

PACIFIC
ENVIRONMENTAL
GROUP, INC.

September 1, 1995
Project 330-006.3E

Ms. Amy Leech
Department of Environmental Health
Environmental Protection Division
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Re: Response to Alameda County Health Care Services
Agency (ACHCSA) letter to ARCO Products Company (ARCO),
dated July 21, 1995 (ACHCSA letter of July 21), regarding the
following site:

ARCO Service Station 0608
17601 Hesperian Boulevard
San Lorenzo, California

Dear Ms. Leech:

On behalf of ARCO Products Company (ARCO), Pacific Environmental Group, Inc. (PACIFIC) has prepared this letter in response to the above referenced ACHCSA letter of July 21. That letter contained comments on the *Work Plan* and RI/FS revisions submitted by PACIFIC to ACHCSA on June 28, 1995. This response confirms our agreements based on the ACHCSA letter of July 21, as well as subsequent telephone conversations. Each of your comments from the referenced letter, summarized in italics, is addressed below.

If the pilot study indicates that petroleum hydrocarbon concentrations do not significantly decline in areas of concern, then other, more effective remedial alternatives, and possibly containment measures, should be considered and implemented.

If the conditions described above occur, ARCO and PACIFIC will discuss other potential remedial alternatives with ACHCSA. However, based on the RI/FS, other active remedial alternatives were judged to be not feasible for this site.

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Monthly analysis for TPH-g and BTEX should be conducted in Wells EA-1, MW-8, and MW-10, in addition to dissolved oxygen. Pulsing or restarting the groundwater extraction system may need to be considered if an increasing trend of petroleum hydrocarbon concentrations is detected.

ARCO and PACIFIC will consider restarting or pulsing the ground-water extraction system if an increasing trend in hydrocarbon concentrations is detected. This and other options will be discussed with ACHCSA prior to implementation.

As discussed by telephone and approved by you verbally, a modification of the oxygen-releasing compounds (ORC) pilot study has been made. This modification recognizes that the sparging wells that were initially proposed as ORC wells have only 1 foot of screen, limiting the amount of oxygen that can enter the groundwater from the well. Rather than installing ORC in Wells SP-1 and SP-2, they will be installed in Wells E-1A, MW-5, and MW-10. Monitoring will take place in Wells MW-8, MW-10, and SP-2. The monthly analysis requested above will be conducted. In addition, well purging prior to sampling will be performed on a quarterly basis only.

Remedial Action Alternative 2 should not include that well owners be given the go-ahead to begin pumping. This issue should be addressed in the Groundwater Management Plan. The Plan should address the timing, appropriateness, and monitoring involved with health protection and plume migration. The domestic irrigation wells should remain turned off through the duration of the pilot study.

→ Remedial Action Alternative 2 will be modified as described in this comment, and the Groundwater Management Plan will address the issues listed. ARCO and PACIFIC will not advise any of the domestic well owners that they may use their wells in 1995. Since the *Groundwater Management Plan* is now not scheduled for completion until second quarter 1996 (see below), ARCO and PACIFIC expect to request the domestic irrigation well owners to not use their wells at least through that period.

The risk assessment is acceptable. ACHCSA is of the opinion that there is no significant public health risk in the areas and concentrations evaluated.

The risk assessment, which has been accepted by ACHCSA, will be included in the final RI/FS document.

Please submit a draft copy of the 'Fact Sheet' to ACHCSA for review and approval prior to distribution. In addition, it was discussed that a mass mailing of the 'Fact Sheet' would be distributed to all properties in the affected area, including properties with and without wells. Please submit

a copy of the address list that was compiled during the initial domestic well survey.

A draft copy of the "Fact Sheet" and the address list will be provided to ACHCSA prior to distribution. The distribution list is a topic for further discussion among ARCO, PACIFIC, and ACHCSA.

SCHEDULE

The schedule proposed for completion of the tasks discussed above is as follows:


- Installation of ORC September 1, 1995
- Monitor Pilot Study 3rd and 4th quarters, 1995
- Contact Well Owners to Not Pump in 1996 4th quarter, 1995
- Report Results of Pilot Study 1st quarter 1996
- Submittal of Final RI/FS 1st quarter 1996
- Groundwater Management Plan Submittal 2nd quarter 1996
- Submittal of Draft Fact Sheet 2nd quarter 1996
- Submittal of Address List 2nd quarter 1996


If you have any questions regarding this letter, please call.

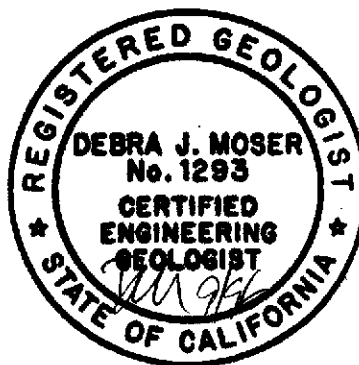
Sincerely,

Pacific Environmental Group, Inc.

for K.W.


Keith Winemiller
Project Engineer


Debra J. Moser
Project Manager
CEG 1293



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cc: Ms. Julieta Shin, Alameda County Health Care Services Agency,
Mr. Kevin Graves, Regional Water Quality Control Board
Dr. Ravi Arulanantham, Regional Water Quality Control Board
Mr. Michael Whelan, ARCO Products Company
Mr. Chris Winsor, ARCO Products Company