PACIFIC
ENVIRONMENTAL
GROUP, INC.

March 28, 1996
Project 325-004.1D

Ms. Eva Chu
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502-6577

Re: Risk Assessment Work Plan Addendum
Former Chevron U.S.A. Service Station 9-7127
Grant Line Road at Interstate 580
Tracy, California

Dear Ms. Chu:

Pacific Environmental Group, Inc. (PACIFIC), on behalf of Chevron Products Company (Chevron), prepared and submitted a risk assessment work plan dated February 26, 1996 for the site referenced above. The purpose of the risk assessment is to delineate the potential risk from benzene to humans associated with the future development of the site. The proposed risk assessment included the utilization of American Society for Testing and Materials' (ASTM's) *Standard Guide for Risk Based Corrective Action Applied at Petroleum Release Sites* (RBCA) and *A Seasonal Soil Compartment Model* (SEASOIL) for the determination of potential risk.

The workplan was reviewed by Ms. Eva Chu of the Alameda County Department of Environmental Health. In a telephone conversation on March 21, 1996, Ms. Chu requested the exclusive utilization of RBCA for the characterization of risk at the site. The purpose of this work plan addendum is to provide for appropriate modifications to the scope of work presented in the Risk Assessment Work Plan.

SCOPE OF WORK

The workplan will be carried out using the RBCA Tier 1 and Tier 2 framework. The steps involved for completing this RBCA evaluation will include site assessment, Tier 1 evaluation, and where necessary, Tier 2 evaluation. The Groundwater Services, Inc. format will be utilized for these evaluations.

Site investigations have been previously conducted which will provide relevant information regarding the initial site assessment. The site assessment will identify possible sources and receptors of petroleum hydrocarbons. Potential migration pathways,

transport mechanisms, and possible points of exposure will be analyzed based on petroleum hydrocarbon concentrations previously identified at the site.

The identified exposure pathways at this site are: inhalation through volatilization and atmospheric dispersion, inhalation through volatilization and enclosed space accumulation, and potable water use through leaching and groundwater transport. Current site conditions will be compared with values provided in the Tier 1 Risk Based Screening Level (RBSL) Look-up Table for commercial/industrial receptor with a cancer risk of 1E-6.

If the resulting values obtained from the Tier 1 evaluation exceed the values presented in the RBSL Look-up Table for a given exposure pathway, a Tier 2 evaluation will be completed for that pathway. The Tier 2 evaluation provides for the development of site specific target levels. Exposure factors will be evaluated given the future use of the site. Site parameters will be evaluated given the site specific soil, groundwater, surface, and building parameters. When site parameter data are not available, a reasonable estimate with justification will be provided. Petroleum hydrocarbon concentrations in soil and groundwater concentrations provided by previous investigations will be utilized for this evaluation. These results will be tabulated and included in the final RBCA evaluation report.

SCHEDULE OF ACTIVITIES

Upon approval of this Plan by Chevron and the Alameda County Health Care Services Agency, PACIFIC will initiate the preparation of the RBCA evaluation; the completed RBCA evaluation will be submitted to Chevron within 4 weeks.

If you have any questions or comments regarding the scope of work in this workplan addendum, please call.

Sincerely,

Pacific Environmental Group, Inc.

Michelle Shipp
Senior Staff Scientist

Mark Sullivan
Project Manager

REFERENCES

American Society for Testing and Materials. *Risk Based Corrective Action Applied at Petroleum Release Sites: E 1739 - 95*. November 1995.

cc: Mr. Kenneth Kan, Chevron Products Company