★ Stellar Environmental Solutions, Inc.

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December 10, 2003

Mr. Don Hwang Local Oversight Program Environmental Health Services – Environmental Protection Alameda County Health Care Services Agency 1131 Harbor Bay Parkway Alameda, California 94502-6577 Alamec'a County

DEC 1 5 2003

Environmental Heatte

Subject: Amended Workplan for Additional Site Characterization

Oakland Auto Works (Former Vogue Tyres) – 240 W. MacArthur Blvd., Oakland, CA

ACEH Fuel Leak Case No. R00000142

Dear Mr. Hwang:

Stellar Environmental Solutions, Inc. (SES) is submitting this workplan amendment to you in response to your letter of December 3, 2003 regarding your review of our August 20, 2003 workplan for the referenced site. This workplan amendment addresses all of the technical revisions requested in the Alameda County Environmental Health Care Services Agency (ACEH) requests for modification and/or clarification to the workplan. We trust that based on this response SES can more forward without delay to complete the characterization work. Unless specified otherwise, all other proposed elements of our original workplan are unchanged, and are incorporated by reference. Specific responses to the ACEH letter are presented below.

1) Site Characterization

The ACEH requested that the three originally-proposed boreholes to the east of the property be eliminated, and that additional boreholes be placed to the west and to the north of the former UFSTs. Our revised, proposed borehole locations are shown on the attached figure. We are proposing a total of 12 boreholes, focused on the north and west sides of the plume, and in the area of the former UFSTs.

2) Borehole Samples and Depths

Soil samples from all proposed boreholes will be collected for laboratory analysis at depth intervals of no more than 5 feet. We anticipate that boreholes will be advanced to a maximum depth of 25 feet, hence we anticipate collecting 5 soil samples per borehole. If no soil

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contamination is evident by PID readings during drilling, soil samples will be collected at 5-foot intervals, or at significant lithologic changes, and/or at the depth just above first occurrence of groundwater. If soil contamination is evident by PID readings, the soil sample collected from laboratory analysis will be from the depth within that 5-foot interval that displays the maximum PID reading. Soil samples will not be collected for laboratory analysis from the saturated zone, which will be characterized by grab-groundwater sampling in the boreholes), however soil samples will be collected from the anticipated lower non-water-bearing unit below the upper aquifer, to evaluate the vertical extent of contamination. Soil sampling protocols are discussed in detail in the original workplan.

3) Preferential Pathway Survey

The ACEH December 3, 2003 letter requests no additional information regarding the utility survey relative to the original ACEH request for workplan.

The ACEH has requested that the water well survey include all water wells (not just water supply wells). The letter does not specify specifically whether this is to include groundwater monitoring wells. It is our professional experience that the objective of this task is to identify potential sensitive receptors, which would not include groundwater monitoring wells. Our previously-conducted well survey, through California DWR, included identifying all water supply wells (which DWR defines as irrigation, domestic, municipal and industrial). We assume that this satisfies the ACEH objective, and will conduct a new DWR survey request to include groundwater monitoring wells only if ACEH specifically requests that this be done.

4) Geologic Cross-Sections

Per ACEH request, attached is the amended site plan showing the site cross-section locations. The cross-sections for the Soil and Water Investigation Report will be amended to include the findings of the proposed investigation, including soil and groundwater analytical results and utility conduits. The cross-sections will be used in the Report to evaluate the probability of the plume encountering preferential pathways.

5) MTBE

SES will complete an evaluation of the distribution of MTBE (including potential offsite sources and migration). This will include an extended geologic cross-section(s) which will incorporate

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data (analytical results, utility conduits, well screens, etc.). The findings will be discussed in the Soil and Water Investigation Report.

6) Professional Seal

All technical reports/workplans will be signed by a California Registered Geologist.

Technical Reports

The following technical reports will be submitted to ACEH.

- Amended Workplan (this document).
- Fourth Quarter 2003 Groundwater Monitoring Progress Report. This report will be submitted by January 31, 2004.
- Soil and Water Investigation Report. This report will be submitted within 60 days following ACEH approval of this amended workplan..
- First Quarter 2004 Groundwater Monitoring Progress Report. This report will be submitted by April 30, 2004.
- Second Quarter 2004 Groundwater Monitoring Progress Report. This report will be submitted by July 31, 2004.
- Third Quarter 2004 Groundwater Monitoring Progress Report. This report will be submitted by October 31, 2004.

We trust that this submittal meets your agency's needs. In so much as this workplan amendment provides you with all the requested elements and/or clarifications, we request your expedited approval so that we can move forward with project this month. Your quick response is greatly appreciated. Please contact the undersigned directly if you have any questions.

No. 6814

Sincerely,

Bure M. Huly

Bruce M. Rucker, R.G., R.E.A.

Project Manager

Richard S. Makdisi, R.G., R.E.A.

Merris

Principal

Attachments: Revised Site Plan with cross-section locations and proposed borehole locations

