



**ENVIRONMENTAL STRATEGIES CONSULTING LLC**

2025 Gateway Place, Suite 280 ▪ San Jose, CA 95110 ▪ (408) 453-6100 ▪ Fax (408) 453-0496

October 12, 2004

Mr. Bob Schultz  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577

Re: Results of Groundwater Samples Collected at Clearprint Paper Company,  
1482 67<sup>th</sup> Street, Emeryville, California

Dear Mr. Schultz:

Environmental Strategies Consulting LLC (Environmental Strategies) was retained by Proskauer Rose LLP to perform a supplemental groundwater investigation at the Clearprint Paper Company (Clearprint) facility in Emeryville, California. The supplemental investigation work was performed on September 28, 2004.

The supplemental investigation was conducted to identify the extent, if any, of contamination associated with releases from the former underground storage tanks (USTs) at the site and to determine whether upgradient sources of contamination have adversely affected environmental conditions at the Clearprint facility.

**Site Background**

Four former underground storage tanks were located under the sidewalk between the south side of the Clearprint building and 67th Street. Two of the tanks (one 8,000 gallon and one 1,000 gallon) were constructed of steel and were installed in approximately 1950-1951 and the other two tanks (one 10,000 steel and one 10,000 gallon fiberglass) were installed in approximately 1978-1979. The tanks contained solvents and mineral oil that were used to produce transparent paper products. Certain solvents, which may have contained very low percentages of benzene, toluene, and xylene, were used until August 1990. No solvents containing ethylbenzene were ever used at the facility and xylene was a constituent of solvents used until 1984.

As required by the DEH, three monitoring wells (MW-1, MW-2, and MW-3) were installed at the site in 1995. Monitoring well MW-1 was installed within ten feet of the downgradient former underground storage tank, based on the assumed direction of groundwater flow. Monitoring wells MW-2 and MW-3 were placed upgradient from the area of the former USTs to check for upgradient sources of contamination. Monitoring

well MW-2 was installed in the sidewalk adjacent to the Clearprint building and monitoring well MW-3 was installed in the 67<sup>th</sup> Street right-of-way.

### **Groundwater Sampling**

On September 28, 2004, Environmental Strategies collected groundwater samples from monitoring wells MW-1 and MW-2. Environmental Strategies was unable to locate monitoring well MW-3 previously located in the 67<sup>th</sup> Street right-of-way. The street has been re-paved since the monitoring well was installed in 1995 and it appears that the MW-3 well may have been destroyed.

During the September 28, 2004 sampling, depth to groundwater measurements were taken using an electronic sounding device calibrated against a steel engineers'-scale tape to 0.01 foot. Measuring points on the monitoring wells are indicated by a mark on each surveyed well. This information was used to determine the groundwater elevations at the site.

Before collecting groundwater samples from the monitoring wells, a minimum of three casing volumes of groundwater was removed from each well with a polyvinyl chloride bailer. During the purging of the wells, groundwater parameters (i.e., temperature, pH, and conductivity) were monitored for stabilization. The relative stability of these parameters indicates that representative groundwater from the aquifer has been obtained. These measurements, along with the depth to groundwater and purge volume information, were recorded on Environmental Strategies' water sampling forms. If less than three well volumes were removed due to insufficient recharge, the wells were sampled once depth to groundwater has recovered approximately 80 percent of initial depth to groundwater. Monitoring well MW-1 was purged to dryness and allowed to recover before samples were collected.

Once well purging activities were completed, Environmental Strategies collected groundwater samples using a new disposable bailer and nylon string for each well. The groundwater was decanted from the disposable bailer into laboratory supplied volatile organic analysis (VOA) vials equipped with Teflon<sup>TM</sup> septa and glass amber bottles. To avoid volatilization from the groundwater samples, no headspace was allowed within the VOA vials. After sample collection, the samples were placed on ice in a cooler. The samples were handled following proper chain-of-custody procedures and were sent via overnight courier to Centrum Analytical Laboratories, Inc., in Riverside, California. The groundwater samples were analyzed for total petroleum hydrocarbons quantified as gasoline and diesel and mineral oil (TPHg, TPHd, and mineral oil, respectively) by Environmental Protection Agency (EPA) method 8015, and benzene, toluene, ethylbenzene, and xylene (BTEX) using EPA method 8021.

### **Analytical Results**

Analytical results from groundwater samples collected from MW-1 and MW-2 on September 28, 2004 indicated TPHg, TPHd, mineral oil, and BTEX were not detected in monitoring well MW-2. Benzene and ethylbenzene were detected in MW-1 at

concentrations of 0.002 mg/L and 0.004 mg/L, respectively. The concentration of benzene detected in monitoring well MW-1 is slightly above the California maximum concentration level for drinking water of 0.001 mg/L. Ethylbenzene was detected in MW-1 at a concentration well below the California maximum concentration level of 0.300 mg/L. Analytical results are included as an attachment.

### **Conclusions**

Based on the absence of contaminants in monitoring well MW-2 and the low concentrations of benzene and ethylbenzene detected in monitoring well MW-1, Environmental Strategies does not recommend additional groundwater sampling at the Clearprint facility. Additionally, on behalf of Proskauer Rose LLP, Environmental Strategies is requesting that Alameda County Environmental Health grant the facility "No Further Action" status.

If you have any questions, please do not hesitate to contact myself or Betsy Mitton at 408-453-6100.

Sincerely yours,



Richard Freudenberger  
Senior Partner

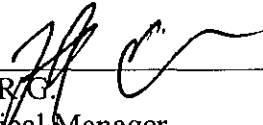
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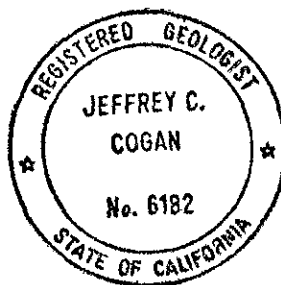
Enclosures

cc: Gail S. Port, Esquire, Proskauer Rose LLP

**Certification**

I certify under penalty of law that this document, Letter Re: Results of Groundwater Samples Collected at Clearprint Paper Company, 1482 67<sup>th</sup> Street, Emeryville, California, dated October 12, 2004, and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the facility, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

  
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Jeff Cogan, R/G.  
Title: Technical Manager  
Environmental Strategies Consulting LLC





**Centrum  
Analytical  
Laboratories, Inc.**

CERTIFIED HAZARDOUS WASTE TESTING MOBILE & IN HOUSE LABORATORIES

Client: Environmental Strategies  
2025 Gateway Place, Ste. 280  
San Jose, CA 95110

Date Sampled: 09/28/04  
Date Received: 09/28/04  
Job Number: 25119

Project: Clearprint 1482 67th St., Emeryville

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**CASE NARRATIVE**

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The following information applies to samples which were received on 09/28/04 :

The samples were received at the laboratory chilled and sample containers were intact.

Unless otherwise noted below, the Quality Control acceptance criteria were met for all samples for every analysis requested. The date of issue for this report is 10/04/04.

Report approved by:

Tom Wilson  
Laboratory Director

ELAP Lab# 2419, 2479, 2527, 2373, 2562

RL: Reporting Limit -- The lowest level at which the compound can be reliably detected under normal laboratory conditions.

ND: Not Detected -- The compound was analyzed for, but was not found to be present at or above the Reporting Limit.

NA: Not Analyzed -- This compound was not on the list of compounds requested for analysis.



### Fuel Screen by GC/FID

Client:	Environmental Strategies	Date Sampled:	09/28/04
Project:	Clearprint 1482 67th St , Emeryville	Date Received:	09/28/04
Job No.:	25119	Date Extracted:	09/29/04
Matrix:	Water	Date Analyzed:	09/29/04
Analyst:	JB	Batch Number:	8015DW3292

<b>Fuel Identified:</b>	<b>Diesel</b>	<b>Mineral Oil</b>	<b>Extractable Hydrocarbons</b>	<b>Reporting Limits</b>
<b>Units:</b>	mg/L	mg/L	mg/L	mg/L
Method Blank	ND	ND	ND	0.40
MW-1	ND	ND	ND	0.40
MW-2	ND	ND	ND	0.40



### QC Sample Report - Fuel Screen by GC/FID

Matrix: Water

Batch number: 8015DW3292

#### Batch Accuracy Results

Spike Sample ID: Laboratory Control Sample

Compound	Spike Concentration (mg/L)	Spike Sample % Recovery	% Recovery Acceptance Limits	Pass/Fail
Diesel	3.2	95	70 - 130	<b>Pass</b>

Analytical Notes:

#### Batch Precision Results

MS/MSD Sample ID: Laboratory Control Sample

Compound	MS Sample Result (mg/L)	MSD Sample Result (mg/L)	Relative Percent Difference (RPD)	RPD Acceptance Limit	Pass/Fail
Diesel	3.03	3.07	1%	25%	<b>Pass</b>

Analytical Notes:

MS: Matrix Spike

LCS: Laboratory Control Sample

MSD: Matrix Spike Duplicate

LCSD: Laboratory Control Sample Duplicate



### Volatile Hydrocarbons as Gasoline by mod. EPA 8015B

Client: Environmental Strategies  
Project: Clearprint 1482 67th St., Emeryville  
Job No.: 25119  
Matrix: Water  
Analyst: RV

Date Sampled: 09/28/04  
Date Received: 09/28/04  
Date Analyzed: 09/29/04  
Batch Number: SH2GASW204

Sample ID	Reporting Limit mg/L	Volatile Hydrocarbons as Gasoline mg/L
Method Blank	0.50	ND
MW-1	0.50	ND
MW-2	0.50	ND





**QC Sample Report - Volatile Hydrocarbons as Gasoline by mod. EPA 8015B**

Matrix: Water

Batch Number: SH2GASW204

**Batch Accuracy Results**

Spike Sample ID: Laboratory Control Sample

Analytical Notes:

Compound	Spike Concentration (mg/L)	Spike Sample % Recovery	% Recovery Acceptance Limits	Pass/Fail
Gasoline	5.0	89	70 - 130	<b>Pass</b>

**Batch Precision Results**

MS/MSD Sample ID: MW-2

Analytical Notes:

Compound	MS Sample Result (mg/L)	MSD Sample Result (mg/L)	Relative Percent Difference (RPD)	RPD Acceptance Limit	Pass/Fail
Gasoline	4.20	3.97	6%	25%	<b>Pass</b>

MS: Matrix Spike

LCS: Laboratory Control Sample

MSD: Matrix Spike Duplicate

LCSD: Laboratory Control Sample Duplicate



**BTEX by EPA 8021B**

Client: Environmental Strategies      Date Sampled: 09/28/04  
Project: Clearprint 1482 67th St., Emeryville      Date Received: 09/28/04  
Job No.: 25119      Date Analyzed: 09/29/04  
Matrix: Water      Batch Number: SH28021W204  
Analyst: RV

	<b>Benzene</b>	<b>Toluene</b>	<b>Ethyl Benzene</b>	<b>Total Xylenes</b>	<b>Surrogate (BFB)</b>
<b>Reporting Limit:</b>	0.001	0.001	0.001	0.003	Limit: >50%
<b>Sample ID</b>	mg/L	mg/L	mg/L	mg/L	
<b>Method Blank</b>	ND	ND	ND	ND	109 %
<b>MW-1</b>	<b>0.002</b>	ND	<b>0.004</b>	ND	115 %
<b>MW-2</b>	ND	ND	ND	ND	108 %



**QC Sample Report - BTEX by EPA 8021B**

Matrix: Water

Batch Number: SH28021W204

**Batch Accuracy Results**

Sample ID: Laboratory Control Sample

Compound	Spike Concentration (mg/L)	% Recovery	% Recovery Acceptance Limits	Pass/Fail
Benzene	0.020	96	70 - 130	Pass
Toluene	0.020	96	70 - 130	Pass
Ethylbenzene	0.020	98	70 - 130	Pass
m,p-Xylenes	0.040	88	70 - 130	Pass
o-Xylene	0.020	76	70 - 130	Pass

Analytical Notes:

**Batch Precision Results**

MS/MSD Sample ID: Laboratory Control Sample

Compound	MS Sample Result (µg/L)	MSD Sample Result (µg/L)	Relative Percent Difference (RPD)	RPD Acceptance Limit	Pass/Fail
Benzene	19.25	20.78	8%	25%	Pass
Toluene	19.11	20.32	6%	25%	Pass
Ethylbenzene	19.67	21.29	8%	25%	Pass
m,p-Xylenes	35.38	37.79	7%	25%	Pass
o-Xylene	15.10	16.50	9%	25%	Pass

Analytical Notes:

MS: Matrix Spike

MSD: Matrix Spike Duplicate

LCS: Laboratory Control Sample

LCSD: Laboratory Control Sample Duplicate

