

August 22, 1991

Ms. Cynthia Chapman
Hazardous Materials Specialist
Alameda County Department of Environmental Health -
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621-1426

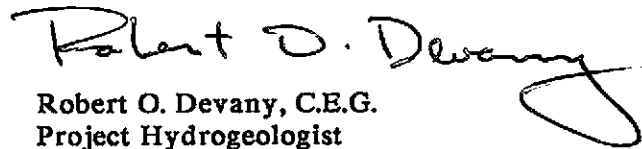
Re: Learner Investment Co.
Property Remediation Plan
WA Job #84-486-00

Dear Ms. Chapman:

We are pleased to forward our remedial action plan for the Learner Investment Company property at 768-46th Avenue in Oakland. The report summarizes Weiss Associates review of the site and regional background data, screens remedial alternatives and presents a site mitigation plan.

Please contact David Sadwick at (213) 689-0200, or me, if you have any questions or to discuss the progress of your review.

Sincerely,
Weiss Associates


Robert O. Devany, C.E.G.
Project Hydrogeologist

ROD:jn

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Attachment: RAP

cc: Mr. David Sadwick, Esq., Heller, Ehrman, White & McAuliffe
Mr. Jack Hecht, Learner Investment Company

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**PROPOSAL FOR
SOIL SAMPLING INVESTIGATION
LEARNER PROPERTIES**

Background

Prior work by Dames and Moore documented three impacted areas at the Oakland site:

1. Soils adjacent to an above ground hydraulic oil storage tank showed elevated total petroleum hydrocarbon (TPH) levels detectable at depths of approximately 4.5 feet.
2. Piles of soil apparently due to excavation for a railroad spur showed TPH levels as high as 3,920 parts per million (ppm) and PCB levels of 25.2 and 19.9 ppm.
3. Soils on a road adjacent to the railroad spur showed levels of TPH up to 1,830 ppm and PCB levels of 0.06 and 0.57 ppm.

We understand that, based on the classification of the soil as either hazardous or non-hazardous, the Learner Company intends to investigate alternatives to Class I TSDF disposal of the soil at the Oakland site. Specifically, stabilization with eventual placement of the material at the Cove Contractor's Landfill site or removal of the material and subsequent land farming at the Stockton site is being considered.

Additional sampling and analysis was deemed prudent to assess the extent of impact. Further, tests to assess the toxicity of the soil were decided on in order to attempt to classify the soil.

Objectives

- o To further assess the extent of overall contamination and the classification of the soil at the Oakland site.
- o Assess alternatives available to stabilize the contaminants in the soil at Oakland.
- o Assess the possible combination of Oakland site remediation with treatment and/or disposal of the soil at the Cove Stockton Landfill.

Approach

In light of the disposal options available to Cove, classification of the soil as either hazardous or non-hazardous is essential. Upon sampling and testing, classification can be assessed and subsequent regulations and disposal options can then be considered.

The scope of work is broken down into six tasks which appear in Plate 1 and are summarized below:

Task 1: Data Evaluation

Collect, review, and evaluate existing data on the Oakland site. Assess the extent of sampling and analytical work performed regarding TPH levels.

Task 2: Develop Sampling Work Plan

Based on the extent and locations of previously documented impact, sampling points will be located for collection of samples.

Task 3: Implement Sampling Work Plan

Soils will be sampled and subjected to acute aquatic toxicity testing, ignitibility and corrosivity testing as described in Title 22 Section 66696. Analysis of samples for TPH will also be performed.

Task 4: Cover Letter Report

Documentation of results obtained in Tasks 1 through 3. Upon receipt of analytical results, a cover letter report will be prepared for client review. The report will present our observations of the analytical results, and we will recommend additional assessment as warranted. At this stage, we would request further authorization to proceed with Tasks 5 and 6, if necessary.

Task 5: Stabilization Evaluation

If analysis of Oakland site soil has an acute aquatic 96-hour LC_{50} less than 500 mg/l, bench-scale testing of stabilization techniques will be performed. Four to six stabilization tests with two to three different materials such as, cement, flyash/lime, etc. will be used to stabilize the soil.

Task 6: Physical and Chemical Testing

Stabilized soil samples will be tested for strength, permeability, and leachability and bioassay to assess its feasibility for treatment.

Project Schedule

Kleinfelder can initiate the sampling activity and data review within two weeks of receiving authorization to proceed. Normal laboratory turnaround time for sample analysis is 15 working days. Bench-scale testing of stabilization techniques, if requested, will require one to two weeks. Chemical analysis will require an additional four weeks for a total of five to six weeks for Tasks 5 and 6.

A report can be prepared for client submittal within an estimated five to seven weeks of receiving authorization to proceed with Tasks 1 through 4.

Assumptions:

- o Access for all field activities will be made by the Learner Company through Keller, Ehrman, White, and McAuliffe.
- o Only one day of soil sampling will be performed. Soil samples will be taken at the surface and no deeper than 6 inches.
- o An estimate of 10 samples will be taken. Some compositing of samples may be required. The necessity for this procedure will be determined upon an initial site walk and survey. Details of the compositing will be reported in full in the final report to the client.
- o Upon completion of acute toxicity testing and TPH analysis, a brief report of results will be submitted to the client. Further work concerning stabilization and leachate testing will not occur without written authorization from the client.

COVE / LEARNER DECISION DIAGRAM

