conduct a Site Inspection (SI) of the Williams Street Site in San Leandro, Alameda County, California.

The Williams Street Site (Williams) property was identified as a potential hazardous waste site and entered into the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) on August 15, 1990 (CAD 983566761). The site was entered into CERCLIS upon notification from the legal counsel of the property owner.

A Preliminary Assessment (PA) of Williams dated December 16, 1992 was prepared by Roy F. Weston for the EPA. The purpose of the PA was to review existing information on the site and its environs to assess the threat(s), if any, posed to public health, welfare, or the environment, and to determine if further action under CERCLA/SARA is warranted.

After reviewing the PA, the EPA decided that further investigation of Williams would be necessary to more completely evaluate the site, using the EPA's Hazard Ranking System (HRS) criteria. The HRS assesses the relative threat associated with actual or potential releases of hazardous substances at the site. The HRS has been adopted by the EPA to help set priorities for further evaluation and eventual remedial action at hazardous waste sites. The HRS is the primary method of determining a site's eligibility for placement on the National Priorities List (NPL). The NPL identifies sites at which the EPA may conduct remedial response actions. This report summarizes the results of the SI investigation of Williams.

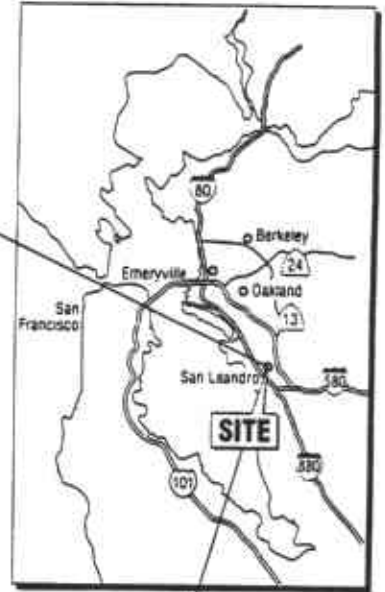
SITE DESCRIPTION

Williams, a former freeze-drying facility, is located at 1964 Williams Street in San Leandro, California, as shown on Figure 2-1. The site consists of a 25,000-square-foot warehouse and surrounding property. The site is part of a larger building and is located at the northwest end of the building. The site is bordered on the north and east by a concrete parking lot and other industrial warehouses, and on the west and south by a Southern Pacific Railroad. The area is zoned as industrial. The site is currently unoccupied. There are marks and stains on the floor indicating where equipment was once located.

A freeze-drying facility operated at the site from 1969 to 1982. Hills Brothers Coffee operated the facility from 1969 through 1971. Subsequently, a company named Cryo-Maid, which changed its name to Innovative Foods, operated the facility from 1972 through 1982. Hazardous substances used in the freeze-drying system at the facility included trichloroethylene (TCE), Freon 11, Freon 22, and a substance with the trade name Dowtherm, which contained one or more of the following: ethylene glycol, diphenyl, diphenyl oxide, diethylene glycol, diethylbenzene, and triethylbenzene.

W.S. Associates purchased the site in 1988 from David Devine. Prior to the sale, a construction company disassembled the freeze-drying system in July 1988. This work was not overseen by





CG/ML/amy/3/06

Source: U.S. Geological Survey, San Leandro, California, 7.5-Minute Series, San Leandro Quadrangle

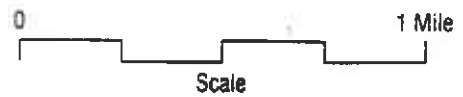


Figure 2-1 Site Location



part of page 1

any regulatory agency. According to representatives of the construction company, Dowtherm was intentionally mixed with water and poured down the sanitary sewer.

On the southwestern side of the warehouse there are three roll-up doors along a railroad spur. It appears that when the freeze-drying system was dismantled a spill of hazardous substances occurred in this area and flowed out the center roll-up door. Staining and peeling are present on the outside wall of the building below the center roll-up door. The soil below the door is also stained with what appears to be a black oily liquid. An analysis of soil and groundwater in this area confirms the presence of hazardous substances, including TCE.

In August 1988, an occupant of the warehouse northwest of the site reported that a spill had occurred during tank dismantling operations. Investigation of the reported spill by the City of San Leandro, Hazardous Materials Section, verified that hazardous substances were discharged to the sanitary sewer drain on site.

When the site was purchased, W.S. Associates was unaware that any hazardous substances had been used on site. Soil and groundwater contamination at the site were not discovered until June 1989, when a Real Estate Transaction Audit was conducted at the site. In January 1990, Dames & Moore was retained by W.S. Associates to further evaluate the lateral and vertical extent of volatile organic substance contamination and obtain additional information regarding sources of this contamination.

The results of the Dames & Moore investigation indicated that the problem was more extensive than initially anticipated and that further remedial investigation would be required. Following an effort by W.S. Associates to obtain information and financial support from Hills Brothers Coffee, Cryo-Maid, and Innovative Foods, the property owners filed a lawsuit in U.S. District Court in September 1990 due to the lack of cooperation from the potential responsible parties.

SUMMARY OF SITE INSPECTION ACTIVITIES

The PA conducted on the site used conservative assumptions to assess the threat posed to public health, welfare, and the environment. Based on these conservative assumptions, the site appeared to be eligible for the NPL. The EPA requested that an SI be conducted to further evaluate HRS assumptions. Further evaluation included a review of existing and additional EPA, Department of Toxic Substances Control, and Bay Area Regional Water Quality Control Board file information, a visit to the Williams Street Site, a meeting and deposition review with the attorney representing W.S. Associates, and reevaluation of groundwater and soil data using the HRS.

Additional information gathered includes:

- As part of the lawsuit filed by W.S. Associates against the potential responsible parties, extensive testimony and information regarding historical operations, spills and leaks, and attribution of contamination have been gathered.
- According to the testimony of a Hills Brothers Coffee employee, a TCE pump, which was located in the warehouse adjacent to the center roll-up door, failed on two or three occasions during the period between 1969 and 1971 resulting in a spill of approximately 10 to 20 gallons each time.
- According to Hills Brothers Coffee facility log books, there were frequent leaks in the freeze-drying system resulting in isolated spills of TCE and Dowtherm. Furthermore, TCE was detected in the air inside the facility and in the freeze-dried product.



- According to former facility employees, the operations of Cryo-Maid/Innovative Foods resulted in several spills and leaks associated with the freeze-drying system.
- A TCE separator was installed sometime during Cryo-Maid's operations. TCE was separated out of the process water and reused in the system. Process water was then discharged to the sanitary sewer. It appears that analyses of the process water prior to discharge did not occur.
- Dames & Moore, contractor for W.S. Associates, and several other environmental contractors retained by potentially responsible parties have agreed on the next stage of investigation at the site. The work will be performed by ERM Environmental. The extent of soil and groundwater contamination will be characterized, as well as preresidential steps taken. The work plan for the proposed investigation was due in October 1992 and will be submitted to the EPA.

The pertinent HRS factors associated with this site are:

- Although there is an observed release of hazardous substances from the site to groundwater, there is no observed release to a drinking water well. Furthermore, there are no municipal water systems within 4 miles using groundwater for drinking. There are approximately 40 private domestic wells within 4 miles of the site. It is possible that some wells are used for drinking water. Based on an average of 2.54 persons per household in Alameda County, the target population for the groundwater pathway appears to be low.
- Although there is a potential for contaminants from the site to reach the surface water, there are no drinking water intakes in the San Francisco Bay, San Leandro Bay, San Leandro Creek, or San Lorenzo Creek. There are several sensitive environments and limited fisheries located primarily along and in the San Francisco and San Leandro Bays. Due to the high dilution factors associated with these water bodies, the overall affect on surface water appears to be minimal.
- The nearest residence is located approximately 900 feet northeast of the site, and the nearest school is located approximately 1 mile west of the site. There are no residents or workers on site. Although there is contaminated soil on site, the target population associated with the soil exposure pathway appears to be low.
- The potential for a release to air is low because the site has been inactive since 1988 and the target population for the air pathway is low.
- Currently there are no hazardous wastes generated, treated, stored, or disposed of on site.



EPA RECOMMENDATION

No Further Remedial Action Planned under CERCLA

Higher-Priority Assessment under CERCLA

Lower-Priority Assessment under CERCLA

Defer to Other Authority (e.g., RCRA, NRC)

Notes:

Initial

Date

<u>JK</u>	<u>11/21/92</u>
_____	_____
_____	_____
_____	_____



SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT

Bechtel Environmental, Inc.
P.O. Box 193965
San Francisco, CA 94119-3965

OBSERVATIONS MADE BY: Thomas Genolio and Gary Yao

DATE: 10/5/92

FACILITY REPRESENTATIVE(S) and TITLE(S): Leonard Stein, Attorney at Law
Susan Lowenburg, Lowenburg Corporation

SITE: Williams Street Site

EPA ID: CAD 983566761

The following information was obtained during the site visit and interview with Leonard Stein and Susan Lowenburg:

Leonard Stein is an attorney with Steefel, Levitt, and Weiss. Mr. Stein is representing W.S. Associates, the owners of the site. Susan Lowenburg, of the Lowenburg Corporation, has been retained by W.S. Associates to manage the site property. The site visit began at 9:45 a.m. The weather was sunny and approximately 75° F.

D.H. Overmeyer Company constructed the building in which the site is located. This type of building is referred to as an overmeyer. D.H. Overmeyer never operated at the site. The site was sold to David B. Devine in the mid-1960s. Mr. Devine did not participate in any operations at the site.

From 1967 to 1969, the Austin Company was contracted by Hills Brothers Coffee to design and construct a commercial freeze-drying plant at 1964 Williams Street. Hills Brothers Coffee operated the freeze-drying facility from 1969 through 1971. During this time, Hills Brothers freeze-dried caffeinated coffee.

A Sandvik contact freezer was used in the freeze-drying process. Trichloroethylene (TCE) was used in this process as a refrigerant. Supercooled TCE was sprayed under a conveyor which froze the concentrated coffee liquer. The product was broken into pieces, ground up into granules and transferred to an environmental chamber. In the environmental chamber, the product was run through a four-layer conveyor system. A liquid called Dowtherm was heated by a natural gas heater and circulated through the chamber under the conveyor belts. Water vapor was sublimed from the frozen food particles and condensed on the surface of panels above the conveyor in the form of a thin sheet of ice. The condenser panels contained Freon 11, Freon 22, and/or TCE at a temperature of -90° F. The cooled liquid was then drained, and warm liquid was pumped back the system, which exploded ice off the condenser panels. The ice was melted and discharged to the sanitary sewer.

Hills Brothers documents indicated that TCE was detected in air inside the facility and in the product at various occasions during operation. It appears that the process water discharged to the sanitary sewer system was never analyzed. It is possible that TCE was released into the sanitary sewer during this period.



SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT (Cont'd)

Site: Williams Street Site

In 1971, Hills Brothers sold the facility to HJT Inc. HJT Inc. was subsequently renamed Cryo-Maid Inc. John Horton supplied the operating capital for Cryo-Maid from 1971 to 1980. James Mercer, an engineer who patented the freeze-drying operation, went to work for Cryo-Maid. From 1971 to 1982, Cryo-Maid operated the freeze-drying system on site. During this period, the use of TCE expanded, increasing the quantity of TCE on site. TCE was contained in an approximately 800-gallon tank. A TCE separator was installed on site during this time to separate TCE from the process water. TCE was skimmed from the top of the separator tank and reused in the process. Process water was then discharged to the sanitary sewer.

According to a Hills Brothers employee, during the mid-1970s the TCE pump seals failed on two or three occasions, causing approximately 10 to 20 gallons to spill. The pump was located in the back of the facility, adjacent to the center roll-up door. TCE was detected in the soil outside the facility directly under the center roll-up door.

In 1980, Edward Hirschburg purchased the freeze-drying company from John Horton. The facility was renamed Cryo-Maid/Innovative Foods. Mr. Hirschburg operated the facility until 1982, when freeze-drying fluids were pumped into storage tanks and operations were suspended. Cryo-Maid/Innovative Foods intended to continue operations at a later date. Operations were never resumed.

David Devine sold the site to W.S. Associates in 1984. W.S. Associates purchased the site unaware that any hazardous substances had been used on site. C.J. Construction, under John Goldberg, disassembled the freeze-drying system. This work was not overseen by any regulatory agency. According to the testimony from a former employee at C.J. Construction, it appears that an unknown quantity of Dowtherm was intentionally mixed with water and poured into the sanitary sewer. This substance was detected at the San Leandro Water Pollution Control Plant (WPCP) and suspected to have caused illness to a WPCP employee due to chemical exposure. The City of San Leandro, Hazardous Materials Section, was notified of the spill and inspected the facility during dismantling of the freeze-drying equipment. Mr. Hirschburg was required to provide compensation to the WPCP for analytical expenses incurred. Asbestos removal occurred as part of the closure of the site. There is no information on asbestos removal procedures. Reports also indicate that an unknown substance was spilled outside the facility during the dismantling process.

Dowtherm, a product of the Dow Chemical Company, contains CERCLA hazardous substances, as shown in Table 1 of the December 16, 1991 Preliminary Assessment.

Mr. Hirschburg, when questioned about what happened to the TCE during dismantling, said that the TCE had all evaporated within the closed freeze-drying system and denied any handling of TCE during dismantling. There is no documentation regarding what happened to the TCE that had been stored and used at the site. Soil and groundwater samples were taken, as part of the Dames & Moore investigation, from the area outside the center roll-up door of the warehouse. Analytical results indicate significant levels of TCE in soil and groundwater, as shown in Tables 4 and 5 of the December 16, 1991 Preliminary Assessment.

The outside of the facility was painted in 1985. In the back of the facility under the roll-up doors, the paint on the wall was stained and peeling off. It appears that a substance spilled out the door and down the side of the building.



SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT (Cont'd)

Site: Williams Street Site

The inside of the warehouse was empty. There were marks and stains on the floor indicating where the freeze-drying equipment had been. The warehouse floor was covered with absorption powder.

Dames & Moore, contractor for W.S Associates, and several other environmental consultants, retained by potential responsible parties (PRPs), have agreed to the next stage of investigation at the site. The extent of groundwater and soil contamination at the site will be characterized, as well as preredial steps taken. Funding for this investigation was contributed by all PRPs.

