

240 Larkin Williams Industrial Court, Fenton, MO 63026 (314) 349-8800

July 19, 2004

Mr. Amir K. Gholami, REHS Hazardous Materials Specialist Alameda County Health Care Services Agency Environmental Health Services 1131 Harbor Bay Parkway Alameda, CA 94502-6577

RE: Fuel Leak Investigation, Site No. RO0002532

Fleischmann's Yeast

921 98th Ave., Oakland, CA 94603

Dear Mr. Gholami,

Enclosed is the Work Plan you requested in the June 9, 2004 letter.

To insure timely delivery of future communications, could you please change the contact name and address from Mr. Stephen Vanni to the following:

Mr. Robert Ribbing
Fleischmann's Yeast
240 Larkin Williams Industrial Court
Fenton, MO 63026

Please contact me by email at Robert_Ribbing@bpna.com or by phone at (636) 349-8844 to discuss the Work Plan or any other issues regarding this site. I would appreciate a quick and thorough review of this plan so we can obtain closure of this site that is effective and would minimize any delay to the current owner and their future plans.

Sincerely,

Robert B. Ribbing

Environmental Manager

encl.

cc: David DeMent, ACC Environmental

George Petty w/o encl. Al Pelton, Dreisbach



July 19, 2004

Mr. Robert Ribbing Fleischmann's Yeast 240 Larkin Williams Industrial Court Fenton, Missouri 63026

RE: Work Plan for Additional Site Characterization 921 98th Street, Oakland, California Fuel Leak Investigation, Site # RO0002532 ACC Project Number: 6725-001.02

Enviornend Realth

Dear Mr. Ribbing:

ACC Environmental Consultants, Inc. (ACC), has prepared this Work Plan to perform additional site characterization at 921 98th Street, Oakland, California (Site) as requested by the Alameda County Health Care Services Agency (ACHCSA). The ACHCSA request for additional subsurface investigation and source characterization was summarized in its June 9, 2004 letter. Tasks proposed in this Work Plan include: 1) performing additional subsurface investigation utilizing direct push technology and grab groundwater sampling for constituents of concern, 2) installation and monitoring of three temporary piezometers to better determine groundwater gradient and flow direction; and 3) discussing removal of the formaldehyde underground storage tank (UST).

ACC Environmental Consultants, Inc., (ACC) has enclosed two copies of the Work Plan and has forwarded one copy directly to Mr. Amir Golami at the ACHSA for review and approval. If you have any questions regarding this Work Plan, please contact me at (510) 638-8400, extension 109 or email me at ddement@accenv.com.

Sincerely,

David R. DeMent, RG, REA II Environmental Division Manager

/eig:drd

Enclosures



WORK PLAN FOR ADDITIONAL SITE CHARACTERIZATION

July 19, 2004

921 98th Street Oakland, California

Prepared For:
Mr. Robert Ribbing
Fleischmann's Yeast
240 Larkin Williams Industrial Court
Fenton, Missouri 63026

OAKLAND - SACRAMENTO SEATTLE - LOS ANGELES Fuel Leak Investigation, Site # RO0002532 ACC Project Number: 6725-001.02



WORK PLAN FOR ADDITIONAL SITE CHARACTERIZATION

921 98th Avenue Oakland, California

ACC Project Number: 6725-001.02

Prepared for:

Mr. Robert Ribbing
Fleischmann's Yeast
240 Larkin Williams Industrial Court
Fenton, Missouri 63026

July 19, 2004

Prepared By:

Edward Giacometti Staff Geologist

Reviewed By:

David DeMent, RG, REA II Environmental Division Manager

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WORK PLAN FOR ADDITIONAL SITE CHARACTERIZATION

921 98th Street Oakland, California

1.0 INTRODUCTION

This Work Plan was prepared by ACC Environmental Consultants, Inc., (ACC) at the request of Fleischmann's Yeast (Client), to describe additional subsurface characterization work and remedial action to be performed at the subject Site. The objectives of this work are to address technical comments made by the Alameda County Health Care Services Agency (ACHCSA) in its June 9, 2004 letter.

2.0 BACKGROUND

The subject property is located along the northeast corner of 98th Avenue and San Leandro Street in Alameda County (Figure 1). As shown on a historic site plan, the Site formerly contained two gasoline USTs and two associated product dispensers. While ACC did not find any information in regards to removal of the gasoline USTs, verbal accounts of plant employees indicate the USTs were apparently last used and removed in the early 1980's.

In June 2002, ACC contracted with DCM Construction, Inc. (DCM) to excavate in the vicinity of the two former, gasoline USTs to verify that the gasoline USTs had been removed. Exploratory excavation at gasoline UST designated T1 revealed broken and cut product and vent lines and engineered fill where soils should have been native silts and clays. Exploratory excavation at gasoline UST designated T2 was not as conclusive but did verify that a UST was not located as depicted on the historical site plan. ACC then contracted with GeoTech Utility Locating (GeoTech), of El Cerrito, California, a subsurface utility locating firm, to scan the area of the suspect USTs, especially T2. The results of the subsurface magnetometer survey were more conclusive, traced product lines leading to each UST's respective dispenser, and indicated that no metallic anomalies were located in the area of the former gasoline USTs.

2.1 Previous Site Investigation - September 2002

2.1.1 Field Activities

On September 16, 2002, ACC advanced eight exploratory soil borings (designated B1 through B8) at select locations adjacent to former USTs T1 and T2 (Figure 2). The locations of the borings were marked with white paint and Underground Service Alert was notified at least 48 hours prior to commencing work. A soil boring permit was obtained form Alameda County Public Works Agency.

The eight exploratory soil borings were advanced by continuously coring with a four-foot long, hydraulically-driven, hollow-stem Geoprobe® sampling tool equipped with 2-inch inside-diameter clear acetate liners. Soil borings B1 and B2 were advanced adjacent to and on each side of former

gasoline UST T1. Soil boring B3 (also designated T1-Disp) was advanced at the former dispenser for UST T1. Soil borings B4 and B5 were advanced adjacent to and on two sides of former gasoline UST T2. Soil boring B6 was advanced at the midpoint between former UST T2 and its former product dispenser located inside the existing building. Finally, soil borings B7 and B8 were advanced directly adjacent to the formaldehyde UST as close as physical parameters allowed. Grab groundwater samples were collected in soil borings B1, B4, and B7 by advancing a Geoprobe® sampling tool equipped with a clean, four-foot-long stainless steel screen. When the probe was advanced to approximately 20 feet below ground surface (bgs), the external sampling probe was pulled upwards four feet to expose the internal screen to the water-bearing formation. A grab groundwater sample was then retrieved through the rods with either a pre-cleaned stainless steel bailer or clean polyethylene tubing equipped with a check valve. Grab groundwater samples were collected in 40-milliliter VOA vials without headspace. Following collection, the vials were labeled, placed in a pre-chilled insulated container, and then transported to STL San Francisco (STL-SF), a state-certified laboratory, for analysis.

Drilling was performed under the direction of a California Registered Geologist, and the subsurface materials in the borings were identified using visual and manual methods. Soils in each soil boring were logged and classified during drilling operations according to the Unified Soil Classification System (USCS). Following drilling and sample collection, each boring location was abandoned with neat cement to just below the surface (2 to 3 inches). The surface of each boring location was completed with concrete to grade and colored to match the surrounding material.

2.1.2 Analytical Results

Eleven soil samples and three grab groundwater samples from the September 2002 exploratory borings were collected and analyzed for TPHg, BTEX, and MTBE by EPA Method 8260B. Soil and grab groundwater sample analytical results are summarized in Tables 1 and 2 below.

2.1.3 Extent of Soil and Groundwater Pollution

Soil

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Exploratory soil borings revealed that soils at the Site consist of fine-grained silts and clays from the surface to approximately 15 to 16 feet bgs. These soils typically limit the migration potential of released total petroleum hydrocarbons (TPH) due to their adsorption to the soil matrix and the low soil permeability. Based on the findings of exploratory soil excavation and accurately mapping the former UST locations from a scaled site plan, ACC believes that the exploratory soil borings advanced were correctly placed directly adjacent to the former USTs, product pipelines, and product dispenser. Therefore, ACC estimates that the sample analyses of soil and grab groundwater samples collected in the soil borings are indicative of worst-case conditions, with any residual TPH concentrations decreasing significantly with distance from the former UST excavations. Residual TPH was identified primarily in soil from 8 to 15 feet bgs. Some TPH-impacted soil was identified in soil borings B3 (T1-Disp) and B6, but these impacts were relatively minor and decreased significantly with vertical distance.



Water

First-encountered groundwater was logged in poor quality clayey sands at approximately 16 feet bgs. Grab groundwater sample analytical results indicate that water is being impacted by residual TPH in soil at each former UST location. However, based on the relatively low BTEX to TPHg ratios and the approximate age of the former USTs, weathering is occurring and BTEX is likely being preferentially degraded by natural attenuation processes.

ACC reviewed topographic contours on the San Leandro Quadrangle and estimates the regional groundwater flow direction to be northwest. A grab groundwater sample collected in soil boring B7 located north of USTs T1 and T2 reported only 1.8 ppb MTBE. While the location of soil boring B7 is estimated to be somewhat crossgradient of the USTs, migration in first-encountered groundwater in this area is typically defined more by diffusion than groundwater flow direction. As such, the analytical results reported in the grab groundwater sample collected from soil boring B7 likely approximate the horizontal extent of residual TPH impact in groundwater.

Based on the findings summarized in ACC's January 17, 2003 Subsurface Investigation Report, the City of Oakland Fire Services Agency referred the case to the ACHCSA for regulatory oversight. The case was assigned to Mr. Amir Gholami, who verbally approved ACC's Work Plan to perform additional field work.

2.2 Previous Site Investigation – August 2003

2.2.1 Field Activities

On August 4, 2003, ACC advanced twelve additional exploratory soil borings (designated B9 through B20) at select locations adjacent to and downgradient of the former gasoline USTs (Figure 2). The approved soil boring locations were marked with white paint and Underground Service Alert was notified at least 48 hours prior to commencing work. A soil boring permit was obtained from the Alameda County Public Works Agency.

The additional exploratory soil borings were advanced by continuously coring with a four-foot long, hydraulically-driven, hollow-stem Geoprobe® sampling tool equipped with 2-inch inside-diameter clear acetate liners. Soil borings B9, B10, and B11 were advanced adjacent to and on each side of former gasoline UST T1. Soil boring B12 was advanced approximately at the midpoint between the two former gasoline USTs. Soil borings B13 and B14 were advanced adjacent to and on each side of former gasoline UST T2. Finally, soil borings B12 and B15 through B20 were advanced in accessible locations downgradient of the two former gasoline USTs for the purposes of collecting grab groundwater samples. Soil samples were collected and analyzed from soil borings B9 through B11 and B13 through B15. Grab groundwater samples were collected in soil borings B10, B12, B13, B15 through B18, and B20 by advancing a Geoprobe® sampling tool equipped with a clean, four-foot-long stainless steel screen. Soil boring B19 encountered metallic refusal at five feet bgs, indicative of rebar underneath the concrete slab surface. When the probe was advanced to approximately 20 feet bgs, the external sampling probe was pulled upwards four feet to expose the internal screen to the water-bearing formation. A grab groundwater sample was then retrieved through the rods with either a pre-cleaned stainless steel bailer or clean polyethylene tubing equipped with a check valve. Grab groundwater samples were collected in 40-milliliter volatile

organic analysis (VOA) vials without headspace. Following collection, the VOA vials were labeled, placed in a pre-chilled insulated container, and then transported following chain of custody protocol to STL San Francisco (STL-SF), a state-certified laboratory, for analysis.

Drilling was performed under the direction of a staff geologist, and the surface materials in the borings were identified using visual and manual methods. Soils in each soil boring were logged and classified during drilling operations according to the Unified Soil Classification System (USCS). Following drilling and sample collection, each soil borings was abandoned with neat cement flush to grade.

2.2.2 Analytical Results

Fourteen soil samples and eight grab groundwater samples were collected and analyzed for total petroleum hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, and xylenes (BTEX), and methyl tertiary butyl ether (MTBE). Soil sample analytical results are summarized in Table 3 and the grab groundwater sample results are summarized in Table 4, both of which are attached.

2.2.3 Extent of TPH Impacts in Soil and Groundwater

Soil

The September 2002 and the August 2003 exploratory soil boring investigations revealed that soils across the area of investigation consist of fine-grained silts and clays from the surface to approximately 15 to 16 feet bgs. These soils typically limit the migration potential of released TPHg due to petroleum hydrocarbon adsorption to the soil matrix and the low soil permeability. Soil impacts appear to be highly localized in the fine-grained silty clays. TPHg concentrations in soil ranged from nondetect (less than 1 ppm) to 2,500 ppm immediately adjacent to the former UST in soil boring B9, and benzene concentrations ranged from nondetect (less than 0.005 ppm) to 19 ppm immediately adjacent to the former UST in soil boring B9.

Water

First-encountered groundwater was logged in poor quality clayey sands at approximately 16 feet bgs. Grab groundwater sample analytical results indicate that water is being impacted by residual TPHg in soil at each former UST location. However, based on the relatively low BTEX to TPHg ratios and the approximate age of the former USTs, weathering is occurring and BTEX is being preferentially degraded by natural attenuation processes.

ACC estimates the regional groundwater flow direction to be northwest. Iso-concentration maps prepared for TPHg and benzene concentrations in groundwater exhibited a slight elongation in the northwest direction. Due to relatively poor aquifer qualities and a relatively flat estimated groundwater gradient, migration in groundwater is primarily through diffusion with some elongation in the groundwater flow direction. Therefore, the analytical results reported in the grab groundwater samples collected from soil borings B18 and B20 approximate the horizontal extent of reportable TPHg and benzene impact in groundwater and demonstrate that the plume of impacted groundwater originating from each former gasoline UST is relatively small and localized to the immediate area of each UST.

2.3 Site Hydrogeology

The surface of the Site consists of concrete and/or asphalt pavement underlain by approximately 3 to 6 inches of sand and/or gravel baserock. Subsurface soil conditions were highly consistent across the Site. In general, soils consisted of uniform silty clay and clay to a depth of approximately 16 feet bgs. The fine-grained clays were generally dark olive green to olive gray, medium stiff, moderately to highly plastic, damp, and displayed low estimated permeability. At approximately 15 to 16 feet bgs, sand content began to increase with depth and saturated SC clayey sand is observed. This SC zone appears to be first-encountered groundwater.

First-encountered groundwater was logged in poor quality clayey sands at approximately 16 feet bgs. Grab groundwater sample analytical results indicate that groundwater is being impacted by residual TPHg leaching from soil at each former UST location. However, based on the relatively low BTEX to TPHg ratios and the approximate age of the former USTs, weathering is occurring and BTEX is being preferentially degraded by natural attenuation processes. TPHg and benzene plumes are localized in the immediate vicinity of former UST T1 and its former fuel pump and the former fuel pump location for UST T2.

2.4 Regulatory Status

Based on the findings summarized in ACC's January 17, 2003 Subsurface Investigation Report, the OFSA referred the case to the ACHCSA for regulatory oversight. The case was assigned to Mr. Amir Golami, who verbally approved ACC's Work Plan to perform field work reported in August 2003.

In a letter dated June 9, 2004, the ACHCSA requested a Work Plan that described the work necessary to produce a technical report that included: 1) performing additional subsurface investigation utilizing direct push technology and grab groundwater sampling for constituents of concern; 2) the installation of temporary piezometers; and 3) a summary of the formaldehyde UST removal.

3.0 ADDITIONAL SUBSURFACE INVESTIGATION

3.1 Rationale for Additional Source Characterization

Soil boring investigations performed in September 2002 and August 2003 indicated that elevated concentrations of gasoline constituents exist primarily in soil at the southeast end of UST T1 and in the vicinity of the UST T2 product dispenser. As demonstrated in soil borings B4, B5, B11, B13, and B14, residual petroleum hydrocarbon impacts rapidly attenuate in the vertical direction in the fine-grained soils present at the Site.

To address ACHCSA's technical comment on performing additional source characterization, ACC proposes to advance additional exploratory soil borings in select locations to further characterize impacts in soil. Soil borings B21 and B22 will be advanced in proximity to former UST T1, soil boring B23 in proximity to former UST T2, and soil borings B24 and B25 in proximity to the former UST T2 product dispenser. Due to recently completed demolition

activities, these areas are now accessible with a truck-mounted Geoprobe rig. Proposed soil boring locations are shown on Figure 2.

3.2 Rationale for Additional Groundwater Plume Characterization

To address ACHCSA's technical comment on performing additional groundwater characterization and establish groundwater gradient and flow direction, ACC proposes to install three temporary piezometers in exploratory soil borings B22, B28, and B31, and advance exploratory soil borings and collect grab groundwater samples in soil borings B22 through B33. Due to recently completed demolition activities, the areas around each proposed soil boring location are now accessible with a truck-mounted rig. Proposed soil boring locations are shown on Figure 2.

3.3 Drilling Program

A drilling permit will be obtained from the Alameda County Public Works Agency and it will be notified at least 72 hours prior to commencing field activities. The proposed soil boring locations are illustrated on Figure 2.

3.3.1 Soil Sampling

The soil borings will be advanced according to ACC protocol using a hydraulically driven Geoprobe® sampling tool equipped with 2.0-inch inside diameter clear acetate liners. Soil boring and sampling protocols are attached. Soil sampling will be performed under the direction of a Registered Geologist, and the subsurface materials in the soil borings will be identified and logged according to the Unified Soil Classification System. The sampling probe and rods will be pre-cleaned prior to use and between sample drives by washing them with a trisodium phosphate and potable water solution, a potable water rinse, and distilled water rinse. The work will be conducted in one day and soil cuttings will not be generated.

Soil borings B21 through B25 will be advanced by continuously coring from the surface to a depth of sixteen (16) feet bgs or into first-encountered groundwater estimated to be no deeper than 20 feet bgs. Soil samples will be collected according to ACC sampling protocols in soil borings B21 through B25 approximately every four feet at 4.0, 8.0, 12.0, and 16.0 feet bgs. Soil at one-foot increments will be screened with a ppbRAE photoionization detector (PID) prior to preparing soil samples for submission to the laboratory. ACC proposes to collect a minimum of three soil samples for analysis in each of soil borings B21 through B25 based on the results of screening encountered soils with a PID and field indications of impact such as characteristic odor and discoloration. The general intent is to maximize subsurface characterization and to confirm previous site investigation findings.

In addition, soil borings B21 and B32 will be continuously cored through the first-encountered water bearing zone to a depth of 30 feet bgs or approximately 5 feet into fine-grained soils beneath the first-encountered water bearing zone that is interpreted as an aquitard. This additional information will be used to prepare a cross section, confirm hydrogeological conditions at the Site, and further evaluate migration potential in groundwater. Soil will be

screened for indications of petroleum hydrocarbons and one soil sample will be collected in soil boring B21 for analysis in non-saturated soil at the saturated/non-saturated interface for analysis.

Based on field observations and/or field indications of significant petroleum hydrocarbon impacts in soil, additional soil borings may be advanced in appropriate step-out locations. Rationale for any additional soil borings will be presented in the report of findings.

3.3.2 Grab Groundwater Sampling

Soil borings B25 through B33 will also be continuously cored approximately five (5) feet into saturated soil to collect grab groundwater samples. Grab groundwater samples will be collected in a consistent manner according to ACC protocols. Grab groundwater samples will be collected with the use of a stainless steel Hydropunch® sampling probe and retrieved from the probe with either a new, disposable 0.5-inch-diameter bailer or new polyethylene tubing equipped with a check-ball. Water will be undisturbed to the extent feasible and collected from a consistent depth of 2.0 to 3.0 feet below the top of first-encountered water estimated at 16 to 20 feet bgs. Soil borings B25 through B33 are shown on Figure 2.

3.3.3 Sample Analysis

The soil and grab groundwater samples will be submitted to STL San Francisco (STL-SF), a state-certified analytical laboratory, following standard chain of custody procedures for analysis of total petroleum hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, and xylenes (BTEX), and methyl tertiary butyl ether (MTBE) by EPA Method 8260B. Any given 8260B sample analysis can also report all fuel oxygenates and DCA and EDB. To reduce overall analytical costs, ACC proposes to only request all fuel oxygenates for soil and grab groundwater samples reporting the highest concentrations of TPHg, BTEX, or MTBE. Since the former USTs were removed in the early 1980's and previous investigation reported only minor to nondetect concentrations of MTBE, this manner of progressive analysis will reduce analytical costs and still provide full characterization for all fuel oxygenates. At a minimum, one soil sample collected in each of soil borings B22, B23, and B24, and grab groundwater samples collected from B25 and B27, will be analyzed for TPHg, BTEX, MTBE, and all fuel oxygenates.

Standard turnaround time for analytical results is five (5) working days. Following drilling and sample collection, each soil boring will be abandoned with neat cement to just below the surface (3 to 6 inches). The soil boring will then be completed with concrete to grade to match the surrounding material.

4.0 PIEZOMETER INSTALLATION

4.1 Rationale for Piezometers

In order to confirm the stabilized depth to groundwater and groundwater gradient, ACC proposes to install and monitor three temporary piezometers. Proposed piezometer locations are soil borings B25, B31, and B32. These locations are located a minimum of 150 feet apart and should not be disturbed by site activities or vehicle movement during monitoring.

4.2 Proposed Piezometer Construction

Each piezometer will be constructed of 1.0-inch-diameter polyvinylchloride (PVC) casing. Casing will be solid from the surface to 15 feet and slotted from 15 to 25 feet. The PVC casing will be inserted into each 2.0-inch-diameter, continuously-cored soil boring to 25 feet bgs, and stabilized at the surface with approximately 6 inches of concrete. The PVC casing will be sealed with a tight fitting plastic slip cap and the piezometer will be covered with a high visibility traffic cone. The site is fenced with limited controlled access so no additional security is necessary.

4.3 Piezometer Monitoring and Sampling

Following installation of the three piezometers, the surface seals will be allowed to set for approximately 24 hours and the surface of the casings will be surveyed to the nearest 0.01 foot. The highest piezometer casing will be assigned an arbitrary elevation and the other two piezometers will be surveyed relative to it. The distance between the three piezometers will be measured to the nearest 0.1 foot in order to calculate groundwater gradient and flow direction.

When the piezometers have stabilized for a minimum 48 hours, the depth to water will be measured to the nearest 0.01 foot with an electric Solinst meter. Groundwater elevations will be calculated in the three wells and ACC will prepare a groundwater elevation contour map. After 72 hours have elapsed, ACC will confirm groundwater elevations in the three piezometers.

Pending the initial grab groundwater sampling analytical results, ACC may resample one or more of the piezometers. If sampling a piezometer is warranted, it will first be purged of three casing volumes, allowed to stabilize to 80 percent of its original volume, and a representative volume will be collected for analysis. Following confirmation of the stabilized groundwater elevations, the three piezometers will be removed and the soil borings will be properly grouted.

5.0 FORMALDEHYDE UST

ACC is currently negotiating with the OFSA for cost-effective removal of the formaldehyde UST. The OFSA formerly requested that the formaldehyde UST be removed. Data related to the formaldehyde tank will be provided to OFSA following removal.

6.0 REPORTING

A summary technical report discussing field work, observations and findings, analytical results, conclusions, and recommendations will be prepared for submission to the ACHCSA within twenty (20) days of receipt of analytical results. The report will summarize data obtained to date, assess human health risk by comparing sample analytical results to applicable risk-based screening levels, migration potential, and present appropriate conclusions and recommendations.

6.1 Health and Safety Plan

A site-specific health and safety plan that encompasses the proposed work within the area and complies with the requirements of 29 CFR Part 1910.120 will be prepared prior to field work. A copy of the Health and Safety Plan will be kept on site during field work operations and will be



available for reference by appropriate parties during the work. The environmental consultant will act as the Site Safety Officer.

The Geoprobe operator will prepare its own site-specific health and safety plan and be made aware that there is <u>no</u> onsite water, power, or sanitary facilities.

FIGURES



Source: The Thomas Guide, Bay Area 2002

Title: Location Map 921 98th Avenue Oakland, California

Figure Number: 1	Scale: None
Project No.: 6725-001	Drawn By: EJG
A . C . C	Date: 1/8/03
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