Eva,

This was the site Dale Kletke was working on. They submitted a risk assessment. I looked at the risk assessment and asked them for additional work. They did the work and based on the results, I am o.K with the risk. I spoke to you about this site with Tom prior to them submitting a risk assessment and you mentioned you will be able to do the closure for it. It is a SLIC case and so a letter will do! No case closure summary is really needed. There is enough money, but I have asked them to send \$1000 in case we get short.

10/7/97- Reviewed Risk Assessment/modeling

- The RA report has gw monitoring events for DEC 95, April 96 and Jan 97 and April 97. From this report it looks like there is not significant dieset in any of the wells, except for 1700 ppb in W-10. Now, hydraulic fluid was not found in any of the wells except for TW2 or W-10. Also, BTEX and acetone was only found in W-10. The problem is that acetone was sampled at W-10 but it was never sampled again in TW-1 or TW-2. So really although the modeling shows that it is not goint to go further than 480 feet (the receptor-bay is about 4000 feet from site), they have never checked the validity of the model by sampling TW-1 or TW-2.
- 3. It is the same with TPH. TW-1 had floating product but then after remediation, why was it not sampled subsequently, in 97 to find out what is actually present near the building.

10/16/97 - pSpoke to Ed Shaw - Mr. Shaw mentioned that he will be go ahead and sample TW-1 and TW-2 for benzene and acetone. That will give us some indication of whether we have anything downgradient to W-10 and also these mw's are under/near the building.

12/10/97 - Reviewed October 31, 1997 report on sampling TW-1 and TW-2 It looks like the model predicted the attenuation pretty accurately and for whatever reasons, the floating product found in TW-1 has reduced considerably to insignificant levels. I am O.K with the risk.

Zisk assessment did not evanate CIHC

D.K.

from folder # 60 00-024 Sho 1008

ESE, Inc., 4090 Nelson Avenue, Suite J, Concord, CA 94520 (510)685.4053 FX.5323 James River Corporation, Flexible Packing Division, 2101 Williams Street, SL 94577 Contact: Regina Colbert 614.2351

8/31/95 New case from ML.

Summary:

GROUNDWATER INVESTIGATIONS: In 1983, Harding-Lawson Associates (HLA), a consultant to the previous property owner Crown-Zellerbach, began an investigation of groundwater quality in the vicinity of the UST locations. Between 1983 and 1986, HLA installed 10 monitoring wells and the site. Nine monitoring wells (W-1 to W-9) were constructed with perforated intervals from approxmately 15 ot 40 feet bg. The predominant water-bearing unit intercepted by these wells is a gravelly sand encountered at a depth of approximately 25 feet bg. One well (B-1) was drilled using double-cased methods and was perforated in a gravelly sand encountered form a depth of 45-50 feet. Groundwater level measurements indicated that shallow groundwater beneath the site flowed to the southwest. During their investigations, HLA collected groundwater samples to be analyzed for acetone, acetates, alcohols and acids. Analytical results indicated that isopropyl alcohol, acetone, and acetic acid were present in well W-8, however, none of the constituents analyzed had migrated as far down-gradient as wells W-7 and W-9. HLA also conducted aquifer testing and had prepared preliminary designs for a groundwater extraction system to remove groundwater impacted by reported losses from the USTs operated at the site. These results are summarized in HLA's April 10, 1986 "Hydrogeologic Investigation" report.

In April 1988, James River was granted a permit by the City of San Leandro to discharge extracted and aerated groundwater to the sanitary sewer. On April 20, 1989, Brown and Caldwell Consultants (BCC) conducted groundwater sampling to ensure that treated groundwater would comply with the discharge limits in the San Leandro discharge permit. The results of the analysis indicated that chlorinated hydrocarbons in excess of the discharge limits were present in on-site shallow groundwater. The groundwater extraction and treatment program was placed on hold while other options were evaluated.

In August 1989, BCC conducted additional groundwater sampling to confirm the presence of chlorinated compounds identified in the April sampling. The highest concentrations of chlorinated compounds were identified in the groundwater monitoring wells located immediately adjacent to the hydraulically upgradient property boundary (wells W-5, W-6), suggesting an off-site source. Additional information pertaining to groundwater contamination by chlorinated compounds is with the documented by a PSA report prepared for the site located at 1964 Williams Street. Was Groundwater flow was west-southwesterly, based on measurements obtained by BCC in November 1989. In March 1990, James River initiated a quarterly groundwater monitoring program as a followup to the April and August 1989 x sampling events. of 14 borables of deal and self when the specient was to collect water for a contract of the specient of the secretation of 14 borables of ale the self water for a contract of the secretation of 14 borables of and six ale and there were the segratuat of the six and and six as the as too oppose pet the six as the six as too oppose of the six as the si

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See if ab results show hits of PCEcan chantoppans be read new? In November 1990, four borings (BC-1, BC-2, BC-3 and W-10) were drilled and one monitoring well was installed in borehole W-10, which is approximately six (6) feet southwest in the "inferred down gradient" position of the area where soils containing dried ink were left in place beneath the rail spur. The monitoring well is 17.5 feet deep and monitors only groundwater contained within the first water-bearing unit encountered. Groundwater analyzed from well W-16 was shown to contain 2400 ppb-cis-1,2-DCE, 440 ppb-ethyl benzene, 22,000 ppb-toluene and 2100 ppb-total xylenes.

ORIGINAL TANK SPECIFICATIONS: This facility originally had six UST's operating from the early 1950's to 1989 when in 1989, a majority of the tanks were removed by ESI, and their contractor Atlas Hydraulic who performed the removal activiities. Tank 1 was a 6000-gallon steel tank which previously contained ethyl alcohol. No information on the date the tank was removed is currently available. Tank 2 was a 3000-gallon steel tank previously containing butyl acetate and isopropyl acetate and was removed in December 1983. Tank 3 was a 5000-gallon steel tank which previously held ethyl alcohol and was removed in June 1989. Tank 4 was a 3000-gallon steel which previously held n-propyl alcohol and ethyl alcohol and was removed June 1989. Tank 5 was a 2000-gallon steel tank was previously held ethyl acetate and N-propyl acetate. Tank 5 reportedly failed on July 5, 1982, with loss of approximately 1500-gallons of N-propyl acetate and was removed in July 1982. Tank 6 was a 2000-gallon steel tank which previously held N-propyl acetate and was removed in June 1989. Six tank excavation verification samples were taken for the tanks removed in 1989, in addition to five samples taken in association with the piping removal. Samples associated with the tank excavtion were nondetectable for ethyl alcohol (<40,000 ppb), N-propanol (<20,000 ppb) and N-propylacetate (<400 ppb). Verification samples taken from the pipeline trenches showed levels of ethyl alcohol (55,000,000 ppb in sample 11), N-propanol (5,700,000 ppb in sample 11), Npropylacetate (390,000 ppb in sample 9 and 60,000 ppb in sample 11).

During over-excavation of soils in the vicinity of samples 9, 10 and 11 stained soils were encountered. Excavations were halted and Chem-Tech Consulting, performed a soil gas survey to identify the extent of stained soils in this area. Subsequent excavtion of this area to a depth of approximately two feet bgs and included the removal of a portion of a rail spur.

Removal of the rail spur revealed that the stained soils continued beyond the area delineated the soil vapor survey.

In September, 1990, Diablo Tank and Equipment performed additional pipeline removal activities. Trenches were opened at 20-foot intervals and the piping was then cut and pulled through the trench. No stained soils were observed in the trenches associated with the pipeline removal. Thirteen verification soil samples were analyzed by EPA Methods 8010/8020 for trichloroethene, toluene and totals.

why us analysis for PCE?

xylenes as prescribed in the approved work plan. Low concentrations of toluene were identified in eight of the samples (<30 ppb), total xylenes were identified in four of the samples (<40 ppb) and trichlorethene was identified in one sample (30 ppb). Two additional soil samples were collected from the rail spur area (RS-1 and RS-BA). Purgeable organic constituents were not detected in sample RS-1 taken from the southern end of the rail spur excavation. Sample RS-BA was collected from stained soil and pieces of dried ink present in the wall in the northwestern corner of the excavation. The bioassay test was performed using fathead minnows, and resulted in all 10 minnows surviving the 96-hour test period.

In early 1989, excavations were performed in the vicinity of the ink room in order to install new underground solvent storage tanks and an underground fire runoff containment tank. During excavations, stained soils were encountered at a depth of approximately 3 to 5 'bg and appeared to fill a 3 to 4 foot wide east-west trending trench. The limits of the stained soil were not identified during the installation of the tanks.

In June 1989, a limited investigation was performed which included the drilling of 16 boreholes in the vicinity of the stained soil. Cuttings from the boreholes were examined for the presence of staining, and based on these results and the results of the limited soil sampling and analysis, the approximate extent of stained soil was identified. Tetrachloroethene was the only constituent present at levels in excess of its established Toxicity Characteristic Leaching Procedure (TCLP) limit in an analysis using EPA Method 8240 for purgeable priority pollutants; Method 8270 for base nuetral/acid extractable, EPA Method 1310 for metals silver, barium, cadmium, chromium, lead, mercury, arsenic and selenium.

In December 1989, Atlas Hydraulic began excavation of the stained soils encountered in the June 1989 limited investigation. Soil was removed to a depth of approximately 6 feet bg and four verification samples taken from the excavation sidewalls at a depth of approximately 4 feet bg. All four samples (12 to 15) analyzed showed concentrations of toluene ranging from 2,100-39,000 ppb. Other constituents detected include chloroform-64 ppb, total xylenes-1200 ppb and tetrachloroethylene-180 ppb in sample 12, tetrachloroethylene-50 ppb, ethyl benzene-490 ppb and total xylenes-270 ppb in sample 14, and benzene-720 ppb, and ethyl benzene-180 ppb in sample 15.

In September 1990, Diablo Tank and Equipment performed an over-excavation of soil in the area of the previous ink room excavations. Excavations were to be deepened until field screening indicated no organic vapors present, or until a depth of 13 feet, approximately the depth of the water table. Lateral excavations were to include an additional one foot be removed from the sidewalls of the previous excavation. Staining was noted in some of the open root traces. This staining, and the organic vapor monitor readings, indicate that the inks or ink constituents have migrated downward through the root traces to the total depth of the

18-2(8) 756 pm 15,000 pm 18,000 pm 18,000 pm 18-2(8) 73 pm 630

HPBA

totaled 107 feet in length, resulting in the total area of the excavation sidewalls equaled 1,391 square feet. Six sidewall verification samples were collected at a depth of 8 to 9 feet bg, in addition to two bottom samples (IR-1 to IR-8). Verification soil samples results indicated that no metals in excess of the Total Threshold Limit Concentrations (TTLC) were detected. Toluene was detected at concentrations ranging from <0.2 ppm to 15,000 ppm in seven of the eight verification soil samples. Levels of purgeable priority pollutants as 2-hexanone (<2 ppm to 16 ppm), acetone (<5 ppm to 24 ppm), ethyl benzene (1.1 ppm in IR-2), MEK (<2 ppm to 30 ppm), trichloroethene (0.2 ppm in IR-2), tetrachloroethene (<0.2 to 160 ppm), cis-1,2-DCE (0.9 ppm in IR-2) and xylene isomers (7.4 ppm in IR-2) were detected in these verification samples. Samples IR-2 and IR-8, which were collected from the western and northwestern sidewalls where no additional excavation could be performed due to the presence of a utility trench and the underground fire runoff water collection tanks and asssociated piping, generally contained the highest concentrations of purgeable organic constituents.

excavation. The excavation was approximately 13 feet deep and the sidewalls

Three stockpiled soil composite samples were analyzed for soluble metals by the California Waste Extraction Test (WET). Since the Soluble Threshold Limit Concentration (STLC) for lead is 5.0 mg/l, the composite samples failed the WET analysis for lead and the soil was transported to a Class I landfill.

Review "Sampling Results - Cardboard Bailer Vault Groundwater Sampling and Hydropunch Investigation" dated March 8, 1994-Harding Lawson Associates (HLA).

Cardboard Bailer Vault Sampling: The concrete vault previously housed a hydraulically powered cardboard bailing mechanism. Groundwater was encountered approximately four feet below the floor of the vault, or about ten feet below the existing water table. Groundwater sampled on December 21, 1993 contained approximately 0.4 foot of free product observed floating on top of the groundwater. Based on the laboratory analysis, it was decided that a boring would be installed approximately 20 feet downgradient of the vault and a ground water sample collected using a hydropunch. Two soil samples were taken near the water table, and one groundwater sample was taken with the hydropunch. At 15.5 feet below the building floor surface, free product was encountered. These soil samples collected at 15.5 to 16.0 and 18.0 to 18.5 feet below the building floor contained 5700 mg/kg and 3100 mg/kg TPHmo, respectively. The groundwater sample was collected between 19.0 and 21.0 feet below the building floor yielded 110 mg/L TPHmo. Groundwater flow was in a westerly direction for this sampling event. Wells W-7 and W-8 are to be tested for TPHmo next quarter with the intent of monitoring the TPHmo release associated with the cardboard bailer vault.

Review "First Quarter 1994 Groundwater Monitoring Report" dated April 13, 1994 (HLA). Groundwater samples were taken from eigth wells were collected and analyzed (W-3, W-5, W-6, W-7, W-8, W-9, W-10 and B-1). Direction of groundwater flow is toward the southwest at a gradient ranging between 0.0027 to 0.005 ft/ft. Groundwater samples were analyzed for BTEX, TCE, vinyl chloride, PCE, TCA 1,2-DCE, 1,1-DCA, acetone and methyl iso-butyl ketone (MIBK). Acetone was detected at a concentration of 99,000 ppb, and MIBk was detected at a concentration of 3600 ppb in groundwater sampled from well W-10. Other contaminants detected include TCE in wells W-5 (460 ppb), W-6 (160 ppb), W-7 (230 ppb) and W-9 (110 ppb), vinyl chloride in well W-8 (180 ppb), PCE in wells W-5 (2600 ppb), W-6 (220 ppb), W-7 (220 ppb) and W-9 (13 ppb), 1,2-DCE in wells W-3 (25 ppb), W-5 (1200 ppb), W-6 (56 ppb), W-7 (21 ppb) and W-8 (250 ppb). Due to contamination detected in the method blank, analyses from TPHmo for wells W-7 and W-8 were regarded as invalid, and testing of these wells for TPHmo will be performed next quarter. HLA concludes that the evidence of chlorinated hydrocarbons detected in the shallow groundwater at the James River facility originated from an upgradient offisite source, possibly 1964 Willaims Street.

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Review "Second Quarter 1994 Groundwater Monitoring Report" dated July 28, 1994 (HLA). The direction of groundwater flow is toward the southwest at a gradient ranging between 0.0027 to 0.0048. The samples analyzed for TPHmo for wells W-7 and W-8 detected concentrations at 130 ppb and 110 ppb, respectively. All samples analyzed for the eight wells were nondetectable for BTEX fractions. Levels of volatile organics including TCE, Vinyl chloride, PCE, 1,2-DCE, acetone and MIBK were detected at levels higher than previous sampling events (11/93 and 3/94).

Review "Third Quarter 1994 Groundwater Monitoring Report dated October 19, 1994 (HLA). The direction of groundwater flow is toward the west at a gradient ranging between 0.0018 to 0.005 ft/ft. Chemical concentration of detected volatile organic contaminants were in most cases similar, in some cases, lower that concentrations detected in June 1994. Exceptions were levels of 1,2-DCE detected in wells W-6 and W-7. The samples analyzed for TPHmo for wells W-7 and W-8 detected concentrations at 630 ppb and 870 ppb, respectively.

Review "Revised Fourth Quarter 1994 Groundwater Monitoring Report" dated January 4, 1995 (HLA). The direction of groundwater flow is toward the west at a gradient ranging between 0.0027 and 0.005 ft/ft. Chemical concentration of detected volatile organic contaminants were in most cases similar, in some cases, lower that concentrations detected in September 1994. Exceptions were levels of vinyl chloride in well W-7, 1,2-DCE detected in wells W-3, W-5 and W-9, and MIBK in well W-10. The samples analyzed for TPHmo for wells W-7 and W-8 detected concentrations at 120 ppb and 270 ppb, respectively.

Review "Second Quarter 1995 Groundwater Monitoring Report" dated June 15, 1995 (ESE). The direction of groundwater flow is toward the west at a approximate gradient of 0.004 ft/ft. Chemical concentration of detected volatile organic contaminants were in most cases similar, in some cases, lower that concentrations detected in September 1994. Exceptions were levels of vinyl chloride in wells W-3 and W-7 and W-8, TCE in wells W-3, W-5 and W-9, PCE in wells W-3, W-5, W-6 and W-9, and 1,2-DCE detected in wells W-3, W-7 and W-8. The samples analyzed for TPHmo for wells W-7 and W-8 detected concentrations at 9600 ppb and less than 1300 ppb, respectively.

9/1/95

Review "Third Quarter 1995 Groundwater Monitoring Report" dated August 3, 1995 (ESE). The direction of groundqter flow is toward the west at a approximate gradient of 0.006 ft/ft. Chlorinated hydrocarbons are continuing to be detected in wells W-3 through W-9 (TCE, vinyl chloride, PCE 1,2-DCE). Acetone concentrations found in well W-10 have consistently decreased (from a high of 150,000 ppb in Jun 94-presently 19,000 ppb).

Recommendations/comments: Need to define extents of TPHd and TPHmo contamination in soils and groundwater from the cardboard bailer vault. This release eventually was confirmed in subsequent monitorings of TPHd and TPHmo in wells W-7 and W-8. This vault is somewhat inaccessible due to the fact that it is located inside the packaging plant.

Acetone is a major contaminant in well W-10, but is not found in any other wells. If source is localized, can this source be removed by excavation. Well W-10 is in very close proximity to the excavation and removal of soils affected in the rail spur area, as documented in the "Additional Site Investigation Summary Report" prepared by Brown and Caldwell Consultants (BCC) dated July 11, 1991.

9/26/95

Call from Regina Colbert of James River concerning request for additional oversite funds (\$750). Informed her that a request for additional work to address free product (hydraulic oil) in the vicinity of the former cardboard bailer vault. Also informed her that monitoring for chlorinated VOCs will be either discontinued or reduced, as well as monitoring for wells which have four consecutive quarters of non-detect. Her direct number is 614-2351.

10/10/95

Final draft of PSA letter after peer review. Sent letter 10/10/95.

11/22/95

Review PSA work plan from ESE, Inc-dated November 21, 1995. This workplan consists of the advancement of three (3) borings and the installation of temporary four-inch diameter groundwater monitoring wells. Placed call to Eric Garcia concerning the fact that the work plan does not incorporate any borings in close proximity to the original cardboard bailer vault. Draft letter approving stipulation that one additional boring be located within 10 feet of the former cardboard bailer vault with the intent of converting this boring to a recovery well if any free product is encountered.

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11/27/95 Final draft of letter sent.

11/27/95 Call from Regina Colbert concerning the placement of the additional boring within 10 feet of HPB-1. Received fax from ESE showing locations of the proposed soil boring/temporary well.

11/28/95 Call from Regina Colbert asking if one of the original proposed soil boring/temporary well could be exchanged for the one additional boring I requested, in order to keep the original proposal outlining three borings acceptable. We agreed that the boring/temporary well which is furthest north would be the boring which would be replaced by the additional well which I requested. She will have ESE fax me the final addendum showing the locations of the three proposed borings/temporary wells.

Review ESE "Fourth Quarter 1995 Ground Water Monitoring Report"-dated November 20, 1995. Groundwater flow was in a westerly direction at a calculated gradient of 0.006 ft/ft, which is consistent with data collected from previous monitoring periods. This Monitoring wells W-3, W-4, W-6, W-7, W-8, W-9 and B-1 have been ND for the last 7 sampling events for BTEX fractions. Draft letter requesting a revised sampling schedule.

Placed call to Woodward-Clyde Consultants and left message for a Kris Weis (?) concerning chlorinated hydrocarbons plume. Concentrations of these chlorinated hydrocarbons seem to be out of the range of values which would be representative of the San Leandro plume. Maximum concentrations of chlorinated hydrocarbons detected this sampling period include TCE-450 ppb in W-5, vinyl chloride-290 ppb in W-8, PCE-3700 ppb in W-9, cis-1,2-DCE-350 ppb in W-5, and acetone-39,000 ppb in W-10.

Researched DTSC files on the Williams Street site-1964 Williams Street to determine whether concentrations of chlorinated HCs which were being detected at 2101 Williams Street site were from the upgradient? 1964 Williams Street site. The chemical constituents found in soil and groundwater samples from the 1964 Williams Street site include TCE, diphenyl, diphenylether, chloroform, 1,1-DCA, 1,1-DCE, 1,2-DCE, MeCl, tetrachlorethene, toluene, 1,1,1-TCA, 1,1,2-TCA, Freon 11, and bromodichloromethane. Final draft of letter requesting that chlorinated HCs analyses will no longer be required. Acetone analysis for groundwater samples in MW-10 are to be continued. Letter sent.

12/27/95 Three tengram manistrum weels (TW-1 throTW-3)

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the capillary from in each well. All samples were

whatever with the capillary from in each well. All samples were

analyzed for text as hydroule third. only sort from

TW-1 at 20 by contained text of to \$700ppm. Text was

also only detected in TW-2 at 2,200ppb

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12/20/95