

February 28, 2005

1103-4J

Mr. John Graham  
**CENTEX HOMES**  
2527 Camino Ramon, Suite 100  
San Ramon, California 94583

**RE: SOIL MANAGEMENT PLAN  
CAHILL NORTH BLOCK/  
DEL MONTE PLANT 51  
SAN JOSE, CALIFORNIA**

Dear Mr. Graham:

As requested, we are pleased to present this soil management plan (SMP) for the Cahill North (former Del Monte Plant 51) site in San Jose, California. This SMP pertains to the portion of the former Del Monte Plant site located to the north of West San Fernando Street. This work was performed per our proposal dated November 17, 2004.

As you know, the California Regional Water Quality Control Board (CRWQCB) issued a letter dated October 4, 2004 asking that additional soil sampling be performed to evaluate if arsenic levels detected in soil at the site are consistent with natural background levels. Based on a conversation with Mr. David Barr of the CRWQCB, he considers the property suitable for the planned development; however, if arsenic levels are found to be above typical background concentrations, Mr. Barr indicated that the preparation of a soil management plan (SMP) may be requested. In a subsequent conversation, Mr. Barr indicated that if the performance of additional sampling was not desired, it could be assumed that the detected arsenic levels are above natural background levels and a SMP could be prepared and implemented.

The purpose of this SMP is to summarize current site conditions and describe appropriate protocols for handling of soil during construction activities at the site. The SMP is applicable to the currently planned construction activities and must also be implemented for any future work at the site that would involve soil excavation, such as utility repair work.

### **Site Background**

The Del Monte Plant 51 property to the north of West San Fernando Street consists of three adjoined buildings (Buildings 1, 3, and 5), which occupy the majority of the property between White and Bush streets. Since the early 1900s, the site primarily has been used for the processing and packaging of dried fruit products. Operations at the site took place between 1916 and 1992.

We understand that Centex Homes plans to develop the site for residential use. Due to the historic nature of the Del Monte buildings, the planned development recently has been revised to include renovation (instead of demolition) of the buildings located between The Alameda and West San Fernando Street. These buildings will be converted into multi-story, loft-type residential units. The existing brick walls will be retained and incorporated into the development. Below grade parking facilities also are being considered.

## Past Environmental Investigations

As part of facility closure activities, a number of studies and remedial activities have been performed at the site. Providing a complete summary of all past work is beyond the scope of this SMP, however, recent work that is pertinent to the SMP is presented in our report dated November 8, 2000. This work was performed for Del Monte Foods and generally follows the scope outlined in the work plan prepared by CH2MHill (January 1998) that was approved by the California Regional Water Quality Control Board (CRWQCB).

During that investigation, soil samples were collected from various grid locations established across the site, as well as from specific areas of potential concern such as sumps locations. This data is summarized below in Tables 1 and 2, respectively. Sampling locations are shown on Figure 2. As shown, the only contaminant of concern detected above the established target levels was arsenic.

**Table 1. Analytical Results of Selected Soil Samples from Grid Locations**  
(concentrations in parts per million)

Grid Location and (Soil Sample ID)	Diesel Range Hydrocarbons	Oil Range Hydrocarbons	BTE	Total Xylenes	Arsenic	Lead	Organochlorine Pesticides
72 (SS-1)	<b>1.70</b>	<10	<0.0005	<0.0005	<b>28.6</b>	<b>22.3</b>	ND
4 (SS-2)	<b>29.1</b>	<b>83.7</b>	<0.0005	<0.0005	<b>24.9</b>	<b>76.9</b>	ND
31 (SS-3)	<b>24.3</b>	<b>95.9</b>	<0.0005	<0.0005	<b>26.3</b>	<b>77.5</b>	<b>2.69 Delta-BHC</b>
42 (SS-4)	<b>1.00</b>	<10	<0.0005	<b>0.0293</b>	<b>22.1</b>	<9.27	ND
50 (SS-5)	<b>1.30</b>	<10	<0.0005	<0.0005	<b>22.4</b>	<9.62	ND
65 (SS-6)	<b>1.80</b>	<10	<0.0005	<0.0005	<b>26.5</b>	<b>13.4</b>	ND
38 (SS-7)	<1.0	<10	<0.0005	<0.0005	<b>22.3</b>	<10.3	ND
68 (SS-8)	<b>1.70</b>	<10	<0.0005	<0.0005	<b>31.2</b>	<b>15.2</b>	ND
Residential PRG	NE	NE	Various	210	0.39	400	NE
Target Level*	500	500	Various	9,500	14	130	PRG (NE)

< Indicates that the compound was not detected at or above the stated laboratory reporting limit

ND Not Detected (detection limits vary)

PRG Preliminary Remediation Goal-EPA Region 9, 2000

NE Not established

BTE Benzene, Toluene, and Ethylbenzene

\* Target Level proposed in January 1998 work plan and approved by CRWQCB. BTEX values are from the RBCA Tier 2 SSTL table.

**Table 2. Analytical Results of Selected Soil Samples - Areas of Potential Concern**  
(concentrations in parts per million)

Soil Sample	Oil Range Hydrocarbons	Diesel Range Hydrocarbons	BTEX	VOCs	Arsenic	Lead	Organochlorine Pesticides
Main	<10	<1.0	<0.005	ND	<b>21.5</b>	<10.5	ND
Sump 1	<10	<b>1.10</b>	<0.005	ND	<b>19.4</b>	<10.3	ND
Sump 2	<b>94</b>	<b>22</b>	<0.005	0.0072*	<b>4.3</b>	<b>5.2</b>	ND
Sump 3	<10	<1.0	<0.005	ND	<b>17.4</b>	<10.4	ND
PRG	NE	NE	Various	8.9*	0.39	400	Various
Target Level**	500	500	Various	NE	14	130	PRG

< Indicates that the constituent was not detected at or above stated laboratory reporting limits

ND Not Detected (detection limits vary)

NE Not Established

\* Methylene Chloride. No other VOCs were detected.

\*\* Target Level proposed in January 1998 work plan and approved by CRWQCB.

### Soil Management Protocols

Because the planned development will cap the arsenic impacted soil below pavements and building foundations, the potential for exposure to the soil will be virtually eliminated. Thus, the soil will not pose a significant risk to human health or the environment. However, during construction activities (current and future), appropriate protocols for handling and/or disposal of the soil should be employed.

Prior to performing any work that would be expected to expose impacted soil, the following actions should be taken:

- 1) Information regarding the contaminant concentrations and location of the impacted soil (e.g., a copy of this SMP) should be provided to the selected contractor.
- 2) The contractor should be required to prepare a health and safety plan in accordance with OSHA requirements and provide appropriately trained workers. Note that due to the short duration of most construction projects/earthwork activities, the detected arsenic concentrations would not be expected to pose a significant threat to construction workers; however, employers are responsible for the health and safety of their employees and appropriate health and safety measures should be implemented based on the type of work to be performed.
- 3) Dust control procedures should be implemented to limit visible dust associated with excavation activities, truck and vehicle traffic onto and off the site, and the effects of ambient wind traversing exposed soil. These procedures should, at a minimum, include:
  - ▼ Misting or spraying water during soil excavation and loading of soil into transportation vehicles
  - ▼ Limiting vehicle speeds to 5 miles per hour on unpaved portions of the site
  - ▼ Covering stockpiled soil with visqueen (or similar) material
  - ▼ Minimizing drop heights of soil during loading/unloading activities
  - ▼ Rapid cleanup of sediments deposited on paved roadways
  - ▼ The placement of temporary gravel surfacing at Site entrances/exits



- 4) If excess soil is to be generated for off-site disposal, an environmental consultant (professional engineer or registered geologist) should be retained to oversee the collection of representative soil samples for characterization purposes. The samples should be analyzed for arsenic. Since lead and petroleum hydrocarbons also have commonly been detected in the soil, analyses for these constituents also should be performed. Note that the intended disposal site or facility may require additional testing. The sampling frequency should be based on the volume of soil to be exported, knowledge of the intended use of the soil, and industry standards. Based on the laboratory data, the suitability of the soil for any specific use should be evaluated by the environmental consultant.
- 5) Two underground fuel oil tanks were removed from the site in 1988. These tanks were located on the south side of Building 3 adjacent to the boiler room (see Figure 2). Approximately 150 cubic yards of impacted soil were removed from the excavation; however, additional impacted soil, that was not accessible due to its proximity to the existing wall and building foundation, remains in place at the site. Although there is no requirement to remove this soil, if soil from this location becomes accessible and is to be excavated during current or future construction activities, it should be segregated and tested as described above to evaluate appropriate disposal alternatives.

### Limitations

This SMP was prepared for the sole use of Centex Homes. We make no warranty, expressed or implied, except that our services have been performed in accordance with environmental principles generally accepted at this time and location.

Thank you for choosing us to assist you. If you have any questions, please call and we will be glad to discuss them with you.

Very truly yours,

**Lowney Associates**

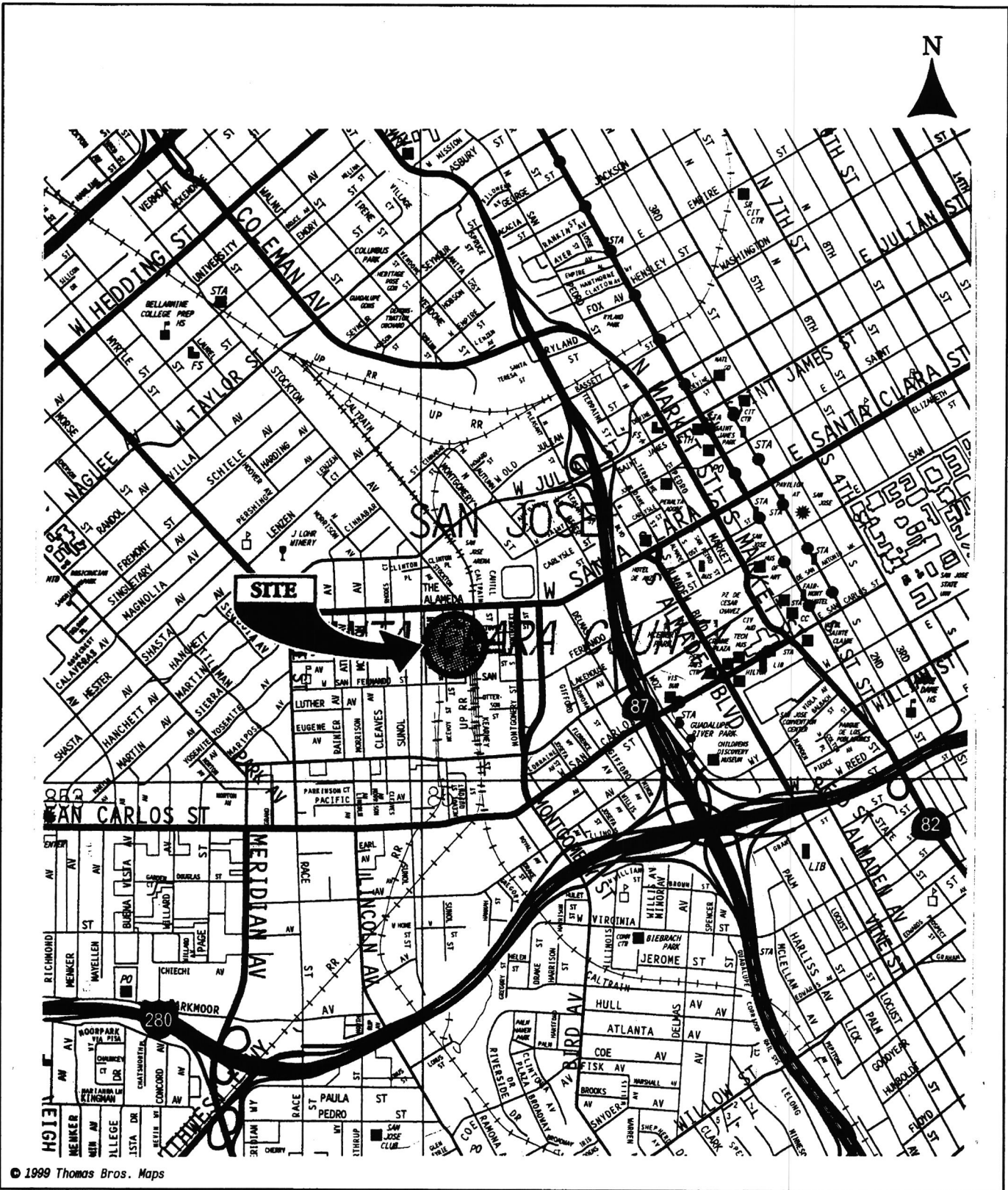


Stason I. Foster, P.E.  
Principal Environmental Engineer



Copies: Addressee (3)  
California Regional Water Quality Control Board  
Attn: Mr. David Barr

MV, 1103-4J SMP.DOC



VICINITY MAP  
CAHILL STATION  
San Jose, California

