



**JAMES RIVER CORPORATION**

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

September 18, 1990

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

Mr. Lester Feldman  
California Regional Water  
Quality Control Board  
San Francisco Bay Region  
1800 Harrison Street  
7th Floor  
Oakland, California 94607

SUBJECT: James River Corporation Flexible Packaging Plant,  
2101 Williams Street, San Leandro, California

Dear Mssrs. Seto and Feldman:

James River Corporation, with the approval of Alameda County Health Agency (County) has been performing groundwater monitoring and tank and pipeline removal activities at our San Leandro facility. Past activities are documented in correspondence between myself and Mr. Seto, and in reports and work plans prepared by Brown and Caldwell Consultants (BCC) from 1989 to the present. Prior to 1989, work related to the tank removal and groundwater monitoring was performed by Harding Lawson Associates.

The plant is located at 2101 Williams Street, as shown on Figure 1. Nine monitoring wells were installed between 1984 to 1986. Water level measurements have consistently indicated a southwesterly groundwater flow direction during the period 1984 to 1990. A tidal study performed by BCC from November 13 through 17, 1989 indicated that tidal action in San Francisco Bay does not affect groundwater flow at the site. Groundwater analytical results indicate that the chlorinated hydrocarbons trichloroethene (TCE), tetrachloroethene or perchloroethene (PCE), dichloroethene (DCE), as well as acetone, toluene, and vinyl chloride are present in the shallow groundwater underneath the James River site. Results also indicate that the highest levels are present in wells located along the northwestern (up-gradient) property boundary (wells W4 and W5). Because we do not use any of the chlorinated solvents found, we were suspicious that the chlorinated solvents were coming from off-site sources.

Ltr. L. Seto & L. Feldman  
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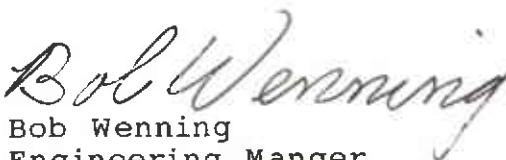
Work recently undertaken at the site by BCC included sampling and analysis of groundwater in areas hydraulically up-gradient of our site. The up-gradient survey indicates that the chlorinated hydrocarbons TCE, DCE, and PCE are present in shallow groundwater beneath areas located hydraulically up-gradient of the James River site. A copy of BCC's report of the up-gradient investigation is included as Attachment A to this letter.

At our request, BCC conducted a records review of files located at the San Francisco Bay Regional Water Quality Control Board (Board) office in Oakland, California. This records review identified 3 sites within a mile of the James River site at which chlorinated hydrocarbons have previously been identified in the shallow groundwater (Figure 2).

The findings of the up-gradient groundwater survey, the fact that the highest levels are present in wells located along the up-gradient property boundary and the fact that these chlorinated solvents have never been used on the site, point to an up-gradient source of chlorinated hydrocarbons. Thus, we request that the Board investigate past usage of chlorinated hydrocarbons at properties located hydraulically up-gradient of the James River site.

Sincerely,

JAMES RIVER CORPORATION

  
Bob Wenning  
Engineering Manger

BW/gd

0910-207(S)

Attachments

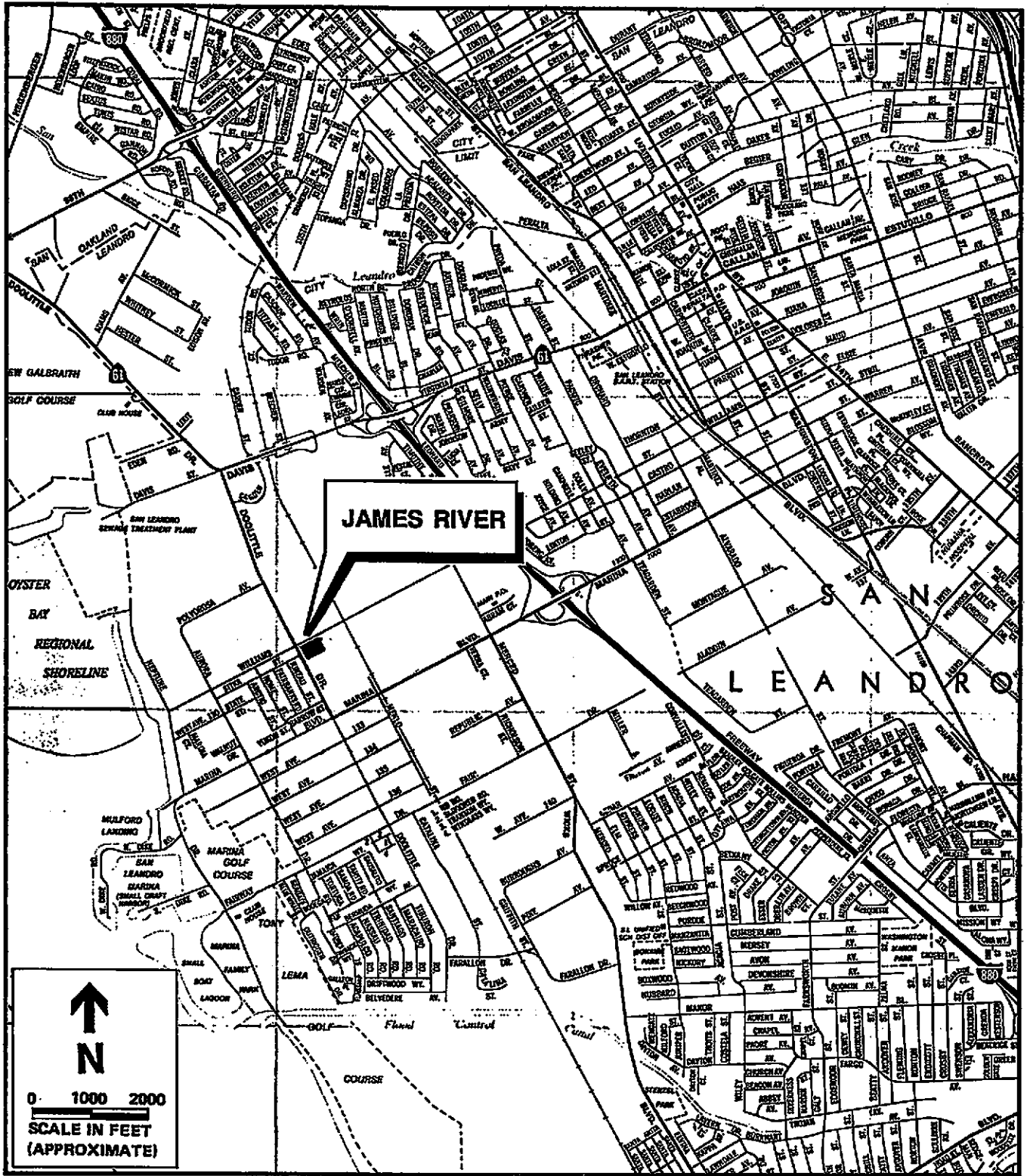


Figure 1 Site Location

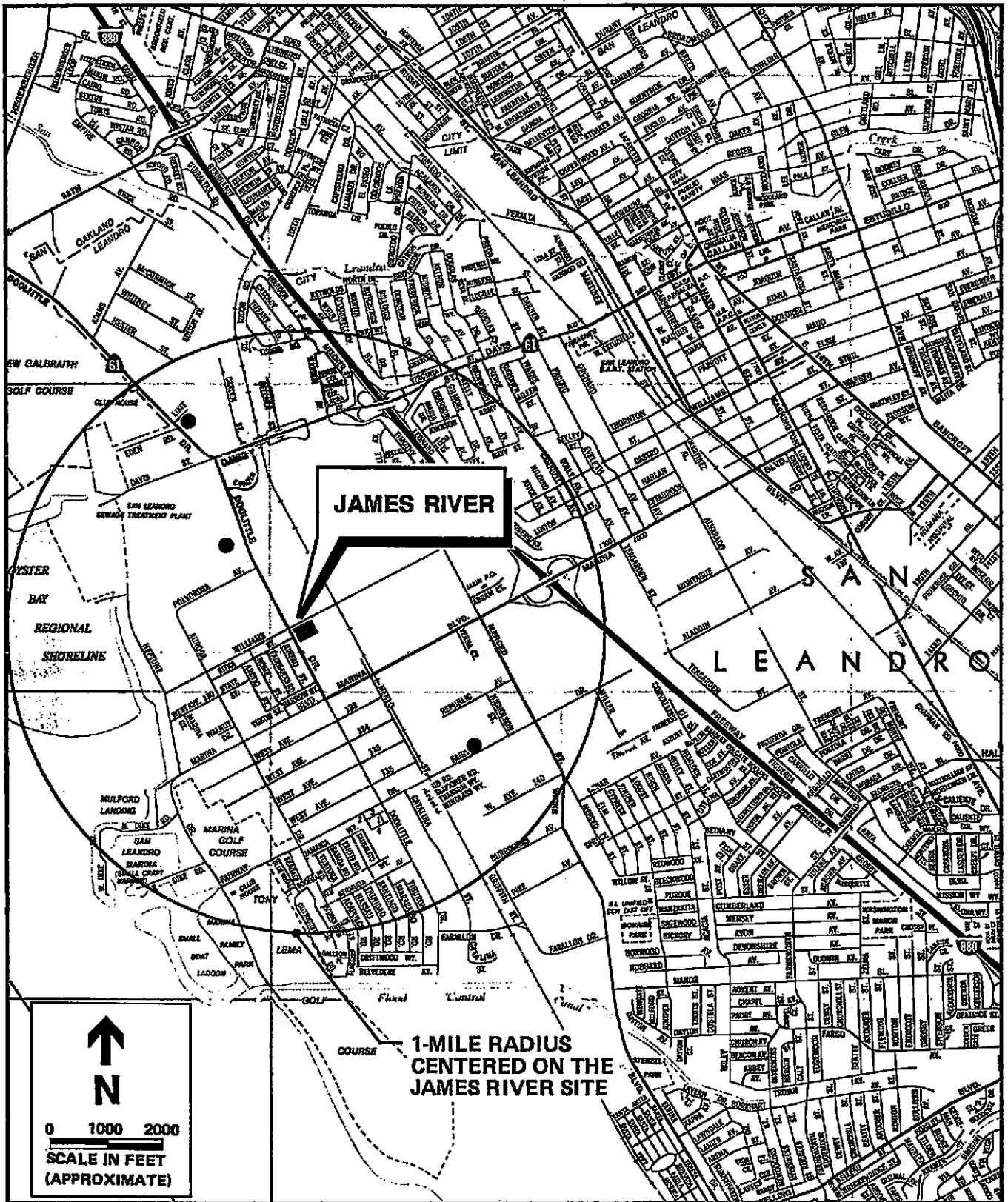


Figure 2 Sites in Vicinity Listed in North Bay Toxics Files