



# Printpack inc.

4335 WENDELL DRIVE, S.W. / P.O. BOX 43687 / ATLANTA, GA 30336  
PHONE 404-691-5830

202468

E.H.DIR.OFF.AUG23/07PM 3:31IN

**CERTIFIED MAIL 7003 1680 0004 8763 1516  
RETURN RECEIPT REQUESTED**

August 17, 2007

Mr. Ariu Levi  
Environmental Health Services  
Environmental Protection  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577

RE: SLIC Case File #RO0002468  
Global ID# T06019771096  
James River Corporation  
2101 Williams Street  
San Leandro, CA

Dear Mr. Levi:

Printpack, Inc. received your July 19, 2007 letter that requested payment of \$6,000.00 for oversight fees associated with the above referenced SLIC site. Printpack sold the above referenced property to 2101 Williams Associates LLC in 1998. Therefore, Printpack does not believe it has responsibility for costs associated with any monitoring program the county is entertaining. The appropriate property owner contact is:

Mr. Don Jones  
Donald L. Jones Company  
2081 Adams Avenue  
San Leandro, California 94577

I may be contacted at 404-691-5830, Ext 17413 if additional clarification is needed concerning Printpack and this matter.

Sincerely,

Todd Wiederhold, Manager  
Corporate Environmental Affairs

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

July 19, 2007

Mr. Doug Cook  
PaintPack Inc.  
4335 Wendell Drive, SW  
Atlanta, GA 30336

2101 Williams Associates LLC  
2101 Williams Street  
San Leandro, CA 94577-3224

Subject: Spills, Leaks, Investigations and Cleanup (SLIC) case file #RO0002468 (Global ID # T06019771096), James River Corporation, 2101 Williams Street, San Leandro, CA

Dear Mr. Cook:

The above-referenced site is a Spills, Leaks, Investigations, and Cleanup (SLIC) case due to the presence of soil and groundwater contamination detected at your property. Alameda County Environmental Health is the agency providing regulatory oversight for this case. In order for Alameda County Environmental Health (ACEH) to review SLIC cases, we require an oversight account to cover our costs. Please send a check in the amount of \$6,000.00 payable to Alameda County Environmental Health. Please send your check to the attention of our Finance Department.

This additional deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$166.00 per hour.

Please write "SLIC" (the type of project), the site address, and the number AR0305970 on your check.

If you have any questions, please contact Steven Plunkett at (510) 383-1767.

Sincerely,

  
Ariu Devi  
Division Chief

cc: D. Drogos, S. Plunkett, File

## Chu, Eva, Env. Health

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**From:** Doug Cook[SMTP:DCOOK@printpack.com]  
**Sent:** May 10, 2001 7:49 AM  
**To:** EChu@co.alameda.ca.us  
**Cc:** jstokes@alston.com; gfranchini@printpack.com; MHEMBREE@printpack.com; THARPER@printpack.com  
**Subject:** Re: 2101 Williams, San Leandro, CA

Hello Eva,

I've been on the road and otherwise inundated with work. I apologize for not getting back to you sooner.

Printpack committed last year to performing short term ground water monitoring at the Donald L. Jones Company's Williams Street property. We have completed two rounds of sampling to date. We will be sending you the results of the second event within two weeks along with modeling results that persuasively demonstrate that the chlorinated plume under the property is from an off site source.

As you know, Printpack bought the Williams Street property from the James River Corporation as part of a larger acquisition. Printpack immediately shut down the site and ultimately sold it to The Donald L. Jones Company for redevelopment.

During Printpack's relatively short tenure as the owner of the property, it did not release any contaminant to the soil or groundwater. The property now belongs to The Donald L. Jones Company. I believe that Mr. Jones is the appropriate person to petition for any funding that might be needed in overseeing this or other monitoring at the Williams Street property.

Printpack has embarked on the \$30,000 monitoring program requested by Alameda County plus a \$10,000 modeling effort to prove its long standing contention that the Chlorinated plume came from off site. However, Printpack cannot commit to further expenditures.

Douglas Cook, Director  
Environmental Affairs  
PRINTPACK, INC.  
4335 Wendell Drive, S.W.  
Atlanta, Georgia 30336-1622  
404-691-5830, ext. 17431

>>> "Chu, Eva, Env. Health" <EChu@co.alameda.ca.us> 05/03 2:50 PM >>>  
Hi Doug,

I haven't received word from you on whether additional money will be submitted to bring Printpack's account back into the black. If money is not received, I will not be able to continue to work the case. I am considering giving the case to Roger Brewer, at the SF-RWQCB, since he is overseeing the adjacent property. And I will send your account to our collections department. I hope to hear from you before I do that.

evachu

Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
(510) 567-6762  
(510) 337-9335 fax

## **Chu, Eva, Env. Health**

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**From:** Chu, Eva, Env. Health  
**Sent:** May 03, 2001 11:50 AM  
**To:** 'Cook, Doug'  
**Subject:** 2101 Williams, San Leandro, CA

Hi Doug,

I haven't received word from you on whether additional money will be submitted to bring Printpack's account back into the black. If money is not received, I will not be able to continue to work the case. I am considering giving the case to Roger Brewer, at the SF-RWQCB, since he is overseeing the adjacent property. And I will send your account to our collections department. I hope to hear from you before I do that.

*evachu*

Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
(510) 567-6762  
(510) 337-9335 fax

## Chu, Eva, Env. Health

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**From:** theshaw@attglobal.net[SMTP:theshaw@attglobal.net]  
**Reply To:** theshaw@attglobal.net  
**Sent:** April 12, 2001 9:40 AM  
**To:** Chu, Eva, Env. Health  
**Subject:** Re: 2101 Williams - Thanks

eva,

My Utah Mailing Address is:

Ed Shaw/ESCM  
P.O. Box 387  
Monroe, UT 84754

I will have my report out in the next two weeks.

I talked to Doug Cook about their account with you. He said that when Printpack took over from James River that your office started billing Printpack even though James River was still the responsible party. He told me that he thought the same ought to apply since Don Jones purchased the property. I do not know what to offer on it otherwise - I will probably try to duck on this one for the time being.

Thanks,

Ed.

"Chu, Eva, Env. Health" wrote:

- > Hi Ed,
- >
- > I just spoke with Roger Brewer at the RWQCB and he says you and the
- > consultant for the former Watkins Terminal will swap groundwater data so
- > both sets of groundwater data will be plotted on one site plan to evaluate
- > plume characteristics and concentrations. That's great.
- >
- > Please send your mailing address so I can send you a copy of the Watins
- > Terminal March 27, 2001 sampling event report, unless you already have a
- > copy.
- >
- > I have not been able to get word from Doug Cook if money will be sent for us
- > to continue with environmental oversight. Do you have any ideas?
- >
- > evachu
- >
- > Alameda County Environmental Health
- > 1131 Harbor Bay Parkway
- > Alameda, CA 94502
- > (510) 567-6762
- > (510) 337-9335 fax

## **Chu, Eva, Public Health, EHS**

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**From:** Chu, Eva, Public Health, EHS  
**Sent:** March 01, 2001 5:06 PM  
**To:** 'Cook, Doug'  
**Subject:** 2101 Williams Street, San Leandro, CA

Hi Doug,

On November 15, 2000, I requested additional money to replenish your account (see attachment). To date this office have not received the money requested. Please give me an update on when we may expect the check.



prntpack-7.doc

*evachu*

Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
(510) 567-6762  
(510) 337-9335 fax

## **Chu, Eva, Public Health, EHS**

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**From:** Chu, Eva, Public Health, EHS  
**Sent:** February 06, 2001 2:31 PM  
**To:** 'Shaw, Ed'  
**Cc:** 'Cook, Doug'  
**Subject:** 2101 Williams Street, San Leandro, CA

Hi Ed,

I received and reviewed the Environmental Report prepared for the former Printpack property. It was not clear whether you collected product from TW-1 for laboratory analysis, or you collected groundwater (after free product removal) from the well for analysis. Please clarify. I couldn't decipher from the chain of custody form if the sample time for TW-1 was 11:45 or 13:45. That would have told me if it was product or groundwater.

For the sampling event in March 2001, please collect groundwater from the same wells as in December 2000 for HVOCs. I'll try to get the Watkins Terminal property to sample at about the same time.

*evachu*

Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
(510) 567-6762  
(510) 337-9335 fax

## **Chu, Eva, Public Health, EHS**

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**From:** Chu, Eva, Public Health, EHS  
**Sent:** December 20, 2000 9:44 AM  
**To:** 'Doug Cook'  
**Cc:** 'Ed Shaw'; 'Roger Brewer'  
**Subject:** 2101 Williams, San Leandro, CA

Hi Doug,

I met with Ed at the site this morning to confirm the existence of the groundwater monitoring wells to be sampled. All wells were evident. Ed will need to install locking caps and new well heads, as necessary. Well TW-1 was checked for free product. Approximately 10 inches of product was noted. Ed will collect a sample of the product to confirm if it is hydraulic fluid. He will also conduct monthly product removal until product level is reduced to a sheen. The other wells, TW-2, TW-3, W-5, W-7, W-8, and W-10 will be sampled for chlorinated solvents using EPA Method 8260. A detail report summarizing field activities is required 60 days upon completion of field work.

Quarterly monitoring at the site should continue until further notice. I expect that the next sampling event will be conducted at the approximate same time when Watkins Terminal's wells are sampled.

If you have any questions, please call or email.

p.s. Have you sent money to replenish your account?

*evachu*

Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
(510) 567-6762  
(510) 337-9335 fax



## **Chu, Eva, Public Health, EHS**

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**From:** Chu, Eva, Public Health, EHS  
**Sent:** December 05, 2000 1:49 PM  
**To:** 'dcook@printpack.com'  
**Cc:** 'theshaw@attglobal.net'  
**Subject:** 2101 Williams Street, San Leandro, CA

Doug,

Per our teleconference today, an extension to January 15, 2001 is granted to reinstate quarterly groundwater monitoring/sampling at the subject site. Please provide 72 hours advance notice prior of field activities. Thanks.

*evachu*

Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
(510) 567-6762  
(510) 337-9335 fax

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

StID 1008

November 15, 2000

Mr. Doug Cook  
Printpack Inc  
4335 Wendell Dr SW  
Atlanta, GA 30336

**NOTICE OF VIOLATION**

Dear Mr. Cook:

On March 7, 2000, the Alameda County Department of Environmental Health, Hazardous Materials Division, sent you a letter (see attachment) requesting that groundwater monitoring be re-instated at **2101 Williams Street, San Leandro, CA**. Groundwater from Wells W-5, W-7 through W-10, TW-1, TW-2, and TW-3 was to be analyzed for chlorinated solvents. As of the date of this letter, however, we have not received any quarterly monitoring reports demonstrating that groundwater monitoring was re-instated. Therefore, this letter constitutes a **Notice of Violation** that you are in violation of specific laws and that the technical report is due.

Failure to furnish technical reports regarding documented or potential groundwater contamination violates Section 13267(b) of the California Water Code. The Regional Water Quality Control Board (RWQCB) can impose civil penalties of up to \$1,000 per day that such a violation continues.

You are required to re-instate quarterly monitoring for the site **within 30 days** of the date of this letter. Quarterly monitoring reports are due within 60 days upon completion of field activities. **Failure to respond will result in referral of this case to the RWQCB to consider for enforcement action. Modification of required tasks or extensions of stated deadlines must be confirmed in writing by either this agency or the RWQCB.**

If you have any questions, I can be reached at (510) 567-6762.

eva chu  
Hazardous Materials Specialist

attachment

c: Mike Bakaldin, San Leandro Fire Department (QIC Code 41401) (w/o)  
email: Roger Brewer

prntpack-8

12/20/00 Onsite visit w/ Ed Shaw + Dan Jones. All wells to be sampled were evident at site. TW-1 had ~10" of FP (HF) Ed will bail @ once/month. Locking caps + new well heads will be installed where necessary. Wells will be sampled for HVOCs (8260)

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL PROTECTION  
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FAX (510) 337-9335

StID 1008

November 15, 2000

Mr. Doug Cook  
Printpack Inc  
4335 Wendell Dr SW  
Atlanta, GA 30336

RE: **Project #652C, Add-on  
at 2101 Williams Street, San Leandro, CA 94601**

Dear Mr. Cook:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. The account is currently in a negative balance of -\$850.00. To replenish the account, please submit an additional deposit of \$3000.00, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested, or any unused monies will be refunded to you or your designee.

The deposit/refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$105 per hour.

Please be sure to write the following identifying information on your check:

project #652C/ Stid #1008  
type of project (site mitigation, add-on), and  
site address (2101 Williams St, San Leandro, CA)

If you have any questions, please contact me at (510) 567-6762.

eva chu  
Hazardous Materials Specialist

\*\*\*\*\* Alameda County Department of Environmental Health \*\*\*\*\*  
 Deposit/Refund Account History

\*\* PROJECT INFORMATION \*\*

Project#: ---652C Date Open: 08/26/1997 Date Closed:

Payor Information:

Site Information:

-----  
 PRINTPACK, INC.  
 4335 WINDELL DRIVE S.W.  
 ATLANTA GA 30336

-----  
 Flexible Packing Division  
 2101 Williams St.  
 San Leandro CA 94577

\*\* DEPOSIT HISTORY \*\*

Deposit Date	Receipt#	Amount Received
-----	-----	-----
08/26/1997	796450	\$ 4,000.00
12/23/1997	804909	\$ 1,000.00
		-----
		\$ 5,000.00

\*\* WORKLOG HISTORY \*\*

Work Date	Insp	Activity Description / Time Spent (hrs)	Amount Charged
-----	-----	-----	-----
08/16/1997	tp	Review Plans/Reports	1.9 178.6
08/26/1997	adm	administrative charge	1. 94.0
09/18/1997	tp	Review Plans/Reports	0.3 28.2
10/06/1997	TP	Review Plans/Reports	0.4 37.6
10/07/1997	ML	Review Plans/Reports	3. 282.0
12/10/1997	ML	Review Plans/Reports	2. 188.0
12/11/1997	ML	Review Plans/Reports	2. 188.0
12/18/1997	EC	Review Plans/Reports	1.5 141.0
12/22/1997	EC	Review Plans/Reports	1. 94.0
12/23/1997	ML	Review Plans/Reports	0.5 47.0
12/23/1997	EC	Review Plans/Reports	4.5 423.0
12/24/1997	ML	Review Plans/Reports	0.5 47.0
12/29/1997	EC	Review Plans/Reports	0.3 28.2
02/06/1998	EC	Meetings, Consultations	0.2 18.8
02/10/1998	EC	Meetings, Consultations	0.4 37.6
02/11/1998	EC	Meetings, Consultations	2. 188.0
02/19/1998	EC	Meetings, Consultations	0.5 47.0
03/02/1998	EC	Meetings, Consultations	2. 188.0
03/13/1998	EC	Meetings, Consultations	0.2 18.8
04/21/1998	EC	Meetings, Consultations	0.6 56.4
04/23/1998	EC	Meetings, Consultations	1.5 141.0
04/24/1998	EC	Meetings, Consultations	0.5 47.0
06/12/1998	EC	Meetings, Consultations	0.3 28.2

ENVIRONMENTAL HEALTH  
 ADMINISTRATION  
 00 NOV 15 AM 10:11

06/22/1998	EC	Meetings, Consultations	1.2	112.8
06/24/1998	EC	Meetings, Consultations	1.	94.0
06/26/1998	EC	Meetings, Consultations	0.3	28.2
06/29/1998	EC	Meetings, Consultations	0.8	75.2
07/01/1998	EC	Investigation On-Site	3.5	350.0
01/06/1999	EC	Meetings, Consultations	0.3	30.0
04/14/1999	ec	Meetings, Consultations	0.3	30.0
04/14/1999	ec	Meetings, Consultations	0.3	30.0
08/10/1999	ec	Meetings, Consultations	0.4	40.0
01/05/2000	EC	Transfer payment to 652B	0.	201.2
04/21/2000	ec	Meetings, Consultations	0.3	30.0
05/01/2000	ec	Meetings, Consultations	0.4	40.0
				3,608.80
			\$	3,608.80

Balance: \$ 1,391.20 Amount Refunded: \$

Project 652C

\$ 1311.20 Balance

Additional charges not debited as of 11/15/00

13.8 hours @ 100/hour = \$ 1380.00

7.4 hours @ 105/hour = 777.00

- 2157.00

1311.20

- 845.80

- < \$845.80 >

balance as of 11/15/00

Need more money letter.

ENVIRONMENTAL HEALTH  
 ADMINISTRATION  
 00 NOV 15 AM 10:11

\*\*\*\*\* Alameda County Department of Environmental Health \*\*\*\*\*  
 Deposit/Refund Account History

\*\* PROJECT INFORMATION \*\*

Project#: ---652B Date Open: 08/08/1989 Date Closed: 01/28/2000

Payor Information:

Site Information:

-----  
 JAMES RIVER CORPORATION  
 1 BETTER WAY ROAD  
 MILFORD OH 45150

-----  
 Flexible Packing Division  
 2101 Williams St.  
 San Leandro CA 94577

\*\* DEPOSIT HISTORY \*\*

Deposit Date	Receipt#	Amount Received
-----	-----	-----
08/08/1989	552852	\$ 480.00
09/14/1990	577044	\$ 558.00
12/17/1993	725501	\$ 1,200.00
12/19/1995	768129	\$ 1,000.00
		-----
		\$ 3,238.00

\*\* WORKLOG HISTORY \*\*

Work Date	Insp	Activity Description / Time Spent (hrs)	Amount Charged
-----	-----	-----	-----
08/29/1989		plan review 1.2 hr \$\$56/hr	67.2
08/30/1989		consultation/letter 1.2 hr \$\$56/hr	67.2
09/25/1989		report/letter 1 hr \$\$56/hr	56.0
10/05/1989		report/letter 1 hr \$\$56/hr	56.0
03/01/1990		meeting	1.5 90.0
03/22/1990		Letter	0.5 30.0
05/11/1990		Plan review	1.5 90.0
08/01/1990	LS	Review Plans/Reports	1.5 84.0
08/02/1990		review report	2. 120.0
09/14/1990	adm	ADMINISTRATIVE CHARGE	1. 60.0
09/26/1990		review 9/11,18/90 report	1. 60.0
09/26/1990		review report	1. 60.0
09/26/1990	adm	delete dupl.charge	- 60.0
09/27/1990		Consultation	0.25 15.0
09/27/1990	adm	delete dupl.charge	- 15.0
09/27/1990		consult w/consultant	0.25 15.0
12/04/1990		report review/lab result	0.75 45.0
03/20/1991		report review	0.5 33.5
06/04/1991	LS	Review Plans/Reports	0.75 50.2
06/04/1991	LS	Write Letters	0.5 33.5
09/11/1991		report review	1. 67.0

04/08/1992	RW	Write Letters	0.5	35.5
10/06/1992	LS	Meetings, Consultations	0.5	35.5
10/06/1992	LS	Review Plans/Reports	1.5	106.5
10/06/1992	RW	Investigation in Office	1.	71.0
10/07/1992	RW	Review Plans/Reports	0.5	35.5
10/20/1992		review file/mmet w/W.G.	2.	142.0
11/04/1992	LS	Review Plans/Reports	0.5	35.5
11/04/1992	RW	Meetings, Consultations	0.5	35.5
11/13/1992	RW	Review Plans/Reports	1.	71.0
11/13/1992	LS	Meetings, Consultations	1.	71.0
11/23/1992		review files	2.	142.0
12/02/1992		meet w/Walter	2.	142.0
12/14/1992		letter re:meeting	1.5	106.5
06/14/1993		review quarterly report	1.	75.0
06/16/1993		call w/Todd Miller	0.75	56.2
09/16/1993		letter re:Feb.report	1.5	112.5
10/12/1993		meet w/Walter,consultant	1.	75.0
02/01/1994	ML	Review Plans/Reports	0.5	37.5
02/03/1994	ML	Meetings, Consultations	1.	75.0
02/04/1994	ML	Meetings, Consultations	0.5	37.5
02/24/1994	ML	Review Plans/Reports	1.5	112.5
08/31/1995	DK	Review Plans/Reports	1.5	135.0
09/01/1995	DK	Review Plans/Reports	3.7	333.0
09/05/1995	DK	Review Plans/Reports	0.7	63.0
09/26/1995	DK	Review Plans/Reports	0.8	72.0
10/10/1995	DK	Write Letters	0.8	72.0
11/22/1995	DK	Write Letters	0.5	45.0
11/22/1995	DK	Review Plans/Reports	1.5	135.0
11/27/1995	DK	Write Letters	0.3	27.0
11/28/1995	DK	Write Letters	1.	90.0
11/28/1995	DK	Review Plans/Reports	0.5	45.0
11/29/1995	DK	Write Letters	1.1	99.0
11/30/1995	DK	Write Letters	0.2	18.0

\*\* WORKLOG HISTORY \*\*

Work Date	Insp	Activity Description / Time Spent (hrs)	Amount Charged
11/30/1995	DK	Review Plans/Reports	0.2 18.0
02/05/1996	DK	Review Plans/Reports	0.4 36.0
02/06/1996	DK	Review Plans/Reports	0.5 45.0
02/15/1996	DK	Meetings, Consultations	0.1 9.0
02/26/1996	DK	Review Plans/Reports	0.8 72.0
02/27/1996	DK	Review Plans/Reports	2.7 243.0
02/28/1996	DK	Review Plans/Reports	0.3 27.0
02/29/1996	DK	Review Plans/Reports	0.1 9.0
03/18/1996	DK	Review Plans/Reports	0.1 9.0
03/21/1996	DK	Review Plans/Reports	0.1 9.0
04/02/1996	DK	Review Plans/Reports	0.1 9.0
04/03/1996	DK	Review Plans/Reports	0.2 18.0
05/14/1996	DK	Meetings, Consultations	0.2 18.0
07/01/1996	DK	Review Plans/Reports	0.4 37.6
07/09/1996	DK	Review Plans/Reports	1. 94.0
08/13/1996	DK	Review Plans/Reports	0.5 47.0
08/13/1996	DK	Meetings, Consultations	0.1 9.4
08/14/1996	DK	Review Plans/Reports	3.7 347.8
08/15/1996	DK	Review Plans/Reports	0.9 84.6
08/16/1996	DK	Review Plans/Reports	1.2 112.8
08/19/1996	DK	Write Letters	1.3 122.2
08/20/1996	DK	Write Letters	0.4 37.6
10/10/1996	DK	Meetings, Consultations	0.2 18.8
10/21/1996	DK	Review Plans/Reports	2.9 272.6
10/23/1996	DK	Write Letters	0.4 37.6
10/30/1996	DK	Review Plans/Reports	0.3 28.2
10/30/1996	DK	Meetings, Consultations	0.3 28.2
12/03/1996	DK	Review Plans/Reports	0.1 9.4
12/05/1996	DK	Meetings, Consultations	1.6 150.4
12/05/1996	DK	Review Plans/Reports	2.7 253.8
12/05/1996	DK	Initial Site Visit	1. 94.0
01/06/1997	DK	Review Plans/Reports	0.4 37.6
01/13/1997	DK	Review Plans/Reports	0.2 18.8
07/01/1997	BC	Initial Site Visit	0.8 75.2
07/01/1997	BC	Meetings, Consultations	0.3 28.2
07/11/1997	BC	Meetings, Consultations	0.4 37.6
08/10/1998	EC	Meetings, Consultations	1.2 120.0
01/05/2000	EC	Payment from 652D	0. - 3,036.8
01/05/2000	EC	Payment from 652c	0. - 201.2
01/05/2000	adm	Fee adjustment	0. 81.2
01/05/2000	EC	Project Ended/Refund request	0. 0.0
05/08/2000	ec	Meetings, Consultations	0.4 40.0
05/12/2000	ec	Meetings, Consultations	0.4 40.0
			-----
			\$ 3,318.00

Balance: \$           - 80.00           Amount Refunded: \$ 0.00

*Project 652B*

*11/15/00  
 } Need transfer  
 this to project  
 then close out  
 project B  
 Swach*



Printed: 10/31/2000

\*\*\*\*\* Alameda County Department of Environmental Health \*\*\*\*\*  
Deposit/Refund Account History

\*\* PROJECT INFORMATION \*\*

Project#: ---652D Date Open: 08/20/1998 Date Closed: 01/28/2000

Payor Information:

Site Information:

-----  
FORT JAMES CORP.  
2101 WILLIAMS STREET  
SAN LEANDRO CA 94577

-----  
Flexible Packing Division  
2101 Williams St.  
San Leandro CA 94577

\*\* DEPOSIT HISTORY \*\*

Deposit Date	Receipt#	Amount Received
-----	-----	-----
08/20/1998	806320	\$ 3,036.80
		-----
		\$ 3,036.80

\*\* WORKLOG HISTORY \*\*

Work Date	Insp	Activity Description / Time Spent (hrs)	Amount Charged
-----	-----	-----	-----
01/05/2000	EC	Transfer money to 652B	1. 3,036.8
01/05/2000	EC	Project Ended/Refund request	0. 0.0
			-----
			\$ 3,036.80
			-----
		Balance:\$ 0.00	Amount Refunded: \$ 0.00



Printed: \*\*\*\*\*

\*\*\*\*\* Alameda County Department of Environmental Health \*\*\*\*\*  
BILLING's WORKLOG: Total Deposit/Refund History for All Accounts at Site  
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\*\* SITE INFORMATION \*\*

Site#: 652 -- StID: 1008 Flexible Packing Division  
Date Open: \*\*\*\*\* 2101 Williams St.  
Date Closed: San Leandro CA 94577

\*\* PAYOR INFORMATION \*\*

- > Project # ---652B for Payor # 407 JAMES RIVER CORPORATION  
1 BETTER WAY ROAD  
MILFORD OH 45150
- > Project # ---652C for Payor # 1066 PRINTPACK, INC.  
4335 WINDELL DRIVE S.W.  
ATLANTA GA 30336
- > Project # ---652D for Payor # 1131 FORT JAMES CORP.  
2101 WILLIAMS STREET  
SAN LEANDRO CA 94577

\*\* DEPOSIT HISTORY \*\*

| Proj#   | Deposit Date | Receipt# | Amount Received |
|---------|--------------|----------|-----------------|
| ---     | -----        | -----    | -----           |
| ---652b | *****        | 552852   | \$ 480.00       |
| ---652b | *****        | 577044   | \$ 558.00       |
| ---652b | *****        | 725501   | \$ 1,200.00     |
| ---652b | *****        | 768129   | \$ 1,000.00     |
|         |              |          | =====           |
|         |              |          | \$ 3,238.00 B   |
| ---652C | *****        | 796450   | \$ 4,000.00     |
| ---652C | *****        | 804909   | \$ 1,000.00     |
|         |              |          | =====           |
|         |              |          | \$ 5,000.00 C   |
| ---652D | *****        | 806320   | \$ 3,036.80     |
|         |              |          | =====           |
|         |              |          | \$ 3,036.80 D   |

\*\* WORKLOG HISTORY \*\*

Total \$ 11,274.80  
B,C,D

| Proj#   | Work Date | Activity Description           | Insp  | Time (hrs) | Amount Charged |
|---------|-----------|--------------------------------|-------|------------|----------------|
| ---     | -----     | -----                          | ----- | -----      | -----          |
| ---652b | *****     | plan review 1.2 hr<br>@\$56/hr |       |            | \$67.20        |

|         |       |                                        |     |      |          |
|---------|-------|----------------------------------------|-----|------|----------|
| ---652b | ***** | consultation/letter 1.2<br>hr @\$56/hr |     |      | \$67.20  |
| ---652b | ***** | report/letter 1 hr<br>@\$56/hr         |     |      | \$56.00  |
| ---652b | ***** | report/letter 1 hr<br>@\$56/hr         |     |      | \$56.00  |
| ---652b | ***** | meeting                                |     | 1.5  | \$90.00  |
| ---652b | ***** | Letter                                 |     | 0.5  | \$30.00  |
| ---652b | ***** | Plan review                            |     | 1.5  | \$90.00  |
| ---652B | ***** | Review Plans/Reports                   | LS  | 1.5  | \$84.00  |
| ---652b | ***** | review report                          |     | 2.   | \$120.00 |
| ---652b | ***** | ADMINISTRATIVE CHARGE                  | adm | 1.   | \$60.00  |
| ---652b | ***** | review 9/11,18/90 report               |     | 1.   | \$60.00  |
| ---652b | ***** | review report                          |     | 1.   | \$60.00  |
| ---652b | ***** | delete dupl.charge                     | adm |      | -\$60.00 |
| ---652b | ***** | Consultation                           |     | 0.25 | \$15.00  |
| ---652b | ***** | delete dupl.charge                     | adm |      | -\$15.00 |
| ---652b | ***** | consult w/consultant                   |     | 0.25 | \$15.00  |
| ---652b | ***** | report review/lab result               |     | 0.75 | \$45.00  |
| ---652b | ***** | report review                          |     | 0.5  | \$33.50  |
| ---652B | ***** | Review Plans/Reports                   | LS  | 0.75 | \$50.25  |
| ---652B | ***** | Write Letters                          | LS  | 0.5  | \$33.50  |
| ---652b | ***** | report review                          |     | 1.   | \$67.00  |
| ---652B | ***** | Write Letters                          | RW  | 0.5  | \$35.50  |
| ---652B | ***** | Meetings, Consultations                | LS  | 0.5  | \$35.50  |

\*\* WORKLOG HISTORY \*\*

|         |       |                           |    |      |          |
|---------|-------|---------------------------|----|------|----------|
| ---652B | ***** | Review Plans/Reports      | LS | 1.5  | \$106.50 |
| ---652B | ***** | Investigation in Office   | RW | 1.   | \$71.00  |
| ---652B | ***** | Review Plans/Reports      | RW | 0.5  | \$35.50  |
| ---652b | ***** | review file/mmet w/W.G.   |    | 2.   | \$142.00 |
| ---652B | ***** | Review Plans/Reports      | LS | 0.5  | \$35.50  |
| ---652B | ***** | Meetings, Consultations   | RW | 0.5  | \$35.50  |
| ---652B | ***** | Review Plans/Reports      | RW | 1.   | \$71.00  |
| ---652B | ***** | Meetings, Consultations   | LS | 1.   | \$71.00  |
| ---652b | ***** | review files              |    | 2.   | \$142.00 |
| ---652b | ***** | meet w/Walter             |    | 2.   | \$142.00 |
| ---652b | ***** | letter re:meeting         |    | 1.5  | \$106.50 |
| ---652b | ***** | review quarterly report   |    | 1.   | \$75.00  |
| ---652b | ***** | call w/Todd Miller        |    | 0.75 | \$56.25  |
| ---652b | ***** | letter re:Feb.report      |    | 1.5  | \$112.50 |
| ---652b | ***** | meet w/Walter, consultant |    | 1.   | \$75.00  |
| ---652B | ***** | Review Plans/Reports      | ML | 0.5  | \$37.50  |
| ---652B | ***** | Meetings, Consultations   | ML | 1.   | \$75.00  |
| ---652B | ***** | Meetings, Consultations   | ML | 0.5  | \$37.50  |
| ---652B | ***** | Review Plans/Reports      | ML | 1.5  | \$112.50 |
| ---652B | ***** | Review Plans/Reports      | DK | 1.5  | \$135.00 |
| ---652B | ***** | Review Plans/Reports      | DK | 3.7  | \$333.00 |
| ---652B | ***** | Review Plans/Reports      | DK | 0.7  | \$63.00  |
| ---652B | ***** | Review Plans/Reports      | DK | 0.8  | \$72.00  |
| ---652B | ***** | Write Letters             | DK | 0.8  | \$72.00  |
| ---652B | ***** | Write Letters             | DK | 0.5  | \$45.00  |
| ---652B | ***** | Review Plans/Reports      | DK | 1.5  | \$135.00 |
| ---652B | ***** | Write Letters             | DK | 0.3  | \$27.00  |

\*\* WORKLOG HISTORY \*\*

|         |       |                         |    |     |          |
|---------|-------|-------------------------|----|-----|----------|
| ---652B | ***** | Write Letters           | DK | 1.  | \$90.00  |
| ---652B | ***** | Review Plans/Reports    | DK | 0.5 | \$45.00  |
| ---652B | ***** | Write Letters           | DK | 1.1 | \$99.00  |
| ---652B | ***** | Write Letters           | DK | 0.2 | \$18.00  |
| ---652B | ***** | Review Plans/Reports    | DK | 0.2 | \$18.00  |
| ---652B | ***** | Review Plans/Reports    | DK | 0.4 | \$36.00  |
| ---652B | ***** | Review Plans/Reports    | DK | 0.5 | \$45.00  |
| ---652B | ***** | Meetings, Consultations | DK | 0.1 | \$9.00   |
| ---652B | ***** | Review Plans/Reports    | DK | 0.8 | \$72.00  |
| ---652B | ***** | Review Plans/Reports    | DK | 2.7 | \$243.00 |
| ---652B | ***** | Review Plans/Reports    | DK | 0.3 | \$27.00  |
| ---652B | ***** | Review Plans/Reports    | DK | 0.1 | \$9.00   |
| ---652B | ***** | Review Plans/Reports    | DK | 0.1 | \$9.00   |
| ---652B | ***** | Review Plans/Reports    | DK | 0.1 | \$9.00   |
| ---652B | ***** | Review Plans/Reports    | DK | 0.1 | \$9.00   |
| ---652B | ***** | Review Plans/Reports    | DK | 0.2 | \$18.00  |
| ---652B | ***** | Meetings, Consultations | DK | 0.2 | \$18.00  |
| ---652B | ***** | Review Plans/Reports    | DK | 0.4 | \$37.60  |
| ---652B | ***** | Review Plans/Reports    | DK | 1.  | \$94.00  |
| ---652B | ***** | Review Plans/Reports    | DK | 0.5 | \$47.00  |
| ---652B | ***** | Meetings, Consultations | DK | 0.1 | \$9.40   |
| ---652B | ***** | Review Plans/Reports    | DK | 3.7 | \$347.80 |
| ---652B | ***** | Review Plans/Reports    | DK | 0.9 | \$84.60  |
| ---652B | ***** | Review Plans/Reports    | DK | 1.2 | \$112.80 |
| ---652B | ***** | Write Letters           | DK | 1.3 | \$122.20 |
| ---652B | ***** | Write Letters           | DK | 0.4 | \$37.60  |
| ---652B | ***** | Meetings, Consultations | DK | 0.2 | \$18.80  |

\*\* WORKLOG HISTORY \*\*

|         |       |                         |    |     |          |
|---------|-------|-------------------------|----|-----|----------|
| ---652B | ***** | Review Plans/Reports    | DK | 2.9 | \$272.60 |
| ---652B | ***** | Write Letters           | DK | 0.4 | \$37.60  |
| ---652B | ***** | Review Plans/Reports    | DK | 0.3 | \$28.20  |
| ---652B | ***** | Meetings, Consultations | DK | 0.3 | \$28.20  |
| ---652B | ***** | Review Plans/Reports    | DK | 0.1 | \$9.40   |
| ---652B | ***** | Meetings, Consultations | DK | 1.6 | \$150.40 |
| ---652B | ***** | Review Plans/Reports    | DK | 2.7 | \$253.80 |
| ---652B | ***** | Initial Site Visit      | DK | 1.  | \$94.00  |
| ---652B | ***** | Review Plans/Reports    | DK | 0.4 | \$37.60  |
| ---652B | ***** | Review Plans/Reports    | DK | 0.2 | \$18.80  |
| ---652B | ***** | Initial Site Visit      | BC | 0.8 | \$75.20  |
| ---652B | ***** | Meetings, Consultations | BC | 0.3 | \$28.20  |
| ---652B | ***** | Meetings, Consultations | BC | 0.4 | \$37.60  |
| ---652B | ***** | Meetings, Consultations | EC | 1.2 | \$120.00 |

B \$6,394.80

Balance:

Amount Refunded:

=====

| Proj#   | Work Date | Activity Description  | Insp | Time (hrs) | Amount Charged |
|---------|-----------|-----------------------|------|------------|----------------|
| -----   | -----     | -----                 | ---- | -----      | -----          |
| ---652c | *****     | Review Plans/Reports  | tp   | 1.9        | \$178.60       |
| ---652c | *****     | administrative charge | adm  | 1.         | \$94.00        |
| ---652c | *****     | Review Plans/Reports  | tp   | 0.3        | \$28.20        |
| ---652C | *****     | Review Plans/Reports  | TP   | 0.4        | \$37.60        |
| ---652C | *****     | Review Plans/Reports  | ML   | 3.         | \$282.00       |
| ---652C | *****     | Review Plans/Reports  | ML   | 2.         | \$188.00       |
| ---652C | *****     | Review Plans/Reports  | ML   | 2.         | \$188.00       |
| ---652C | *****     | Review Plans/Reports  | EC   | 1.5        | \$141.00       |
| ---652C | *****     | Review Plans/Reports  | EC   | 1.         | \$94.00        |





|                                         |           |
|-----------------------------------------|-----------|
| Total Deposit B, C, D                   | 11,274.80 |
| Total time charged to B+C               | 9,662.40  |
| Unaccounted time                        | < 40.00 > |
| adjusted time charged<br>as of 12/01/99 | \$9702.40 |

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|                        |                  |
|------------------------|------------------|
| Balance as of 12/01/99 | <u>\$1572.40</u> |
|------------------------|------------------|

Archived Dailies:

| InspDat    | Insp | Activi | Categ     | InspT | StID                                                                                          |      |       |
|------------|------|--------|-----------|-------|-----------------------------------------------------------------------------------------------|------|-------|
| 08/29/1989 | LS   | 0      | 26        | 3.    | 1008                                                                                          |      |       |
| 08/30/1989 | LS   | 0      | 26        | 5.    | 1008                                                                                          |      |       |
| 09/21/1989 | LS   | 0      | 26        | 1.    | 1008                                                                                          |      |       |
| 09/25/1989 | LS   | 0      | 26        | 3.    | 1008                                                                                          |      |       |
| 10/05/1989 | LS   | 0      | 26        | 3.    | 1008                                                                                          |      |       |
| 03/01/1990 | LS   | 0      | 2,6       | 5.    | 1008                                                                                          |      |       |
| 03/22/1990 | LS   | 0      | 2,6       | 2.    | 1008                                                                                          |      |       |
| 08/01/1990 | LS   | 75     | 1.5 1008  | 652B  |                                                                                               | Δéa! |       |
| 08/02/1990 | LS   | 75     | 2. 1008   | 652B  | Δ                                                                                             |      |       |
| 09/26/1990 | LS   | 75     | 1.5 1008  | 652B  | L                                                                                             |      | ***** |
| 12/04/1990 | LS   | 75     | 0.75 1008 | 652B  | L                                                                                             |      | ***** |
| 03/20/1991 | LS   | 75     | 0.5 1008  | 652B  | 2047A                                                                                         | Δ    |       |
| 06/04/1991 | LS   | 74     | 0.5 1008  | 652B  | W                                                                                             |      |       |
| 06/04/1991 | LS   | 75     | 0.75 1008 | 652B  | K                                                                                             |      |       |
| 09/11/1991 | LS   | 75     | 1. 1008   | 652B  | report review                                                                                 |      | ***** |
| 04/08/1992 | RW   | 74     | 0.5 1008  | 652B  | JAMES RIVER, 2101 WILLIAMS                                                                    |      | ***** |
| 10/06/1992 | RW   | 71     | 1. 1008   | 652B  | James River, Williams Street S1                                                               |      | ***** |
| 10/06/1992 | LS   | 75     | 1.5 1008  | 652B  | Reviewed file with Ariu and Rob W.                                                            |      | ***** |
| 10/06/1992 | LS   | 77     | 0.5 1008  | 652B  | Meeting with Rafat and Rob W.                                                                 |      | ***** |
| 10/07/1992 | RW   | 75     | 0.5 1008  | 652B  | telecom w/ Walter Gonzales re: monitoring well sampling schedule                              |      | ***** |
| 10/20/1992 | LS   | 83     | 1. 1008   | 652B  | File review with Rob W.                                                                       |      | ***** |
| 10/21/1992 | RW   | 77     | 2. 1008   | 652B  | review file and meet w/ Walter Gonzales                                                       |      | ***** |
| 11/04/1992 | LS   | 75     | 0.5 1008  | 652B  | Report review and discussion with Rob W.                                                      |      | ***** |
| 11/04/1992 | RW   | 77     | 0.5 1008  | 652B  | discussion of case w/Larry, time deducted from depref sheet                                   |      | ***** |
| 11/13/1992 | RW   | 75     | 1. 1008   | 652B  | evaluation and review of data for response to amended workplan                                |      | ***** |
| 11/13/1992 | LS   | 77     | 1. 1008   | 652B  | File review with Rob to prepare for meeting                                                   |      | ***** |
| 11/23/1992 | RW   | 75     | 1. 1008   | 652B  | review of all files for meeting w/ JRC time deducted from depref sheet                        |      | ***** |
| 12/10/1992 | RW   | 74     | 1. 1008   | 652B  | letter to James River re: meeting and comments on investigation; deducted from depref         |      | ***** |
| 10/12/1993 | RW   | 11     | 3.5 1008  | -0-   | site walk through and gen inspect                                                             | -0-  |       |
| 10/12/1993 | RW   | 20     | 1. 1008   | -0-   | wast min write up                                                                             | -0-  |       |
| 10/12/1993 | RW   | 77     | 1. 1008   | 652A  | mtg w/ Walter gonsalves and his consultant to discuss site investigation                      |      | ***** |
| 12/10/1993 | RW   | 15     | 0.25 1008 | -0-   | FOLLOWUP telephone call to check on data and \$1200.00 depref accountcheck still not recieved | -0-  |       |
| 02/01/1994 | ML   | 75     | 0.5 1008  | 652B  | file review and phone message                                                                 |      | ***** |
| 02/03/1994 | ML   | 77     | 1. 1008   | 652B  | phone converstion with Walter Gonzales                                                        |      | ***** |
| 02/04/1994 | ML   | 77     | 0.5 1008  | 652B  | phone conversation                                                                            |      | ***** |
| 02/24/1994 | ML   | 75     | 1.5 1008  | 652B  | review                                                                                        |      | ***** |

Current Dailies:

| InspDat | Insp | Act | InspT | StID | DRPro | Comment | DailBDat |
|---------|------|-----|-------|------|-------|---------|----------|
|---------|------|-----|-------|------|-------|---------|----------|

| Date       | DK       | 75    | 1.5  | 1008  | 652B    | site summary                                                                                                     | *****    |
|------------|----------|-------|------|-------|---------|------------------------------------------------------------------------------------------------------------------|----------|
| 08/31/1995 | DK       | 75    | 1.5  | 1008  | 652B    | site summary                                                                                                     | *****    |
| 09/01/1995 | DK       | 75    | 3.7  | 1008  | 652B    | case review and summary-new case from ML                                                                         | *****    |
| 09/05/1995 | DK       | 75    | 0.7  | 1008  | 652B    | Site summary                                                                                                     | *****    |
| 09/26/1995 | DK       | 75    | 0.8  | 1008  | 652B    | Call from Regina Colbert. Review file with her concerning cardboard bailer system                                | *****    |
| 10/10/1995 | DK       | 74    | 0.8  | 1008  | 652B    | Review draft of PSA after peer review                                                                            | *****    |
| 10/26/1995 | AG       | 91    | 4.5  | 1008  |         | Worked on this project regarding change of Chemical etc.                                                         |          |
| 10/31/1995 | AG       | 14    | 3.   | 1008  |         |                                                                                                                  |          |
| 11/22/1995 | DK       | 74    | 0.5  | 1008  | 652B    | Draft PSA approval letter. Letter sent.                                                                          | *****    |
| 11/22/1995 | DK       | 75    | 1.5  | 1008  | 652B    | Review PSA work plan for hydraulic cardboard bailer unit.                                                        | *****    |
| 11/27/1995 | DK       | 74    | 0.3  | 1008  | 652B    | Final draft and letter sent.                                                                                     | *****    |
| 11/28/1995 | DK       | 74    | 1.   | 1008  | 652B    | Draft revised sampling schedule.                                                                                 | *****    |
| 11/28/1995 | DK       | 75    | 0.5  | 1008  | 652B    | Review 4th quarter 1995 groundwater monitoring report.                                                           | *****    |
| 11/29/1995 | DK       | 74    | 1.1  | 1008  | 652B    | Final draft of schedule for                                                                                      | *****    |
| InspDat    | Insp Act | InspT | StID | DRPro | Comment |                                                                                                                  | DailBdat |
|            |          |       |      |       |         | groundwater sampling frequency for peer review.                                                                  |          |
| 11/30/1995 | DK       | 74    | 0.2  | 1008  | 652B    | Deposit/Refund funding request letter                                                                            | *****    |
| 11/30/1995 | DK       | 75    | 0.2  | 1008  | 652B    | Call from Woodward Clyde Consultants                                                                             | *****    |
| 02/05/1996 | DK       | 75    | 0.4  | 1008  | 652B    | Review ESE "GW Data Evaluation" report-dated 1/31/96                                                             | *****    |
| 02/06/1996 | DK       | 75    | 0.5  | 1008  | 652B    | Review file for closure status.                                                                                  | *****    |
| 02/15/1996 | DK       | 77    | 0.1  | 1008  | 652B    | Call from Regina Colbert.                                                                                        | *****    |
| 02/26/1996 | DK       | 75    | 0.8  | 1008  | 652B    | Review PSA dated 2/16/96.                                                                                        | *****    |
| 02/27/1996 | DK       | 75    | 2.7  | 1008  | 652B    | Draft letter revising monitoring schedule. Review file and update site summary. Call from Regina Colbert of FPD. | *****    |
| 02/28/1996 | DK       | 75    | 0.3  | 1008  | 652B    | Final draft of revised sampling schedule sent after peer review.                                                 | *****    |
| 02/29/1996 | DK       | 75    | 0.1  | 1008  | 652B    | Call from Regina Colbert of FPD.                                                                                 | *****    |
| 03/18/1996 | DK       | 75    | 0.1  | 1008  | 652B    | Calls from/to Regina Colbert.                                                                                    | *****    |
| 03/21/1996 | DK       | 75    | 0.1  | 1008  | 652B    | Call from Regina Colbert.                                                                                        | *****    |
| 04/02/1996 | DK       | 75    | 0.1  | 1008  | 652B    | Call from Regina Colbert.                                                                                        | *****    |
| InspDat    | Insp Act | InspT | StID | DRPro | Comment |                                                                                                                  | DailBdat |
| 04/03/1996 | DK       | 75    | 0.2  | 1008  | 652B    | Call from Eric Garcia of ESE.                                                                                    | *****    |
| 05/14/1996 | DK       | 77    | 0.2  | 1008  | 652B    | Call from Eric Garcia regarding closure status.                                                                  | *****    |
| 07/01/1996 | DK       | 75    | 0.4  | 1008  | 652B    | Review ESE "Revised Spring 1996 GWMR"-dated 6/26/96.                                                             | *****    |
| 07/09/1996 | DK       | 75    | 1.   | 1008  | 652B    | Review file for closure, confer with BC regarding closure status.                                                | *****    |
| 08/13/1996 | DK       | 75    | 0.5  | 1008  | 652B    | Call to Regina Colbert. Review file. Confer with RW and BC.                                                      | *****    |
| 08/13/1996 | DK       | 77    | 0.1  | 1008  | 652B    | Call from Regina Colbert.                                                                                        | *****    |
| 08/14/1996 | DK       | 75    | 3.7  | 1008  | 652B    | Review file for closure status. Review ink room excavation report. Determine "left in                            | *****    |

| InspDat    | Insp | Act | InspT | StID | DRPro | Comment                                                                                      | DailBDat |
|------------|------|-----|-------|------|-------|----------------------------------------------------------------------------------------------|----------|
| 08/15/1996 | DK   | 75  | 0.9   | 1008 | 652B  | place" concentrations of petroleum hydrocarbons. Update site summary.                        | *****    |
| 08/15/1996 | DK   | 75  | 0.9   | 1008 | 652B  | Finish closure review. Call to M. Bakaldin. Fax request for SLFD file review to Karl Busche. | *****    |
| 08/16/1996 | DK   | 75  | 1.2   | 1008 | 652B  | Performed file search at SLFD.                                                               | *****    |
| 08/19/1996 | DK   | 74  | 1.3   | 1008 | 652B  | Review file. Draft letter after                                                              | *****    |
| 08/20/1996 | DK   | 74  | 0.4   | 1008 | 652B  | SLFD file review. Update site summary.                                                       | *****    |
| 10/10/1996 | DK   | 77  | 0.2   | 1008 | 652B  | Final draft of letter sent after BC review.                                                  | *****    |
| 10/21/1996 | DK   | 75  | 2.9   | 1008 | 652B  | Calls from/to Regina Colbert. Update site summary.                                           | *****    |
| 10/23/1996 | DK   | 74  | 0.4   | 1008 | 652B  | Review file for closure status.                                                              | *****    |
| 10/30/1996 | DK   | 75  | 0.3   | 1008 | 652B  | Review file and prepare draft of letter requesting RBCA assessment.                          | *****    |
| 10/30/1996 | DK   | 77  | 0.3   | 1008 | 652B  | Final draft of RBCA letter sent.                                                             | *****    |
| 12/03/1996 | DK   | 75  | 0.1   | 1008 | 652B  | Review FPD letters dated 7/25/96 and 9/19/96. Update Hazmat database.                        | *****    |
| 12/05/1996 | DK   | 70  | 1.    | 1008 | 652B  | Call from Regina Colbert. Review file.                                                       | *****    |
| 12/05/1996 | DK   | 75  | 2.7   | 1008 | 652B  | Call from Regina Colbert. Initial site visit.                                                | *****    |
| 12/05/1996 | DK   | 77  | 1.6   | 1008 | 652B  | Continue closure summary document.                                                           | *****    |
| 01/06/1997 | DK   | 75  | 0.4   | 1008 | 652B  | Review file. Meeting with representatives of PrintPack.                                      | *****    |
| 01/13/1997 | DK   | 75  | 0.2   | 1008 | 652B  | Review work plan submittal dated 12/10/96.                                                   | *****    |
| 07/01/1997 | BC   | 70  | 0.8   | 1008 | 652B  | Review file.                                                                                 | *****    |
| 07/01/1997 | BC   | 77  | 0.3   | 1008 | 652B  | site visit, attempt to ID owner sp with Mr. Doug Cook of Printpack                           | *****    |
| 07/11/1997 | BC   | 77  | 0.4   | 1008 | 652B  | sp with E. Shaw, consultant for Print Pack                                                   | *****    |
| 09/16/1997 | TP   | 75  | 1.9   | 1008 | 652C  | review RA, write letter, need to check w/ML first                                            | *****    |
| 09/18/1997 | TP   | 75  | 0.3   | 1008 | 652C  | RA to ML                                                                                     | *****    |
| 10/06/1997 | TP   | 75  | 0.4   | 1008 | 652C  | w/ML, Doug Cook & Ed Shaw                                                                    | *****    |
| 10/07/1997 | ML   | 75  | 3.    | 1008 | 652C  | review risk assessment                                                                       | *****    |
| 12/10/1997 | ML   | 75  | 2.    | 1008 | 652C  | reweiw risk assessment                                                                       | *****    |
| 12/11/1997 | ML   | 75  | 2.    | 1008 | 652C  | review risk, other files and documentation for EVA                                           | *****    |
| 12/18/1997 | EC   | 75  | 1.5   | 1008 | 652C  | start rev of file for closure                                                                | *****    |
| 12/22/1997 | EC   | 75  | 1.    | 1008 | 652C  | cont rev of file for closure                                                                 | *****    |
| 12/23/1997 | EC   | 75  | 4.5   | 1008 | 652C  | cont. rev. give hvoc data to m logan to review for rbca                                      | *****    |
| 12/23/1997 | ML   | 75  | 0.5   | 1008 | 652C  | review RBSL's for chlorinated hydrocarbons                                                   | *****    |
| 12/24/1997 | ML   | 75  | 0.5   | 1008 | 652C  | Calculates averages conc for each MW's and then compare with                                 | *****    |

| InspDat    | Insp | Act | InspT | StID | DRPro | Comment                                                                                                                                | DailBDat |
|------------|------|-----|-------|------|-------|----------------------------------------------------------------------------------------------------------------------------------------|----------|
| 12/29/1997 | EC   | 75  | 0.3   | 1008 | 652C  | RBSL's convs w/ l hess                                                                                                                 | *****    |
| 02/06/1998 | EC   | 77  | 0.2   | 1008 | 652C  | convs w/ ed shaw                                                                                                                       | *****    |
| 02/10/1998 | EC   | 77  | 0.4   | 1008 | 652C  | convs w/ shaw and cook. rev                                                                                                            | *****    |
| 02/11/1998 | EC   | 77  | 2.    | 1008 | 652C  | rev if hvocs are from offsite                                                                                                          | *****    |
| 02/19/1998 | EC   | 77  | 0.5   | 1008 | 652C  | convs w/ shaw. send containment policy                                                                                                 | *****    |
| 03/02/1998 | EC   | 77  | 2.    | 1008 | 652C  | complete ltr for rbca                                                                                                                  | *****    |
| 03/13/1998 | EC   | 77  | 0.2   | 1008 | 652C  | convs w/ ed shaw                                                                                                                       | *****    |
| 04/21/1998 | EC   | 77  | 0.6   | 1008 | 652C  | rev ltr. start prepare resopnse                                                                                                        | *****    |
| 04/23/1998 | EC   | 77  | 1.5   | 1008 | 652C  | rev packet submitted by cook. start of rspnse ltr                                                                                      | *****    |
| 04/24/1998 | EC   | 77  | 0.5   | 1008 | 652C  | attent to get copy of rpt on 2175 williams                                                                                             | *****    |
| 06/12/1998 | EC   | 77  | 0.3   | 1008 | 652C  | convs w/ d jones                                                                                                                       | *****    |
| 06/22/1998 | EC   | 77  | 1.2   | 1008 | 652c  | rev wp. convs w/ e shaw                                                                                                                | *****    |
| 06/24/1998 | EC   | 77  | 1.    | 1008 | 652c  | ltr to approve wp                                                                                                                      | *****    |
| 06/26/1998 | EC   | 77  | 0.3   | 1008 | 652c  | disc \$ with d cook                                                                                                                    | *****    |
| 06/29/1998 | EC   | 77  | 0.8   | 1008 | 652c  | ltr/memo to cindy bailey for \$\$                                                                                                      | *****    |
| 07/01/1998 | EC   | 73  | 3.5   | 1008 | 652c  | sgv collection onsite                                                                                                                  | *****    |
| 08/10/1998 | EC   | 77  | 1.2   | 1008 | 652b  | convs w/ shaw and cook. rev fax. look into hvoc conc in vapors                                                                         | *****    |
| 08/14/1998 | EC   | 212 | 0.2   | 1008 | 652B  | ask shaw to run risk analysis on hvocs detected in soil vapors in sample c                                                             |          |
| 12/18/1998 | EC   | 215 | 0.3   | 1008 | 652B  | re-rev sv results. ask e shaw to call                                                                                                  |          |
| 01/06/1999 | EC   | 77  | 0.3   | 1008 | 652C  | covs w/ d cook and shaw. need to input soil vapor data into rbca                                                                       | *****    |
| 04/14/1999 | EC   | 77  | 0.3   | 1008 | 652c  | rev ltr from shaw. ask ml to check rbca #s                                                                                             | *****    |
| 08/10/1999 | EC   | 77  | 0.4   | 1008 | 652c  | ask logan about pel and twa comparison. no cannot use. only can be used by oshas. numbers are not risk based equations. msg to e shaw. |          |

=====

LEGEND FOR 'OLD' DAILY ENTRIES

Category: ( Program )

O - Office  
L - Legal  
P - Program  
T - Training  
A - Advice / consult.  
E - Environ. study

Activity:

I - regular Inspection  
F - Follow up inspection  
S - Spill / release  
Q - reQuest / complaint  
1 - Generators  
2 - UG Tanks  
3 - Business Plans  
4 - Haz.Waste Hauler  
5 - Emerg. Resp.  
6 - Contam. Site  
7 - Public Lands  
8 - Residential

Valid for Dailies in 1987 --> 1989

Complete

**Donald L. Jones Company**  
Commercial Property Development  
Consulting, Brokerage & Investments

**For 2101 Williams Associates**

August 9, 2000

Mr. John H. Sears, Esq.  
Sheppard, Mullin, Richter & Hampton  
Four Embarcadero Center, 17<sup>th</sup> Floor  
San Francisco, CA 94111-4106

Re: Printpack Environmental Indemnity

Dear John:

I need an interpretation.

Doug Cook of Printpack recently wrote advising that (i) soil gas/vapor testing had demonstrated that residual VOCs in the soil and groundwater on-site do not pose a risk to human health; and that, subject to the testing having been accurate and representative, no further action related to specific contaminants is or will be required by the County; but, irrespective of the latter (ii) the County will require quarterly groundwater monitoring, which Cook says is our responsibility according to Section 10 of the Indemnity Agreement.

Enclosed is a copy of Cook's initial letter dated May 5, 2000, together with the County's (Chu's) letter to Printpack dated March 7, 2000, and his response to Chu of May 5.

Subsequent to receiving Cook's May 5 letter, I spoke to Eva Chu at the County who said that they had not granted or issued "No Further Action" or "Closure" status, or the functionally equivalent thereof. I so informed Doug Cook in the enclosed copy of my fax report dated July 22, 2000.

Cook has responded in his letter of July 30, also enclosed, that my conclusion "is an improper reading of Printpack's indemnification language".

What is your opinion? One issue may be that differing contaminants and remedial situations have existed on-site – and at varying times. For instance, the soil gas/vapor tests referred to above were, to my knowledge, performed on just one general area of the site. Therefore, the County's agreeing that "no further action" applies to one circumstance might not necessarily mean that it applies to a different contaminant or situation elsewhere on-site.

It seems to me that the monitoring in question applies to a different situation than is referred to in Cook's letter; and certainly that would seem to be borne out by Ms. Chu's letter report of March 2, 1998 (copy enclosed) which stated that "the RWQCB does not grant closure for sites containing chlorinated hydrocarbons in excess of established drinking water standards". My conclusion is that the monitoring was and remains a "pre-existing" situation and requirement that is not ours.

Sincerely,



Donald L. Jones

cc: Eva Chu  
Doug Cook

2081 Adams Avenue  
San Leandro, California 94577  
Telephone 510 562 2580  
Facsimile 510 569 9333

00 AUG 11 AM 8:58

ENVIRONMENTAL  
PROTECTION



# Printpack inc.

4335 WENDELL DR., S.W. • ATLANTA, GA 30336-1622 • 404-691-5830  
P.O. BOX 43687 • ATLANTA, GA 30378-4201

00 AUG -7 PM 4:39  
ENVIRONMENTAL  
PROTECTION

## CERTIFIED MAIL

Mr. Donald L. Jones  
Donald L. Jones Company  
2081 Adams Avenue  
San Leandro, CA 94577

July 30, 2000

RE: 2101 Williams Street Groundwater Monitoring

Dear Mr. Jones:

Reference is made to your July 22, 2000 faxed memorandum on the above topic. I am glad that you and Ms. Chu have been able to discuss the groundwater monitoring requested by the Alameda County Health Care Services. However, Printpack disagrees with the conclusions drawn by you from that discussion. We believe that The Donald Jones Company is responsible for any short or long term monitoring that the County may request.

You referenced condition 10 of Printpack's indemnification and concluded that Printpack had not received a "Closure" or "No Further Action" or "Functionally Equivalent" letter, thus the requested groundwater monitoring was still the responsibility of Printpack. This is an improper reading of Printpack's indemnification language.

Printpack's Indemnification reads . . . "RELEASE – Seller's liability under this indemnification shall end upon providing Buyer with a written "Closure" or "no Further Action" or "functionally Equivalent" letter for preexisting contamination from the Alameda County Health Department or other government agency or agencies with jurisdiction. Release from liability is contingent on Seller having satisfied conditions set forth in such letter, excluding without limitation, any conditions requiring soil, water or air monitoring."

I am enclosing two letters from Alameda County Health Services. The first, dated March 2, 1998, states in the first paragraph that there is no further action required with respect to soil and groundwater contamination from alcohol, acetates, acetone compounds, and BTEX constituents. The letter also asked for an addition to a previously submitted risk evaluation. The additional analysis



concerned on-site worker exposure to residual chlorinated compounds that might be in the soil or groundwater.

Printpack provided the requested information, and the County subsequently sent Printpack a letter dated March 7, 2000. This letter stated that residual VOCs in the soil and groundwater would not pose a risk to human health. It also requested that additional monitoring of the groundwater be instituted to help delineate the extent of the chlorinated plume under the property.

The letter did not request additional soil or groundwater remediation, soil excavation and removal, or additional risk analyses. What the county asked for was simply groundwater monitoring. Again, monitoring requests do not hold the indemnification release hostage. Our reading of these two letters together is that, except for groundwater monitoring, Printpack has provided the Donald Jones Company with correspondence that is "Functionally Equivalent" to a "No Further Action" letter.

Printpack requests that the Donald Jones Company respond affirmatively to the March 7, 2000 request from the Alameda County Health Services and begin groundwater monitoring. I continue to recommend CTEC-ESCM as a reliable and competent source for this work.

Sincerely,

  
Douglas Cook, Director  
Environmental Affairs

CC: August Franchini, VP, Printpack  
Ms. Eva Chu, ACEHS  
Mr. Ed Shaw, CTEC-ESCM



**Donald L. Jones Company**  
Commercial Property Development  
Consulting, Brokerage & Investments

## FAX REPORT

No. Faxed Pages - 1  
(4 pages to Chu)

To: Doug Cook Fax Numbers 404 696-1205  
Copy: Eva Chu 510 337-<sup>9335</sup>9395  
John Sears 415 434-3947

From: Don Jones

Date: July 22, 2000

Re: 2101 Williams Groundwater Monitoring

Doug - Eva Chu has been in contact with me regarding your letter, dated May 5, 2000.

According to Ms. Chu, however, the "No Further Action" or "Closure" status, or the functionally equivalent thereof, as required in paragraph 10 of the Environmental Indemnification granted by Printpack Inc, has not been granted or issued by the Alameda County Health Care Services.

Obviously, the monitoring required in her report to you, dated March 7, 2000, deals at least in part with the potential contamination of the groundwater by Printpack, or its predecessors, as evidenced by the soil samples collected in the ink room excavation work.

Therefore, the responsibility of the monitoring should remain with Printpack Inc. for at least the time being.

blind note to Chu: also faxed herewith is a copy of the aforementioned Indemnification

2081 Adams Avenue  
San Leandro, California 94577  
Telephone 510 562 2680  
Facsimile 510 569 9333

**ENVIRONMENTAL INDEMNIFICATION****FINAL VERSION (7/31/98)**

1. **SCOPE** - Seller shall indemnify, defend and hold harmless Buyer and/or its successors-in-title and assigns, including tenants from environmental liability specified herein. Seller's responsibility shall be to indemnify and defend Buyer and its successors and assigns, including tenants, from and against any and all third-party claims, demands, fines, penalties, causes of action, damages and liabilities arising directly or indirectly out of contamination caused by Seller or prior owners and occupants of the property. This indemnification covers contamination existing on the property<sup>1</sup>, or emanating from contamination on the property caused by Seller or prior owners and occupants.
2. **Closure Letter** - Seller shall diligently proceed with reasonable efforts to obtain a "Closure" or "No Further Action" or equivalent letter regarding the property from Alameda County Health Department or other applicable government agency.
3. **Costs and Expenses** - In the event Seller has not obtained the closure letter within two years from the date of Buyer's purchase of the property, Buyer may undertake reasonable efforts to obtain the closure letter. Any remediation required by the Alameda County Health Department or other applicable agency in order to obtain such letter shall be promptly undertaken by Seller. In the event Seller fails or refuses to complete such remediation within a reasonable time, Buyer may perform such work and Seller shall reimburse Buyer for costs and expenses incurred.

Buyer shall negotiate with the Alameda County Health Department or other applicable agency to obtain closure on terms no less favorable than normal and customary at the time for this type of property and contamination. If there is a dispute between Buyer and Seller as to the reasonableness of the closure terms and conditions or cost, they shall be submitted to arbitration in California according to the rules of the American Arbitration Association.

4. **DURATION** - Except as provided in paragraph 10, this indemnification shall be in force for fifteen years from the date of purchase of the property.

---

<sup>1</sup> Seller has no responsibility under this indemnification for contamination beginning after transfer of the property to Buyer.

**5. RESPONSE – Seller agrees to perform environmental remediation of preexisting contamination subject to the following conditions:**

\*That such remediation is legally required by the Alameda County Health Department or other government agency or agencies with jurisdiction now or in the future and Seller shall have received or been provided with written notice from such agency or agencies indicating that such remediation is required. Seller's remediation obligation shall be to bring the Property or such Contamination into compliance with applicable Environmental Laws or to a level at which no further action or remediation is required by such agency.

\*That, from and after the purchase of the property, the only action of the Buyer, his assigns or successors-in-title (see condition 6) has been to notify Seller pursuant to condition 8, except as provided by paragraph 3 above.

- 6. ACT FOR - Buyer agrees that Seller shall act on its behalf in responding to, defending and settling any and all third-party claims, demands, fines, penalties, causes of action, remediation requests, damages and liabilities arising directly or indirectly out of contamination at the site, to the extent that such claims are subject to indemnification here under.**
- 7. ACCESS TO PROPERTY – Buyer agrees to allow unencumbered access to the property by Seller, Seller's representatives and contractors to facilitate any closure, remediation or investigative actions that might be mandated by the Alameda County Environmental Health Agency, or other governmental agency or agencies with jurisdiction now or in the future.**
- 8. TIMELY NOTIFICATION – Buyer agrees that Buyer or any other person asserting rights to indemnification hereunder, shall notify Seller of any claims, demands, fines, penalties, causes of action, damages and liabilities arising directly or indirectly out of contamination in a timely manner, but in no event later than thirty days after becoming aware of such action. Buyer agrees that notification of claims, demands, fines, penalties, causes of action, damages and liabilities arising directly or indirectly out of contamination must be provided to Seller by facsimile AND certified mail. This indemnification does not cover any action for which the Seller receives a notice later than 15 years from the date of purchase.**

Notification shall be to:

Douglas Cook,  
Director of Environmental Affairs  
Printpack, Inc.  
4335 Wendell Drive, SW  
Atlanta, Georgia 30336  
FAX: (404) 696-1205

- 9. EXCLUSION - This indemnification applies solely to soil and groundwater contamination existing as of the date of Sale.**

10. **RELEASE**—Seller's liability under this indemnification shall end upon providing Buyer with a written "Closure" or "No Further Action" or functionally equivalent letter for preexisting contamination from the Alameda County Health Department or other government agency or agencies with jurisdiction. Release from liability is contingent on Seller having satisfied conditions set forth in such letter, excluding, without limitation, any conditions requiring soil, water or air monitoring.

**Received, Reviewed and Accepted:**

Seller: Printpack, Inc.:

2101 Williams Associates, LLC  
Buyer: Donald L Jones

Signature: *R. Michael Henderson*

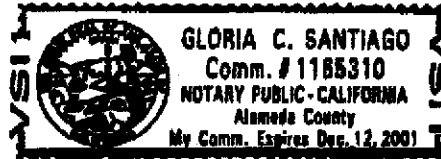
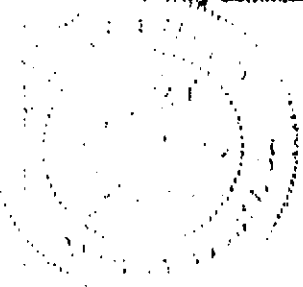
Signature: *Donald L Jones*

Date: August 31, 1998

Date: 7/4/98

*Rita L. Benfield*

Notary Public, Douglas County, Georgia  
My Commission Expires Nov. 8, 1998



## **Chu, Eva, Public Health, EHS**

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**From:** Roger Brewer[SMTP:Rdb@rb2.swrcb.ca.gov]  
**Sent:** July 14, 2000 8:36 AM  
**To:** EChu@co.alameda.ca.us  
**Subject:** James River site

Eva,

Thanks for the well design information for the James River site. It looks like some of the wells may be screened in the first sand unit and in turn useful for evaluating possible downgradient impacts from the Watkins site.

Let me know when they plan to collect groundwater samples again and which wells they will sample. I'd like to make sure that they collect enough samples to help us evaluate what might be coming in off of the Watkins site. It would also be very helpful if they provided a full set of summary boring logs and well designs for existing all wells on the site.

Thanks,  
Roger

## Chu, Eva, Public Health, EHS

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**From:** Roger Brewer[SMTP:Rdb@rb2.swrcb.ca.gov]  
**Sent:** July 06, 2000 10:11 AM  
**To:** EChu@co.alameda.ca.us  
**Subject:** RE: Watkins Terminal site

As it turns out, I stated in the letter to Watkins Terminal that the existing monitoring wells were inadequate and they need to do additional work. The consultant identified a sand unit situated 20 to 40 feet deep as being the most impacted zone. He then set the screen in all of his monitoring wells 15 to 25' deep, didn't find much and concluded that the impact to groundwater was less than originally thought...

I'll fax a copy of the letter to you once it is signed. Do you have information on the design (screened interval, etc.) of the monitoring wells at the James River site?

Roger

*Send Roger well logs*



# California Regional Water Quality Control Board

## San Francisco Bay Region



**Winston H. Hickox**  
Secretary for  
Environmental  
Protection

Internet Address: <http://www.swrcb.ca.gov>  
1515 Clay Street, Suite 1400, Oakland, California 94612  
Phone (510) 622-2300 • FAX (510) 622-2460

**Gray Davis**  
Governor

Date: July 6, 2000  
File No. 01S0426 (RDB)

Michael D. Kevitch  
Watkins Motor Lines, Inc.  
1144 Griffin road  
Lakeland, FL 33804-5002

**SUBJECT:** Conditional Approval of Technical Report *Interim Remedial Action Plan Addendum and Quarterly Monitoring* for Freight Terminals, Inc., 2075 Williams Street, San Leandro, Alameda County

Dear Mr. Kevitch:

This letter responds to your June 19, 2000, technical report regarding interim remedial actions and groundwater monitoring results for the property located at 2075 Williams Street in San Leandro. As explained below, I approve this technical report with the conditions that additional information regarding the subsurface geology of the site be provided and the extent and magnitude of impacts to groundwater in the shallow sand zone identified in the report be further defined.

### **Background**

Soil and groundwater at the site have been shown to be impacted with tetrachloroethylene (PCE) and its breakdown products. Implementation of interim remedial actions at the site was required in Task 2 of Board Order No. 98-120. An initial workplan for these actions (dated July 26, 1999) was verbally approved by our office. The workplan called for the installation of a series of wells in the center of the impacted groundwater. The wells are screened from ten feet below the surface to the base of a shallow sand unit identified during subsurface investigations at the site. The wells are intended to provide a pathway for progressive vaporization of PCE from groundwater (particularly in the sand zone) and gradual reduction of the size and magnitude of the plume. The deadline for implementation of the interim remedial actions was November 30, 1999. Your June 19, 2000, technical report documenting completion of these actions exceeds this deadline but is acceptable for compliance of Task 2 of the Board Order with the conditions noted below.

*California Environmental Protection Agency*

## Conditions for Approval

I hereby approve the report subject to the following conditions:

- **Provide boring logs for each of the "vapor" wells installed at the site and depicted in Figure 5 of the report. Provide a cross section(s) that depicts the location and extent of the sand zone depicted in Figure 4 and described on page 5.** Include the location and screened intervals of monitoring wells in the cross section(s). Depict the known extent and magnitude of impacted groundwater in the cross section(s). **You are requested to submit a technical report to our office that summarizes this information by September 1, 2000.**
  
- **Determine the magnitude and extent of groundwater impacts in the shallow sand unit(s) identified beneath the site.** As described on page 5 of the report, the first-encountered sand unit is situated from a depth of approximately 28 feet to 38 feet in the area of the building and 42 feet (or less) to 59 feet in the area of MW-15. This may reflect the presence of more than one separate sand unit beneath the site. Results of the site investigation indicate that PCE has impacted groundwater immediately above this sand unit (e.g., data from MW-3, MW-6 and MW-15). Grab samples of groundwater collected during drilling of boring MW-15 also indicate substantial impacts to groundwater within the sand unit itself. As stated on page 5 and restated on page 10 of the report, "The bulk of the contaminants appears to be located within this sand zone." I concur with this evaluation.

All of the monitoring wells discussed in the report (including MW-3, MW-6, MW-10, MW-14 and MW-16) are, however, screened above the sand unit. While data from these monitoring wells is useful for evaluating the extent and magnitude of groundwater impacts in the shallower, finer grained units, they are not adequate for evaluating the extent and magnitude of groundwater impacts in the sand unit. This unit holds the highest potential for offsite migration of PCE impacted groundwater. The conclusion on page 10 of the report that "The bulk of the contaminants appears to be located in the vicinity of the terminal building." is therefore unsubstantiated. Additional groundwater samples should be collected and monitoring wells installed onsite and offsite as necessary to adequately define and monitor the extent and magnitude of impacts in the identified sand unit(s). **A technical report containing a workplan to define the lateral and vertical extent of groundwater impacts must be submitted to our office for review no later than September 1, 2000.**

**You are also reminded that, in accordance with Task 3 of Board Order 98-120, the deadline for "Proposed Final Remedial Actions and Cleanup Standards" for the site is November 30, 2000.** A summary and evaluation of all site investigations must be provided in this report. This must include a full determination and evaluation of the extent of impacted



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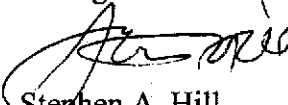
- 3 -

groundwater in the shallow sand unit(s). Proposed final remedial actions should be based in part on the results of this evaluation.

If you have any questions, please contact Roger Brewer of my staff at (510) 622-2374 [e-mail rdb@rb2.swrcb.ca.gov].

Sincerely,

Lawrence P. Kolb  
Acting Executive Officer



Stephen A. Hill  
Chief, Toxics Cleanup Division

cc: Roger Brewer

Eva Chu  
Alameda County Environmental Health Department  
1131 Harbor Bay Parkway, 2nd Floor  
Alameda, CA 94502

Mr. John Caudill  
Atlantic Geoscience  
2500 Atlanta Highway, Suite 414  
Athens, GA 30606

Mr. Mike Bakaldin  
City of San Leandro  
Hazardous Materials Division  
835 E. 14th Street  
San Leandro, CA 94577

**California Environmental Protection Agency**



Recycled Paper

**Chu, Eva, Public Health, EHS**

---

**From:** Roger Brewer[SMTP:Rdb@rb2.swrcb.ca.gov]  
**Sent:** July 04, 2000 10:37 AM  
**To:** EChu@co.alameda.ca.us  
**Subject:** Watkins Terminal site

Eva,

Just received the latest groundwater monitoring report from 2075 Williams St. (Watkins Terminal). I tried to call the consultant to have a copy sent to you but his phone number has apparently been disconnected! Let me know if you want a copy. Were groundwater samples ever collected at the James River facility?

*No. left msg*

Roger

*w/ P. Jones re who will do amr*



# California Regional Water Quality Control Board

ENVIRONMENTAL PROTECTION  
**San Francisco Bay Region**



**Winston H. Hickox**  
Secretary for  
Environmental  
Protection

Internet Address: <http://www.swrcb.ca.gov>  
15 Clay Street, Suite 1400, Oakland, California 94612  
Phone (510) 622-2300 - FAX (510) 622-2460

**Gray Davis**  
Governor

00 MAY 11 AM 9:06

Date: *May 9, 2000*  
File No. 01S0426 (RDB)

Steve Rogers  
Watkins Motor Lines, Inc.  
1144 Griffin road  
Lakeland, FL 33804-5002

*aka. Watkins Terminal*

SUBJECT: Notice of Violation - Failure to Submit Technical Reports, Freight Terminals, Inc., 2075 Williams Street, San Leandro, Alameda County

Dear Mr. Rogers:

Freight Terminals, Inc., has failed to submit quarterly groundwater monitoring reports for the subject facility and is therefore in violation of Site Cleanup Requirements adopted by the Regional Water Quality Control Board on December 16, 1998 (Board Order 98-120). As explained below, the Board may pursue enforcement action for this violation.

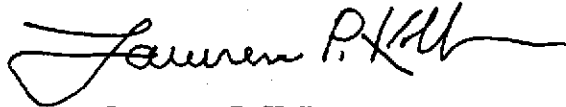
Groundwater beneath the site has been shown to be impacted with Trichloroethylene. The Self-Monitoring Program in Board Order 98-120 requires that groundwater samples from monitoring wells MW1 through MW6 at the site be collected and analyzed on a quarterly basis. Summary monitoring reports are to be submitted to the Board no later than 30 days following the end of each quarter. The first quarterly monitoring report was due April 30, 1999.

To date, our office has not received the required self monitoring reports for the site. The lack of groundwater quality data for the past year will hinder our ability to evaluate the scope of investigation and remedial actions necessary. This is particularly important since the plume has been shown to have migrated offsite and impacted adjacent properties. The downgradient extent of impacted groundwater has not been determined.

Freight Terminals, Inc. is in violation of Board Order 98-120. Water Code Section 13350 allows the Board to impose administrative civil liability of up to \$5,000 per violation day for violations of site cleanup requirements. I urge you to avoid Board enforcement and come into compliance as soon as possible by submitting the past due monitoring reports and promptly submitting all future quarterly self-monitoring reports.

If you have any questions, please contact Roger Brewer of my staff at (510) 622-2374 [e-mail rdb@rb2.swrcb.ca.gov].

Sincerely,



Lawrence P. Kolb  
Acting Executive Officer

cc: Roger Brewer

Eva Chu  
Alameda County Environmental Health Department  
1131 Harbor Bay Parkway, 2nd Floor  
Alameda, CA 94502

Mr. John Caudill  
Atlantic Geoscience  
3005 Riverbend Drive  
Snellville, GA 30278

Mr. Mike Bakaldin  
City of San Leandro  
Hazardous Materials Division  
835 E. 14th Street  
San Leandro, CA 94577

ALAMEDA COUNTY  
HEALTH CARE SERVICES

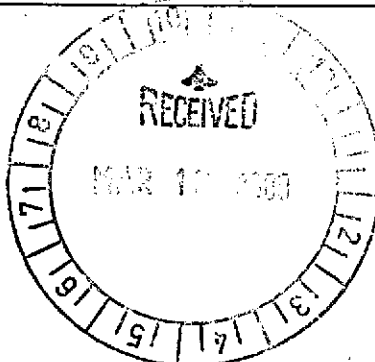
AGENCY  
DAVID J. KEARS, Agency Director



StID 1008

March 7, 2000

Mr. Doug Cook  
Printpack Inc  
4335 Wendell Dr SW  
Atlanta, GA 30336



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION (LOP)  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

**RE: Groundwater Monitoring at 2101 Williams Street, San Leandro, CA**

Dear Mr. Cook:

I have completed review of CTEC-ESCM, Inc.'s December 1999 *OSHA PEL Data* submitted for the above referenced site. Soil gas/vapor concentrations (for volatile organic compounds (VOCs)) collected from the site in July 1998 were compared with OSHA's Permissible Exposure Limits (PEL). The comparison was performed to demonstrate that residual soil vapors would not be harmful to human health. This comparison was made in lieu of running the "very expensive air models."

The detected soil gas concentrations did not exceed OSHA's PELs. I compared the soil gas concentrations with Oakland RBCA's Tier I Risk Based Screening Levels (RBSL) for both commercial and residential exposure to indoor and outdoor vapors. Onsite vapor concentrations were less than Oakland's RBSL by several orders of magnitude. It appears that residual VOCs in soil and groundwater would not pose a risk to human health.

Groundwater analysis for VOCs occurred at the site from June 1994 to July 1995. TCE and PCE continue to be identified in Wells W-7 and W-8, which are located adjacent to the former ink room excavation. Since soil samples collected at 8 feet below grade at the ink room excavation contained elevated PCE (up to 16ppm), residual PCE in soil is a source for some of the VOCs in groundwater. The other source of VOCs in groundwater is from the adjacent property, Watkins' Terminal, located at 2075 Williams Street.

The extent of the VOC plume has not been delineated. Therefore, at this time, quarterly groundwater monitoring of Wells W-5, W-7 through W-10, TW-1, TW-2 and TW-3 should be reinstated. Groundwater should be analyzed for chlorinated solvents. In addition, I will be in contact with Mr. Roger Brewer, of the SF-Regional Water Quality Control Board (RWQCB), who is overseeing environmental investigations at Watkins' Terminal. The downgradient extent of Watkins' Terminal's VOC plume has not been delineated either. It is possible that Watkins' Terminal will be required to sample periodically some of the monitoring wells belonging to Printpack. Please extend your cooperation to Watkins Terminal if they request access to your wells.

Douglas Cook  
re: 2101 Williams Street, San Leandro  
March 7, 2000  
Page 2 of 2

Both Mr. Brewer and I will review data collected from each site to determine if the plumes are limited in extent and if they could pose a potential risk to the adjacent surface waters. After four consecutive quarters of monitoring, if it has been demonstrated that the plumes do not pose any significant risk to the environment, I will re-evaluate your case for closure. Please provide a copy of all future quarterly monitoring reports to Mr. Brewer. If you have any questions, I can be reached at (510) 567-6762.

Regards,



eva chu  
Hazardous Materials Specialist

c: Ed Shaw, CTEC-ESCM, P.O.Box 387, Monroe, UT 84754  
Roger Brewer, SF-RWQCB, 1515 Clay Street, Suite 1400,  
Oakland, CA 94612

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION (LOP)  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

StID 1008

March 7, 2000

Mr. Doug Cook  
Printpack Inc  
4335 Wendell Dr SW  
Atlanta, GA 30336

**RE: Groundwater Monitoring at 2101 Williams Street, San Leandro, CA**

Dear Mr. Cook:

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The extent of the VOC plume has not been delineated. Therefore, at this time, quarterly groundwater monitoring of Wells W-5, W-7 through W-10, TW-1, TW-2 and TW-3 should be reinstated. Groundwater should be analyzed for chlorinated solvents. In addition, I will be in contact with Mr. Roger Brewer, of the SF-Regional Water Quality Control Board (RWQCB), who is overseeing environmental investigations at Watkins' Terminal. The downgradient extent of Watkins' Terminal's VOC plume has not been delineated either. It is possible that Watkins' Terminal will be required to sample periodically some of the monitoring wells belonging to Printpack. Please extend your cooperation to Watkins Terminal if they request access to your wells.

Douglas Cook  
re: 2101 Williams Street, San Leandro  
March 7, 2000  
Page 2 of 2

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Regards,



eva chu  
Hazardous Materials Specialist

c: Ed Shaw, CTEC-ESCM, P.O.Box 387, Monroe, UT 84754  
Roger Brewer, SF-RWQCB, 1515 Clay Street, Suite 1400,  
Oakland, CA 94612

New owners:

Donald L Jones Co (developers)

2081 Adams Ave  
San Leandro, CA 94577

510/562-2580





**Printpack Inc.**

4335 WENDELL DR., S.W. • ATLANTA, GA 30336-1622 • 404-691-5830  
P.O. BOX 43687 • ATLANTA, GA 30378-4201

ENVIRONMENTAL  
PROTECTION

00 MAY 11 PM 3:40

Ms. Eva Chu, Hazardous Materials Specialist  
Alameda County  
Environmental Health Services  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577

May 5, 2000

**RE: Groundwater Monitoring at 2101 Williams Street, San Leandro, CA**

Dear Ms. Chu:

I have received your letter of March 7, 2000 notifying Printpack that . . . "soil gas concentrations (at the site) were compared with Oakland RBCA's Tier I Risk Based Screening levels (RSBL) for both commercial and residential exposure to indoor and outdoor vapor." Your analysis showed that . . . "concentrations are less than Oakland's RBSL by several orders of magnitude" and . . . "residual VOCs in soil and groundwater would not pose a risk to human health."

Printpack and its consultant agree with the County's conclusion. These results indicate that further soil or groundwater remediation is not required. Your letter, however, does request one year of groundwater monitoring for TCE and PCE to "delineate the extent of the plume." In other words, we are now in a groundwater-monitoring program.

As you know, Printpack purchased this property from the James River Corporation in August of 1996. Production ceased in January of 1997. Printpack subsequently sold the property to The Donald L. Jones Company in 1998. Printpack recommends that the County contact the new owner to discuss its request for additional groundwater monitoring.




The current owner may be reached at:

Mr. Don Jones  
Donald L. Jones Company  
2081 Adams Avenue  
San Leandro, CA 94577  
Telephone (510) 562-2580

510/569-9333 Fax

Please contact me directly if you have any questions about this matter.

Sincerely

  
Douglas Cook, Director  
Environmental Affairs

cc: Mr. August Franchini, Printpack  
Mr. Edward Shaw, ESCM, Inc.  
Mr. Donald Jones, The Donald L. Jones Co.

Rec'd 2/14/01



**Printpack Inc.**

4335 WENDELL DR., S.W. • ATLANTA, GA 30336-1622 • 404-691-5830  
P.O. BOX 43687 • ATLANTA, GA 30378-4201

Ms. Eva Chu  
Alameda County Health Care Services  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502


February 1, 2000

RE: Groundwater Monitoring Report for - Don Jones Property

Dear Ms. Chu:

Please find enclosed the first of four quarterly monitoring reports.

Sincerely,

  
Douglas Cook, Director  
Environmental Affairs

Send copies of Figures to  
Roger Brewster + see if we can  
co-ordinate next sampling for  
March 27.





# California Regional Water Quality Control Board

## San Francisco Bay Region



Gray Davis  
Governor

Winston H. Hickox  
Secretary for  
Environmental  
Protection

Internet Address: <http://www.swrcb.ca.gov>  
1515 Clay Street, Suite 1400, Oakland, California 94612  
Phone (510) 622-2300 • FAX (510) 622-2460

December 17, 1999

**FAX**

Eva Chu  
Alameda County Environmental Health Dept.  
1131 Harbor Bay Parkway, 2nd Floor  
Alameda, CA 94502  
Tel: 1-510-567-6762  
Fax: 1-510-337-9335

Eva:

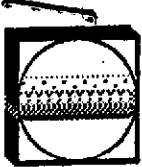
Attached are pertinent pages of the Watkins Terminal reports. It seems fairly clear that the Watkin's plume has migrated onto the James River property.

Lab data is summarized in the November 30, 1998 report. The James River site portion of the plume is, however, probably more accurately depicted in the May 29, 1998 report. The downgradient extent of the plume is unknown. It's interesting how the same consultant, using the same data, suddenly decided to swing the end of the plume around to the south on the November 30 map of the James River site; probably a weak attempt to avoid this data gap.

I'd be very interested to see additional data from the five wells at the James River site noted on the map. We may be able to request that the sampling be done by Watkins Terminal, especially if the data indicate that they are the source of the solvent release. Give me a call when you've had a chance to go over this..

Roger Brewer  
Associate Engineering Geologist  
Bay Area Water Board  
1-510-622-2374

**California Environmental Protection Agency**



# CTEC-ESCM, Inc.

"Saving the Earth"

October 14, 1999

P.O. Box 271  
Pinellas Park, FL 33780  
(727) 573-4471  
Fax (727) 572-7831

copy

Alameda County Health Care Services  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502

ATTN: Ms. Eva Chu, Haz. Materials Spec

Subject: OSHA PEL DATA for  
Former Printpack Property  
2101 Williams Street  
San Leandro, Alameda County, CA

Dear Ms. Chu;

Reference is made to our recent discussions regarding running of air models for the volatile air constituents detected in during our soil gas sampling program that was conducted on July 1, 1998 at the subject facility. We discussed either running models (i.e., 8 models) for each soil gas constituent or show that each constituent detected was detected in such low concentrations that no further action was required. In order to show that the concentrations were in such low concentrations, it was requested that either an air model be run on each constituent or that copies of either U.S. or California Guidelines be submitted to prove that the constituents were not harmful to human health.

Table 1 shows the detected air concentrations (highest only shown) and the respective OSHA Permissible Exposure Limits. California has adopted the OSHA Standards in all cases.

**TABLE 1**  
**COMPOUND CONCENTRATIONS**

| COMPOUND                   | DETECTED <sup>ppm</sup> <del>PPM</del> <sup>✓</sup> CONCENTRATION (PPM) | OSHA PEL (PPM) |
|----------------------------|-------------------------------------------------------------------------|----------------|
| Dichloroethane 1,2-DCA     | 0.012                                                                   | 100            |
| Dichloroethene cis 1,2-DCE | 0.017                                                                   | 200            |
| Ethyl Benzene              | 0.0074                                                                  | 100            |
| Heptane                    | 0.092                                                                   | 400            |
| Toluene                    | 2.300                                                                   | 100            |
| Trimethyl Benzene          | 0.0098 (added both)                                                     | 25             |
| Vinyl Chloride             | 0.018                                                                   | 1              |
| Xylene                     | 0.0331 (added both)                                                     | 100            |

OAK RICA  
Tier 1

12  
3000

.50

TCE

.010

206

59



# California Regional Water Quality Control Board

## San Francisco Bay Region



Winston H. Hickox  
Secretary for  
Environmental  
Protection

Internet Address: <http://www.swrcb.ca.gov>  
1515 Clay Street, Suite 1400, Oakland, California 94612  
Phone (510) 622-2300 • FAX (510) 622-2460

Gray Davis  
Governor

September 30, 1999  
File No. 01S0426 (CTH)

Mr. Steve Rogers  
Watkins Motor Lines, Inc.  
1144 Griffin Road  
Lakeland, FL 33804

SUBJECT: Interim Remedial Action Workplan - Order No. 98-120 - for Property  
Located at 2075 Williams Street, San Leandro, Alameda County

Dear Mr. Rogers:

Board Order 98-120 specified a deadline of March 30, 1999, for submittal of the Interim Remedial Action (IRM) Workplan for the subject site. Task B.1. of Board Order 98-120 outlined the items to be addressed in your IRM workplan. Additionally, in the Regional Board (Board) letter dated March 1, 1999, responding to your Remedial Investigation (RI) report, the Board asked you to include further remedial investigation in your IRM workplan. Your IRM workplan, submitted on March 30, 1999, contained a section detailing the proposed additional remedial investigation. In our letter dated May 5, 1999, Board staff approved this additional investigation workplan. Our May 5, 1999, letter also stated that your IRM workplan was inadequate because it did not contain an evaluation of remedial options nor did it contain sufficient detail for Board staff to evaluate your proposed remedial action, passive vapor extraction. Your July 26, 1999, revised Interim Remedial Action Plan adequately addresses these items and is, therefore, acceptable.

### Additional Investigations

Your March 30, 1999, IRM workplan proposes to delineate the extent of the impact to soils by the VOC release at the site. You propose drilling six borings in the central portion of the site near the location of the VOC release. In addition, you propose to drill two borings to approximately 50 feet to collect grab groundwater samples at 30 feet and 50 feet below ground surface. These data will be used to evaluate the impact of the VOC plume on deeper water bearing zones present beneath the site. As stated above, Board staff approved this portion of the workplan in our May 5, 1999, response to your initial IRM.

*California Environmental Protection Agency*

### **Interim Remedial Action Evaluation**

Your July 26, 1999, revised IRM workplan evaluates four remedial alternatives for the site:

- Groundwater extraction and treatment "pump and treat".
- Oxygen Injection. Oxygen is injected into the groundwater to volatilize the PCE and cause it to migrate to the surface.
- Vacuum extraction. A series of extraction wells are placed on the plume perimeter then oxygen is injected into the plume in the center and drawn through the groundwater by applying a vacuum to the perimeter wells.
- Passive vapor extraction. Discussed below.

Your IRM workplan proposes an innovative technology for remediating soil and groundwater at the Site, which involves altering the thermal, vapor pressure, and concentration gradients of the dissolved VOC plume. Your IRM workplan states that you need to install vapor wells to act as vents for VOC vapors. You propose to install 20 2-inch vapor wells across the site, primarily in and around the source area. You will also install 16 2-inch vapor wells along the western and northwestern margins of the site to prevent off-site migration of the PCE. Your IRM workplan states that thermal heating of the asphalt will be the driving force for the remediation. PCE vapors from the underlying soils will pool up under the asphalt and then vent into the atmosphere through the 20 2-inch wells. As the vapors vent a concentration gradient will develop that will help the PCE to volatilize from the groundwater to the soil. At the same time a pressure gradient will develop to further promote PCE volatilization. However, your revised IRM workplan recognizes that this innovative technology may not be as effective as is hoped. Therefore, you propose installing the passive vapor extraction wells in such a manner that they can be easily converted to active dual groundwater/soil vapor extraction wells, if necessary.

Your IRM workplan evaluates the four alternatives presented above. Based on cost, expected effectiveness, and site physical site constraints, you conclude that passive vapor extraction is the preferred interim remedial alternative. This conclusion is acceptable to the Board. However, the Board understands that passive soil venting is an untested innovative technology, and that the time frame for completion of the IRM task is considerably longer than originally mandated by Task B.2. of Order 98-102, 2 years versus six months. The Board is agreeing to this proposal because the Site is located in an industrial area, there are no receptors at risk from the VOCs in the shallow groundwater, the VOC plume is stable and shows very little downgradient migration, and there are no vertical conduits to allow the shallow VOC contamination to impact deeper potentially useful groundwater. If, however, the VOC

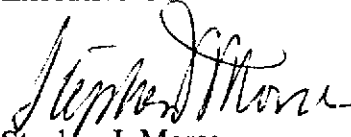
concentrations in soil and groundwater do not decrease significantly during the course of this interim remedial action, you may be required to implement active soil and groundwater remediation at the Site.

You propose operating the passive remediation system for two years before evaluating its effectiveness. Task B.2. of Board Order 98-120 calls for an evaluation of the effectiveness of the interim remedial system by November 30, 1999, and Task B.3. of Board Order 98-120 requires submittal of a remedial action plan (RAP) by November 30, 2000. You have requested an extension to November 30, 2001 for submittal of both reports. I find your request acceptable. I will not recommend enforcement action, provided that you submit both technical reports by November 30, 2001. Please note that this letter does not formally alter the original deadline, and the Board may pursue enforcement action if the technical reports are not submitted by this later date.

If you have any questions concerning this letter, please contact Chuck Headlee of my staff at (510) 622-2433; e-mail [cth@rb2.swrcb.ca.gov](mailto:cth@rb2.swrcb.ca.gov).

Sincerely,

Loretta K. Barsamian  
Executive Officer

  
Stephen I. Morse  
Chief, Toxics Division

cc: Ms. Eva Chu  
Alameda County Department of Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502

Mr. John Caudill  
Atlantic Geoscience  
3005 Riverbend Drive  
Snellville, GA 30278

Mr. Mike Bakaldin  
City of San Leandro  
Hazardous Materials Division  
835 E. 14th Street  
San Leandro, CA 94577

99 OCT -6



**Date:** 6/29/98  
**To:** Ms. Cindy Bailey  
**Cc:** [ Click here and type names ]  
**From:** Eva Cbu  
**RE:** Deposit History

---

Here is a list of deposits made for Project 652B which was paid by the James River Corporation which totals \$3,238.00. The worklog lists charges starting from August 29, 1989 to July 11, 1997. The total amount charged for that time period amounted to \$6,274.80. Therefore, Project 652B is in a negative balance of \$3,036.80.

Please send a check payable to "Alameda County, Environmental Health" in the amount of \$3,036.80 to bring this account into a zero balance. Include on the check or cover letter the following information:

Add on for Project #652B, StID 1008

2101 Williams Street, San Leandro, CA

Our mailing address is: Alameda County, Environmental Health

1131 Harbor Bay Parkway

Alameda, CA 94502-6577

Thank you for your cooperation in this matter. If you have any questions, I can be reached at (510) 567-6762.

ec

attachments

6/29/98

~~CONFIDENTIAL~~

1

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



StID 1008

June 29, 1998

Ms. Cynthia Bailey  
Fort James Corp.  
120 Tredegar Street  
Richmond, VA 23219

ENVIRONMENTAL HEALTH SERVICES

1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
(510) 337-9335 (FAX)

**RE: Deposit History for 2101 Williams Street, San Leandro, CA**

Dear Ms. Bailey:

Here is a list of deposits totaling \$3,238.00, made for Project #652B and paid by the James River Corporation, for the oversight of the above referenced site. The worklog lists charges starting from August 29, 1989 and ending July 11, 1997. The total amount charged for that time period totaled \$6,274.80. Therefore, Project #652B is in a negative balance of \$3,036.80.

Please send a check made payable to "Alameda County, Environmental Health" in the amount of \$3,036.80 to bring this account into a zero balance. Include on the check or cover letter the following information:

Add on for Project #652B, StID 1008  
2101 Williams Street, San Leandro, Ca

Thank you for your cooperation in this matter. If you have any questions, I can be reached at (510) 567-6762.

eva chu  
Hazardous Materials Specialist

c: Doug Cook  
Printpack Inc  
4335 Wendell Dr SW  
Atlanta, GA 30336

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
(510) 337-9335 (FAX)

StID 1008

June 24, 1998

Mr. Doug Cook  
Printpack Inc  
4335 Wendell Dr SW  
Atlanta, GA 30336

**Subject: Workplan Approval and Groundwater Sampling at 2101 Williams St, San Leandro CA**

Dear Mr. Cook:

Thank you for the submittal of the "Preliminary Investigation" report prepared for the adjacent property (2075 Williams Street, San Leandro, CA). Upon review of that report, it appears that some offsite migration of chlorinated hydrocarbons on to your property may be occurring. The San Francisco Bay Regional Water Quality Control Board is the lead agency overseeing site assessment/remediation at that site.

It is also apparent to me that historic use of chlorinated solvents at your site has also resulted in a release of chemicals to the subsurface. This is evident with the detection of elevated PCE levels in both soil and groundwater in the vicinity of the ink room. CTEC-ESCM's June 22, 1998 "Soil Vapor Collection Work Plan" was submitted to address if residual solvent contamination at the site poses a risk to human health. The proposal to collect soil vapor samples at the site is acceptable. However, the following additions/changes should be incorporated into the workplan:

1. up to two soil vapor samples should also be collected in the vicinity of the ink room,
2. soil vapor should be collected from ~3' bgs. Samples from 6' bgs are not necessary, and,
3. groundwater should be collected from monitoring wells W-1, W-8, W-7, and TW-3 for analysis for chlorinated hydrocarbons.

If you have any questions, I can be reached at (510) 567-6762.

eva chu  
Hazardous Materials Specialist

c: Ed Shaw, P.O.Box 387, Monroe, UT 84754



**Printpack Inc.**

4335 WENDELL DR., S.W. • ATLANTA, GA 30336-1622 • 404-691-5830  
P.O. BOX 43687 • ATLANTA, GA 30378-4201

① Get complete copy of A61 & Feb 1997  
Preleim Invest. report

April 6, 1998

Ms. Eva Chu,  
Hazardous Materials Specialist  
Alameda County Health Care Services  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577

RE: Printpack Property Located at 2101 Williams Street, San Leandro, CA

Dear Ms. Chu:

This is in response to your letter of March 2, 1998. Senior management at Printpack has reviewed the County's request for yet more information and further evaluation of groundwater and soil at Printpack's Williams Street property. Quite honestly, we are disappointed and somewhat exasperated with the never ending demand for additional data at a site that has been investigated to the point that further investigation is of questionable value.

Printpack acquired the subject property in August of 1996 and shut down operation in early 1997. I reviewed pertinent correspondence files on the site and met with Mr. Dale Klettke in early 1997 to develop a path forward for resolving all outstanding issues. Mr. Klettke, as an agent for the County, stated that the only outstanding issue was hydraulic fluid contamination from a leaking compactor ram. Following that meeting, we memorialized the agreement and forwarded a copy of our understanding to Mr. Klettke (see attached). Based on our agreement with the County, hydraulic fluid was remediated and documentation of it was provided to the County (see attached). As agreed, we also filed a Risk Based Closure Plan (see attached). Once all stated conditions were met, we expected the promised expeditious review and issuance of a "No Further Action Letter".

We waited for the promised review and receipt of the "No Further Action letter". Instead of the promised expeditious response from the County, we received silence. Following many telephone calls by Printpack and its consultant, ESCM, Mr. Thomas Peacock, sent two letters stating that Printpack needed to the County a total of \$5,000 to cover staff time before additional review



work could be performed. I mailed a \$4,000 check on August 22, 1997 and a \$1,000 check on December 18, 1997. No further information was forthcoming until we again began calling the County. Now your office has reviewed the file and determined that more information is needed. I must tell you that Printpack's position is that enough is enough.

Based on our understanding of your letter request, the County would like Printpack to justify that the chlorinated solvent plume under its property did not originate on-site. This request is made even though a large part of the county is currently contaminated by chlorinated solvent from several sources known to the County and to the Regional Water Quality Control Board. Additionally, you state that it is the Water Quality Control Board's policy not to grant closure to sites with chlorinated hydrocarbon contamination above the drinking water standard. You further state that the property could be designated as a containment zone if Printpack does more drilling sampling and risk analysis. Finally, you request soil gas data costing several thousands of dollars.

In response to these varied requests, Printpack has reviewed data available to the County and has determined that the Watkins property north of 2101 Williams Street is contaminated with Chlorinated solvent. The groundwater direction is from the contaminated Watkins property. The highest concentration of chlorinated contamination is close to the northern boundary of Printpack's property (see attached data from a previously filed report and information on Watkins property.) Printpack cannot attest to whether chlorinated solvent was ever used on the subject property. However, all information available to Printpack indicates that no chlorinated solvent was ever stored in bulk quantities at the property and no chlorinated solvent releases have ever been reported.

Printpack agrees to provide the County with the additional soil vapor data that it requests. However, we do not plan to do any additional drilling or plume definition work at the site. It seems to us that the available data supports our belief that the chlorinated plume is from off-site. Furthermore, Printpack does not intend to perform remediation of chlorinated solvent that migrates onto its property from off-site sources. Finally, Printpack has already provided the County with a risk based closure plan and does not plan to do any additional plan development.

In summary, Printpack will provide soil gas vapor data as requested. Printpack believes adequate justification exists for the County to find that the chlorinated plume under 2101 Williams Street migrated onto the property from off-site and no further delineation is warranted. If the County will not provide a "no further action letter" as previously agreed to, the site can stay open indefinitely. However, Printpack cannot continue down the path of more and more investigation without a firm plan to end this process. Subsequent reviewers have voided previous commitments by the County. This approach is not acceptable to Printpack.

If you have questions about our position or have a definitive proposal to proffer for closing this process, please contact me. Any proposal must be ratified in advance by the head of the Alameda County Health Service before Printpack can undertake additional work. Lastly, any proposal must include an expeditious and immutable time line for closure of this process.

Sincerely,



Douglas Cook, Director  
Environmental Affairs

cc: ESCM, w. enclosures

Mr. Dennis Love, President, Printpack, Inc., w/o enclosures

Mr. Fred Crowe, Vice President and General Manager, w/o enclosures

Mr. James Stokes, Alston & Bird, w. enclosures

Mr. Thomas Peacock, Alameda County Health Services, w/o enclosures



4335 WENDELL DR., S.W. • ATLANTA, GA 30338-1622 • 404-691-5830  
P.O. BOX 43687 • ATLANTA, GA 30378-4201

90 APR 15 11 5 26

April 6, 1998

Ms. Eva Chu,  
Hazardous Materials Specialist  
Alameda County Health Care Services  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577

RE: Printpack Property Located at 2101 Williams Street, San Leandro, CA

Dear Ms. Chu:

This is in response to your letter of March 2, 1998. Senior management at Printpack has reviewed the County's request for yet more information and further evaluation of groundwater and soil at Printpack's Williams Street property. Quite honestly, we are disappointed and somewhat exasperated with the never ending demand for additional data at a site that has been investigated to the point that further investigation is of questionable value.

Printpack acquired the subject property in August of 1996 and shut down operation in early 1997. I reviewed pertinent correspondence files on the site and met with Mr. Dale Klettke in early 1997 to develop a path forward for resolving all outstanding issues. Mr. Klettke, as an agent for the County, stated that the only outstanding issue was hydraulic fluid contamination from a leaking compactor ram. Following that meeting, we memorialized the agreement and forwarded a copy of our understanding to Mr. Klettke (see attached). Based on our agreement with the County, hydraulic fluid was remediated and documentation of it was provided to the County (see attached). As agreed, we also filed a Risk Based Closure Plan (see attached). Once all stated conditions were met, we expected the promised expeditious review and issuance of a "No Further Action Letter".

We waited for the promised review and receipt of the "No Further Action letter". Instead of the promised expeditious response from the County, we received silence. Following many telephone calls by Printpack and its consultant, ESCM, Mr. Thomas Peacock, sent two letters stating that Printpack needed to the County a total of \$5,000 to cover staff time before additional review



work could be performed. I mailed a \$4,000 check on August 22, 1997 and a \$1,000 check on December 18, 1997. No further information was forthcoming until we again began calling the County. Now your office has reviewed the file and determined that more information is needed. I must tell you that Printpack's position is that enough is enough.

Based on our understanding of your letter request, the County would like Printpack to justify that the chlorinated solvent plume under its property did not originate on-site. This request is made even though a large part of the county is currently contaminated by chlorinated solvent from several sources known to the County and to the Regional Water Quality Control Board. Additionally, you state that it is the Water Quality Control Board's policy not to grant closure to sites with chlorinated hydrocarbon contamination above the drinking water standard. You further state that the property could be designated as a containment zone if Printpack does more drilling sampling and risk analysis. Finally, you request soil gas data costing several thousands of dollars.

In response to these varied requests, Printpack has reviewed data available to the County and has determined that ~~the Watkins property~~ north of 2101 Williams Street is contaminated with Chlorinated solvent. The groundwater direction is from the contaminated Watkins property. The highest concentration of chlorinated contamination is close to the northern boundary of Printpack's property (see attached data from a previously filed report and information on Watkins property.) Printpack cannot attest to whether chlorinated solvent was ever used on the subject property. However, all information available to Printpack indicates that no chlorinated solvent was ever stored in bulk quantities at the property and no chlorinated solvent releases have ever been reported.

WITCE  
not PCE!

*How do you explain the detection of 160ppm PCE at IR-1 (13')  
23ppm @ IR-2 (8') and 16ppm PCE @ IR-3 (13') by the lab room.*

Printpack agrees to provide the County with the additional soil vapor data that it requests. However, we do not plan to do any additional drilling or plume definition work at the site. It seems to us that the available data supports our belief that the chlorinated plume is from off-site. Furthermore, Printpack does not intend to perform remediation of chlorinated solvent that migrates onto its property from off-site sources. Finally, Printpack has already provided the County with a risk based closure plan and does not plan to do any additional plan development.

*this did not evaluate HOC risk*

In summary, Printpack will provide soil gas vapor data as requested. Printpack believes adequate justification exists for the County to find that the chlorinated plume under 2101 Williams Street migrated onto the property from off-site and no further delineation is warranted. If the County will not provide a "no further action letter" as previously agreed to, the site can stay open indefinitely. However, Printpack cannot continue down the path of more and more investigation without a firm plan to end this process. Subsequent reviewers have voided previous commitments by the County. This approach is not acceptable to Printpack.

*Analysis not required, at this time, but wells TW-2 and TW-3 should be analyzed for HOCs*

*IR-1 (13')  
and by the  
20 800 gal.  
R's off container tank*



If you have questions about our position or have a definitive proposal to proffer for closing this process, please contact me. Any proposal must be ratified in advance by the head of the Alameda County Health Service before Printpack can undertake additional work. Lastly, any proposal must include an expeditious and immutable time line for closure of this process.

Sincerely,



Douglas Cook, Director  
Environmental Affairs

cc: ESCM, w. enclosures

Mr. Dennis Love, President, Printpack, Inc., w/o enclosures

Mr. Fred Crowe, Vice President and General Manager, w/o enclosures

Mr. James Stokes, Alston & Bird, w. enclosures

Mr. Thomas Peacock, Alameda County Health Services, w/o enclosures

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
(510) 337-9335 (FAX)

StID 1008

March 2, 1998

Mr. Doug Cook  
Printpack Inc  
4335 Wendell Dr SW  
Atlanta, GA 30336

**RE: Soil Vapor Collection and/or Risk Analysis for 2101  
Williams Street, San Leandro, CA**

Dear Mr. Cook:

I have completed review of the case file for the above referenced site. Remedial action has been completed for the soil and groundwater contaminated with alcohol, acetate, and acetone compounds, as well as BTEX constituents. Based upon the available information and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to the above contaminants is required.

Groundwater beneath the site is also impacted by chlorinated hydrocarbons (HVOCs). It has not been determined that the solvent plume is coming from an offsite source. Soil borings (GS-1, GS-3, GS-4, and GS-5) advanced upgradient of the onsite "hot" wells (W-5, W-6, W-7 and W-3) identified lower concentrations of PCE than from the onsite wells, suggesting that the plume may be originating from onsite. Please re-evaluate historic use of solvents at the site to determine if PCE was stored/used at the site. In addition, the extent of the solvent plume has not been delineated. Please sample wells TW-2 and TW-3 for chlorinated hydrocarbons.

Currently, the Regional Water Quality Control Board does not grant closure for sites containing chlorinated hydrocarbons in excess of established drinking water standards (MCLs). Rather, the site can be designated as a containment zone once a management plan has been submitted and approved. In order for a containment zone to be designated, the vertical and lateral extent of the plume must be defined. In addition, it must be demonstrated that the contaminant concentrations do not pose a risk to human health or the environment. Please refer to the enclosed containment zone policy document.

Mr. Doug Cook  
re: risk analysis for 2101 Williams St, San Leandro  
March 2, 1998  
Page 2 of 2

At this time, a risk evaluation should be performed to determine if there are potential risks to construction workers and onsite workers at the facility and potential impact to well water or surface waters in the near vicinity. Potential pathways to be evaluated include the volatilization of HVOCs from groundwater to indoor and outdoor air; construction workers' exposure through dermal contact and inhalation; and potential impact to domestic wells and surface waters. The required risk assessment may be performed by collecting soil gas vapors in the vicinity of well W-5 and immediately adjacent to the east corner of the James River Flexible Packaging Plant. Soil gas vapors should be collected at -3' and 6' bgs. A workplan for this phase of investigation should be submitted to this office for review and approval.

If you have any questions, I can be reached at (510) 567-6762.



eva chu  
Hazardous Materials Specialist

enclosure

c: Edward Shaw (w/o)  
ESCM  
1781 Mars Hill Rd  
Watkinsville, GA 30677



**Printpack inc.**

4335 WENDELL DR., S.W. • ATLANTA, GA 30336-1622 • 404-691-5830  
P.O. BOX 43687 • ATLANTA, GA 30378-4201

VIA FEDERAL EXPRESS

Mr. Thomas Peacock, Manager  
Division of Environmental Protection  
Alameda County Health Care Services  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577

December 18, 1997

RE: PROJECT # 652B / STID 1008

Dear Mr. Peacock:

This is to transmit a check in the amount of \$1,000.00 to cover the processing fees associated with Printpack's account. This is in addition to the \$4,000.00 previously sent to the County in August 1997. It is my understanding from our consultant, ESCM, that your Ms. Logan stated that Printpack's submittal was adequate to allow site closure. However, an additional \$1,000.00 fee would be necessary before she could prepare and forward a closure letter.

I trust that this check will allow the County to complete the administrative process associated with this project and issue a closure letter. Please contact me or our consultant, if there are any questions about this matter.

Sincerely,

Douglas Cook, Director  
Environmental Affairs

cc: Mr. Fred Crowe, Printpack  
Mr. August Franchini, Printpack  
Mr. Ed Shaw, ESCM





**Printpack inc.**  
 4335 Wendell Drive, S.W. Atlanta, GA 30336  
 (404)691-5830

DATE 12/19/97

CHECK NO. 657181

SunTrust Bank, Atlanta, Georgia  
 or  
 SunTrust Bank, Northwest Georgia, N.A.

64-79  
 611

PAY THIS AMOUNT  
 \*\*\*\*\*\$1,000.00  
 PAYABLES ACCOUNT  
 VOID AFTER 90 DAYS

PAY **One thousand and 00/100 Dollars**

TO THE  
 ORDER  
 OF

ALAMEDA CO HEALTH CARE SERVICE  
 ENVIRONMENTAL PROTECTION DIV  
 1131 HARBOR BAY PARKWAY STE350  
 ALAMEDA CA 94620-6577

*Dennis J. Love*  
 AUTHORIZED SIGNATURE

⑈657181⑈ ⑆061100790⑆ 8800535729⑈

↑ DETACH HERE BEFORE DEPOSITING ↑



**Printpack inc.**

4335 WENDELL DR., S.W. • ATLANTA, GA 30336-1622 • 404-691-5830  
P.O. BOX 43687 • ATLANTA, GA 30378-4201

VIA FEDERAL EXPRESS

Mr. Thomas Peacock, Manager  
Division of Environmental Protection  
Alameda County Health Care Services  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577

August 22, 1997

RE: PROJECT #652B / STID 1008

Dear Mr. Peacock:

This is to transmit a check in the amount of \$4,000.00 for oversight and processing fee associated with Printpack's account. I trust this check will allow review and processing Printpack's recent closure request.

Please contact me or our consultant, ESCM Technology, if there are any questions about this matter.

Sincerely,

Douglas Cook, Director  
Environmental Affairs

cc: Mr. Fred Crowe, Printpack  
Mr. August Franchini, Printpack  
Mr. Ed Shaw, ESCM





**Printpack inc.**  
 4335 Wendell Drive, S.W. Atlanta, GA 30336  
 (404)691-5830

SunTrust Bank, Atlanta, Georgia  
 or  
 SunTrust Bank, Northwest Georgia, N.A.

64-79  
 611

DATE 08/22/97

CHECK NO. 623025

PAY THIS AMOUNT  
 \*\*\*\*\*\$4,000.00

**PAYABLES ACCOUNT**  
 VOID AFTER 90 DAYS

PAY **Four thousand and 00/100 Dollars**

TO THE  
 ORDER  
 OF

ALAMEDA CO HEALTH CARE SERVICE  
 ENVIRONMENTAL PROTECTION DIV  
 1131 HARBOR BAY PARKWAY STE350  
 ALAMEDA CA 94520-6577

PROJECT # 652B  
 STJD 1008

*Dennis J. Love*

AUTHORIZED SIGNATURE

⑈623025⑈ ⑆061100790⑆ 8800535729⑈

↑ DETACH HERE BEFORE DEPOSITING ↑



**Printpack inc.**  
 4335 WENDELL DR., S.W. • ATLANTA, GEORGIA 30378

ALAMEDA CO HEALTH CARE SERVICE  
 ENVIRONMENTAL PROTECTION DIV  
 1131 HARBOR BAY PARKWAY STE350  
 ALAMEDA CA 94520-6577

white -env.health  
yellow -facility  
pink -files

ALAMEDA COUNTY, DEPARTMENT OF  
ENVIRONMENTAL HEALTH  
Hazardous Materials Inspection Form

1131 Harbor Bay Pkwy  
Alameda CA 94502  
510/567-6700

II, III

Site ID # 1008 Site Name Former James River Today's Date 7.1.97  
Site Address 2101 Waller St  
City San Leandro Zip 94577 Phone \_\_\_\_\_

\_\_\_\_ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

**Inspection Categories:**

- \_\_\_\_ I. Haz. Mat/Waste GENERATOR/TRANSPORTER  
\_\_\_\_ II. Hazardous Materials Business Plan, Acutely Hazardous Materials  
\_\_\_\_ III. Under ground Storage Tanks

\* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

**Comments:**

Site is vacant.

A FORLEASE SIGN ON BLDG.

BT Commercial - Tony Beatty / Jeff Starkovick

In Nov 1996 - James River Sold Site to Puntpack Inc  
Onsite employee: Ed Wortham  
Headqtrs - Atlanta GA

James River - no local location  
Headqtrs - Portland OR

Left business card w/ Mr Wortham.

He will call me back to give me new Puntpack Inc  
Contact + mailing address.

- Need to contact James River to get some info as  
RPs are both James River + Puntpack Inc

Contact \_\_\_\_\_  
Title \_\_\_\_\_  
Signature \_\_\_\_\_

Inspector Becher  
Signature \_\_\_\_\_

II, III



ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

*Cancelled Nov '96 ESE*

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION (LOP)  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

June 3, 1997

STID 1008

*no longer employee*

Regina Colbert

Flexible Packaging Division

2101 Williams St.

San Leandro, CA 94577

*James Saldy  
Rover*

*Print Pack:*

*Hayward or Fremont or SC 7 no phone #*

Dear Regina Colbert:

Additional site monitoring and environmental oversight is required at your site before you can receive a site closure letter from this office. To date, your site account has a negative balance of (\$2,989.55). A complete itemization of time spent is attached.

The deposit refund mechanism is authorized in Section 3-140.5 of the Alameda County Ordinance Code in order to recover the costs incurred by this Department for administration and technical oversight related to investigations and cleanup for this site. Work on this project has been debited at the ordinance specified rate, currently \$94 per hour.

To replenish the deposit refund account (project 652B), please submit an additional deposit of \$4,000, to cover the current charges and also future work. Please write the project #652B and the STID 1008 on your check.

Please contact me at (510) 567-6782 if you have any questions.

Sincerely,

Thomas Peacock, Manager  
Division of Environmental Protection

c: Candyce Kelly, Division Finance

FOR LEASE

510-652-0800

---

BT Commercial

Tony Beatty /

Jeff Starkovich

Ed Worthen :

---

Print pack Inc.

---

Atlanta GA  
headqtrs.

---

Jones River

Portland.



# Printpack Inc.

**DIVERSIFIED PACKAGING DIVISION**

2101 WILLIAMS STREET • SAN LEANDRO, CA 94577  
PHONE 510-614-2300 • FAX 510-614-2301

DATE: 30 October 1996

TO: Dale Klette (fax - 510-337-9335)

LOCATION: Alameda EIB.

FROM: Regina Colbert  
SALES FAX # (510)614-2303

URGENT: \_\_\_\_\_ ROUTINE:

4/8 PAGES INCLUDING TRANSMITTAL SHEET

IF YOUR EXPERIENCE DIFFICULTY WITH RECEIPT, PLEASE CALL  
(510)614-2311.

Dale, we didn't send you the 7/25  
letter so there's one in the mail with  
a duplicate of the 9/19 letter.

The Re: QCB was notify for purposes  
of stormwater

Back to you soon,



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



STID 1008

October 23, 1996

Ms. Regina Colbert  
James River Corporation  
2101 Williams Street  
San Leandro, CA 94577

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION (LOP)  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

RE: JAMES RIVER CORPORATION, 2101 WILLIAMS STREET, SAN LEANDRO

Dear Ms. Colbert:

This office recently completed a review of the case file for the above referenced San Leandro site up to and including the Environmental Science & Engineering, Inc., (ESE) "Revised Spring 1996 Ground Water Monitoring Report" dated June 26, 1996. ESE recommends case closure for the James River facility, and that a no further action letter be issued in the fuel/acetone/MIBK area according to guidelines presented by the State Water Resources Control Board - "Interim Guidance on Required Cleanup at Low-Risk Fuel Sites", dated December 8, 1995.

**Alameda County Department of Environmental Health (ACDEH) has the following concerns pertaining to the above referenced site:**

- ◆ Laboratory analysis of verification samples collected from the June 1989 UST excavation and pipeline removal revealed ethyl alcohol, n-propanol and n-propyl acetate at concentrations of 55,000 ppm, 5700 ppm and 60 ppm, respectively, from sample #11 (sample where piping hole was detected). N-propyl acetate was detected at a concentration of 390 ppm at a depth of 40" (sample #9 - trench along building ramp).
- ◆ Verification soil samples collected on September 25, 1990, after over-excavation of the ink room excavation, revealed maximum concentrations of 2-hexanone-16 mg/kg, acetone-24 mg/kg, ethyl benzene-1.1 mg/kg, MEK-30 mg/kg, trichloroethene-0.2 mg/kg, toluene-15,000 mg/kg, tetrachloroethene-160 mg/kg, total xylenes-7.4 mg/kg and cis-1,2-DCE-0.9 mg/kg. Verification samples indicate that purgeable aromatic and volatile chlorinated hydrocarbons are present in soil remaining in the excavation bottom, to a depth of 13 feet below ground surface (bgs), the total depth excavated.
- ◆ The free-phase hydraulic fluid floating on groundwater in well TW-1.
- ◆ Elevated concentrations of acetone and methyl iso-butyl ketone (MIBK) historically detected in monitoring well W-10.

Ms. Regina Colbert

RE: James River Corporation, 2101 Williams Street, San Leandro

October 23, 1996

Page 2 of 2

At this time you are requested to have a qualified consultant evaluate the human health risk to assure that all chemical constituents are within acceptable levels for the protection of human health, for all present and possible future uses of the site. **Please be advised that additional site-assessment data may be needed.** If these human health risk levels are not deemed appropriate, you will be required to provide a work plan detailing additional risk-based corrective action to be performed to remediate this site to such acceptable levels, or otherwise mitigate perceived risk.

Please be advised that this work plan is to be consistent with the guidelines provided in the ASTM Designation: E 1739 - 95 "Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites". This guide is a consistent decision-making process for the assessment and response to a petroleum release, based on the protection of human health and the environment.

The RBCA process is not limited to a particular class of compounds. The ASTM Committee E-50, and members of ASTM Subcommittee E-50.04, have drafted a provisional standard which provides for its use on non-petroleum release sites (RBCA Version 4.0 - 8/2/96). This document is intended to be a companion document to the Standard Guide for RBCA Applied at Petroleum Release Sites, E1739 - 95. If a release site contains mixtures of petroleum and other chemicals, this guide should be followed.

**This risk assessment and/or work plan is to be submitted to this office within 90 days of the date of this letter, or no later than January 22, 1997. Please be advised that this letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267(b) and Health and Safety Code Sections 25299.37 and 25299.78.**

Please feel free to call me directly at 510/567-6880 should you have any questions.

Sincerely,



Dale Klettke, CHMM  
Hazardous Materials Specialist

c: Dale Klettke--files  
Mike Bakaldin, San Leandro Hazardous Materials Program  
George Reid, ESE, Inc., 4090 Nelson Avenue, Suite J, Concord, CA 94520

1008rbca.yes

bc



# Printpack Inc.

**DIVERSIFIED PACKAGING DIVISION**

2101 WILLIAMS STREET • SAN LEANDRO, CA 94577  
PHONE 510-614-2300 • FAX 510-614-2301

19 September 1996

Mr. Dale Klettke  
Alameda County  
1131 Harbor Bay Pkwy, #250  
Alameda, CA 94502-6577

Dear Mr. Klettke ,

Printpack, Inc. has purchased the James River Flexible Packaging plant in San Leandro, CA and will assume responsibility for all environmental obligations, including reporting.

Your records should be updated to reflect the new owner: Printpack, Inc. located at 2101 Williams Street, San Leandro, CA.

Should there be any comments or questions, contact my office directly at (510) 614-2351 or Mr. Doug Cook, Director of Corporate Environmental Affairs, at (404) 691-2538, extension 7431.

Sincerely,

Regina R. Colbert  
Government Regulatory Coordinator

PRINTPAC.SAM

Member Flexible Packaging Association



Printed on Recycled Paper



# Printpack Inc.

**DIVERSIFIED PACKAGING DIVISION**2101 WILLIAMS STREET • SAN LEANDRO, CA 94577  
PHONE 510-614-2300 • FAX 510-614-2301

9 September 1996

Mr. Dale Bowyer  
Stormwater Permits  
Region 5  
Regional Water Quality Control Board  
2101 Webster Street, Suite 500  
Oakland, CA94612  
(510) 286-1380

Re: Permit Number: 201S004144

Dear Mr. Bowyer ,

Printpack, Inc. has purchased the James River Flexible Packaging plant in San Leandro, CA and will assume responsibility for all environmental obligations, including reporting.

Your records should be updated to reflect the new owner: Printpack, Inc. located at 2101 Williams Street, San Leandro, CA.

Should there be any comments or questions, contact my office directly at (510) 614-2351 or Mr. Doug Cook, Director of Corporate Environmental Affairs, at (404) 691-2538, extension 7431.

Sincerely,

Regina R. Colbert  
Government Regulatory Coordinator

PRINTPAC.SAM



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

STID 1008

August 20, 1996

Ms. Regina Colbert  
James River Corporation  
2101 Williams Street  
San Leandro, CA 94577

DEPARTMENT OF ENVIRONMENTAL HEALTH  
80 Swan Way, Rm. 210  
Oakland, CA 94621  
(510) 271-4300

RE: JAMES RIVER CORPORATION, 2101 WILLIAMS STREET, SAN LEANDRO

Dear Ms. Colbert:

This office recently completed a review of the case file for the above referenced San Leandro site up to and including the Environmental Science & Engineering, Inc., (ESE) "Spring 1996 Ground Water Monitoring Report" dated June 20, 1996. ESE recommends case closure for the James River facility, and that a no further action letter be issued in the fuel/acetone/MIBK area according to guidelines presented by the State Water Resources Control Board - "Interim Guidance on Required Cleanup at Low-Risk Fuel Sites", dated December 8, 1995.

Alameda County Department of Environmental Health (ACDEH) has reviewed the file for case closure. At the present time, this site does not warrant case closure for the following reasons:

- 1 This site **does not** qualify as a "Low-Risk Groundwater Case" as defined in the "Interim Guidance on Required Cleanup at Low-Risk Fuel Sites". In the State Board's "Supplemental Instructions", dated January 5, 1996, the Regional Board recommended that *"fuel sites be treated differently and less stringently than solvent sites"*. MIBK/acetone contaminated sites are not fuel sites, but are solvent sites.
- 2 This site is being regulated as a Spill, Leaks and Investigation Cleanup (SLIC) site, and therefore the permanent hydraulic fuel tank exemption does not apply. For your information, Alameda County is regulating the hydraulic fluid release pursuant to Health & Safety Code Section 25299.2(a). **The free-phase hydraulic fluid floating on groundwater in well TW-1 will need to be remediated before case closure is warranted.**

On August 16, 1996, hazardous material files at the San Leandro Fire Department were reviewed to determine whether information could be found documenting acetone use in manufacturing processes prior to the James River Corporations' acquisition of the facility. In a State of California, Department of Industrial Relations, October 30, 1964 memorandum to the Crown-Zellerbach Corporation, the following information was obtained. **The October 30, 1964 memorandum states that acetone was used in the coloring unit (concentration was measured at 1,600 ppm) and that red ink used in the printing process contained acetone as the solvent.**



Ms. Regina Colbert

RE: James River Corporation, 2101 Williams Street, San Leandro

August 20, 1996

Page 2 of 2

In addition, a hazardous materials inventory dated 7/7/81, which was filed with the San Leandro Fire Department documents that methyl ethyl ketone (MEK), perchloroethylene, and methyl isobutyl ketone (MIBK) were used and stored at the 2101 Williams Street site.

At this time please continue to adhere to a **annual** (1st quarter) schedule of well sampling, monitoring, and report submittal as referenced in Title 23, California Code of Regulations (CCR) section 2652(d). Sample analytes should be total petroleum hydrocarbons as diesel and hydraulic fluid (TPHd and TPHhf) for groundwater monitoring wells W-7 and W-8, acetone, methyl isobutyl ketone (MIBK), benzene, toluene, ethyl benzene and total xylene isomers (BTEX) for well W-10, and TPHhf and BTEX for groundwater samples collected from temporary wells TW-2 and TW-3. In addition, free product recovery (hand bailing or passive skimming) is to continue for temporary well TW-1.

The next groundwater monitoring event should be performed during the first quarter of 1997. After documentation of the 1st quarter 1997 groundwater sampling event, ACDEH will review the results to determine whether hydraulic fluid groundwater analyses will be continued.

**Groundwater elevation readings for wells W-3, W-5, W-6, W-7, W-8, W-9, W-10 and B-1 are to continue on a semi-annual basis (1st and 3rd quarters), and for convenience may be incorporated into the annual reports.**

Please feel free to call me directly at 510/567-6880 should you have any questions.

Sincerely,



Dale Klettke, CHMM  
Hazardous Materials Specialist

c: Thomas Peacock, LOP Manager--files  
Mike Bakaldin, San Leandro Hazardous Materials Program  
George Reid, ESE, Inc., 4090 Nelson Avenue, Suite J, Concord, CA 94520

1008clos.no

**ALAMEDA COUNTY ENVIRONMENTAL  
HEALTH SERVICES**

**ENVIRONMENTAL PROTECTION DIVISION**

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

Telephone (510) 567-6700

Fax (510) 337-9335

**FAX COVER SHEET**

DATE: 8/15, 19 96

TO: KARL BUSCHE

FAX # (510) 618-3445

Total number of pages including cover sheet 1

FROM: DALE KLETTE

LOP

NOTE: DIRECT LINE 567-6880

~~PLEASE RESPOND BY FAX ONLY. X~~

WOULD LIKE TO SCHEDULE FILE REVIEW FOR

JAMES RIVER CORPORATION - 2101 WILLIAMS ST

RP IS REQUESTING CLOSURE.

(SMILE) HAVE A NICE DAY  
DO SOMETHING FOR OUR ENVIRONMENT



# Printpack Inc.

DIVERSIFIED PACKAGING DIVISION

25 July 1996 2101 WILLIAMS STREET • SAN LEANDRO, CA 94577  
PHONE 510-614-2300 • FAX 510-614-2301

STD  
1008

Mr. Dale Klettke  
Hazardous Materials Specialist  
Environmental Health Services  
Alameda County  
1131 Harbor Bay Pkwy, #250  
Alameda, CA94502-6577  
(510) 337-9335

Re: Permit Number: Case #1008

Dear Mr. Klettke ,

James River Corporation is in the process of selling the San Leandro facility to Printpack, Inc. The sale is anticipated to be completed by August 21, 1996.

Printpack, Inc. will assume responsibility for all environmental obligations, including reporting. Changes to operating practices are not expected.

Your records should be update to reflect the new name, Printpack, Inc.

Should there be any comments or questions, contact office directly at (510) 614-2351.

Sincerely,

Regina R. Colbert  
Government Regulatory Coordinator

PRINTPAC.SAM





Environmental  
Science &  
Engineering, Inc.

ENVIRONMENTAL  
PROTECTION

96 JUN 24 PM 3:19

**TO:** James River Corporation  
P.O. Box 5088  
San Leandro, CA 94577-0552

**DATE:** June 20, 1996

**ATTN:** Ms. Regina Colbert

**JOB NUMBER:** 65-96-044/7000

**SUBJECT:** JAMES RIVER FLEXIBLE PACKAGING FACILITY

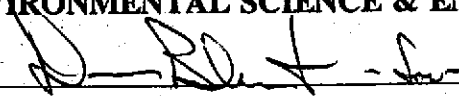
**WE ARE TRANSMITTING THE FOLLOWING:**

Enclosed you will find two (2) copies of the Spring 1996 Ground Water Monitoring Report for the James River Flexible Packaging Facility. If you have any questions or comments regarding this matter please contact me at (510) 685-4053.

**CC:** Mr. Dan Klettke, CHMM (1 copy)

**DIST:**  
LB  
File  
Originator

**ENVIRONMENTAL SCIENCE & ENGINEERING, INC.**

**BY:**   
Eric Garcia  
Senior Staff Scientist

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

STID 1008

DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6777

February 28, 1996

Ms. Regina Colbert  
James River Corporation  
2101 Williams Street  
San Leandro, CA 94577

RE: REVISED GROUNDWATER MONITORING SCHEDULE  
JAMES RIVER CORPORATION, SAN LEANDRO

Dear Ms. Colbert:

This office recently completed a review of the case file for the above referenced San Leandro site up to and including the Environmental Science & Engineering, Inc., (ESE) "Report of Preliminary Site Assessment" dated February 27, 1996.

This report documents the advancement of three (3) soil borings (TW-1, TW-2 and TW-3) which were converted to temporary groundwater monitoring wells. Approximately 0.05 feet of free product (reported as total petroleum hydrocarbons as hydraulic fluid-TPHhf) was measured in monitoring well TW-1. TPHhf was detected in ground water samples TW-2 and W-10 at concentrations of 2,200 ug/l (ppb) and 2,500 ug/L, respectively. In addition, a sample of the free product collected from TW-1 was analyzed and found to contain benzene, toluene, ethyl benzene and total xylenes (BTEX) at concentrations of 13 ppb, 7,000 ppb, 220 ppb and 1,230 ppb, respectively.

As documented in the State Water Resources Control Board's (SWRCB) Report on Hydraulic Lift Tanks (HLTs) it was concluded that leaks from HLTs are not perceived to be a significant risk to water quality in California. This is reportedly due to hydraulic fluid's low volatility, low concentrations of aromatic compounds (BTEX), tendency to adhere to soil particles and relative immobility in a subsurface environment. In addition it is reported that the resulting dissolved TPHhf groundwater plume is expected to be small and to not travel far from the point of release. However in this case, the dissolved hydraulic plume appears to be migrating off-site, since a concentration of 2200 ug/L of TPHhf was detected in temporary monitoring well TW-2, which is **approximately 600 feet down gradient from the point of release**. In addition, elevated levels of BTEX were detected in the sample of free product containing hydraulic fluid which was analyzed to contain only 4200 ug/L of TPHhf.

At this time please adhere to a **annual** (1st quarter) schedule of well sampling, monitoring, and report submittal as referenced in Title 23, California Code of Regulations (CCR) section 2652(d). Sample analytes should be total petroleum hydrocarbons as diesel and hydraulic fluid (TPHd and TPHhf) for groundwater monitoring wells W-7 and W-8, acetone, methyl isobutyl ketone (MIBK), benzene, toluene, ethyl benzene and total xylene isomers (BTEX) for well W-10, and TPHhf and BTEX for groundwater samples collected from temporary wells TW-2 and TW-3.

Ms. Regina Colbert  
RE: James River Corporation, 2101 Williams Street, San Leandro  
February 28, 1996  
Page 2 of 2

In addition, free product recovery (hand bailing or passive skimming) is to continue for temporary well TW-1.

The next groundwater monitoring event should be performed during the first quarter of 1996.

**Groundwater elevation readings for wells W-3, W-5, W-6, W-7, W-8, W-9, W-10 and B-1 are to continue on a semi-annual basis (1st and 3rd quarters), and for convenience may be incorporated into the annual reports. In addition, please supply information on any possible sources of acetone which may be contributing to the consistently high levels of dissolved acetone being detected in groundwater monitoring well W-10.**

Please feel free to call me directly at 510/567-6880 should you have any questions.

Sincerely,



Dale Klettke, CHMM  
Hazardous Materials Specialist

c: Thomas Peacock, LOP Manager--files  
Mike Bakaldin, San Leandro Hazardous Materials Program  
George Reid, ESE, Inc., 4090 Nelson Avenue, Suite J, Concord, CA 94520

bc  
1008smp2.dkt



Environmental  
Science &  
Engineering, Inc.

TO: James River Corporation  
2101 Williams Street  
San Leandro, California 94577

DATE: February 2, 1996

ATTN: Ms. Regina Colbert

JOB NUMBER: 6595226

SUBJECT: GROUND WATER DATA EVALUATION REPORT

WE ARE TRANSMITTING THE FOLLOWING:

Two copies of the final report "Ground Water Data Evaluation" for the subject site. Please call either Mr. Eric Garcia or David Blunt at (510) 685-4053 should you have any questions concerning this report.

CC: Mr. Dale Klettke, ACHCSA, (w/attachment)

DIST:  
LB  
FILE  
ORIGINATOR

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

BY \_\_\_\_\_

David Blunt  
Senior Geologist

f6595226\evalrpt.trn

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ARNOLD PERKINS, DIRECTOR  
RAFAT A. SHAHID, DEPUTY DIRECTOR

DEPARTMENT OF PUBLIC HEALTH  
499 Fifth Street  
Oakland, California 94607  
(510)

STID 1008

December 21, 1995

Ms. Regina Colbert  
James River Corporation  
2101 Williams Street  
San Leandro, CA 94577

RE: GROUNDWATER MONITORING SCHEDULE  
JAMES RIVER CORPORATION, SAN LEANDRO

Dear Ms. Colbert:

This office recently completed a review of the case file for the above referenced San Leandro site up to and including the Environmental Science & Engineering, Inc., (ESE) "Fourth Quarter of 1995 Ground Water Monitoring Report" dated November 20, 1995. Laboratory analysis of groundwater samples have documented non-detectable concentrations of benzene, toluene, ethyl benzene, and total xylenes (BTEX) in monitoring wells W-3, W-5, W-6, W-7, W-8, W-9 and B-1 for seven consecutive sampling events.

On December 20, 1995, I personally reviewed the case file for 1964 Williams Street (referred to as the Williams Street Site in the DTSC files), to determine whether the concentrations of chlorinated hydrocarbons detected in groundwater samples from your monitoring wells could be originating from an up gradient source. Soil samples collected from the 1964 Williams Street Site have documented levels of TCE-1,500,000 ppb, Freon 11-5,200,000 ppb, 1,1-DCE-140,000 ppb and 1,1,1-TCA-640,000 ppb in addition to significant levels of methylene chloride, tetrachloroethene (PCE), 1,1,2-DCA, chloroform, and toluene. Groundwater samples collected from the 1964 Williams Street Site have documented levels of TCE-520,000 ppb, 1,1-DCE-1000 ppb, 1,1,1-TCA-22,000 ppb, PCE-92 ppb and Freon 11-620 ppb. Groundwater flow for the 1964 Williams Street Site was calculated to be in a south-southwesterly direction at a gradient of approximately 0.001 ft/ft during measurements taken during 1991-1992. It is also reported in the DTSC files that the 1964 Williams Street site was at that time at the leading edge of another chlorinated hydrocarbon plume associated with the Caterpillar site (intersection of San Leandro Blvd and Davis Streets). The 1964 Williams Street Site is directly up gradient from the 2101 Williams Street Site (see site map).

**Therefore, groundwater sampling and analysis of wells W-3, W-5, W-6, W-7, W-8, W-9 and B-1 for BTEX and chlorinated hydrocarbons (EPA Method 8240) will no longer be required by this office. However, the quarterly monitoring of W-10 for BTEX, MIBK and acetone should continue.**



Ms. Regina Colbert  
RE: James River Corporation, 2101 Williams Street, San Leandro  
December 21, 1995  
Page 2 of 2


In addition, groundwater samples have documented non-detectable concentrations of TPHd and TPHmo in monitoring wells W-3, W-5, W-6, W-9, W-10 and B-1 for seven consecutive sampling events.

**Groundwater monitoring of wells W-3, W-5, W-6, W-9, W-10 and B-1 for TPHd and TPHmo is no longer being required by this office. However, the quarterly monitoring of wells W-7 and W-8 for TPHd and TPHmo should continue.**

**Groundwater elevation readings for wells W-3, W-5, W-6, W-7, W-8, W-9, W-10 and B-1 are to continue on a quarterly basis.**

Please feel free to call me directly at 510/567-6880 should you have any questions.

Sincerely,

  
Dale Klettke, CHMM  
Hazardous Materials Specialist

1008lsmp

attachment

c: Thomas Peacock--files  
Mike Bakaldin, San Leandro Hazardous Materials Program  
George Reid, ESE, Inc., 4090 Nelson Avenue, Suite J, Concord, CA 94520

white -env.health  
 yellow -facility  
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF  
 ENVIRONMENTAL HEALTH  
 Hazardous Materials Inspection Form

1131 Harbor Bay Pkwy  
 Alameda CA 94502  
 510/567-6700

II, III

Site ID # \_\_\_\_\_ Site Name WILLIAMS STREET SITE Today's Date 12/20/95  
 Site Address 1964 WILLIAMS ST.  
 City SAN FRANCISCO Zip 94577 Phone \_\_\_\_\_

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?  
 Inspection Categories:  
 I. Haz. Mat/Waste GENERATOR/TRANSPORTER  
 II. Hazardous Materials Business Plan, Acutely Hazardous Materials  
 III. Under ground Storage Tanks

\* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments: IN REFERENCE TO 210 W WILLIAM STREET SITE (JAMES RIVER)  
FREEZE DRYING PLANT - USED TCE, FREON 11, 22, DOWTHERM®

PSA MW-4 WELL IS A SOURCE WELL  
 TCE IN SOIL FOR MW-1 68 - 23,000 (10.5 lbs) ppb  
 MW-4 TCE IN H<sub>2</sub>O 13,000 ppb  
 WALL SCRAPINGS 1,500 ppm TCE 1,1-DCA-32 ppb  
 5,200 ppm FREON 11 1,000-1,1-DCE  
 140 ppm 1,1-DCE  
 640 ppm (1,1,1-TCA)

ADDITIONAL WELLS - 5 ADDITIONAL MW'S (MW-5 to MW-9)  
 520,000 ppb IN MW-9 DOWN GRADIENT  
 500 ppb - 1,1-DCE  
 tetra chloro ethene PCE 39 ppb  
 5,000 ppb - 1,1,1-TCA  
 trichloro 620 ppb - FREON 11

HYDRAULIC CONDUCTIVITY DURING SLUG TESTS RANGE 8.1x10<sup>-4</sup> (MW-5) TO 2.1x10<sup>-3</sup> (MW-9)

THIS SITE IS DOWN GRADIENT OF CATERPILLAR SITE IN AREA BELIEVED TO BE AT THE LEADING EDGE OF THE HC PLUME (CATERPILLAR SITE)  
 REPORTED CONC. AT EDGE 100 ppb - TCE, 30 - PCE

GW GRADIENT SOUTH-SOUTHWEST 0.001 FT/FT

Contact \_\_\_\_\_  
 Title \_\_\_\_\_ Inspector \_\_\_\_\_  
 Signature \_\_\_\_\_ Signature \_\_\_\_\_

II, III

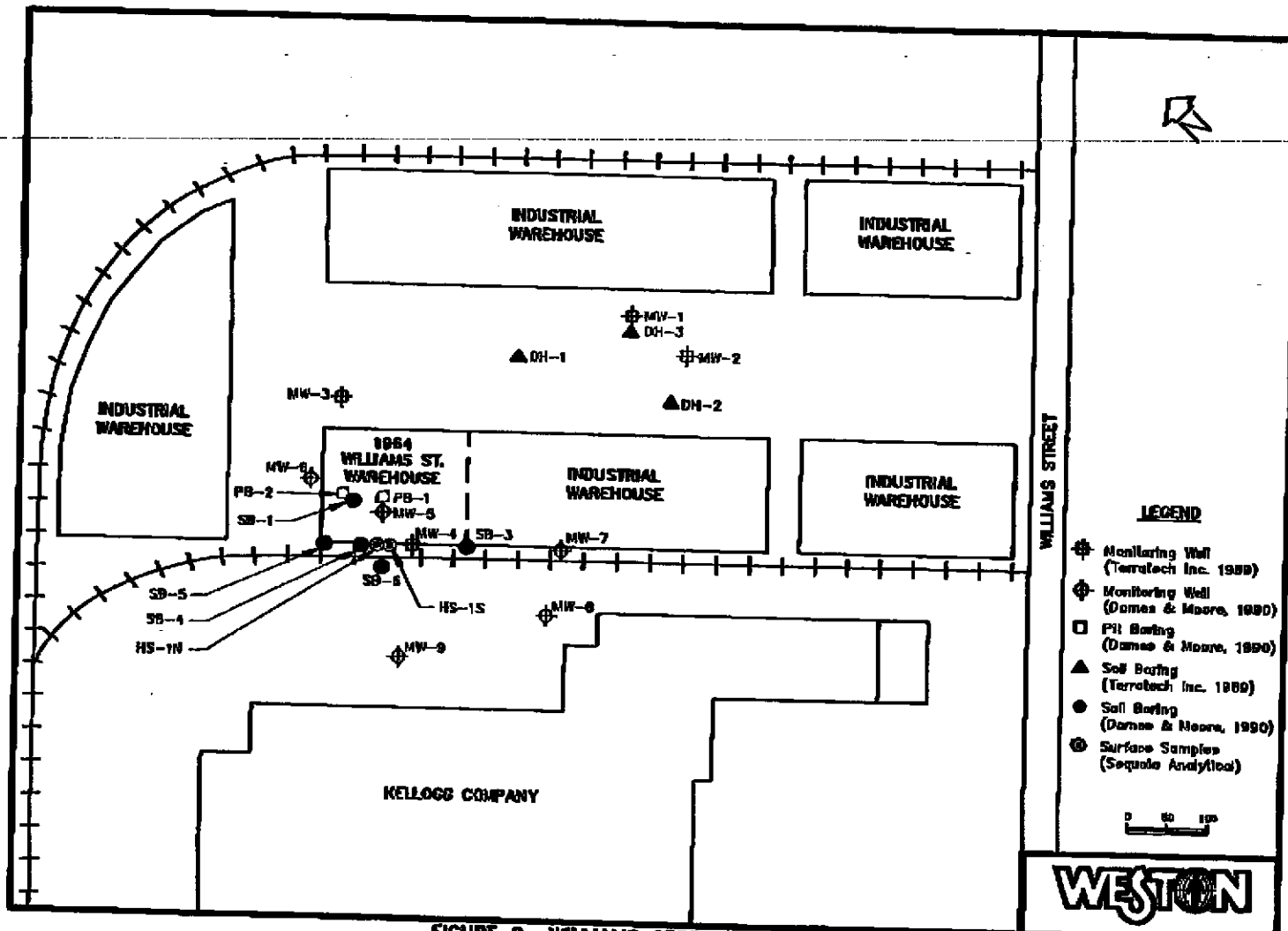


FIGURE 2 WILLIAMS STREET SITE PLAN  
 SAN LEANDRO, ALAMEDA COUNTY, CALIFORNIA

0145/12-5-01/CW/C3

**TABLE 4 (continued)**

**Summary of Dames & Moore Soil Analytical Results (ug/Kg)<sup>1,2</sup>**

| Constituent           | MW-7    |         | MW-8    |         | MW-9    |               |         |
|-----------------------|---------|---------|---------|---------|---------|---------------|---------|
|                       | 13.0 ft | 18.0 ft | 11.5 ft | 16.5 ft | 11.5 ft | 11.5 ft (Dup) | 19.5 ft |
| Methylene Chloride    | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5        | 5.1     |
| Tetrachloroethane     | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5        | ND-2.5  |
| 1,1,1-Trichloroethane | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5        | 55      |

**TABLE 4**

**Summary of Dames & Moore Soil Analytical Results (ug/Kg)<sup>1,2</sup>**

| Constituent                     | PB-1    | PB-2    | SB-1    |         | SB-3              |         | SB-4   |         |         | SB-5   |         |         |
|---------------------------------|---------|---------|---------|---------|-------------------|---------|--------|---------|---------|--------|---------|---------|
|                                 | 12.0 ft | 11.5 ft | 16.5 ft | 21.5 ft | 11.0 ft           | 16.0 ft | 4.5 ft | 16.0 ft | 20.0 ft | 5.0 ft | 11.0 ft | 16.0 ft |
| Methylene Chloride <sup>1</sup> | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5  | 42.5 <sup>2</sup> | ND-2.5  | ND-2.5 | ND-2.5  | ND-2.5  | ND-2.5 | ND-2.5  | ND-2.5  |
| Tetrachloroethane               | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5            | ND-2.5  | ND-2.5 | ND-2.5  | 4.0     | ND-2.5 | ND-2.5  | ND-2.5  |
| 1,1,1-Trichloroethane           | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5            | ND-2.5  | 6.1    | ND-2.5  | 54      | ND-2.5 | 49      | 8.3     |
| 1,1,2-Trichloroethane           | ND-2.5  | ND-2.5  | ND-2.5  | 2.9     | ND-2.5            | ND-2.5  | ND-2.5 | 11      | ND-2.5  | ND-2.5 | ND-2.5  | ND-2.5  |
| Trichloroethane                 | 380     | 11      | 1,400   | 2,600   | 210               | 160     | 3,400  | 3,000   | 17,000  | 370    | 14,000  | 9,900   |
| Trichlorofluoromethane          | 6.5     | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5            | ND-2.5  | ND-2.5 | ND-2.5  | ND-2.5  | ND-2.5 | ND-2.5  | ND-2.5  |
| 1,1-Dichloroethane              | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5            | ND-2.5  | ND-2.5 | ND-2.5  | ND-2.5  | ND-2.5 | ND-2.5  | ND-2.5  |
| Acetone                         | ND-50   | ND-50   | ND-50   | ND-50   | ND-50             | ND-50   | 110    | ND-50   | ND-50   | ND-50  | ND-50   | ND-50   |

| Constituent            | SB-6   |         |               |         | MW-5    |         | MW-6   |         |         |
|------------------------|--------|---------|---------------|---------|---------|---------|--------|---------|---------|
|                        | 6.5 ft | 11.5 ft | 11.5 ft (Dup) | 16.5 ft | 16.5 ft | 21.5 ft | 6.5 ft | 11.5 ft | 16.2 ft |
| Methylene Chloride     | ND-2.5 | ND-2.5  | ND-2.5        | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5 | ND-2.5  | ND-2.5  |
| Tetrachloroethane      | ND-2.5 | ND-2.5  | ND-2.5        | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5 | ND-2.5  | ND-2.5  |
| 1,1,1-Trichloroethane  | ND-2.5 | ND-2.5  | ND-2.5        | 250     | ND-2.5  | 170     | ND-2.5 | ND-2.5  | ND-2.5  |
| 1,1,2-Trichloroethane  | ND-2.5 | ND-2.5  | ND-2.5        | ND-2.5  | ND-2.5  | ND-2.5  | ND-2.5 | ND-2.5  | ND-2.5  |
| Trichloroethane        | 140    | 22,000  | 12,000        | 41,000  | 1,600   | 9,900   | 140    | 900     | 730     |
| Trichlorofluoromethane | ND-2.5 | ND-2.5  | ND-2.5        | ND-2.5  | ND-2.5  | 5.4     | ND-2.5 | ND-2.5  | ND-2.5  |
| 1,1-Dichloroethane     | ND-2.5 | ND-2.5  | ND-2.5        | ND-2.5  | ND-2.5  | 5.8     | ND-2.5 | ND-2.5  | ND-2.5  |
| Acetone                | ND-50  | ND-50   | ND-50         | ND-50   | ND-50   | ND-50   | ND-50  | ND-50   | ND-50   |

1. Methylene chloride was detected in the method blank at 9.8 ug/Kg.
2. For all constituents that were not detected, results are reported "ND" followed by the detection limit.

**TABLE 5**

**Summary of Dames & Moore Groundwater Analytical Results (ug/L)<sup>14</sup>**

| Constituent              | MW-1     | MW-2   | MW-3   | MW-4    | MW-5   |
|--------------------------|----------|--------|--------|---------|--------|
| Chloroform               | ND - 0.5 | ND-0.5 | ND-0.5 | 58      | ND-0.5 |
| 1,1-Dichloroethane       | ND - 0.5 | ND-0.5 | ND-0.5 | 32      | 8.0    |
| 1,1-Dichloroethene       | ND - 0.2 | ND-0.2 | ND-0.2 | 1,000   | 97     |
| Trans-1,2-Dichloroethene | ND - 0.5 | ND-0.5 | ND-0.5 | ND-0.5  | 3.5    |
| Methylene Chloride       | ND - 0.5 | ND-0.5 | ND-0.5 | 470     | 18     |
| Tetrachloroethene        | ND - 0.5 | ND-0.5 | ND-0.5 | 92      | 18     |
| Toluene                  | ND - 0.5 | ND-0.5 | ND-0.5 | 24      | ND-0.5 |
| 1,1,1-Trichloroethane    | ND - 0.5 | ND-0.5 | ND-0.5 | 22,000  | 980    |
| 1,1,2-Trichloroethane    | ND - 0.5 | ND-0.5 | ND-0.5 | 110     | ND-0.5 |
| Trichloroethene          | ND - 0.5 | 1.1    | 36     | 330,000 | 98,000 |
| Trichlorofluoromethane   | ND - 0.5 | ND-0.5 | 13     | 590     | 120    |
| Bromodichloromethane     | ND - 0.5 | ND-0.5 | ND-0.5 | ND-0.5  | 3.6    |
| 1,2-Dichloropropane      | ND - 0.5 | ND-0.5 | ND-0.5 | ND-0.5  | ND-0.5 |

| Constituent              | MW-5<br>DUP. | MW-6   | MW-7   | MW-8   | MW-9    |
|--------------------------|--------------|--------|--------|--------|---------|
| Chloroform               | 8.1          | ND-0.5 | ND-0.5 | ND-0.5 | ND-0.5  |
| 1,1-Dichloroethane       | 9.3          | ND-0.5 | ND-0.5 | ND-0.5 | 17      |
| 1,1-Dichloroethene       | 110          | 1.2    | ND-0.5 | ND-0.5 | 560     |
| Trans-1,2-Dichloroethene | 4.6          | ND-0.5 | ND-0.5 | ND-0.5 | 4.1     |
| Methylene Chloride       | 20           | ND-0.5 | ND-0.5 | ND-0.5 | 190     |
| Tetrachloroethene        | 19           | ND-0.5 | ND-0.5 | ND-0.5 | 39      |
| Toluene                  | ND-0.5       | ND-0.5 | ND-0.5 | ND-0.5 | ND-0.5  |
| 1,1,1-Trichloroethane    | 1,430        | 6.2    | ND-0.5 | 0.8    | 5,000   |
| 1,1,2-Trichloroethane    | ND-0.5       | ND-0.5 | ND-0.5 | ND-0.5 | 22      |
| Trichloroethene          | 100,000      | 1,800  | 22     | 120    | 520,000 |
| Trichlorofluoromethane   | ND-0.5       | 31     | 12     | 28     | 620     |
| Bromodichloromethane     | ND-0.5       | ND-0.5 | ND-0.5 | ND-0.5 | ND-0.5  |
| 1,2-Dichloropropane      | ND-0.5       | ND-0.5 | ND-0.5 | ND-0.5 | 6.5     |

1. Methylene chloride was detected in the method blank at 9.8 ug/Kg.
2. For all constituents that were not detected, results are reported "ND" followed by the detection limit.

pathways representing means by which hazardous substances may pose a threat to human health and/or the environment. The exposure pathway include three migration pathways (groundwater, surface water, and air) and one exposure pathway (soil). For each pathway, three factors are evaluated: likelihood of release of hazardous substances, targets, and waste characteristics.

This section will present a summary of the potential threats associated with each HRS exposure pathway at the Williams Street site.

### **3.1 Sources of Contamination**

Information regarding the types and quantities of hazardous materials onsite during the period of operation was not available because the facility vacated in 1988. Sources of contamination identified during the Preliminary Assessment include the following:

1. The refrigerant used in the freeze-drying operation was contained in a storage tank estimated to be approximately 800 gallons in volume. Refrigerant was circulated through a closed system. Based upon the information presented above, the refrigerant was identified as DOWTHERM during the period that Hills Brothers operated the facility. Cryo-Maid/Innovative Foods reportedly changed the refrigerant from DOWTHERM to TCE some time during their period of operation, although investigation reports of the August 1988 spill cite Innovative Foods as identifying the refrigerant as Freon 11 (Trichlorofluoromethane).

The predominant chemical constituents identified by available analytical data is TCE. Other substances identified include: diphenyl, diphenylether, chloroform, 1,1-dichloroethane, 1,1-dichloroethene, trans-1,2-dichloroethene, methylene chloride, tetrachloroethene, toluene, 1,1,1-trichloroethane, 1,1,2-trichloroethane, trichlorofluoromethane, and bromodichloromethane.

2. Widespread soil contamination is present at the Williams Street. Analysis of soil borings collected at depths ranging from 5.0 to 21.5 feet within the warehouse (PB-1, PB-2, SB-1) and along the southwest side of the warehouse (SB-3, SB-4, SB-5, SB-6) revealed TCE concentrations ranging from 11 ug/Kg to 41,000 ug/Kg. Further, two soil samples collected at a depth of 15 to 21 inches below the roll-up door on the southwest side of the warehouse revealed TCE concentrations of 1,400,000 mg/Kg and 5,000,000 ug/Kg. The surface area covered by these soil borings is approximately 15,000 square feet.

### **3.2 Groundwater Pathway**

This section presents information on the hydrogeologic setting, groundwater targets, and conclusions regarding the groundwater pathway.

#### **3.2.1 Hydrogeologic Setting<sup>18</sup>**

San Leandro is located in the major groundwater producing area in the east San Francisco Bay region referred to as the Bay Plain. Groundwater in the San Leandro Alluvial Cone

12-1

CHECK DISBURSEMENT  
SPECIAL HANDLING INSTRUCTIONS

VENDOR NAME ALAMEDA COUNTY ENVIRONMENTAL

VENDOR NUMBER 749815

CHECK DATE 12/11/95 ?

ATTACH WITH CHECK

RETURN CHECK TO \_\_\_\_\_

OTHER \_\_\_\_\_

ORIGINATOR MARY ELLEN LUCAS DATE 12/08/95  
SNL #562

Please fax all attachments to (513)576-7115.

**JAMES RIVER CORPORATION**  
**FOOD AND CONSUMER PACKAGING**  
 One Better Way Rd., Milford, OH 45150-2743



04-356570

Citibank Delaware  
 A subsidiary of Citicorp  
 One Penn's Way, New Castle, DE 19720

DATE  
 12/13/95

NET AMOUNT  
 \*\*\*\*\*1,000.00

ONE THOUSAND DOLLARS NO CENTS

ALAMEDA COUNTY ENVIRONMENTAL  
 HEALTH DEPT  
 ENVIRONMENTAL PROTECTION DIV  
 1131 HARBOR BAY PARKWAY RM 250  
 ALAMEDA CA 94502-6577

JAMES RIVER CORPORATION  
 NOT VALID AFTER 60 DAYS

*Stephen E. Blue*  
 (Signature)

⑈ 356570⑈ ⑆ 031100209⑆ 38830624⑈

0749815

Detach Here For Your Records

| Oper. Loc. | Voucher Number | Invoice Number | Purchase Order | Invoice Date | Amount   | Discount | Net Amount |
|------------|----------------|----------------|----------------|--------------|----------|----------|------------|
|            | 562 120166     | 652B-A         | 113095         | 11/30/95     | 1,000.00 | .00      | 1,000.00   |
|            | 04-356570      | 12/13/95       |                |              | 1,000.00 | .00      | 1,000.00   |

Check

JAMES RIVER CORPORATION One Better Way Rd., Milford, OH 45150-27

REF./A/C NO. *Add On*

COUNTY OF ALAMEDA  
 OFFICE OF THE AUDITOR-CONTROLLER

DATE: *12/19/95*

MISCELLANEOUS RECEIPT

No 768129 *M Logan*

\$ *1,000.00*  
 DOLLARS

RECEIVED FROM: *James River Corp. One Better Way Rd. Milford, OH 45150-2743.*  
 FOR: *James River Corporation 2101 Williams St. SAN LEANDRO CA 94577*  
 RECEIVED BY: *Juliette D'Amore*  
 DEPT. NO.: *130-4530*

CASH  PERSONAL/CASHIER'S CHECK/M. O. # *04-356570*

OTHER:

110-1 (Rev 10/85) [0134E (08)] 3-Part

Distribution: White - Payor Yellow & Pink - Depart.





**JAMES RIVER CORPORATION**

PACKAGING BUSINESS

2101 Williams St., San Leandro, CA 94577-3200 510-614-2300 Fax 510-614-2301  
Mailing Address: P.O. Box 5088, San Leandro, CA 94577-0552

6 December 1995

Mr. Dale Klettke  
Alameda County  
Health Care Services Agency  
Department of Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577

Dear Mr. Klettke,

As a follow up to our Monday, December 4, 1995 and conversation, James River will proceed with the work plan approved by the agency's November 22, 1995 correspondence with the understanding that three temporary monitoring wells will be installed, one (1) of which will be in proximity to the former cardboard bailer vault and the additional two (2) will be exterior to the production building. In the event that free product is encountered in the boring near the former vault, that boring will be converted to a permanent four-inch-diameter recovery well.

With the intent to minimize the impact on operations, the drilling has been scheduled for Wednesday December 27, 1995.

In the event of comments or inquires, do not hesitate to contact my office at (510) 614-2351.

Sincerely,

Regina R. Colbert  
Government Regulations Coordinator

*no longer w/ ESE*

cc: ~~Eric Garcia~~, ESE Inc., 4090 Nelson Avenue, Suite J, Concord, CA 94520  
Mike Bakaldin, San Leandro Hazardous Materials Program

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, DIRECTOR

November 30, 1995

Alameda County Environmental Health Dept.  
Environmental Protection Division  
1131 Harbor Bay Parkway, Room 250  
Alameda CA 94502-6577  
(510)567-6700 fax: (510)337-9335

ATTN: Ms. Regina Colbert

James River Corporation  
2101 Williams Street  
San Leandro, CA 94577

RE: Project # 652B - A  
at 2101 Williams Street in San Leandro 94577

*UC# 749815* RECEIVED DEC 04 1995

*STID 1008*

ALAMEDA COUNTY ENVIRONMENTAL  
HEALTH DEPARTMENT

ENVIRONMENTAL PROTECTION DIVISION  
1131 Harbor Bay Parkway, Suite #250  
Alameda, CA 94502-6577  
Telephone (510) 567-6700  
Fax Number (510) 337-9335

DIRECT #  
(510) 567-6880

FAX COVER SHEET

DATE: NOVEMBER 30, 19 95

TO: KRIS

DTSC

FAX # (510) 540-3801

Total number of pages including cover sheet 1

FROM: DALE KLETTEKE

ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH

NOTE:

WOULD LIKE TO REVIEW ANY FILES  
PERTAINING TO CHLORINATED VOC PLUME AT  
1964 WILLIAM STREET, OR ANY OTHER REPORTS  
DOCUMENTING THE PREVIOUS 12-DEG CHLORINATED GROUNDWATER  
PLUME.

(SMILE) have a nice day.  
DO SOMETHING FOR OUR ENVIRONMENT.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6777

November 30, 1995

ATTN: Ms. Regina Colbert

James River Corporation  
2101 Williams Street  
San Leandro, CA 94577

RE: Project # 652B - A  
at 2101 Williams Street in San Leandro 94577

Dear Ms. Colbert:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$1000.00, payable to Alameda County.

Please write your project number and site address on your check.

We must receive this deposit before we perform any further work on this project. At the completion of this project, any unused monies will be refunded to you or your designee.

If you have any questions, please contact Dale Klettke at (510) 567-6880.

Sincerely,

Tom Peacock, Area Manager  
Environmental Protection Division

c: files/inspector



Environmental  
Science &  
Engineering, Inc.

FACSIMILE

DATE: 11.28.95 TIME: 1415

TO: Dale Klettke FROM: Eric W. Garcia  
Alameda Co. Health Care Services Agency ESE, Inc.  
4090 Nelson Avenue, Ste J  
Concord, CA 94520

FAX #: (510) 337-9335 JOB #: 6595207

SUBJECT: Revised - Revised Site Map

Number of Pages

(Including this Cover Sheet)

2

ADDITIONAL MESSAGE:

Please call if there are any questions.  
Eric

If you have any questions, please call us immediately at (510) 685-4053.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

STID 1008

November 22, 1995

DEPARTMENT OF ENVIRONMENTAL HEALTH  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6777

Regina Colbert  
James River Corporation  
Flexible Packaging Division  
2101 William Street  
San Leandro, CA 94577

RE: JAMES RIVER CORPORATION, 2101 WILLIAMS STREET, SAN LEANDRO

Dear Ms. Colbert:

I am in receipt of and have reviewed the Environmental Science & Engineering, Inc., (ESE) "Work Plan for Preliminary Site Assessment", dated November 21, 1995.

This work plan consists of the advancement of three (3) soil borings and the collection of soil and groundwater samples from each of these borings. ESE will then install and develop temporary four-inch-diameter groundwater monitoring wells in each of the borings. This work plan will evaluate the extent of any soil and groundwater contamination associated with the cardboard bailer mechanism which was decommissioned in December 1993.

These four-inch-diameter temporary monitoring wells will help facilitate the removal of any free product which may be encountered in the borings, and will be installed to provide for easy conversion to permanent groundwater monitoring and/or free product recovery wells.

**This work plan is approved with the stipulation that one additional soil boring be advanced within approximately 10 feet of the former cardboard bailer vault in the "inferred" down gradient location. This boring is to be converted to a permanent four-inch-diameter recovery well if free product is encountered in the boring.**

Appropriate soil and groundwater samples should be collected for the additional boring. Please notify this office at least 48 hours prior to commencing operations, so I can schedule time to be on site. I am also aware that there are constraints on the placement of the requested additional boring inside the building during operational hours. Therefore, I will make myself available during non-operational hours (Saturdays or evenings) to schedule a time when the drilling will least impact operations at your facility. Please feel free to call me directly at 510/567-6880 should you have any questions or comments concerning this matter.

Sincerely,

Dale Klettke, CHMM  
Hazardous Materials Specialist

Regina Colbert

RE: James River Facility, 2101 Williams Street, San Leandro

November 22, 1995

Page 2 of 2

c: Jun Makishima, Interim Director  
Tom Peacock, Supervising Hazardous Materials Specialist--files  
Mike Bakaldin, San Leandro Hazardous Materials Program  
Eric Garcia, c/o ESE Inc., 4090 Nelson Avenue, Suite J, Concord, CA 94520

1008psa1.ok



DEPARTMENT OF ENVIRONMENTAL HEALTH  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6777

STID 1008

October 10, 1995

Regina Colbert  
James River Corporation  
Flexible Packaging Division  
2101 William Street  
San Leandro, CA 94577

RE: JAMES RIVER CORPORATION, 2101 WILLIAMS STREET, SAN LEANDRO

Dear Ms. Colbert:

This office is in receipt of and has completed review of the case file for this site, up to and including the August 3, 1995 Environmental Science & Engineering, Inc. (ESE) "Third Quarter of 1995, Ground Water Monitoring Report". In addition, the results of sample analyses and observations documented during the December 1993 decommissioning of a cardboard bailer vault system have been recently re-evaluated. This letter is in specific reference to the March 8, 1994 - Harding Lawson Associates (HLA) - "Sampling Results, Cardboard Bailer Vault Groundwater Sampling and Hydropunch Investigation". After removal of the cardboard bailer vault system, approximately 1700 gallons of water was pumped from the vault and a sample of the groundwater from inside the ram housing was collected. Approximately 0.4 feet of free product was observed floating on top of the groundwater. Subsequent laboratory analysis of the groundwater sample collected was found to contain 210 mg/L (ppm) of Total Petroleum Hydrocarbons as motor oil (TPHmo). The free product layer was separated from the groundwater sample for separate analysis. A sample of the virgin James River lubricant was analyzed and the gas chromatogram patterns from the free product and the virgin lubricant were compared and found to have similar patterns.

Based on the laboratory results for the floating product and groundwater gradient, a boring was advanced approximately 20 feet downgradient of the vault and a groundwater sample collected with a hydropunch. At 15.5 feet below the building floor surface, free product was encountered in the boring. The two soil samples collected from approximately 15.5-16.0 feet and 18.0-18.5 feet below the building floor were analyzed and contained 5,700 and 3,100 mg/kg (ppm) TPHmo, respectively. The groundwater sample collected between 19.0 to 21.0 feet below the building floor yielded 110 mg/L (ppm) TPHmo.

Analytical results for ground water samples from monitoring wells W-7 and W-8 have detected concentrations of TPHmo at a maximum of 9600 ug/L (ppb) in monitoring well W-7 for the May 1995 sampling event. These wells are reportedly located in a cross-gradient groundwater flow direction at an approximate distance of 170 (well W-8) and 270 feet (well W-7) from the former cardboard bailer vault system.



Ms. Regina Colbert  
RE: 2101 Williams Street  
Page 2 of 2

A confirmed release from the cardboard bailer vault system has occurred at this site. Pursuant to provisions of Article 4, Chapter 4, Section 13267(b) of the Porter-Cologne Water Quality Control Act, you are required to perform a preliminary site assessment (PSA) to define the extent of both soil and ground water contamination. To facilitate this task, a PSA work plan must be submitted for review. **This work plan is due within 45 days of the date of this letter or November 25, 1995.**

However, in order to pursue the pending PSA in a more cost-effective fashion, this office encourages you to first employ rapid site assessment tools (e.g. CPT, Geo Probe, Hydropunch, etc.) to qualitatively assess impacts before proposing final well locations.

Pursuant to provisions of the Business and Professions Code all work and reports which require geologic or engineering evaluations and/or judgements must be performed under the direction of an appropriately registered or certified professional. All reports and proposals must be submitted under seal of a California-registered geologist or civil engineer with the appropriate environmental background. Please include a statement of qualifications for each lead professional involved with this project.

**Please be advised that this letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267(b).**

Please call me at 510/567-6880 should you have any questions.

Sincerely,



Dale Klettke, CHMM  
Hazardous Materials Specialist

c: George Young, Acting Chief-Hazardous Materials Division--files  
Gil Jensen, Alameda County District Attorney's Office

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6777

September 19, 1995

ATTN: Mr Walter Gonzalez

James River Corp.  
2101 Williams St.  
San Leandro CA 94577

RE: Project # 652B - A  
at 2101 Williams St in San Leandro 94577

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$750.00, payable to Alameda County.

Please write your project number and site address on your check.

We must receive this deposit before we perform any further work on this project. At the completion of this project, any unused monies will be refunded to you or your designee.

If you have any questions, please contact Dale Klettke at (510) 567-6700.

Sincerely,

Tom Peacock, Acting Chief  
Environmental Protection Division

c: files/inspector

**ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION  
DEPOSIT / REFUND ACCOUNT SHEET**

**SITE INFORMATION**

Flexible Packing Division  
2101 Williams St.  
San Leandro 94577  
Site Contact:  
Site Phone :

|                         |
|-------------------------|
| StID: 1008 Site#: 652   |
| PROJECT#: 652B          |
| PROJECT TYPE: A         |
| INSP: Rob Weston        |
| ACCT. SHEET PG #: _____ |

**PROPERTY OWNER INFORMATION**

Owner Contact:  
Owner Phone :

**CONTRACTOR INFORMATION**

James River Corp.  
2101 Williams St.  
San Leandro CA 94577 #407  
Contr. Contact:  
Contr. Phone :

| Date    | Action Taken                      | Time  |       | Hours Spent/Depstd | Hour Balnce | Money          |              |
|---------|-----------------------------------|-------|-------|--------------------|-------------|----------------|--------------|
|         |                                   | In    | Out   |                    |             | Spent/Depositd | Money Balnce |
|         | Balance from Prev. Page           | ..... | ..... | .....              |             |                | <u>-563</u>  |
|         | Rcpt# 725501                      |       |       |                    |             |                |              |
| 17/93   | Deposit of \$1,200.00 @ \$75/hour |       |       | +16.               |             |                | 637          |
| 2/2/94  | Transfer file to MF-              |       |       |                    |             |                |              |
| 2/1/94  | File Review                       |       |       | 0.5                |             | 37.50          | 599.50       |
| 2/3/94  | Phone conversa<br>Walter Gonzalez |       |       | 0.5                |             | 37.50          | 562.00       |
| 2/3/94  | File review                       |       |       | 0.0                |             | 0.00           |              |
| 2/26/94 | Ground water Report               |       |       | 1.5                |             | 112.50         | 449.50       |
| 8/31/95 | Review Reports                    |       |       | 1.0                |             | 112.50         | 337.00       |
| 9/1/95  | Review/DRAFT SUI LETTER           |       |       | 3.7                |             | 277.50         | 59.50        |
| 9/5/95  | FILE SUMMARY                      |       |       | 0.7                |             | 52.50          | 7.00         |

**UPON COMPLETION OF PROJECT**

PROJ COMPLETED BY : \_\_\_\_\_ ATTACH:  State Forms A, B & C  
 Billing Adjustment\*  
 DATE OF COMPLETION : \_\_\_\_\_ DATE SENT TO BILLING: \_\_\_\_\_

TOTAL COST OF PROJECT: \_\_\_\_\_ REFUND AMOUNT: \_\_\_\_\_ Rev. 1/93

\* Billing adjustment forms needed when site is in our UST program.

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION  
DEPOSIT / REFUND ACCOUNT SHEET

DALE KLETTKE  
~~DALE KLETTKE~~  
SLIC

SITE INFORMATION

Flexible Packing Division  
2101 Williams St.  
San Leandro 94577  
Site Contact: WALTER GONZALEZ  
Site Phone :

StID: 1008 Site#: 652  
PROJECT#: 652B  
PROJECT TYPE: A  
INSP: Rob Weston  
ACCT. SHEET PG #: \_\_\_\_\_

PROPERTY OWNER INFORMATION

Owner Contact:  
Owner Phone :

NEED \$750.00 FOR DEPOSIT/REFUND

CONTRACTOR INFORMATION

James River Corp.  
2101 Williams St.  
San Leandro CA 94577 #407  
Contr. Contact: WALTER GONZALEZ  
Contr. Phone :

Done 9-11-95

| Date              | Action Taken                                      | Time |     | Hours Spent/Depstd | Hour Balance | Money Spent/Depositd | Money Balan |
|-------------------|---------------------------------------------------|------|-----|--------------------|--------------|----------------------|-------------|
|                   |                                                   | In   | Out |                    |              |                      |             |
|                   | Balance from Prev. Page                           |      |     |                    |              | -563                 |             |
| 17/93             | Rcpt# 725501<br>Deposit of \$1,200.00 @ \$75/hour |      |     | +16.               |              |                      | 637         |
| 2/2/94            | Transfer file to MF-                              |      |     |                    |              |                      |             |
| 2/1/94            | File Review                                       |      |     | 0.5                |              | 37.50                | 599.50      |
| 2/3/94            | Phone conversa. Walter Gonzalez                   |      |     | 0.5                |              | 37.50                | 562.00      |
| <del>2/3/94</del> | <del>File review</del>                            |      |     | <del>0.0</del>     |              | <del>0.00</del>      |             |
| 2/26/94           | Ground water Report                               |      |     | 1.5                |              | 112.50               | 449.50      |
| 8/31/95           | REVIEW REPORTS                                    |      |     | 1.5                |              | 112.50               | 337.00      |
| 9/1/95            | REVIEW/DRAFT SWI LETTER                           |      |     | 3.7                |              | 277.50               | 59.50       |
| 9/5/95            | FILE SUMMARY                                      |      |     | 0.7                |              | 52.50                | 7.00        |
| 9/26/95           | CALL FROM REGINA COLBERT                          |      |     | 0.6                |              |                      |             |
| 10/10/95          | FINAL DRAFT                                       |      |     | 0.0                |              |                      |             |

UPON COMPLETION OF PROJECT

PROJ COMPLETED BY : \_\_\_\_\_ ATTACH:  State Forms A, B & C  Billing Adjustment\*

DATE OF COMPLETION : \_\_\_\_\_ DATE SENT TO BILLING: \_\_\_\_\_

TOTAL COST OF PROJECT: \_\_\_\_\_ REFUND AMOUNT: \_\_\_\_\_ Rev. 1/95

\* Billing adjustment forms needed when site is in our UST program.

DALE KLETTICE  
LOP

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION  
DEPOSIT / REFUND ACCOUNT SHEET

SITE INFORMATION

Flexible Packing Division  
2101 Williams St.  
San Leandro 94577  
Site Contact: WALTER GONZALEZ  
Site Phone :

StID: 1008 Site#: 652  
PROJECT#: 652B  
PROJECT TYPE: A  
INSP: Rob Weston  
ACCT. SHEET PG #: \_\_\_\_\_

PROPERTY OWNER INFORMATION

Owner Contact:  
Owner Phone :

NEED \$750<sup>00</sup>  
FOR DEPOSIT/REFUND

CONTRACTOR INFORMATION

James River Corp.  
2101 Williams St.  
San Leandro CA 94577 #407  
Contr. Contact: WALTER GONZALEZ  
Contr. Phone :

Done 9-11-95

| Date     | Action Taken                      | Time  |       | Hours Spent/Depstd | Hour Balance | Money Spent/Depositd | Mo... Balan |
|----------|-----------------------------------|-------|-------|--------------------|--------------|----------------------|-------------|
|          |                                   | In    | Out   |                    |              |                      |             |
|          | Balance from Prev. Page           | ..... | ..... | .....              |              | (-563)               |             |
|          | Rcpt# 725501                      |       |       |                    |              |                      |             |
| 17/93    | Deposit of \$1,200.00 @ \$75/hour |       |       | +16.               |              |                      | 637         |
| 2/2/94   | Transfer file to MT-              |       |       |                    |              |                      |             |
| 2/1/94   | File Review                       |       |       | 0.5                |              | 37.50                | 599.50      |
| 2/3/94   | Phone conversa<br>Walter Gonzalez |       |       | 0.5                |              | 37.50                | 562.00      |
| 2/8/94   | File review                       |       |       | 1.0                |              | 75.00                |             |
| 2/14/94  | Ground water Report               |       |       | 1.5                |              | 112.50               | 449.50      |
| 3/31/95  | Review Reports                    |       |       | 1.5                |              | 112.50               | 337.00      |
| 9/1/95   | Review/DRAFT SUIC LETTER          |       |       | 3.7                |              | 277.50               | 59.50       |
| 9/5/95   | FILE SUMMARY                      |       |       | 0.7                |              | 52.50                | 7.00        |
| 9/26/95  | CALL FROM REGINA COBERT           |       |       | 0.6                |              | 54.00                | -47.00      |
| 10/10/95 | FINAL DRAFT                       |       |       | 0.8                |              | 72.00                | -119.00     |
| 11/22/95 | REVIEW ESG WORK PLAN              |       |       | 1.5                |              | 135.00               | -254.00     |

UPON COMPLETION OF PROJECT

PROJ COMPLETED BY : \_\_\_\_\_

ATTACH: State Forms A, B & C  
Billing Adjustment\*

DATE OF COMPLETION : \_\_\_\_\_

DATE SENT TO BILLING: \_\_\_\_\_

TOTAL COST OF PROJECT: \_\_\_\_\_

REFUND AMOUNT: \_\_\_\_\_

Rev. 1/93

\* Billing adjustment forms needed when site is in our UST program.

Harding Lawson Associates

RECEIVED  
HAZMAT  
25 JAN 10 11 31



January 4, 1995

30374 001

Ms. Madhulla Logan  
Alameda County Health Agency  
Department of Environmental Health  
80 Swan Way, Room 200  
Oakland, California 94621

**Revised Fourth Quarter 1994 Groundwater Monitoring Report  
James River Corporation  
San Leandro, California**

Dear Ms. Logan:

Enclosed is Harding Lawson Associates' (HLA) *Revised Fourth Quarter 1994 Groundwater Monitoring Report, James River Corporation, San Leandro, California*. A revision to Table 3 regarding the concentrations of benzene, toluene, ethylbenzene, and xylenes (BTEX) has been made. The concentrations were originally recorded as not analyzed (NA), but were intended to be recorded as nondetectable (ND). Table 3 has subsequently been revised to report BTEX as less than the reported detection concentrations in all eight wells sampled. This is consistent with the historical reporting format for Table 3.

HLA apologizes for any inconvenience this matter may have caused.

If you have any further questions regarding this report, please call me at (415) 884-3105.

Very truly yours,

**HARDING LAWSON ASSOCIATES**

A handwritten signature in cursive script, appearing to read "Richard J. Hutton".

Richard J. Hutton  
Senior Hydrologist

cc: Ms. Regina Colbert, James River Corporation

RJH:gl/GJ38390-JR

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) 271-4320

September 16, 1993

Mr. Walter Gonzalez  
Government Regulations Coordinator  
James River Corporation  
Flexible Packaging Division  
2101 Williams Street  
San Leandro, CA 94577

**Subject: Quarterly monitoring and subsurface investigation**

Dear Mr. Gonzalez:

This Department has received and reviewed the Brown and Caldwell report dated April 29, 1993 documenting the monitoring event that took place in February 1993. The following comments are offered on the report:

1. As stated in a letter from this Department dated December 14, 1992, the subsurface investigation will proceed with monitoring of wells: W-3, W-5, W-6, W-7, W-8, W-9, W-10, B-1 for chemicals of concern. Monitoring wells: W-1, W-4 will be used in conjunction with the other monitoring wells for gathering ground water elevation data and calculation of site specific gradient. The monitoring of all wells will proceed on a quarterly schedule. All reports, due quarterly, will include the results of the sampling events.
2. Further information was requested in the December 14, 1992 letter to clarify comments made in the "Summary Report of Additional Site Investigation", dated July 11, 1991 authored by Brown and Caldwell. That information has not been provided. The information requested concerns the origin of chlorinated VOCs and is vital to the site investigation.
3. Recommend that all monitoring wells be evaluated for presence of diisopropyl ether, isopropyl alcohol, acetone, methyl isobutyl ketone (MIBK), and methyl ethyl ketone (MEK) to determine the extent of contamination. This site is still in the process of characterization. The number of contaminants of concern have increased, alleged source of off-site contamination has not been identified and gradient calculation is limited in scope.
4. Explanation requested of the evaluation of the "A,B,C"

Mr. Walter Gonzalez  
September 16, 1993  
Page 2

zones noted on page 3, paragraph 2, and how they were selected and/or discounted as appropriate for use in the ground water gradient calculation. Have aquifer tests been performed to confirm that each "zone" is hydraulically separated?

5. Submit a time line and work plan for site characterization, i.e. monitoring well installation, further site assessment.
6. As stated in the December letter your deposit/refund account established September 14, 1990 with the sum of \$558.00 is currently a negative balance of \$516.40. Please remit a deposit of \$1200.00 so that this Department may continue oversight tasks associated with the investigation occurring at the Flexible Packaging site.

This Department is aware of the financial constraints expressed by James River Corporation. However, the responsibility for the subsurface investigation of the Flexible Packaging Division site remains. This investigation is not proceeding in a timely manner. Please feel free to contact me regarding this important matter.

Sincerely,



Robert Weston  
Hazardous Materials Specialist

cc: , Chief  
Scott Seery, Sr. Hazardous Materials Specialist  
Mary Ortendahl, Alameda County Economic Development Program  
Rich Hiett, SFRWQCB  
Todd Miller, Brown and Caldwell



6-16-93 11:30 - 12:00  
Telcom w/ Todd Miller

IDENTIFY UPGRADIENT SOURCE!

DISCUSS INK FROM STATEMENT!  
SENT LETTER ADDRESSING,

WHY NO MONTHLY ELEVATION DATA?

WHEN WILL MORE WELLS / FURTHER WORK  
BEGIN?



TODD -

LETTER - REGIONAL REPORT ✓

6-14-93

W-3 RESULTS CONSISTENT - TREND NEUTRAL

W-5 TCE STABLE, VC ↑, PCE STABLE

W-6 TCE ↑, PCE FLAT

W-7 TCE —, VC ↑, PCE ↓

W-8 TCE ↑, VC ↑, PCE —

W-9 TCE ↑, PCE —

W-10 Toluene ↓

B-1

Page 2, <sup>①</sup> 8240, although great for getting a cross section of  
5<sup>th</sup> paragraph VOCs (halocarbons and HC aromatics), does not have as  
low a detection limit as 8010/8020, for example,  
which is really only an issue when only trace concentrations  
of target compounds are present. <sup>②</sup> Is 8015 (TPH) really  
correct, Or is 8020 better for detecting the contents of  
the former USTs? If not, is another method better suited?

✓  
③ Need to evaluate the "A, B, C" horizons/zones noted on page 3, paragraph 2, and how they were selected or discounted as appropriate for the sake of ground H<sub>2</sub>O flow directions. Have any aquifer tests been performed which would confirm that each "zone" is hydraulically separated? Or is it just an assumption? ✓

✓  
④ I would suggest that all wells be evaluated for presence of diisopropyl ether, IPA, acetone, MIBK, and MEK to determine if they are isolated to only some of the wells, or all of 'em. [This'll help determine an on- or off-site source.]

✓  
⑤ I wouldn't omit any more wells from those being sampled.

⑥ When are more wells/further assessment going to be installed/performed?



**Brown and Caldwell**  
Consultants

3480 Buskirk Avenue  
Pleasant Hill, CA 94523-4342  
P.O. Box 8045  
Walnut Creek, CA 94596-1220  
(510) 937-9010  
FAX (510) 937-9026

99 APR 20 12:11:25

April 29, 1993

Mr. Walter Gonzalez  
Government Regulations Coordinator  
James River Corporation  
Flexible Packaging Division  
2101 Williams Street  
San Leandro, California 94577

11-7175-05/1

Subject: Transmittal of Quarterly Groundwater Monitoring Report

Dear Mr. Gonzalez:

Transmitted herewith is the February 1993 Quarterly Groundwater Monitoring Report for the James River Company (JRC), Flexible Packaging Facility located in San Leandro, California. This report has been prepared by Brown and Caldwell (BC) under the terms and conditions of the April 16, 1992, agreement between BC and JRC, and the February 10, 1993, proposal for one quarter of groundwater monitoring.

The next quarterly groundwater monitoring should be conducted during May 1993. Currently, BC is operating under the conditions of the February 1993 proposal for one quarter of groundwater monitoring. This proposal does not make provisions for conducting the groundwater monitoring for the remaining three quarters of calendar year 1993.

If you have any questions regarding the information contained within the enclosed document, and you wish BC to continue managing the current groundwater monitoring program please contact me at your earliest convenience at (510) 210-2278.

Very truly yours,

BROWN AND CALDWELL

Todd Miller  
Project Manager

TM:lp  
Enclosures

cc: Mr. Robert Weston, Alameda County Department of Environmental Health

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) 271-4320

December 14, 1992

Mr. Walter Gonzalez  
James River Corporation  
Flexible Packaging Group  
2101 Williams Street  
San Leandro, CA 94566-0552

Subject: Flexible Packaging Group  
2101 Williams Street, San Leandro

Dear Mr. Gonzalez:

At our recent meeting to discuss your proposal for an amended ground water monitoring program at the subject site, several important issues were addressed. The subsurface investigation is based on ground water flow gradients calculated from a linear pattern of monitoring wells located east to west across the site. Data from these wells show a gradient moving across the property in a southwesterly direction. As we showed at the meeting, the gradient maps are drawn with only a small arc of definition. Most of the site gradient is extrapolated. Large data gaps exist in the reported gradient due to the relatively small number of sampling events, combined with the limitations of the sampling point locations. Additional well points outside of the current array will be needed to define the site specific gradient. Both the definition of the extent of contamination and interception of contaminate plumes will be enhanced by more sampling points and gradient definition.

In order to proceed with a technically sound investigation and at the same time reduce costs associated with sampling and analysis only the following monitoring wells will be sampled quarterly: W-5, W-6, W-3, B-1, W-7, W-8, W-9, W-10. It was agreed at the meeting that all monitoring wells would be used to gather ground water elevation data at the quarterly events. I suggest you consider gathering monthly elevation data. The water samples will continue to be run for halogenated volatile organics and aromatic volatile organics using EPA methods 8010 and 8020.

During the course of the meeting other issues related to the investigation were examined. The "Summary Report of Additional Site Investigation", dated July 11, 1991 prepared by Brown and Caldwell Consultants states on page 5-2, "monitoring well W-10, located downgradient of an area known to contain buried inks, contained cis-1,2-dichloroethene (cis-1,2-DCE), ethylbenzene, toluene, and xylenes at concentrations of 2,400, 440, 22,000, and 21,00 micrograms per liter, respectively." James River

James River Corporation  
Flexible Packaging  
December 14, 1992

Corporation will need to explain this finding in a future report. In the same Report, page 2-7, soil samples were found containing chlorinated VOCs at a depth of four feet in the ink room excavation. These samples are above ground water level and seem to confirm that chlorinated VOCs were used at the site. These two areas alone would constitute a potential source for the contaminants found in the ground water.

Further information is requested for the results from soil borings, rail spur soil samples, and samples taken from beneath the former underground storage tanks and tested using EPA method 8010. This information is necessary to attempt to locate the source of contamination.

The Department requires that responsible parties remit a deposit to cover costs associated with our oversight of site investigations and remediations, associated with underground storage tank sites. Such deposits are authorized by Section 3-141.6 of the Alameda County Ordinance Code, and placed into a site-specific account from which funds are drawn at the current rate of \$71 per hour as time is dedicated to the project. Funds remaining in the account upon completion of a project will be refunded. Conversely, should these funds be depleted before project completion, additional funds will be requested. Your deposit account established September 14, 1990 with the sum of \$558.00 is currently a negative balance of \$195.00.

Please remit a deposit of \$491.00 so that the Department may continue oversight tasks associated with the investigation occurring at the Flexible Packaging site.

This Department is aware of the large amount of solvents and other hazardous wastes generated at the site. As I mentioned at our meeting we are ready to assist you with waste minimization training, audits and other technical resources to reduce costs associated with disposal and hazardous waste generation. These waste minimization consulting activities are offered at no cost to you.

I look forward to our continuing working relationship with a spirit of cooperation and communication. If you have questions concerning the site investigation or the deposit account please contact me at 271-4320.

James River Corporation  
Flexible Packaging  
December 14, 1992

Sincerely,



Robert Weston  
Hazardous Materials Specialist

cc: Ed Howell, Chief-files  
Scott Seery, Senior Hazardous Materials Specialist  
Todd Miller, Brown & Caldwell  
Mary Ortendahl, Alameda County Economic Development Office  
John Jang, RWCQB

12/2/92

WE WANT TO COOPERATE AND ASSIST BUT BASED ON A PROFESSIONAL, TECHNICAL ~~OPINION~~ NOT ABLE TO APPROVE

\* MEETING TO DISCUSS PROPOSAL AND ASK QUESTIONS ABOUT THE INVESTIGATION.

GRADIENT MAPS HAVE DATA GAPS DUE TO PLACEMENT AND RECOMMEND INSTALLATION OF WELLS TO AID IN DEFINITION

QUANTUM MONITORING IS ~~THE~~ MINIMUM SAMPLING SCHEDULE.

RESPECTFULLY DECLINE CONCURRENCE W/ PROPOSED AMENDED MONITORING PROGRAM.

1. DEVELOP CORRECTIVE ACTION PLAN
2. REDUCE SAMPLING IN REDUNDANT AREAS  
ELIMINATE B-1, W-1.
3. INSTALL ADDITIONAL WELLS IN ORDER TO DEFINE GRADIENT  
A. BE CAPABLE OF INTERCEPTING PLUMES
4. GRADIENT IS MORE COMPLEX THAN DEPICTED  
ALL MAPS SHOW IS A NARROW SLICE OF THE TOTAL



- 1) gradients - lack of data points (wells), few episodes
- 2) source areas - VOCs  
BTEX  
buried inks
- 3) appropriateness of analysis methods for solvents stored in removed USTs
- \* 4) former waste/runoff H<sub>2</sub>O collection sump excavation
- 5) former ink room excavation - 4.0' depth
  - samples
  - contaminants found
- 6) what was found in soil sampled from below R+R spur?

|                               |                              |    |
|-------------------------------|------------------------------|----|
| <u>Borings sampled for</u>    | <sup>W-10, et al</sup> 8010? | ?? |
| <u>USTs never sampled for</u> | 8010?                        | NO |
| <u>20,000 gal</u>             | " " 8010?                    | ?? |

pipelines leading to above grad tanks? yes

Need/Conclusions

- ① boring sample results - 8010 num?
- ② UST samples not analyzed for 8010
- ③ sample for 20,000 gal sump - 8010?

## EXAMPLES OF PROBLEMS

1. 1-18-92 SOIL SAMPLE FROM INK ROOM  
EXCAVATION.  
#12 / 4 FT, CHLOROFORM 64 PPB  
PCE 180 PPB  
TOLUENE 34,000 PPB  
#14 / 4 FT TOLUENE 16,000 PPB  
#15 / 4 FT TOLUENE 2,100 PPB

2. GRADIENT MAP OVERHEADS  
DATA GAPS, NEED EXPLANATION

3. FUEL CONSTITUENTS THAT ARE NOT  
ADDRESSED.

4. HOW DID INK ROOM CONTAMINATION HAPPEN?  
BURNED PICS

WE WANT TO COOPERATE AND ASSIST JRC  
BUT BASED ON A TECHNICAL REVIEW OF  
THE DATA, IN OUR PROFESSIONAL OPINION  
WE CAN NOT APPROVE THE AMENDED  
GND H<sub>2</sub>O MONITORING PROGRAM.

IN FACT A REVIEW OF THE SITE DATA  
INDICATES THAT FURTHER WORK NEEDS  
TO BE PERFORMED TO DEFINE THE GRADIENT  
AND THE EXTENT OF CONTAMINATION.

AS WELL A CAP NEEDS TO BE DEVELOPED.  
~~ADDITION~~

1. CONTAINMENT VAULT FOR 2<sup>o</sup> OF  
INK ROOM RUNOFF.

2. TANK REMOVALS NO VOC

3. PIPELINES ANALYZED

ALAMEDA COUNTY - ENVIRONMENTAL HEALTH - HAZARDOUS MATERIALS DIVISION

MEMORANDUM

DATE: October 21, 1992  
TO : Files of James River Corporation  
FROM: Robert Weston  
SUBJ: Conference on proposed amendment of monitoring plan

---

At the request of Walter Gonzalez, government regulation coordinator, for the James River Corporation (JRC), Flexible Packaging Group, located at 2101 Williams Street, San Leandro, a meeting was held today to discuss the company's proposed amendments to the quarterly ground water monitoring program. Todd Miller, with Brown and Caldwell Consultants was present at the meeting to discuss the reports prepared by the firm for JRC.

This case was transferred to me from Larry Seto, Senior Hazardous Materials Specialist when I assumed responsibility for oversight of site remediations in the City of San Leandro. Larry and I reviewed and discussed the case prior to today's meeting.

Several major points were discussed during the hour and a half meeting:

1. Historical use of chemicals at the site do not include chlorinated solvents.
2. Data collection from 10 ground water monitoring wells has been done on a quarterly basis since 03/90. One quarter was missed due to a contract lapse with Brown and Caldwell.
3. Data from monitoring wells on site present a characterization of contaminants and concentration fluctuations.
4. Constituents of concern from the former underground tanks is at relatively low concentrations near the former tank location.
5. Sampling of up gradient off site ground water indicates a possible off site source of the chlorinated VOC problem.
6. VOC contamination in shallow ground water is currently under investigation in the City of San Leandro by CAL/EPA lead. I referred Mr. Gonzalez to this document and other sources of information in order to expedite the investigation into the potential sources of VOCs.
7. Current technology for remediating the contaminated ground water, pump and treat, would be expected to increase the rate of on site movement of the VOC contamination.
8. JRC is committed to continued monitoring and future remediation of all on site contamination.

9. Investigation to determine the source and responsible party for the VOC contamination will continue.
10. As technology is available for in-situ remediation or other cost effective remediation is identified it will be implemented.

The meeting has helpful in being able to discuss the issues of interest to the JRC and to the Department. In addition to substantive discussion of the above issues it also, in a general sense, showed the Department's environmental concerns are also shared by JRC.

10-6-92  
4:30

WALTER GONZALES - CONTACTED  
REGARDING CONTACT TO RAFAEL AND  
MARY ORTENDAL. LEFT MESSAGE  
ON VOICE MAIL.

10-7-92  
4:00

TELECOM W/ WALTER GONZALES TO DISCUSS  
JAMES RIVER SITE. WE SET UP A MTG  
FOR OCTOBER 21, 1992 AT 10:00 AM.  
WE DISCUSSED SOURCE OF CHLORINATED PROBLEM.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) 271-4320

April 8, 1992

Mr. Anthony Mongero  
Brown and Caldwell Consultants  
3480 Buskirk Avenue  
P.O. Box 8045  
Walnut Creek, CA 94596-1220

Dear Mr. Mongero:

I have received your request for the abandonment of Monitoring Well W-2 at the James River Corporation, Flexible Packaging Group Facility, located at 2101 Williams Street in San Leandro, California. Your proposal describing the procedure for abandoning Monitoring Well W-2 is acceptable.

However, the urgency for the abandonment of this monitoring well is still something that has not been fully explained. All the wells at this site will eventually be abandoned using the protocol you have described for Monitoring Well W-2. It appears that W-2 could be closed at the time of those other abandonments. If the security and integrity of the monitoring wells at this site is in question, as you have suggested as a reason for closing W-2, then further actions on the part of the responsible party will be necessary to ensure that subsurface monitoring continue.

If you have any questions regarding this letter, please contact me at the enclosed address or call me at (510) 271-4320.

Sincerely,

  
Robert Weston  
Hazardous Materials Specialist

RW:RW

cc: Mr. Robert L. Wenning, James River Corporation



**I. SITE LAYOUT AND FACILITY DIAGRAMS**

Attach an annotated map of the facility sufficient to allow fire, safety, health, and other appropriate personnel to adequately respond to an emergency at your facility and indicate if it is available on site to first responders. See instructions.

J. NUMBER OF EMPLOYEES \_\_\_\_\_

K. SIZE OF FACILITY IN SQ. FT. \_\_\_\_\_

**L. EMERGENCY RESPONSE PLANS AND PROCEDURES**

Emergency Response and Evacuation Plan for your business:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(See Instructions. Use additional sheets as required)

**M. EMPLOYEE TRAINING PROGRAM**

Initial and annual refresher training plan for your business:

\_\_\_\_\_  
\_\_\_\_\_

(See Instructions. Use additional sheets as required)

I certify that the information contained in this business plan is accurate, that the plan meets the requirements of Chapter 6.95 (Section 25500 et seq.) of the Health and Safety Code, that amendments and revisions to it will be submitted in accordance with that Chapter, and that I am authorized to make this certification on behalf of the above-named business.

Signature \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_

If this is not an initial submission, date of last change: \_\_\_\_\_

City of San Leandro  
Civic Center, 835 E. 14th Street  
San Leandro, California 94577



April 3, 1991

Robert Wenning, Engineering Manager  
James River Corporation  
2101 Williams Street  
San Leandro, CA 94577

Dear Mr. Wenning,

Thank you for completing your application for a Special Discharge Permit. We appreciate the time and effort you have expended to provide the information which was requested in the application.

James River Corp. has made considerable progress with the removal of the underground tanks and old piping system, and the remediation of the contaminated soils surrounding these areas. However, the ground water clean-up project has been complicated by the discovery of halogenated hydrocarbons migrating through the aquifer from an unknown source. The number of identifiable toxic organic compounds has gone from one to twelve. James Rivers' sampling shows several of these toxic organics present in concentrations which exceed 100 mg/l. Specifically, Acetone is 790 mg/l and 2-Hexanone is 150 mg/l. We are not only concerned about the pollutants found in these high concentrations but also with the Total Toxic Organic content of your proposed discharge. Your sampling data as of December 1990 shows an average TTO of 440.4 mg/l within the ten monitoring wells and the sum of the TTO as 1072.4 mg/l. The TTO limit in the City's ordinance is 2.31 mg/l.

Section 14 of your application proposes no treatment of the ground water to remove the TTO pollutants prior to discharge to the sanitary sewer system. The City of San Leandro wastewater treatment plant is not designed to treat these organic pollutants. The plant's normal treatment process will cause these pollutants to be either volatilized and discharged into the air violating the Bay Area Air Quality Management Districts limits, or pass through the plant's processes and violate our NPDES Permit limits. Based on these factors James River's Special Discharge Permit will not be renewed.


Dave Karp, Mayor

City Council: Ellen M. Corbett; John E. Faria; Bob Glaze;  
Linda Perry; Julian P. Polvorosa; Anthony B. Santos; Dick Randall, City Manager

Considering that the modeling of the aquifer has not been completed and a remediation system has not been designed, application for a special discharge permit maybe premature. The project is now at the stage that will allow you to address various options as the remediation plans are developed without halting the project to change or redesign your system.

If you have any question please contact John Camp, Industrial Waste Inspector, at 577-3436. Once again, we appreciate your cooperation and look forward to following your progress in this matter.

Very truly yours,



Paul Zolfarelli  
Sr. Industrial Waste Inspector

PZ:ci

CC: Larry Seto, Alameda County DHS  
Lester Feldman, RWQCB

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

August 8, 1990

Mr. Bob Wenning, Engineering Manager  
James River Corporation  
Flexible Packaging Division  
2101 Williams St.  
San Leandro, CA 94577

Dear Mr. Wenning:

I have reviewed your workplan dated April 6, 1990 and your addendum dated July 5, 1990, that was prepared by Brown and Caldwell. Your workplan is acceptable with the following conditions:

1. A bioassay must be run on the stained soil sample taken from the pipe trench, in addition to 8010 and 8020 and the CAM metals.
2. If detectable amounts of contaminants are found in the stained soil, additional sampling maybe required and the extent of contamination defined.
3. A minimum of one monitoring well must be installed in the verified downgradient direction of the stained soil area.

Please submit to this office, an additional deposit/refund check for \$558.00, made payable to the County of Alameda. Your project has a current negative account balance of -\$102.00.

If you have any questions, please contact me at (415) 271-4320.

Sincerely,

Larry Seto, Senior,  
Hazardous Materials Specialist

LS:mnc

cc: San Leandro Fire  
San Leandro Wastewater Treatment Plant  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Agency  
RWQCB  
Charlene Williams, DOHS  
Rafat A. Shahid, Assistant Agency Director, Environmental Health  
Donna Courington, Brown and Caldwell  
Files



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

90 MAR 22 AM 10:40

March 21, 1990

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

11-42-5081-01/5

Subject: Additional Analytical Results, James River  
Corporation Flexible Packaging Plant,  
San Leandro, California

Dear Mr. Seto:

Upon review of my files, I realized that I inadvertently omitted some of the analytical results available for the James River site. Enclosed are copies of laboratory reports and a location map for samples collected during borehole drilling in June 1989. The purpose of the drilling and sampling was to delineate the extent of pigment stained soils in the vicinity of the new ink room. Stained soils identified by this investigation were later excavated and disposed of at a Class I facility, as indicated in our previous discussions.

Please call should you have questions or comments regarding this additional data.

Very truly yours,  
BROWN AND CALDWELL

A handwritten signature in black ink that reads 'Donna Courington'. The signature is written in a cursive style with a long, sweeping underline.

Donna Courington  
Project Manager

DLC:dc

Enclosure



**JAMES RIVER CORPORATION**

FLEXIBLE PACKAGING DIVISION/  
SAN LEANDRO PLANT  
2101 Williams Street, San Leandro, CA 94577 (415) 895-4300

89 DEC 20 AM 11:41

December 18, 1989

Mr. Larry Seto  
Dept. of Environmental Health  
Hazardous Materials Program  
80 Swan Way, Room 200  
Oakland, CA 94621

Dear Larry,

This is a follow up to our phone conversation of Monday, December 18th. I informed you that we encountered some discolored dirt extending under our railroad line. We believe this dirt contains dried printing ink. The layer is about 6" thick at a depth of about 18". The area is about 4 ft. wide x 25 ft. long.

The purpose of my call was to have you or someone from your office come look at the site. This would help you understand the localized nature of the problem. I thought you might be able to give us some likely options which we could pursue in further detail. As you have explained to me, your activity level as well as your department's is such that a site visit is impractical until late January '90. You did indicate that if it was very costly to excavate the railroad track area, a possible alternative could be to "cap" the area. In order for this to happen, our consultants would need to supply an indisputable evidence that the contaminants would not leach into the ground water. Even if this could be proven, it would be the Regional Water Quality Board's decision and not the counties to allow or disapprove the plan. You indicated the best method usually is to remove all contaminants and properly dispose them.

I will continue to look into our alternatives and pursue the plan that is most economically feasible to attain an "approved" remediation. I will keep you informed as we proceed. I look forward to your site visit and thank you for your help & cooperation.

Sincerely,

JAMES RIVER CORPORATION

Bob Wenning  
Engineering Manager

BW:gd

cc: Al Ringel  
Bill Wilson





**JAMES RIVER CORPORATION**  
FLEXIBLE PACKAGING DIVISION/  
SAN LEANDRO PLANT  
2101 Williams Street, San Leandro, CA 94577 (415) 895-4300

11-2-89  
Rec'd

October 30, 1989

Mr. Larry Seto  
Dept. of Environmental Health  
Hazardous Materials Program  
80 Swan Way, Room 200  
Oakland, CA 94621

Dear Larry,

In response to the questions in your letters of 10/10/89 & 9/26, I will give you a summary of our remediation plan.

We have hired Engineering Services, Inc. (ESI) as a consultant for this job. Tom Jur who is the project manager for ESI will direct excavation efforts. ESI procured Atlas Hydraulic Corporation to perform soil vapor checks and excavate contaminated soils. The excavated soils will have a composite sample analyzed to determine the proper facility at which it can be disposed. A confirming sample will be taken in the area of the excavation to confirm all contaminated dirt is removed. Both of these samples will be taken & checked by Trace Analysis of Hayward. These sample analysis results will be used in a final report to you prior to back filling the excavation with clean fill.

Once these holes are closed, we will remove the second set of product pipes that were attached to the tanks. Confirming soil samples will be taken before those holes are closed.

The following are specific answer to your questions:


- 1) The vertical and horizontal extent of contamination will be determined by using an organic vapor meter. This work will be performed by Atlas Hydraulic at the direction of Engineering Services Inc. Attached is a description of the organic vapor meter.
- 2) After excavation, composite samples will be taken from the excavated dirt as well as a confirming sample in the excavated hole. These samples will be taken and analyzed by Trace Analysis Laboratories of Hayward.
- 3) The samples will be analyzed for Ethyl Alcohol, N.P. Alcohol and N.P. Acetate.

Mr. Larry Seto  
October 30, 1989  
Page 2 of 2

- 4) The hauler and disposal facility will be determined based on the amount of dirt excavated and the analysis results.
- 5) We expect to commence work during the week of November 6, 1989. The lab results and back filling should take place by November 15th.
- 6) Attached are the name and addresses of the principal contractors involved in this remediation.

I would like to invite you or someone from you office to be here during excavation. Please call me if you need more info or would like to visit the site.

Sincerely,

  
Bob Wenning  
Engineering Manager

BW:gd

Attachments

cc: Rafat A. Shahid  
Jim Givens-Atlas  
Tom Jur - ESI  
Al Ringle  
File



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



REC'D OCT 16 1989

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

October 10, 1989

Mr. Bob Wenning, Engineering Manager  
James River Corporation  
Flexible Packaging Division  
2101 Williams St.  
San Leandro, CA 94577

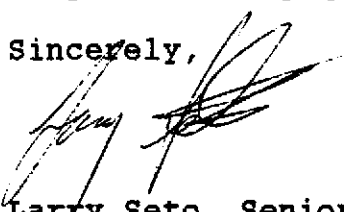
Dear Mr. Wenning:

We have reviewed your remediation plan for the product pipeline area at the above site. To assist us in evaluating your proposal, we need the following information.

1. Name of your sampler
2. Contaminants that will be sought during the testing
3. Name of analytical laboratory *TRALE ANALYSIS HAYWARD*
4. Expected date of completion

If you have any questions, please contact me at 271-4320.

Sincerely,

  
Larry Seto, Senior Hazardous  
Materials Specialist

LS:mnc

cc: Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Agency  
Rafat A. Shahid, Assistant Agency Director, Environmental Health  
RWQCB  
San Leandro Fire  
Howard Hatayama, DOHS  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



REC OCT 03 1989

Certified Mail #P 062 127 653

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

September 26, 1989

Mr. Bob Wenning, Engineering Manager  
James River Corporation  
Flexible Packaging Division  
2101 Williams Street  
San Leandro, CA 94577

Dear Mr. Wenning:

The excavation that previous housed three underground tanks at the above address may be backfilled.

Certain areas under the pipelines were found to have contamination up to 55,000 ppm of ethyl alcohol, 5,700 ppm n-propanol and 390 ppm N-Propyl Acetate. Please submit to this office within thirty (30) days of the receipt of this letter, your plan of correction. Your plan must include, but shall not be limited to the following:

1. Method that will be used to determine the vertical and — horizontal extent of contamination
2. Name of your hauler ~
3. Name of disposal facility ←
4. Expected date of completion

As per your conversation with Larry Seto from our office on September 25, 1989, please submit all documents and laboratory reports concerning the water quality at the above site.

Mr. Bob Wenning, Engineering Manager  
James River Corporation  
Flexible Packaging Division  
2101 Williams Street  
San Leandro, CA 94577  
September 26, 1989  
Page 2 of 2

If you have any questions, please contact Larry Seto, Sr. Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,

*Rafat A. SW*

Rafat A. Shahid, Chief,  
Hazardous Materials Program

RAS:LS:mnc

cc: San Leandro Fire  
Eric Staedicke, San Leandro Wastewater Treatment Plant  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Agency  
RWQCB  
Howard Hatayama, DOHS  
Larry Seto, Alameda County Hazardous Materials Program  
Files



**JAMES RIVER CORPORATION**  
FLEXIBLE PACKAGING DIVISION/  
SAN LEANDRO PLANT  
2101 Williams Street, San Leandro, CA 94577 (415) 895-4300

September 26, 1989

10/5/89

ALAMEDA COUNTY  
DEPT. OF ENVIRONMENTAL HEALTH  
HAZARDOUS MATERIALS

Mr. Larry Seto  
Alameda County Health Service Dept.  
80 Swan Way, Room 200  
Oakland, CA 94621

Dear Larry:

The purpose of this letter is two fold. First, I will give you a quick recap of our underground tank removal project and associated remediation. Second, I will attach a summary of our ground water remediation efforts for a separate spill which occurred a number of years ago.

Three underground tanks were removed 6/27/89. Tanks #1 and #3 contained mixtures of Ethyl Alcohol or N-Propanol and N-Propylacetate. Tank #2 contained only N-Propanol. Soil samples were taken immediately to be checked for solvent contamination. The next day, the first set of product pipe lines were excavated. These pipes ran from the solvent tanks to our main production building. Soil samples were taken at that time. (See attachment 1, 2 and 3.) Soil samples from pipe trench location #10 and #11 show a slight level of contamination. All other locations look good.

Our remediation plans are as follows:

1. Fill in large tank hole with noncontaminated dirt excavated from hole.
2. Conduct a soil vapor analysis in the area of sample location 9 and 10 of the pipe trench in order to determine the extent of contamination.
3. Excavate the dirt from the area.
4. Take confirming soil samples from the bottom of excavation.
5. Take composite soil samples from contaminated excavated dirt.
6. Assuming the confirming soil samples are determined through analysis to be non contaminated, we will backfill with clean fill from off sight.
7. The excavated dirt will be hauled to an appropriate land fill based on test results from Step 5.

Mr. Larry Seto  
September 26, 1989  
Page 2

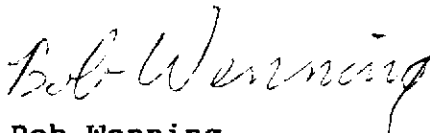
A second set of product lines exist between the tank location and an auxiliary building east of our main production building. Due to the fact we have truck traffic in this area, we will wait until the first areas are filled and repaved before excavating.

In attachment 2 you will find a brief history and explanation of our ground water remediation to date. Attachment 3 is our most recent proposal from Brown and Caldwell to conduct ground water sampling off our property to determine the extent or source of chlorinated hydrocarbons. We are presently attempting to get permission from adjacent property owners to conduct this study.

I hope this summary brings you up to date. If you have any further questions, please feel free to contact me.

Sincerely,

JAMES RIVER CORPORATION



Bob Wenning  
Engineering Manager

BW:gd

Attachments

cc: Al Ringel  
Lester Faldman -  
(CA Regional Water Quality Board)

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

Certified Mail #P 062 127 653

September 26, 1989

Mr. Bob Wenning, Engineering Manager  
James River Corporation  
Flexible Packaging Division  
2101 Williams Street  
San Leandro, CA 94577

Dear Mr. Wenning:

The excavation that previous housed three underground tanks at the above address may be backfilled.

Certain areas under the pipelines were found to have contamination up to 55,000 ppm of ethyl alcohol, 5,700 ppm n-propanol and 390 ppm N-Propyl Acetate. Please submit to this office within thirty (30) days of the receipt of this letter, your plan of correction. Your plan must include, but shall not be limited to the following:

1. Method that will be used to determine the vertical and horizontal extent of contamination
2. Name of your hauler
3. Name of disposal facility
4. Expected date of completion

As per your conversation with Larry Seto from our office on September 25, 1989, please submit all documents and laboratory reports concerning the water quality at the above site.

Mr. Bob Wenning, Engineering Manager  
James River Corporation  
Flexible Packaging Division  
2101 Williams Street  
San Leandro, CA 94577  
September 26, 1989  
Page 2 of 2

If you have any questions, please contact Larry Seto, Sr. Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,

*Rafat A. SW*

Rafat A. Shahid, Chief,  
Hazardous Materials Program

RAS:LS:mnc

cc: San Leandro Fire  
Eric Staedicke, San Leandro Wastewater Treatment Plant  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Agency  
RWQCB  
Howard Hatayama, DOHS  
Larry Seto, Alameda County Hazardous Materials Program  
Files

P 062 127 653

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

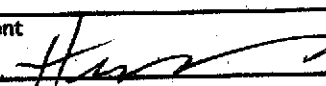
(See Reverse)

|                                                             |    |
|-------------------------------------------------------------|----|
| Sent to                                                     |    |
| Street and No.                                              |    |
| P.O., State and ZIP Code                                    |    |
| Postage                                                     | \$ |
| Certified Fee                                               |    |
| Special Delivery Fee                                        |    |
| Restricted Delivery Fee                                     |    |
| Return Receipt showing to whom and Date Delivered           |    |
| Return Receipt showing to whom Date and Address of Delivery |    |
| TOTAL Postage and Fees                                      | \$ |
| Postmark or Date                                            |    |

PS Form 3800, June 1975

**SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.**  
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)  
2.  Restricted Delivery (Extra charge)

|                                                                                                                                      |                                                                                                                                                                                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3. Article Addressed to:<br>Bob Wenning<br>James River Corp<br>Flexible Packaging Div.<br>2101 Williams St.<br>San Leandro, CA 94577 | 4. Article Number<br>P062 127 653                                                                                                                                                                                                                                       |
| 5. Signature - Address<br>X                                                                                                          | Type of Service:<br><input type="checkbox"/> Registered <input type="checkbox"/> Insured<br><input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD<br><input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise |
| 6. Signature - Agent<br>X                         | Always obtain signature of addressee or agent and DATE DELIVERED.                                                                                                                                                                                                       |
| 7. Date of Delivery<br>OCT 3*                                                                                                        | 8. Addressee's Address (ONLY if requested and fee paid)                                                                                                                                                                                                                 |





SEP 21 1989

ATTACHMENT 3

September 18, 1989

Mr. Robert Wenning  
 Engineering Manager  
 James River Corporation  
 2101 Williams Street  
 San Leandro, California 94577

4459-02/1

Subject: Revised Groundwater Survey Proposal,  
 Flexible Packaging Plant, San Leandro, California

Dear Mr. Wenning:

This letter revises the scope of services submitted to you in our August 9, 1989 proposal. This previous proposal described our approach for a groundwater survey at your Flexible Packaging Plant in San Leandro, California. The purpose of the field study is to determine if there is an upgradient source of chlorinated hydrocarbons in shallow groundwater beneath your property. This revised scope was requested by you to limit the focus of the investigation to the northeast boundary of the site and the adjoining Southern Pacific Railroad property. We anticipate that we can accomplish this by advancing 18 temporary boreholes (Figure 1) to a depth of approximately 20 feet as described previously. Based on our experience at similar sites, we estimate this task will take 2 field days and 2 days to prepare a letter report. The revised cost for this field investigation will be as follows:

| <u>DESCRIPTION</u>   | <u>SUBCONTRACTOR<br/>(HOURS)</u> | <u>BROWN AND CALDWELL<br/>(HOURS)</u> | <u>TOTAL</u>  |
|----------------------|----------------------------------|---------------------------------------|---------------|
| MOB                  | 2.5                              | 2.5                                   | 625.00        |
| SURVEY DAY 1         | 7.5                              | 7.5                                   | 2850.00       |
| SURVEY DAY 2         | 10                               | 10.0                                  | 3800.00       |
| DEMOB                | 2.5                              | 2.5                                   | 625.00        |
| LABORATORY STANDARDS |                                  |                                       | 440.00        |
| REPORT PREPARATION   |                                  | 16.0                                  | 1260.00       |
| PROJECT MANAGEMENT   |                                  | 9.5                                   | <u>800.00</u> |

TOTAL \$10,400.00

As you can see, fixed costs such as mob/demob and lab standards will not be reduced by this limited scope. If the field investigation involves several phases, these fixed costs will be charged each time the project team is mobilized. The need for additional field investigations will depend on the results of this initial survey.

Mr. Robert Wennin  
September 18, 1989  
Page 2 of 2

We are available to perform this revised survey, however, if the purpose of this revised scope is to establish whether upgradient groundwater has elevated chlorinated hydrocarbons relative to onsite (downgradient) groundwater the effect of tidal fluxes from San Francisco Bay should be considered. Tidal variations in shallow groundwater can cause hydraulic gradient reversals. These gradient reversals could cause contaminants to flow against the normal gradient during high tides. That is, shallow groundwater could flow from your site toward the SP property during these high tide events. In order to assess the tidal influence, we suggest that repetitive groundwater elevation measurements be made at wells W-5, W-6, and W-7 during one tidal cycle. This data could be collected continuously by Brown and Caldwell, using an automatic data logger and transducers, or manually recorded by a James River employee. In any case, this data should be collected prior to initiating our limited field study.

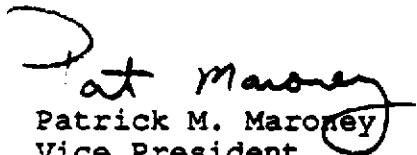
We are prepared to conduct an onsite tidal study which will include continuous monitoring of wells W-5, W-6, and W-7 for 24 hours at a cost of \$800. If you have any questions in regard to these recommendations and revised scope of services, please contact Mr. Tim Cook.

Very truly yours,

BROWN AND CALDWELL



Tim D. Cook  
Principal Hydrogeologist



Patrick M. Maroney  
Vice President

TDC:tdc

Enclosure

cc: Paula Diepholder, Brown and Caldwell  
Pat Maroney, Brown and Caldwell

BROWN AND CALDWELL

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



September 5, 1989

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

Mr. Bob Wenning, Engineering Manager  
James River Corporation  
Flexible Packaging Division  
2101 Williams Street  
San Leandro, CA 94577

Dear Mr. Wenning:

As per your telephone conversation with Larry Seto on August 30, 1989, please submit to us, the contents that were stored in each of the (3) three underground tanks prior to their removal on June 27, 1989.

In addition, any soil that is excavated and aerated, must be taken to the appropriate landfill for disposal. Please submit to us, all documents and laboratory reports concerning the water quality at the above site.

If you have any questions, please contact Larry Seto, Sr. Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,

Rafat A. Shahid, Chief,  
Hazardous Materials Program

RAS:LS:mnc

cc: San Leandro Fire  
Eric Staedicke, San Leandro Waste Water Treatment Plant  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Agency

RWQCB  
Howard Hatayama, DOHS  
Larry Seto, Alameda County Hazardous Materials Program  
Files



**JAMES RIVER CORPORATION**

FLEXIBLE PACKAGING DIVISION/  
SAN LEANDRO PLANT  
2101 Williams Street, San Leandro, CA 94577 (415) 895-4300

September 1, 1989

Mr. Larry Seto  
Alameda County Health Service Dept.  
#80 Swan Way, Room 200  
Oakland, CA 94621

Dear Larry:

Per our tele-con of Wednesday, 8/30, I investigated our old tank position verses contents. Tank 1 had what we called an "F-150 Blend" of N-Propanol and N-Propylacetate. This was a 5000 gal tank positioned at soil sample location No. 1 and No. 2. Tank 2 was a 3000 gal tank containing only 100% N-Propanol. Samples No. 3 and No. 4 were taken from this position. These soil samples were tested only for N-Propanol since that was the only solvent stored in that tank. Tank No. 3 was a 2000 gal tank which held our blend "F-180," a mixture of ethyl alcohol and N-Propylacetate. Soil samples No. 5 and No. 6 were taken from this position.

I am sorry for the confusion. I hope this clears up the reason that soil samples 3 and 4 were analyzed only for N-Propanol. Please contact me if you have any further questions.

Sincerely,

JAMES RIVER CORPORATION

*Bob Wenning*  
Bob Wenning  
Engineering Manager

BW:gd

cc: Jim Givens - Atlas Hydraulics  
Tom Jur - ESI

**atlas  
hydraulic  
corporation**

8/8/89

August 7, 1989

Alameda County Health Service Dept.  
Division of Hazardous Material  
80 Swan Way  
Oakland, CA 94621

ATTN: Larry Seto or  
Mary Mendoza

Project # V 552852  
Fee Paid \$ 480.00  
Date 8/8/89

RE: Flexible Packing Div.  
James River Corp.  
2101 Williams St.  
San Leandro, CA

94577

Gentlemen/Madam:

Enclosed is our check for \$480.00 for a permit to backfill with native material removed from the tank hole on June 27, 1989.

We faxed you on August 1, 1989, some lab results dated January 13th and 19, 1988, which were the results of samples taken at a different location on the site and were in no way related to the current project to backfill the tank hole with native material removed from the hole.

Attached are lab results dated July 14, 1989.

Atlas removed the (3) tanks, per our August 1st fax, on June 27, 1989.

Thank you for your prompt attention to this request.

For your information, a copy of our August 1, 1989 letter is enclosed.

Sincerely,

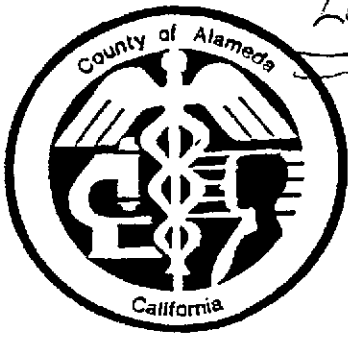
ATLAS HYDRAULIC CORPORATION



J.P. Givens

JP:bb

Enclosure



*Larry* This is your copy only. The marginal information is extra info. For you.

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY  
DEPARTMENT OF ENVIRONMENTAL HEALTH  
HAZARDOUS MATERIALS DIVISION  
80 SWAN WAY, ROOM 200  
OAKLAND, CA 94621  
(415) 271-4320

HAZARDOUS MATERIALS RELEASE AND NOTIFICATION REPORT (H&SC 25180.7)  
 EMERGENCY RESPONSE

1. INFORMATION RECEIVED BY: Katherine Chesick

DATE: 7/20/89 TIME: 1:52 pm

2. INCIDENT LOCATION: James River Co 2101 Williams St  
CITY: San Leandro ZIP CODE: 94577

3. DATE OF INCIDENT: unknown TIME OF INCIDENT: \_\_\_\_\_

4. REPORTED BY: Eric Staedicke AGENCY: San Leandro Wastewater Treatm  
ADDRESS: 3000 Dams CITY, ZIP: \_\_\_\_\_  
TELEPHONE: 577-3934 CONTACT: \_\_\_\_\_  
PHONE: \_\_\_\_\_

5. TYPE OF DISCHARGE:  
 Discharge from vehicle License Plate No. \_\_\_\_\_  
 Manifest/Shipping Information: \_\_\_\_\_  
 Abandoned Material  Fixed Facility  
Name: \_\_\_\_\_ Address: \_\_\_\_\_  
City: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
 Other (specify) In groundwater, origin unknown

6. ESTIMATED QUANTITY DISCHARGED: unknown  
QUANTITY THREATENED TO BE RELEASED: unknown

7. NATURE OF MATERIAL:  
 Solid  Liquid  Gas  Powder  Granular  
 Radioactive  Other  
Chemical Name: TCE, DCE, PCE, Vinyl chloride Common Name: \_\_\_\_\_  
Toluene, Acetone, Xylene

8. HAZARDOUS PROPERTIES:  Corrosive  Ignitable  Toxic  
 Reactive  Other

9. HAZARDOUS MATERIAL WAS RELEASED TO:  
 Air  Storm Drain  San Francisco Bay  Sanitary Sewer  
 Other Natural Waterway (creek, lake, reservoir)  Groundwater  
 Groundsurface (soil, road, etc.)  Other (specify) \_\_\_\_\_

10. WEATHER CONDITIONS: Fair

11. NUMBER OF INJURED PERSONS REQUIRING HOSPITALIZATION: N/A  
NAMES AND ADDRESSES OF HOSPITALS UTILIZED: \_\_\_\_\_

*(same "plume" seen at big open lot across street from Kellogg's roughly east of James River Co, approx 100-200 yds away)*  
*Sample analyses done by Weiss & Associates, contact Dan Bodner*

12. PERSONS PRESENT AT SCENE:

PHONE NO.

NAME:

AFFILIATION

13. RESPONSIBLE PARTY:

*Unknown*

PHONE NO.

NAME:

ADDRESS:

14. EVIDENCE COLLECTED (SAMPLES, PHOTOGRAPHS, ETC.)

*Samples analyzed by Brown + Caldwell*

15. CLEAN-UP ACTIONS:

*not currently active Existing groundwater treatment system cannot handle the "new" contamination*

NAMES AND ADDRESSES OF PERSONS DOING CLEAN-UP:

*Brown + Caldwell, Paula Dispirides (?) P.O. Box 8045 Walnut Creek 94596*

DESCRIPTION OF CLEAN-UP ACTIONS:

*Working on reversing treatment system*

16. TIME INCIDENT CLOSED:

17. ELAPSED TIME:

18. [ ] DISCHARGE NOT TO BE NOTIFIED:

- Unlikely to Cause Substantial Injury to Public Health & Safety
- Public knowledge  Ongoing criminal investigations
- Permitted Discharge  Other

19.  DISCHARGE TO BE NOTIFIED:

POTENTIAL DISCHARGE IS LIKELY TO CAUSE HAZARDOUS WASTE DISCHARGE OR PUBLIC HEALTH OR SAFETY:

*Wells used for drinking water supply in San Leandro may become contaminated*

20. NOTIFICATION:

- Board of Supervisors
- Health Officer
- Alameda County Press Room
- California Department of Health Services
- Reporting Agency or Individual

By copy of this report to the above listed agencies and officials, we are hereby submitting this information on behalf of all designated employees of the Department of Environmental Health, according to Section 25180.7, Health & Safety Code. The information submitted in this report is based upon the best available information at the time the report was completed.

Inspector's Name: Katherine Chesick  
Inspector's Signature: Katherine Chesick

Date: 7/20/89

EH/mam/88

**BROWN AND CALDWELL**  
Transmittal Memorandum

6/28/89  
ALAMEDA COUNTY  
DEPT. OF ENVIRONMENTAL HEALTH  
HAZARDOUS MATERIALS

|               |                             |         |        |
|---------------|-----------------------------|---------|--------|
| Date          | 12-JUNE-89                  | Job No. | 225700 |
| Attention     | LARRY SETO                  |         |        |
| Subject       | JAMES RIVER FLEX. PACKAGING |         |        |
| Contract No.  | -                           |         |        |
| Equipment No. | -                           |         |        |
| Spec. Ref.    | -                           |         |        |
| Submittal No. | -                           |         |        |

TO ALAMEDA COUNTY DEPARTMENT OF  
ENVIRONMENTAL HEALTH  
HAZARDOUS MATERIALS DIVISION  
80 SWAN WAY, RM 200  
OAKLAND, CA 94621

WE ARE SENDING YOU  Attached  Under separate cover via \_\_\_\_\_ the following items:

- Shop drawings     Prints     Plans     Samples     Specifications  
 Copy of letter     Change order     GEOLOGIC REPORT

THESE ARE TRANSMITTED as checked below:

- For approval  
 For your use  
 As requested  
 For review and comment  
 With submittal review action noted

SUBMITTAL REVIEW ACTION:

- No exceptions taken  
 Make revisions  
 Amend and resubmit  
 Rejected - see Remarks

| COPIES | DATE        | NO. | DESCRIPTION                                                                                                 |
|--------|-------------|-----|-------------------------------------------------------------------------------------------------------------|
| 1      | APRIL, 1986 |     | HYDROGEOLOGIC INVESTIGATION SUMMARY REPORT FOR JAMES RIVER CORP FLEXIBLE PACKAGING FACILITY, SAN LEANDRO CA |
|        |             |     |                                                                                                             |
|        |             |     |                                                                                                             |
|        |             |     |                                                                                                             |
|        |             |     |                                                                                                             |
|        |             |     |                                                                                                             |
|        |             |     |                                                                                                             |

REMARKS (SEND BY FIRST CLASS U.S. MAIL.)

Yellow copy \_\_\_\_\_  
 Pink copy \_\_\_\_\_  
 Gold copy \_\_\_\_\_

SIGNED: \_\_\_\_\_

If enclosures are not as noted, kindly notify us at once.