



3480 Buskirk Avenue
Pleasant Hill, CA 94523-4342
P.O. Box 8045
Walnut Creek, CA 94596-1220
(415) 937-9010
FAX (415) 937-9026

July 5, 1990

Mr. Larry Seto
Alameda County Health Agency
Division of Hazardous Materials
80 Swan Way, Rm. 200
Oakland, California 94621

11-42-5081-01/1

Subject: Addendum to Work Plan for James River Corporation
Flexible Packaging Plant, San Leandro, California

Dear Mr. Seto:

This addendum to the April 6, 1990 "Work Plan for James River Corporation, Flexible Packaging Plant, San Leandro, California" has been prepared in response to our discussion of May 14, 1990. A revised site map is included as Figure 1. Additions and/or changes to the investigation described in our April 6, 1990 "Work Plan, James River Corporation, Flexible Packaging Plant, San Leandro, California" are as follows:

Verification Sampling, Ink Room Excavation. Our April 6, 1990 work plan stated that two soil samples would be collected from the excavation bottom and one from each sidewall at the completion of additional excavation, for a total of 6 samples. The samples were to be analyzed for purgeable halocarbons by EPA Method 8010 and purgeable aromatics by EPA Method 8020.

As you requested, the verification sampling plan in the ink room excavation will be modified such that one verification sample will be collected for every 200 square feet of surface area of the excavation sidewalls and bottom. The actual number of samples, and sampling locations, will be determined after excavation is complete. However, at this time, we estimate that 10 discrete samples will be collected from this excavation.

Verification samples collected from the ink room excavation will be analyzed for the CAM metals arsenic, barium, chromium, cobalt, copper, mercury, molybdenum, nickel, selenium, vanadium, and zinc, in addition to the EPA 8010/8020 analyses proposed in the April 6, 1990 work plan. Only selected CAM metals analyses will be performed on samples from the ink room excavation because previous sampling in the excavation indicated that the remaining CAM metals

(antimony, beryllium, cadmium, lead, silver, thallium) were not present above detection levels.

Additional Piping Removal. If stained soils are encountered during removal of additional piping related to the former underground storage tanks (USTs), the stained soils will be sampled and analyzed for the seventeen CAM metals listed above. If no stained soils are encountered during pipeline removal, the verification samples collected along the length of the pipeline will be analyzed by EPA Methods 8010 and 8020. Our April 6, 1990 work plan proposed only analysis by EPA Method 8240.

Rail Spur Area. Our work plan proposed collecting one soil sample for analysis of purgeable priority pollutants by EPA Method 8240.

No additional samples will be collected from this area. However, the sample collected from the rail spur area will be analyzed for organics by EPA Methods 8010 and 8020 and for the seventeen CAM metals listed above.

Additional Well Installation. Our work plan did not contain provisions for sampling and analysis of soils encountered during borehole drilling and well installation. As requested, the work plan will now include collection of soil samples at 5-foot intervals above the water table during installation of the additional monitoring well. We estimate 3 soil samples will be retained for laboratory analysis by EPA Method 8010 and 8020.

These samples may also be analyzed for the seventeen CAM metals listed above. The metals analyses will be contingent upon the identification of stained soils up-gradient of the well location during removal of the additional piping. If stained soils are present up-gradient of the well location, the three soil samples collected from the borehole will be analyzed for CAM metals.

As stated in the April 6, 1990 work plan, should pigment-stained soils be encountered during removal of the additional piping (Figure 1), the stain location will be noted on a site map and the soils will be left in place. Sampling and analysis for metals, purgeable halocarbons, and purgeable aromatics will be performed as described above. Should pigment-stained soils be encountered, removal will not be undertaken due to the proximity of the area to the rail spurs and high traffic work areas (Figure 1). The extent of the stained soils, if present, will be unknown. Excavation in the area of the pipeline could

*Discolored
Soil Area
see Annex on
8/1/90*

Mr. Larry Seto
July 5, 1990
Page 3 of 3

require removal and replacement of the rail spurs, as well as disruption of work at the facility. In addition, the stained soils, if present, will be covered by relatively impermeable asphalt which will limit potential leaching of constituents into underlying soils and groundwater.

We are prepared to begin implementation of this amended work plan upon your approval. Please call should you have further questions or comments.

Very truly yours,

BROWN AND CALDWELL

A handwritten signature in cursive script that reads "Donna Courington". The signature is written in dark ink and is positioned above the typed name and title.

Donna L. Courington
Project Manager