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Mr. Brian Oliva  
Alameda County Health Agency  
Division of Hazardous Materials  
80 Swan Way, Room 200  
Oakland, CA 94621

Subject: **REVISED** Remediation Activities Plan for Del Monte Plant 35 located at 1250 Park Avenue and 4204 Hollis Street in Emeryville, California

Dear Mr. Oliva:

Del Monte requests written concurrence from the Alameda County Health Agency (ACHA) on the planned remediation activities at Del Monte Plant 35, located at 1250 Park Avenue and 4204 Hollis Street in Emeryville, California (Figure 1). The remediation plan was first outlined in CH2M HILL's letter dated May 5, 1992 to ACHA and then discussed and modified according to the ACHA requests at the May 18, 1992 meeting with ACHA, Del Monte, and CH2M HILL. This letter presents the agreed upon plan for remediation activities to be conducted at Del Monte Plant 35.

During the past seven years, Del Monte has conducted several subsurface investigations and remedial actions at Plant 35. Del Monte is planning to remove some of the above-ground structures at Plant 35 which will allow easier access to some of the subsurface soil. During or after removal of some of the Plant 35 above-ground structures, Del Monte will implement the various subsurface investigations and remedial actions presented within this plan and requests concurrence from the ACHA.

## BACKGROUND

Del Monte Plant 35 was a food processing plant which has not been in operation since 1989. Past environmental studies, subsurface investigations, and remedial activities conducted at Plant 35 are presented in the "Phase I/II/III Compilation Report Del Monte Plant No. 35, West and East Parcel, Emeryville, California, Volume 1 and 2 (CH2M HILL, March 1992)". Much of this work was conducted with the oversight of Mr.

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Dennis Byrne of the ACHA. Past activities for the East and West Parcels include the following:

### **East Parcel**

- Removal of a 3,500-gallon underground gasoline tank near 45th Street (January 1986).
- An old railroad tank car (approximately 20,000 gallons) used to store fuel oil was filled in place with grout (1985/1986).
- Removal of a 550-gallon underground gasoline tank near Park Avenue (January 1986).
- Installation and sampling of four groundwater monitoring wells (MW-3, MW-4, MW-5, MW-6) (1988).
- Soil investigation along the proposed Haven Street location (November 1989).

### **West Parcel**

- Installation and sampling of two groundwater monitoring wells (MW-1 and MW-2) (1988).
- Removal of a 550-gallon gasoline tank and soil surrounding the tank near Park Avenue (March 1989).
- Removal of four 50-gallon fuel oil tanks located near the southwest corner of the West Parcel (March 1989).
- Soil and groundwater investigation in the vicinity of the former fuel oil tanks (1988/1989).
- Quarterly groundwater monitoring of West Parcel wells (MW-7 through MW-11) (1989 - Current).

## **PLANNED ACTIVITIES**

Del Monte expects to remove various above-ground structures at Plant 35, including a formerly leased building located at the corner of Park Avenue and Hollis Street (Figure 1). During or after the removal of above-ground structures, Del Monte proposes to conduct the following additional investigative and remedial activities:

### **East Parcel**

- Excavation and treatment/disposal of soil containing petroleum hydrocarbons along the proposed Haven Street location.

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- One-time groundwater sampling of monitoring well MW-3 located downgradient of the Haven Street location.
- Investigation and potential excavation of soil beneath sumps, gutters, drains, etc.
- Investigation of the filled-in-place 20,000-gallon underground fuel oil tank.
- Destruction of monitoring wells MW-3 through MW-6 on the East Parcel.

***Excavation of soil containing petroleum hydrocarbons along the proposed Haven Street location***

During a past soil investigation of the proposed Haven Street location, shallow soil samples contained TPH as gasoline concentrations in excess of 100 mg/kg. Del Monte is planning to excavate the unsaturated soil along the proposed Haven Street location which exceeds 100 mg/kg. Initially, soil samples will be analyzed with a field screening device (ie. EnSys RISC or Hanby field test kits) which detects TPH as gasoline with a detection limit between 10 and 100 mg/kg. Unsaturated soil will be excavated in areas where the field screening device indicates concentrations in excess of 100 mg/kg. When soil excavation is determined to be complete according to field screening devices, confirmation soil samples will be collected for laboratory analysis (EPA method 8015 modified). These confirmation soil samples will be collected at 20-foot interval grid spacing along the base of the excavation and at 20-foot interval spacing along the excavation side walls with a minimum of one sample collected at the base and each side wall. The impacted soil may be aerated onsite to less than 10 mg/kg TPH as gasoline and then returned to the excavation.

***One-time groundwater sampling of monitoring well MW-3 located downgradient of the Haven Street location.***

A groundwater sample will be collected from the downgradient monitoring well MW-3 to confirm that petroleum hydrocarbons reported in the soil in the Haven Street area have not impacted shallow groundwater. The sample will be analyzed for BTEX/TPH as gasoline (EPA method 8015 modified) and TRPH (EPA method 8015 modified). No BTEX, TPH as gasoline, or TRPH's (reported as TPH as diesel fuel) were detected in a previous sample collected from MW-3 in December 1988.

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### ***Investigation and potential excavation of soil beneath sumps, gutters, and drains***

Unsaturated accessible soil beneath sumps, gutters, and drains will be inspected for stains or odors and screened with a photoionizer (HNU). Soil beneath sewer and storm drains will not be included in this investigation. Soil beneath gutters and drains will be screened for TPH as gasoline and diesel (EnSys RISC or Hanby field test kits) at a minimum linear interval of 20 feet. Soil suspected of containing petroleum hydrocarbons according to visual observation and field screening techniques will be analyzed for BTEX/TPH as gasoline (EPA method 8015 modified) and total recoverable petroleum hydrocarbons (TRPH) (EPA method 8015 modified). Unsaturated soil containing detectable levels of benzene, or TPH as gasoline or TRPH in excess of 100 mg/kg will be excavated.

### ***Investigation of the filled-in-place 20,000-gallon underground fuel oil tank***

During an investigation of a filled-in-place 20,000 gallon fuel oil tank in 1985, low concentrations of petroleum hydrocarbons reported as volatile hydrocarbons, extractable hydrocarbons, and oil and grease were detected in samples from a soil boring and one groundwater grab sample. At the time of the investigation the current underground tank investigation regulations were not firmly established and therefore, BTEX and TPH as diesel analyses were not performed on the collected samples. To further characterize the tank area and proceed with closure, two borings will be drilled near the ends of the tank and downgradient (west side). Two soil samples and a groundwater grab sample will be collected from each boring and analyzed for BTEX and TPH as diesel (EPA method 8015 modified). Results of the sampling will be discussed in a letter to the ACHA requesting no further action at the tank area.

### ***Destruction of monitoring wells MW-3 through MW-6 on the East Parcel***

Groundwater quality is no longer being monitored on the East Parcel. Therefore monitoring wells MW-3 through MW-6 (four wells) will be destroyed according to the California Department of Water Resources Well Standards.

### **West Parcel**

- Excavation and treatment/disposal of soil containing solvents in the vicinity of the former fuel oil tanks.
- Investigation and potential excavation of soil beneath sumps, gutters, drains, etc.

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- Groundwater investigation downgradient of the former fuel oil tanks area (across Hollis St.) to assess if solvents are present offsite.
- One-time groundwater sampling of monitoring well MW-2 located downgradient of the Haven Street location.
- Destruction of monitoring wells MW-1 and MW-2.
- Continued quarterly groundwater monitoring of wells MW-7 through MW-11 for chlorinated hydrocarbons (No BTEX or TPH-gas analysis for MW-7).

***Excavation of soil containing chlorinated solvents in the vicinity of the former fuel oil tanks***

Unsaturated soil containing chlorinated solvents in the vicinity of the former fuel oil tanks will be excavated to nondetectable or background levels after demolition of the leased building (Figure 1). These levels will be negotiated later with the ACHA. It is assumed that approximately 50 cubic yards of impacted soil will be removed. Laboratory detection limits are presented in Table 1. A minimum of four and a maximum of 25 confirmation soil samples will be collected within the excavation. Due to the proximity of monitoring well MW-8 to the planned excavation, it will be necessary to destroy MW-8; this well destruction will be conducted according to California Department of Water Resources Well Standards.

***Investigation and potential excavation of soil beneath sumps, gutters, and drains***

The investigation and potential excavation of soil beneath sumps, gutters, and drains located on the West Parcel will be conducted in the same manner as described for the East Parcel.

***Groundwater investigation downgradient of the tanks area (across Hollis St.) to assess if chlorinated solvents are present offsite***

Quarterly groundwater quality data from monitoring wells MW-8 through MW-11 indicate chlorinated solvents are present in the shallow groundwater in the area of the former fuel oil tanks (4). To assess if chlorinated solvents are present offsite, Del Monte will drill a soil boring and collect a groundwater grab sample across Hollis Street using a temporary well casing. The sample will be analyzed for chlorinated solvents by EPA method 601. The results of the sampling will be used to assess if further investigation is

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required based on future use of the site, extent of the contamination, and the relative success of source removal (soil excavation onsite).

***One-time groundwater sampling of monitoring well MW-2 located downgradient of the Haven Street location.***

A groundwater sample will be collected from the downgradient monitoring well MW-2 to confirm that petroleum hydrocarbons reported in the soil in the Haven Street area have not impacted shallow groundwater. The sample will be analyzed for BTEX/TPH as gasoline (EPA method 8015 modified) and TRPH (EPA method 8015 modified). No BTEX, TPH as gasoline, or TRPH's (reported as TPH as diesel fuel) were detected in a previous sample collected from MW-2 in December 1988.

***Destruction of monitoring wells MW-1 and MW-2 on the West Parcel***

Groundwater quality is no longer being monitored in wells MW-1 and MW-2 on the West Parcel. Therefore monitoring wells MW-1 and MW-2 will be destroyed according to the California Department of Water Resources Well Standards.

***Continued quarterly groundwater quality monitoring of wells MW-7 through MW-11 for chlorinated hydrocarbons***

Groundwater quality will continue to be monitored for chlorinated solvents in monitoring wells MW-7 through MW-11. Samples collected will be analyzed by EPA Method 601 only. Results of the monitoring will continue to be reported to the ACHA and RWQCB quarterly.

No BTEX/TPH as gasoline analyses will be performed in MW-7 located downgradient of the removed 550-gallon gasoline storage tank (Figure 1). According to the ACHA, the removed 550-gallon gasoline storage tank area is no longer an environmental issue and is considered closed.

During demolition of the leased building on the West Parcel and excavation of impacted soils at the former fuel oil tank area, monitoring well MW-8 will be destroyed (Figure 1).

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## SOIL TREATMENT/DISPOSAL

Excavated soil containing petroleum hydrocarbons or chlorinated solvents will be placed in onsite, plastic-lined and bermed aeration beds. This soil will be aerated according to Bay Area Air Quality Management District guidelines. Soil will be aerated in separate beds according to the constituents present in the soil. Upon completion of soil aeration, discreet soil samples will be collected approximately every 20 cubic yards and submitted for laboratory analysis. Soil containing chlorinated solvents above detection limits (Table 1) or TPH in excess of 10 mg/kg will be transported to an appropriate landfill for disposal. Soil containing less than 10 mg/kg TPH will be backfilled on the Plant 35 property.

I look forward to your written concurrence. Del Monte is planning to proceed with portions of this work on July 2, 1992. If you have any questions or comments which you would like to discuss, please call me at (510) 251-2888 (ext. 2118).

Sincerely,

CH2M HILL



Bern Baumgartner  
Project Manager

BEB/prep

cc: Mr. Dennis Byrne/Alameda County Health Agency  
Mr. Steve Ronzone/Del Monte  
Mr. Mark Rosenquist/Del Monte  
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