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November 30, 2000
MFG Project No. 030062.1

Mr. Barney Chan
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway
Alameda, California 94502

**Subject: Work Plan for Investigation of Soil and Groundwater Within Utility Trench
Hertz Facility, 1 Airport Drive, Oakland, California [StID # 2260]**

Dear Mr. Chan:

As requested by the Alameda County Environmental Health Services (ACEHS), this work plan describes the scope of additional subsurface investigation at The Hertz Corporation (Hertz) facility located at 1 Airport Drive in Oakland, California (hereinafter the "Site"). The objective of the proposed work is to evaluate whether the backfill of the underground power line (12.47 kilovolts) trench, located immediately south of the Hertz facility, is a preferential pathway for contaminant migration. This work plan has been prepared by MFG, Inc. on behalf of Hertz in response to the ACEHS letter to Hertz, dated October 5, 2000.

As reported by Dale Klettke of the Port of Oakland, the conduit(s) at the bottom of high voltage power line trenches were typically capped with approximately 6-8 inches of concrete and the trenches were typically backfilled with sand. The trench is expected to be approximately 4 to 6 feet deep. The depth to groundwater at the Site has historically ranged from approximately 2.5 to 5.5 below ground level.

MFG's proposed scope of work and schedule are summarized below.

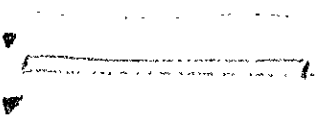
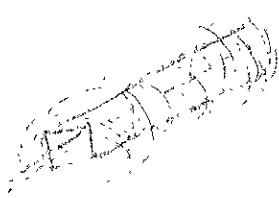
SCOPE OF WORK

Utility Trench Investigation

The objective of the proposed work is to investigate the presence of gasoline range hydrocarbons in the backfill material and groundwater, if present, contained within the trench. To accomplish this objective, MFG will (1) submit this Work Plan to the ACEHS for approval; (2) advance and sample trench backfill material above the concrete cap at four locations; (3) collect and chemically analyze one soil (backfill material) sample from each location for gasoline-range hydrocarbon constituents; (4) collect and chemically analyze grab groundwater samples from each location (where groundwater is present) for gasoline-range hydrocarbon constituents; and (5) present our findings in a letter report. All work will be performed per MFG's written Standard Operating Procedures.

- (1) Prior to performing field activities, MFG will submit this Work Plan to the ACEHS for approval. MFG will also obtain approval for the proposed investigation from the Port of Oakland.

MFG will notify Underground Services Alert and the Port of Oakland to coordinate location and marking of underground utilities in the area of the excavations. In addition, a private underground



Side

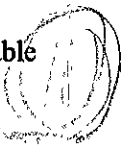
utility locating service will be used. MFG's site-specific health and Safety Plan for the project will be modified to include the work.

- (2) MFG will advance and sample four borings within the trench backfill material to a depth of approximately 4 to 6 feet below ground level. The proposed sample locations are shown on the attached figure. The soil excavations will be advanced by hand augering techniques. Soil samples will be collected in a barrel sampling device advanced using a slide hammer. Each soil sample will be collected in brass or stainless steel liner fitted within the sampling device.

Need to sample
regard less



Soil and groundwater samples will be collected only if (1) backfill materials appear more permeable than surrounding native soil and (2) permeable backfill materials extend below the highest historically observed groundwater levels at the Site.

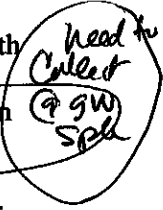


- (3) Soil excavated from the trench will be visually examined in the field for soil classification, color, relative moisture content and indications of contamination. Headspace measurements of excavated soil will be made in the field using a portable photoionization detector (PID). To prepare the soil for headspace measurement, the soil will be placed in a polyethylene Ziploc® bag, the bag will be sealed and then the soil will be broken up and agitated. The bag will be allowed to stand for approximately 10 minutes and then the PID probe will be inserted into the bag.

- (4) A minimum of one soil sample from each excavation/boring will be selected for chemical analysis. The soil sample selected for chemical analysis will be from either the vadose zone-groundwater interface or the backfill material immediately above the concrete cap at the bottom of the trench if saturated conditions are not encountered within the trench. The ends of the sample liners will be covered with Teflon® sheets, capped with polyethylene lids and then sealed with duct tape. The samples will be labeled and immediately placed in an insulated, ice-cooled chest. Sample custody will be maintained in accordance with MFG's written Standard Operating Procedures.

- (5) If saturated conditions are encountered within the trench backfill above the concrete cap, a temporary well point will be placed into the zone of saturation (anticipated to be present at a depth between approximately 4 and 6 feet). Grab groundwater samples will be collected from the temporary well point using a disposable bailer. If saturated conditions are not encountered within the backfill material above the concrete cap, a grab groundwater sample will not be collected.

Need to collect
samples?



- (6) The soil and groundwater samples will be analyzed for total petroleum hydrocarbons as gasoline; the fuel constituents benzene, toluene, ethylbenzene, total xylenes (BTEX); and fuel oxygenates (MTBE, ETBE, TAME, DIPE and TBA) using EPA Method 8015M and EPA Method 8260B. The soil and grab groundwater samples will be chemically analyzed by an analytical laboratory certified by the State of California Department of Health Services. Samples submitted for chemical analysis will be analyzed on a standard (approximately 2-week) turnaround time.

- (7) After collection of soil and grab groundwater samples, the excavated material will be backfilled into the trench and compacted, and the surface pavement will be patched with concrete. [Note: Re-use of the trench backfill material (whether contaminated or non-contaminated) is consistent with the

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Regional Water Quality Control Board (RWQCB)'s policy memorandum: "In-Trench Reuse of Contaminated Trench Spoils from Utility Excavations" dated August 31, 1995 (Attachment A).]

- (8) All sampling equipment will be decontaminated by washing with a laboratory-grade detergent/water solution followed by a tap water rinse and a final distilled water rinse.
- (9) Water and soil cuttings/spoils generated during the investigation, if any, and will be placed in a DOT-approved 5-gallon pails or 55-gallon steel drums for temporary storage at the Site, pending disposal.
- (10) MFG will prepare a brief letter report that documents the methods and results of the proposed trench investigation. The report will include chain-of-custody records and laboratory analysis reports for soil and groundwater samples. The report will contain tables and figures as necessary for clarity of presentation. The anticipated figures in the report include a site location map and a site plan showing the sample locations.

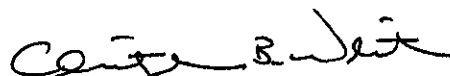
SCHEDULE

Hertz will submit a cost pre-approval request for this proposed investigation to the State of California UST Cleanup Fund. The cost pre-approval request must include a copy of the ACEHS's approval letter for the proposed scope of work. The proposed investigation will be scheduled after the State approves the investigation costs. The proposed field investigation is anticipated to require one day to complete. Analytical results and validation will be completed within 3 weeks after completion of the field work. An investigation report will be issued approximately 5 weeks after the completion of the field work.

Please contact Christopher White at (415) 495-7110 if you have any questions or require further information.

Sincerely yours,

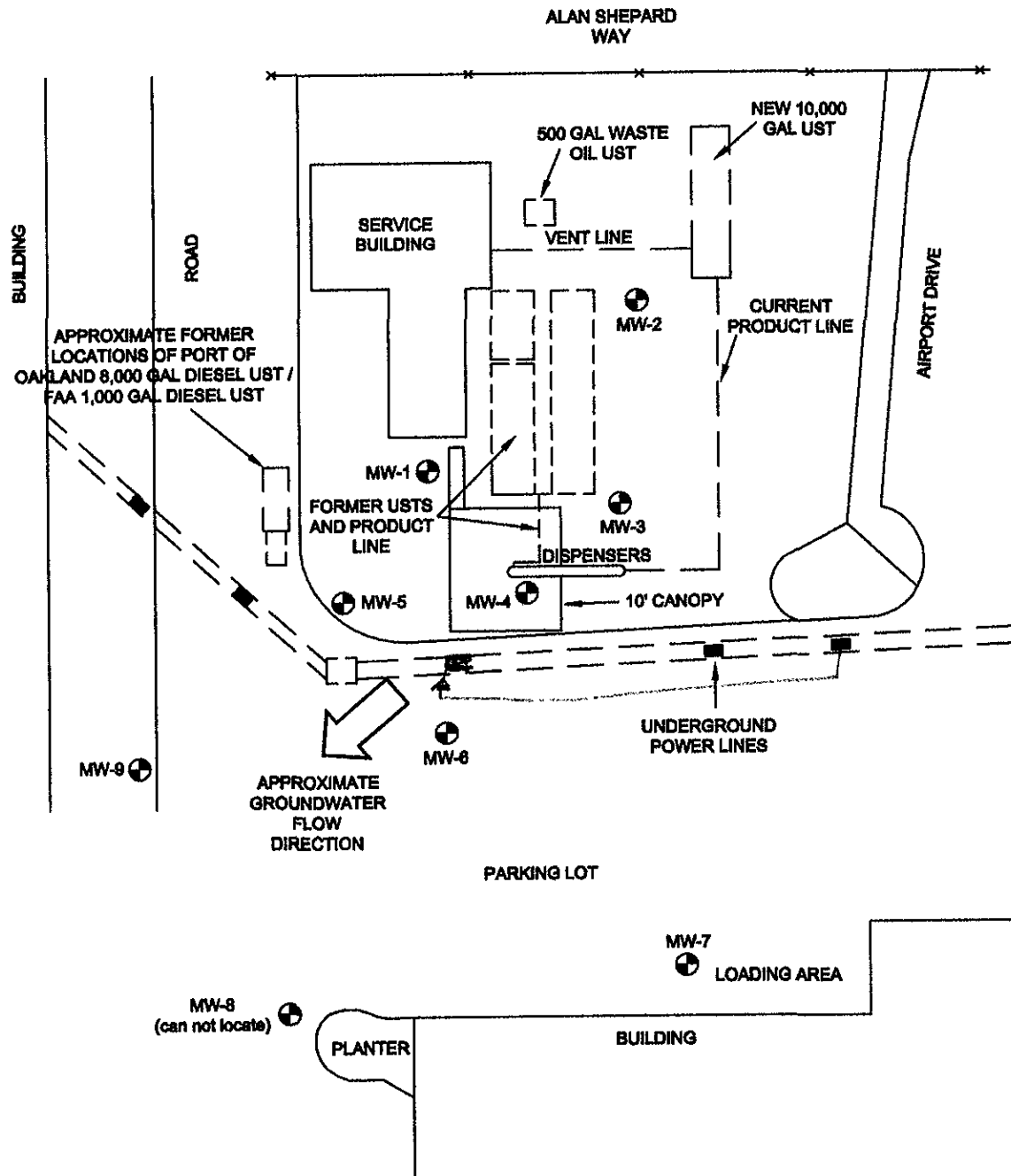
MFG, INC.


Christopher B. White, C.H.G.
Project Hydrogeologist

Attachment: Figure 1 – Site Plan
Attachment A – RWQCB memorandum

cc: Roland Costanzo, The Hertz Corporation, with attachment
Dale Klettke, Port of Oakland, with attachment

? 1,517,9 - 2nd qtr. in 3rd qtr.
 ? 486 - qtrly -



EXPLANATION

- ⊕ GROUNDWATER MONITORING WELL
- x- FENCELINE
- PROPOSED TRENCH SAMPLE LOCATIONS



SITE PLAN BASED ON MAP BY ESE, INC.
 JANUARY 4, 1994

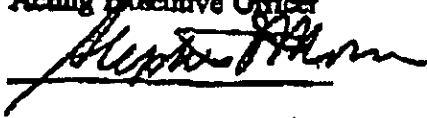
SITE PLAN		
Hertz Service Center 1 Airport Drive Oakland, California		
Project No. 030082	By: N. Johnson	Figure 1
Date: 11/3/00	Checked: <i>ae</i>	
MFG, Inc. consulting scientists and engineers		

REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
M E M O R A N D U M

TO: All Utilities, Public & Private

DATE: August 31, 1995
File No. 1250.01(GVL)

FROM: Stephen I. Morse
Acting Executive Officer



SUBJECT: In-Trench Reuse of Contaminated Trench Spoils from Utility Excavations

In response to requests pursuant to this Board's position on the subject, the following has been prepared. In general, this Board is not opposed to returning soil which was excavated from a utility's trenching operation under certain conditions outlined below. This position compliments Cal/EPA and US EPA, (see attached).

In order to minimize waste creation and since installation of utilities should not be construed as partial site remediation, the following are this Board's recommendations and guidance regarding the subject:

- a. When performing installation, maintenance or repair work, every attempt possible should be made to avoid placement of utilities through known or suspected ground contaminated areas' prior to excavation.
- b. Excavated soils when known to be, or found to be contaminated should be stored immediately adjacent to the excavation and placed back into the original excavation whenever possible and as soon as possible. If there exists a threat of rain, stockpiled soil should be protected from rain infiltration, erosion and runoff.
- c. If a majority of the lateral extent of the contamination is within the bounds of the excavation, we request that you dispose of that soil at an appropriate land disposal or soil treatment facility.
- d. In the event that contamination is encountered during excavation, notification must be made to this Board as well as the property owner and any other notifications as required by law¹.
- e. If the site is determined to be contaminated, all equipment and material to be left in the excavation should be determined to be compatible with the contaminant(s)¹.
- f. Excavated soils should be redeposited so that only clean soil is exposed at the surface of the filled excavation¹ or otherwise covered by concrete or asphalt pavement. Although there is no regulatory basis for the minimum thickness related to trench excavations, we recommend that the clean soil cover should be approximately six to twelve inches thick.

p.2 In-Trench Reuse of Contaminated Trench Spoils from Utility Excavations

- g. The activity of excavating a trench and placing the contaminated soil back into the excavation from which it came generally does not constitute treatment, storage or disposal of a regulated waste. Therefore, that activity is not considered waste generation and does not constitute "land disposal"¹.
- h. Contaminated soil moved during the course of excavation will not be considered a waste until backfilling of the excavation has been completed¹. Trench spoils not used for backfilling are considered to be a waste unless reasonably likely to be non-contaminated or demonstrated to be inert.
- i. All displaced soil (that which can not be placed back into the excavation), should be sampled, examined, analyzed, or otherwise assessed to determine if it¹ is a hazardous waste, designated waste, non-hazardous waste or is inert as defined by Chapter 15, Div. 3, of Title 23, CCR.
- j. All waste material generated as a result of trench excavations, (see Item-i above), must be disposed of at a facility certified by the State to take that waste. The disposal of inert trench spoils, (§2524, Chapter 15, Div. 3, of Title 23, CCR), is generally not regulated, however sufficient sampling and analysis should be performed to verify that it is inert or that it is reasonable to believe that there is no contamination of concern.

1. Ronald Pletzer, DTSC, Senior Hazardous Materials Specialist, Waste Evaluation Unit, April 18, 1998;
2. Sylvia Lawrence, Director, USEPA, Office of Solid Waste, June 11, 1992.

Attachments (2)