A·C·C
ENVIRONMENTAL
CONSULTANTS

April 30, 1997

Mr. Tzu Ming Chen
c/o Ms. Janice Chow
Wo Lee Food Company
208 Jackson Street
Oakland, CA 94607

RE: Addendum to the Corrective Action Plan
208 Jackson Street, Oakland, California
ACC Project No. 6238-1.1

Dear Mr. Chen:

This letter addendum contains information from discussions with Ms. Jennifer Eberle, Alameda County Health Care Services Agency (ACHCSA), and results of recently completed groundwater monitoring and sampling by ACC Environmental Consultants, Inc., (ACC).

ACC previously prepared a Corrective Action Plan (CAP) dated July 10, 1996. The CAP recommended selected excavation, removal of impacted soil and groundwater, and backfilling the open excavation with soil currently stockpiled on site after analytical testing indicates the stockpiled soil is suitable for use. ACC no longer believes this scope of work will meet remedial goals for the site in the most cost-effective manner possible.

ACC conducted biannual groundwater monitoring and sampling on March 21, 1997. Flow direction and gradient was consistent with previous sampling events. Groundwater in wells MW-2 and MW-3 has never contained reportable concentrations of fuel hydrocarbons (FHCs). Groundwater in well MW-4 and MW-5 contained concentrations of FHCs of approximately 58,000 ppb and ~~1,100~~ 430 ppb, respectively. These concentrations represent decreases of approximately 75 and 90 percent, respectively, since June 1994.

Direct evidence of natural attenuation has been documented based on decreases in the concentration of FHCs. Previous boring investigation indicated little or no offsite migration. Site conditions must support natural biodegradation before the FHCs can migrate any appreciable distance. ACC believes that artificial recharge from standing water in the open excavation may be facilitating bioremediation by introducing oxygenated water in the vicinity of the impacted groundwater. Keeping the excavation open and/or adding water to the open excavation should be considered for the purpose of facilitating bioremedial processes.

Oxygen has been shown to be the limiting factor at many sites where biological activity is degrading FHCs. Providing additional oxygen in shallow groundwater should aid natural biodegradation processes and decrease the duration of time required to document appropriate decreases in FHC concentration.

Based on information collected to date, ACC believes that natural attenuation should be the remedial alternative of choice. To facilitate verifying and monitoring natural attenuation, ACC proposes the following scope of work:

- Collect baseline data for dissolved oxygen (DO) levels; → asap (in MWS)
- Evaluate the use of ORC® at the site to facilitate natural bioremedial processes, and if feasible, use the open excavation to aid in artificial groundwater recharge;
- Evaluate the installation of one offsite groundwater monitoring well; → in terms of utilities
- Continue biannual monitoring and sampling of wells to document established groundwater quality trends; and
- Incorporate requests of the ACHCSA in regards to collecting data necessary to justify regulatory site closure.

This proposed scope of work is consistent with previous site investigation, direct knowledge of the site, experience with sites with similar subsurface conditions, and recent guidance directed to local oversight agencies from the Regional Water Quality Control Board. ACC believes this work will achieve remedial goals for the site and result in regulatory site closure in a cost-effective manner.

If you have any questions regarding this addendum please call me at (510) 638-8400.

Sincerely,

reuse SP shed?

David R. DeMent, RG
Senior Geologist

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