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consulting
scientists and
engineers

January 18, 2006
MFG Project No. 030245.2

Mr. Jerry Wickham
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda County, California 94502

Subject: **Work Plan for Preliminary Soil and Groundwater Investigation**
Avis Rent A Car System, Inc. Facility
3956 Old Santa Rita Road, Pleasanton, California

Dear Mr. Wickman:

MFG, Inc. has prepared this work plan for a preliminary soil and groundwater investigation at the Avis Rent A Car System, Inc. (Avis) facility located at 3956 Old Santa Rita Road in Pleasanton, California (hereinafter the "Site"). The location of the Site is illustrated in Figure 1. This work plan has been prepared by MFG on behalf of Avis, in response to letter from the Alameda County Environmental Health Services (ACEHS) to Avis dated November 8, 2005.

SITE BACKGROUND

Underground Storage Tank (UST) closure activities were performed at the Site from August 21 to September 12, 2003. The closed UST system consisted of a 6,000-gallon, double-walled, fiberglass UST and the associated product piping and dispenser. The UST historically contained unleaded gasoline. Mr. John Rigter, Hazardous Materials Specialist of the Livermore–Pleasanton Fire Department was present during UST closure activities during which all of the UST system materials were removed from the site. Soil excavated to remove the UST was stockpiled on-site and sampled on August 21, 2003. The Alameda County Flood Control and Water Conservation District (Zone 7 Water Agency), required a permit for the removal of the two vapor wells within the UST pea gravel fill. A permit was obtained and both vapor wells were subsequently removed and the excavation backfilled with the stockpiled soil on September 12, 2003.

MTBE, ethanol and total lead were detected in confirmation soil samples from the bottom, fill ends of the UST excavation at concentrations of 0.010, 1.9 and 5.3 milligrams per kilogram (mg/kg), respectively. The only target analyte present in the soil confirmation sample collected from the dispenser area was total lead at a concentration 10 mg/kg. The concentrations of total lead detected in the soil samples are considered indicative of background conditions.

During the UST removal confirmation sampling, no groundwater was encountered in the bottom of the excavation at its maximum depth of 13.5 feet below ground level (bgl). The depth to water at the Site is estimated to be approximately 25 to 30 feet bgl.

The UST system closure activities are documented in the report prepared by MFG entitled *Underground Storage Tank System Closure Report* and dated November 21, 2003. Note that the UST that had been utilized by Avis at this facility until its removal in August 2003 was registered and permitted under the address of 4390 Rosewood Drive.

WORK PLAN

MFG proposes to advance two soil borings to investigate soil and groundwater quality in the vicinity of the former gasoline UST excavation at the Site. The following procedures will be used to advance the soil borings and to collect soil samples from each boring and a groundwater grab sample from one of the borings. The locations of the proposed borings are illustrated in Figure 2.

Preliminary Soil and Groundwater Investigation

(1) MFG will notify Underground Service Alert (USA) at least 48 hours prior to drilling at the Site to that they can mark utilities in the vicinity of the work. Furthermore, MFG will contract a private utility locator to check each drilling location for the presence of underground utilities. A drilling permit for each boring will be obtained from the Zone 7 Water Agency at least 10 days prior to conducting the filed investigation.

(2) Two soil borings will be advanced into the uppermost water-bearing zone at the Site using direct-push techniques. The soil encountered in each boring will be described in the field for lithologic classification, color, relative moisture content and indications of contamination according to the Unified Soil Classification System (ASTM Standard Practice D2488-00, Visual Manual Method). Field headspace measurements will be made using a portable photoionization detector (PID). Soil from selected depth intervals will be preserved for laboratory analysis.

The first boring (DP-1 as shown on Figure 2) will be advanced approximately 10 feet southwest of the former UST excavation using single-casing sampling techniques to verify the depth to groundwater. One soil sample from the interval immediately above the identified saturated zone will be collected and preserved for analytical testing. The depth to the uppermost saturated zone is estimated to be between 25 and 30 feet below ground level (bgl). To verify the depth to groundwater, the drive rods will be partially withdrawn from the boring and an electronic water level meter will be used measure the depth to water after allowing sufficient time for groundwater to enter the bottom of the boring and stabilize.

The second boring (DP-2) will be advanced in the center of the former UST excavation using dual-casing sampling techniques. Two soil samples will be collected and preserved for analytical testing from selected depth intervals (based on PID screening) between the bottom of the tank pit (at approximately 13.5 feet bgl) and immediately above the top of the saturated zone. A

groundwater grab sample will be collected from the top of the uppermost saturated zoned using either a temporary well casing or a driven well point.

(3) Groundwater that enters the sampling device or temporary well casing will be purged and sampled using a peristaltic pump with Teflon® tubing or a disposable Teflon® bailer. Water will be purged until field measurements of pH, temperature and specific conductance have stabilized or after five minutes of purging. Groundwater samples will be placed into laboratory supplied 40-milliliter (ml) glass vials and a 500-ml plastic bottle containing the appropriate preservative liquid. The bottle will be sealed with a Teflon®-lined screw cap and each vial will be sealed with a screw cap with Teflon®-lined septa. After sealing, the containers will be labeled and placed in a water ice-cooled, insulated chest for transport to the laboratory for analysis.

Analytical Methods

(4) The soil samples and groundwater grab sample will be submitted to an analytical laboratory certified by the California Department of Health Services (DHS) for chemical analysis for total purgeable petroleum hydrocarbons (TPPH) quantified as gasoline, the fuel components benzene, toluene, ethylbenzene, and total xylenes (BTEX) and fuel oxygenates, including MTBE and ethanol, using EPA Method 8260B, and for total lead (soil samples) or dissolved lead (water sample) using EPA Method 6010.

Equipment Decontamination Procedures

(5) All reusable sampling and drilling equipment will be decontaminated by steam cleaning, pressure washing and/or washing with a laboratory grade detergent/water solution followed by a tap water rinse and a final distilled water rinse.

Report Preparation

(6) MFG will prepare a letter report that documents the methods and results of the proposed groundwater quality investigation. The report will include permits, details regarding field-measured depth to water and water quality parameters of the sampled water, and the chain-of-custody record and laboratory analysis report for the soil and groundwater samples. The report will also contain tables and figures as necessary for clarity of presentation. A lithologic log will be prepared for each boring.

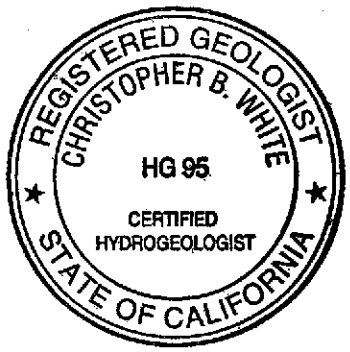
SCHEDULE FOR IMPLEMENTATION OF FIELDWORK

The fieldwork for the proposed investigation will be scheduled upon approval of this work plan by the ACEHS. It is anticipated that the fieldwork can be performed within four weeks of receiving work plan approval and a draft report of the investigation findings will be provided to ACEHS for review within six weeks of receiving analytical reports.

Please do not hesitate to contact me if you have questions about this request or you require further information.

Sincerely yours,

MFG, INC.

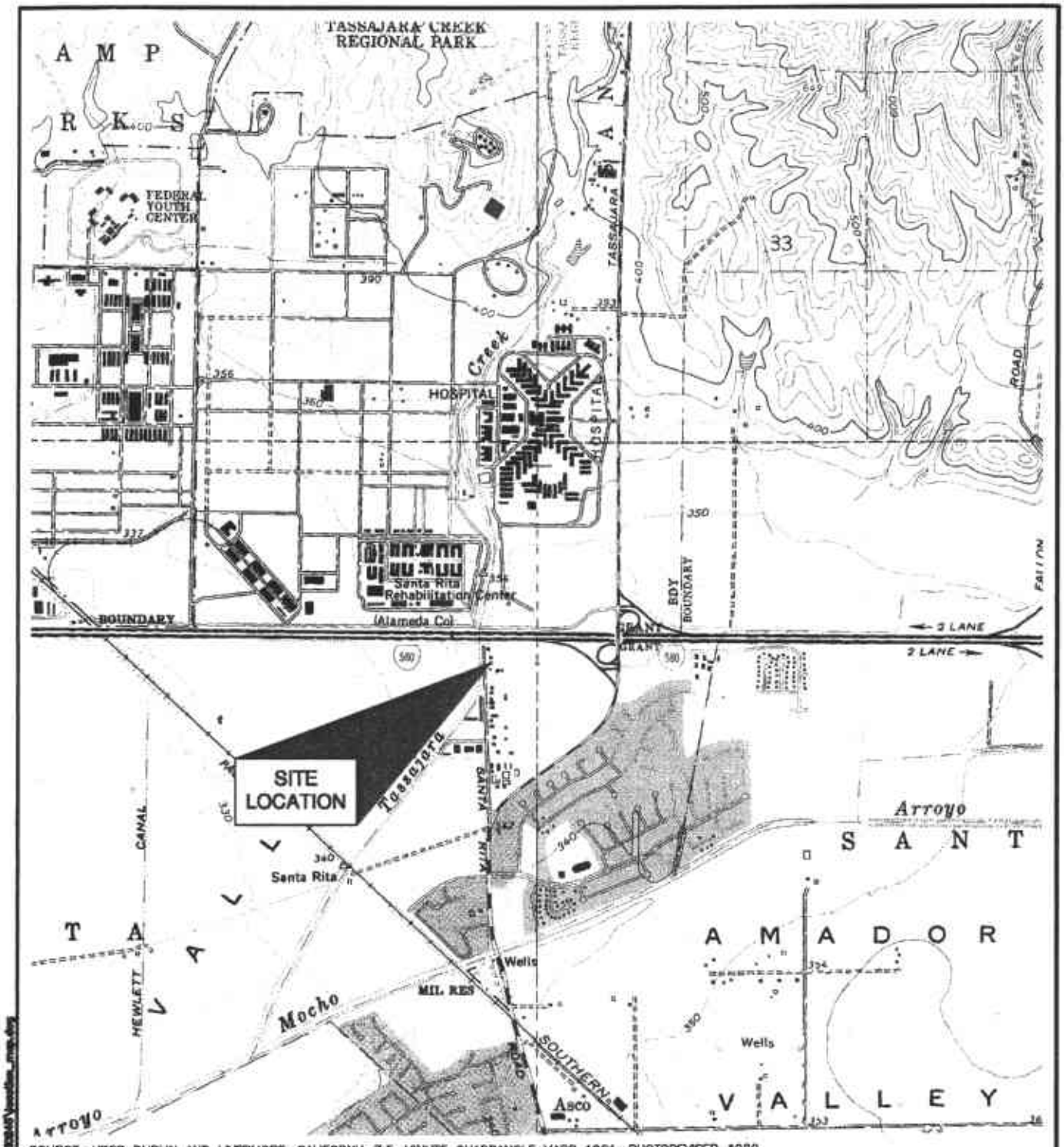


Christopher B. White, C.HG.
Senior Hydrogeologist

Attachments: Figure 1 – Site Location Map
Figure 2 – Site Plan, Proposed Boring Locations

cc: Rose Pelino, Cendant Car Rental Group, Inc.
Charles and Callie Hinkston

J:\030245\Task 2\Work Plan.doc



SOURCE: USGS DUBLIN AND LIVERMORE, CALIFORNIA 7.5-MINUTE QUADRANGLE MAPS 1961, PHOTOREVISED 1980.

APPROXIMATE SCALE

2,000 0 2,000 FEET

Figure 1
Site Location Map

Avis Rent A Car System, Inc.
3956 Old Santa Rita Road
Pleasanton, CA 94588

PROJECT: 030245	DATE: 9/23/03
REV:	BY: MAH CHECKED:

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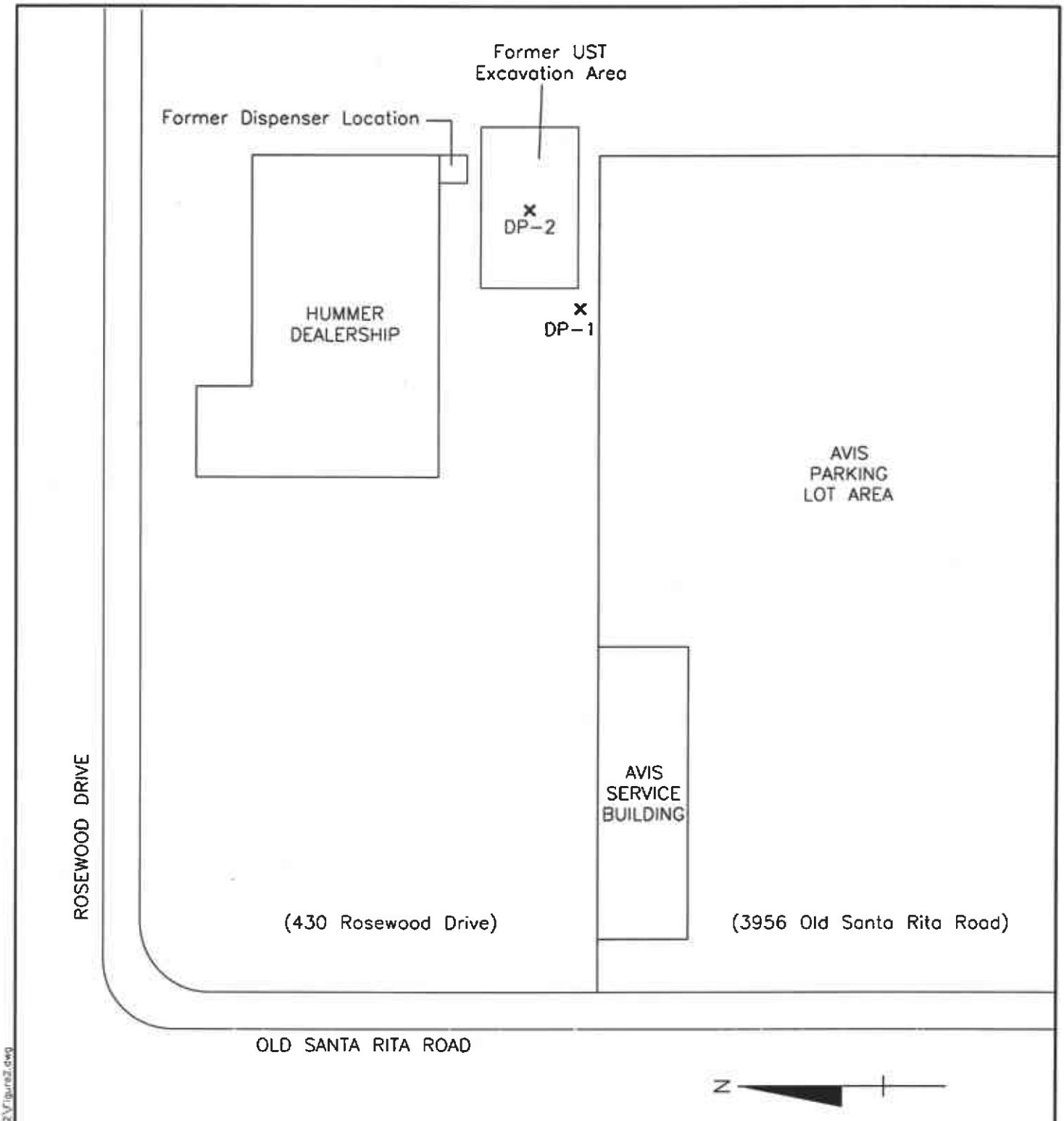
Date: 10/03/2003 Filename: P:\JOBS\030245\location_map.dwg



LEGEND:

× PROPOSED BORING LOCATION AND DESIGNATION

APPROXIMATE SCALE

20 0 20 FEET

FIGURE 2
Site Plan
Proposed Boring Locations

Avis Rent A Car System, Inc.
3956 Old Santa Rita Road
Pleasanton, CA 94588

PROJECT: 030245	DATE: 1/09/06	
REV:	BY: JST	CHECKED: CBW

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Date: 11/04/2003 Filename: J:\030245\Task 2\Figure2.dwg