



Atlantic Richfield Company
(a BP affiliated company)

4 Centerpointe Drive, Room 172
La Palma, CA 90623-1066
Phone: (714) 670-5303
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Alameda County
FEB 7 7 2005
Environmental Health

February 3, 2005

Re: Addendum to Offsite Assessment Work Plan
ACEH Case # RO0000066
Former BP Service Station #11126
1700 Powell Street
Emeryville, California

I declare that, to the best of my knowledge at the present time, the information and/or recommendations contained in the attached document are true and correct.

Submitted by:

Kyle Christie
Environmental Business Manager



February 3, 2005

Mr. Robert Schultz
Alameda County Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

**Re: Addendum to Offsite Assessment Work Plan, ACEH Case # RO0000066
Former BP Service Station #11126
1700 Powell Street
Emeryville, California**

Dear Mr. Schultz:

On behalf of the Atlantic Richfield Company-Remediation Management (RM), a BP affiliated company, URS Corporation (URS) is submitting this Addendum to Offsite Assessment Work Plan for installation of two offsite monitoring wells associated with the Former BP Service Station #11126, located at 1700 Powell Street, Emeryville, California (the Site) (Figure 1).

1.0 Site Background and Access Agreements

A detailed site background is included in Section 1.0 of the *Interim Remedial Action and Offsite Assessment Work Plan (Work Plan)* dated July 11, 2003, which was approved by the Alameda County Environmental Health (ACEH) in letter dated April 28, 2004. URS and RM have been negotiating access to install the offsite groundwater monitoring wells proposed in the July, 2003 *Work Plan* to further delineate the down-gradient extent of the dissolved-phase hydrocarbon plume prior to completion of the Corrective Action Plan. One well was proposed to be located on the adjacent Denny's restaurant property, and two wells on the Powell Street Plaza property across Powell Street from the site. As mentioned in a previous URS letter to ACEH dated November 22, 2004, an alternative location of the wells within the Powell Street right-of-way is not practical due to the presence of numerous underground utilities and heavy traffic.

An ACEH letter dated October 4, 2004 required that RM and Regency Centers Corporation, the owner of the Powell Street Plaza property, submit an access agreement to ACEH by November 20, 2004 (Attachment A). Negotiations for an access agreement to install the two proposed offsite wells at the Powell Street Plaza property have been completed and are in final review stages with RM. To date, RM and Denny's Inc have been unable to negotiate a mutually agreeable access agreement.



2.0 Proposed Scope of Work

URS proposes to install two monitoring wells at the Powell Street Plaza property at 5795 Christie Street, across Powell Street from the Site (Figure 2). Both wells will be located downgradient (south-southwest) of the Site. URS proposes installing one well in front of the east side of the Circuit City building in the parking lot, which is approximately 210 feet south of the UST complex. The second well will be installed the narrow, undeveloped area between the west side of the Circuit City building and the east side of Interstate 80 (I-80), which is approximately 320 feet south-southwest of the site. These locations vary slightly from the those proposed in the *Work Plan*, and are based on accessibility to drill rigs and utility locations.

Upon further review of the location of the proposed well on the Denny's property, which was relocated due to drill rig accessibility issues to only about 50 feet in the cross-gradient to down-gradient direction from monitoring well MW-7, URS does not believe that additional lateral plume delineation would be significantly defined by installing a well at that location. Additionally, over the past two years the gasoline range organics (GRO)/total petroleum hydrocarbons as gasoline (TPHg) and methyl tert-butyl ether (MTBE) concentrations in well MW-7 have declined over 15-fold since the 2002 release event. In 2004, the GRO/TPHg and MTBE concentrations averaged 286 micrograms per liter ($\mu\text{g/L}$) and 129 $\mu\text{g/L}$, respectively. Thus, lack of an access agreement with Denny's Inc. would have a minimal effect in plume delineation. In a letter dated November 22, 2004, URS also proposed two additional monitoring wells on the east side of I-80 near the Powell Street underpass. After reviewing the historical gradient data from the nearby Shell site, URS believes that monitoring wells in these locations would not provide beneficial groundwater monitoring data as they would be located at least 800 feet, primarily in a crossgradient direction, from the Site's UST complex. The direction of the groundwater flow at the subject site is primarily to the west-southwest, but it is due south at the Shell site located on the west side of I-80.

2.1 Preliminary Field Activities

Prior to initiating field activities, URS will obtain necessary access agreements and Alameda County Public Works permits, prepare a site Health and Safety Plan (HASP) for the proposed work, and conduct a subsurface utility clearance. The utility clearance will include notifying Underground Service Alert (USA) of the pending work a minimum of 48-hours prior to initiating the field investigation, and securing the services of a private utility locating company to confirm the absence of underground utilities at each boring location. The HASP will address the proposed boring/well installations and groundwater sampling. A copy of the HASP will be available on-site at all times. The subcontractor(s) performing field activities will be provided with a copy of the HASP prior to initiating work.

2.2 Drilling and Monitoring Well Installation

Two soil borings will be advanced at the approximate locations shown on Figure 2 under the supervision of a URS field geologist. The borings will be advanced using a hollow stem auger drill rig to an approximate depth of 20 feet bgs. The boring locations will be cleared for utilities by air knifing the first five feet of each boring location. Soil samples in the two borings will be collected above the saturated zone at five foot intervals using a California-modified split-spoon sampler lined with brass tubes. Soil samples will be logged by a URS geologist according to the Unified Soil Classification System (USCS), and monitored for grain size, color, consistency, staining, and odor using a photoionization detector (PID). Soil samples collected for potential chemical analysis will be sealed with Teflon® tape, capped, and placed in an ice-filled cooler for transportation to the laboratory. Soil samples collected during this investigation will be submitted to a California State-certified analytical laboratory for analysis of GRO, BTEX and fuel oxygenates using EPA Method 8260B.

Upon completion of drilling, the borings will be converted to groundwater monitoring wells by installing 2-inch diameter, flush-threaded, Schedule 40 PVC casing with 0.020-inch factory-slotted screen. The wells will be screened from approximately 10 feet bgs to approximately 20 feet bgs based on well constructions from the onsite wells (Attachment B). The five foot discrepancy in depth between the onsite wells (10-15 feet bgs) and the proposed offsite wells is because the Powell Street Plaza property has been graded to higher elevation than the Site. Actual depths and screened intervals of the wells will be determined by the URS field geologist working under the supervision of a state registered geologist. A sand pack will be placed in the annular space across the entire screened interval, and will extend approximately 1 foot above the top of the screen for the well. A 1-foot bentonite transition seal will be placed atop the sand pack, and a Portland cement seal will extend from the bentonite transition seal to ground surface. Finish to grade will consist of a traffic rated vault box set flush to grade, with a concrete surface seal. Top-of-casing will be sealed with a water tight locking well cap.

2.3 Monitoring Well Development and Groundwater Sampling

After installation, the monitoring wells will be developed by rigorously surging the well over the length of the screen interval and by purging approximately 10 casing volumes of water or until the recovered groundwater appears to be free of sediment. At least 24 hours after well development, groundwater samples will be collected during the next scheduled quarterly monitoring event and sent under standard chain-of-custody procedures to a California state-certified laboratory. The groundwater samples will be analyzed for the presence of GRO BTEX, and MTBE by EPA Method 8260B.



Mr. Robert Schultz
February 3, 2005
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2.4 Soil Cuttings and Purge Water

Soil cuttings and purge water generated during drilling operations will be temporarily stored in DOT-approved 55-gallon drums and stored at the ConocoPhillips 76 retail facility (subject site BP# 11126) across the street pending characterization and disposal. Soil cuttings and purge water will be transported by certified disposal contractor to an appropriate disposal facility.

2.5 Well Surveying

Upon completion of well construction, a licensed surveyor will survey the well top-of-casing and vault lid elevations relative to mean sea level and latitude and longitude coordinates using Global Positioning System methods and the NAVD 1988 and NAD 1983 vertical and horizontal datums. All new and existing site monitoring wells will be surveyed (existing wells were previously surveyed in 2001 for horizontal NAD 1983 datum only). Groundwater elevations and gradient will be interpreted utilizing top-of-casing wellhead elevations and depth-to-water measurements.

3.0 Corrective Action Plan

Upon completion of field activities and receipt of all laboratory analytical data, URS will prepare and submit to the ACEH a Corrective Action Plan, which will document the results of this investigation, summarize the results of previous investigations and the extent of hydrocarbons in soil and groundwater, develop a Conceptual Site Model (CSM) and recommend further investigation or remedial action if warranted.

3.0 Proposed Schedule

URS is required to complete the installation of the two wells within 30 days of signing the access agreement with Regency Centers Corporation. URS will begin obtaining the necessary permits to complete the work and drill the two wells upon obtaining the required permits. URS requests that the deadline for completion of field work be extended to at least 60 days after approval of this work plan addendum, with submittal of the Corrective Action Plan following 90 days after the completion of field work.



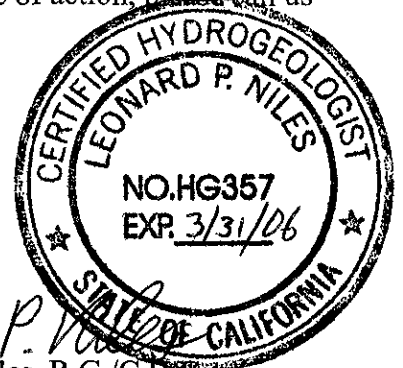
Mr. Robert Schultz
February 3, 2005
Page 5 of 5

If you have any questions or comments regarding our planned course of action, please call us at (510) 893-3600.

Sincerely,

URS CORPORATION

Lynelle Onishi
Project Manager



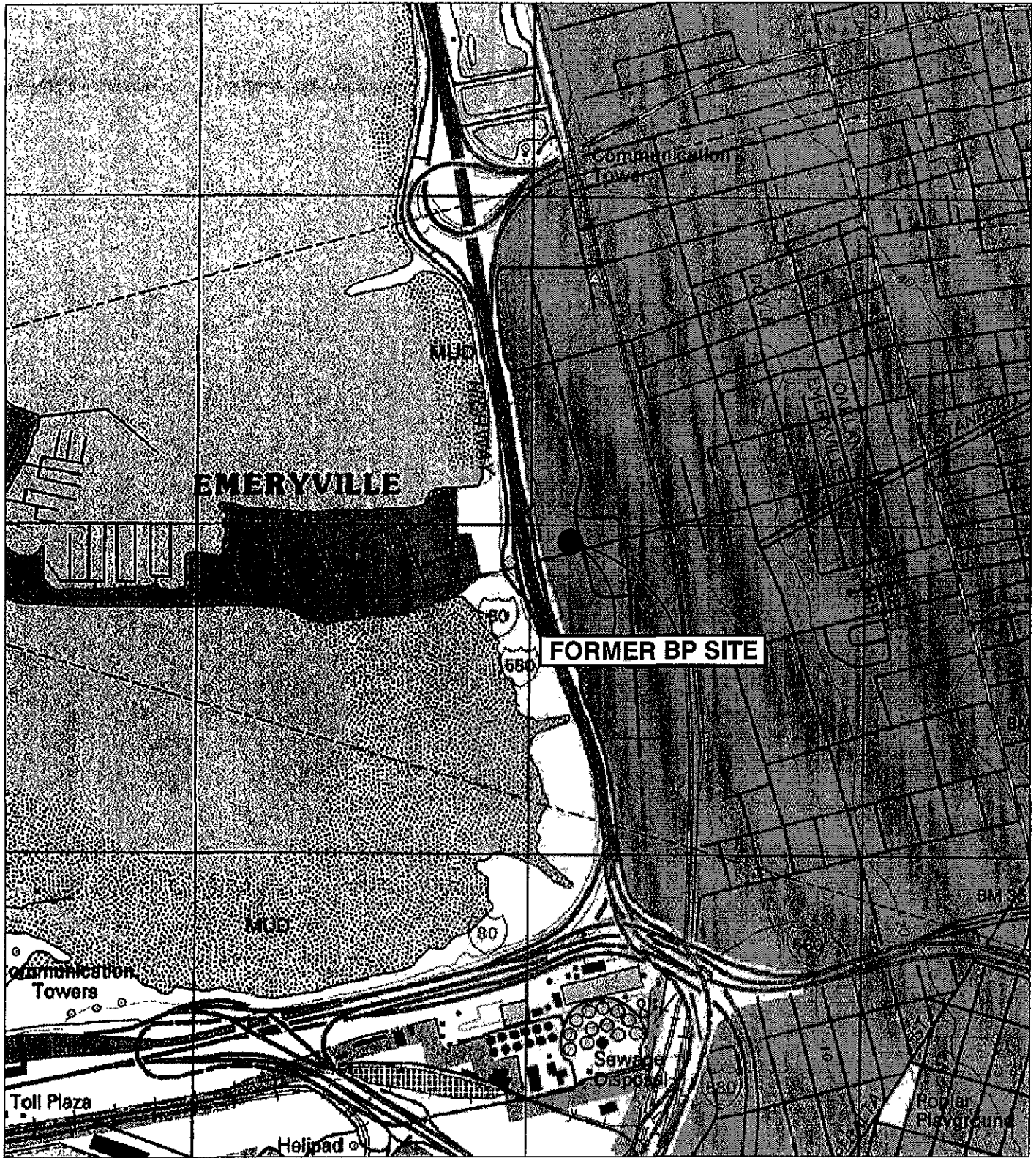
Leonard P. Niles
Leonard P. Niles, R.G./C.H.G.
Senior Geologist

Attachments: Figure 1 - Site Location Map
Figure 2 - Proposed Well Installation Locations

Attachment A – ACEH letter of request for Access Agreement for Off-Site Investigation dated October 4, 2004 and Work Plan Addendum Extension (Electronic mail) dated December 27, 2004

Attachment B – Former BP Site #11126 Monitoring Well Logs (MW-3; MW-7)

cc: Mr. Kyle Christie, RM (copy uploaded to ENFOS)
Ms. Liz Sewell, ConocoPhillips, 76 Broadway, Sacramento, CA 95818 (copy uploaded to FTP server)
Mr. Chad Brathwaite, Regency Centers, 555 South Flower Street, Suite 3500, Los Angeles, CA 90071
Ms. Star Lightner, Farella, Braun and Martel, 235 Montgomery Street, San Francisco, CA 94104



REFERENCE:

BASE MAP FROM USGS TOPOI
NORTH REGION 7

7.5 MINUTE TOPOGRAPHIC
PHOTOREVISED 1998



QUADRANGLE LOCATION



NORTH

0 1400 2800



APPROXIMATE SCALE 1" = 1400'

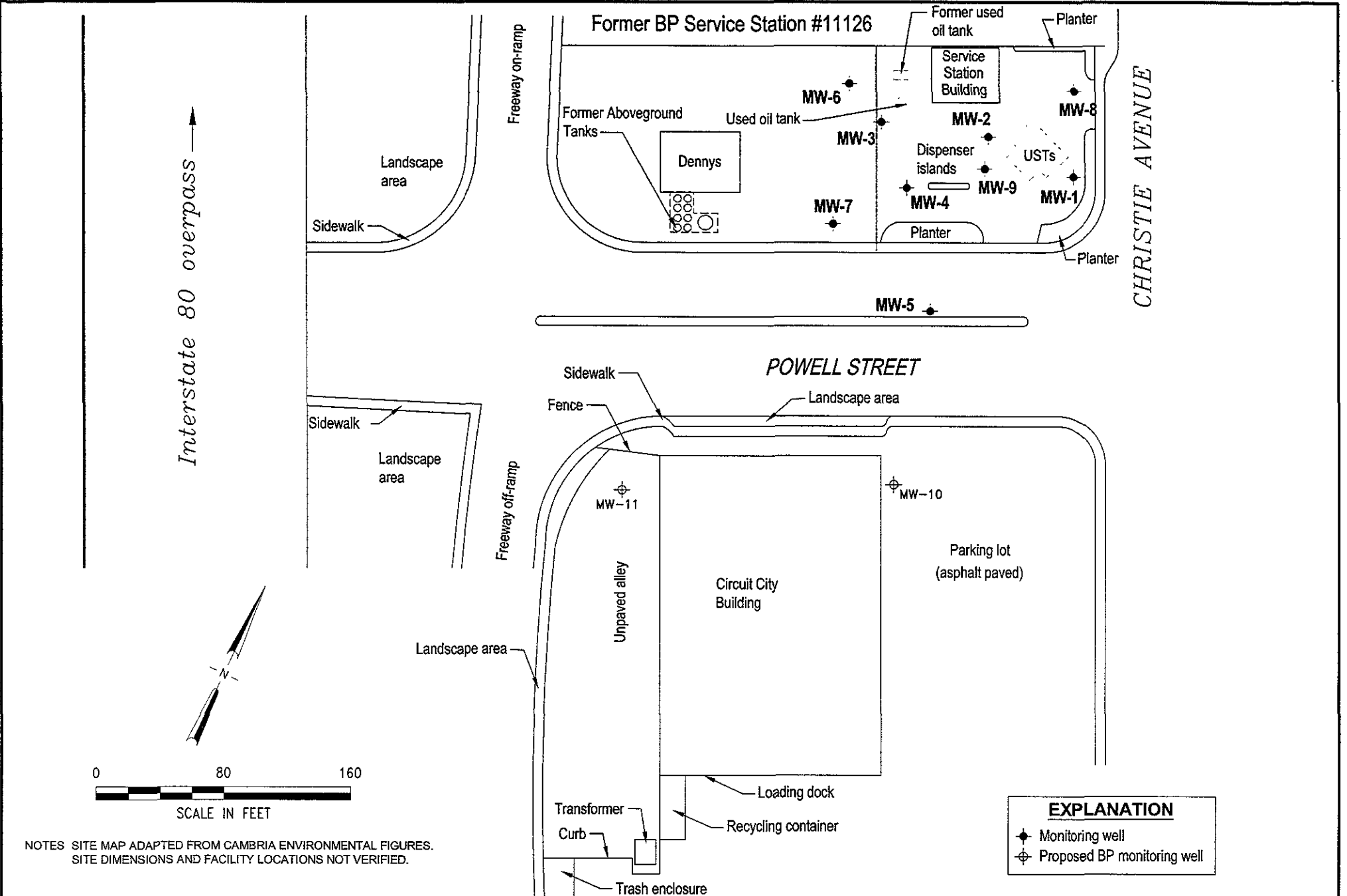
URS

Project No. 38487133
Former BP Service Station #11126
1700 Powell Street
Emeryville, California

SITE LOCATION MAP

FIGURE

1



NOTES SITE MAP ADAPTED FROM CAMBRIA ENVIRONMENTAL FIGURES.
 SITE DIMENSIONS AND FACILITY LOCATIONS NOT VERIFIED.

EXPLANATION	
	Monitoring well
	Proposed BP monitoring well

URS	Project No. 38487133	PROPOSED OFFSITE WELLS LOCATIONS	FIGURE 2
	Former BP Service Station #11126 1700 Powell Street Emeryville, California		

ATTACHMENT A

**ACEH letter of request for Access Agreement for Off-Site Investigation dated October 4,
2004 Work Plan Addendum Extension (Electronic mail) dated December 27, 2004**

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



October 4, 2004

Chad Braithwaite
Regency Centers Corporation
555 South Flower St., Ste. 3500
Los Angeles, CA 90071

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Subject: Property at 5795 Christie Avenue, Emeryville, California (Powell Street Plaza) – Request for Access Agreement for Off-Site Investigation

Dear Mr. Braithwaite:

Atlantic Richfield Company has been unable to conduct off-site investigation associated with groundwater pollution at 1700 Powell Street, Emeryville because you and Atlantic Richfield have not completed the necessary access agreement. The resulting delay is allowing continued migration of polluted groundwater, to the detriment of water quality. As explained below, Alameda County Environmental Health requests that you, together with Atlantic Richfield, submit an access agreement that is sufficient to allow the necessary work and that is signed by all relevant parties.

Up to 69,000 ug/L TPHg, 11,000 ug/L benzene and 28,000 ug/L MTBE have been detected in groundwater in Atlantic Richfield's monitoring well MW-9. A copy of ACEH's April 25, 2003 letter requesting plume delineation is attached to this letter. According to Atlantic Richfield's consultant (URS Corporation), groundwater flows from the service station at 1700 Powell Street toward Powell Street Plaza. The downgradient extent of impact is unknown. A copy of your August 10, 2004 letter to URS Corporation denying access to install the required monitoring wells has been forwarded to me, and a copy is also attached.

It is imperative that this dispute be resolved promptly. Atlantic Richfield's lack of access is likely to have adverse consequences for water quality. There is the potential for unchecked migration of pollutants, and Atlantic Richfield is in violation of the deadline specified in ACEH's April 28, 2004 letter (copy attached).

We request that Regency Centers, together with Atlantic Richfield, submit by November 20, 2004 an access agreement that (i) enables Atlantic Richfield to perform the necessary work and (ii) is signed by all relevant parties. This request is made pursuant to Water Code Section 13267, which authorizes requests for technical reports from persons whose activities may have an impact on water quality; and pursuant to Health & Safety Code Section 25299.78, which allows ACEH to enter and collect samples from any real property which is within 2,000 ft of any place where underground storage tanks are located. You may be subject to administrative civil liability of up to \$10,000 per day for each day of violation pursuant to Health and Safety Code, Section 25299.76 if you fail to respond, respond late, or submit an inadequate response. Any extension in the above deadline must be confirmed in writing by ACEH staff.

Mr. Braithwaite
October 4, 2004
RO-66

Please contact me at (510) 567-6719 or via email at robert.schultz@acgov.org with any questions regarding this case.

Sincerely,



Robert W. Schultz, R.G.
Hazardous Materials Specialist

cc: Kyle Christie, Atlantic Richfield Company, 6 Centerpointe Drive, LPR6-161, La Palma,
CA 90623-1066
Leonard Nilles, URS Corporation, 500 12th St., Ste. 200, Oakland, CA 94607-4014
Donna Drogos, ACEH
Robert W. Schultz, ACEH



"Schultz, Robert, Env.
Health"
<robert.schultz@acgov
.org>

12/27/2004 09:24 AM

To: "Leonard_Niles@URSCorp.com" <Leonard_Niles@URSCorp.com>
cc: chriska@bp.com, Robert_Horwath@URSCorp.com,
Ron_Chinn@URSCorp.com, Kevin_Uno@URSCorp.com, "Elizabeth
'Liz' Sewell (E-mail)" <liz.sewell@conocophillips.com>,
"slightner@fbm.com" <slightner@fbm.com>,
"cbraithwaite@regencycenters.com"
<cbraithwaite@regencycenters.com>, "tdean@dennys.com"
<tdean@dennys.com>
Subject: RE: BP #11126 Offsite Investigation Workplan Extension Request -
1700 Powell, Emeryville

BP's consultant has performed additional review of groundwater data and believes that modified and/or additional downgradient sampling locations are necessary to fully define the plume from the subject site. BP will prepare a map showing the proposed modified or additional sampling locations, as well as the locations of and results of offsite/downgradient work performed in relation to other sites, including the nearby Shell station. BP's proposal to submit a workplan addendum by 1/22/05 is acceptable.

Sincerely,
Bob Schultz

Robert W. Schultz, R.G.
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
510-567-6719 (direct)
510-337-9335 (facsimile)

-----Original Message-----

From: Leonard_Niles@URSCorp.com [mailto:Leonard_Niles@URSCorp.com]
Sent: Thursday, December 23, 2004 12:21 PM
To: Schultz, Robert, Env. Health
Cc: chriska@bp.com; Robert_Horwath@URSCorp.com; Ron_Chinn@URSCorp.com;
Kevin_Uno@URSCorp.com
Subject: BP #11126 Offsite Investigation Workplan Extension Request

Bob,

In our letter of November 22, 2004 re: Offsite Plume Assessment we had proposed installing two additional monitoring wells downgradient from our former BP site #11126 at 1700 Powell Street, Emeryville. This was based on data obtained from wells at the downgradient Shell site located at 1800 Powell Street. The two proposed wells would be located on the west side of the I-80 / Powell Street intersection, across Frontage Road from the Shell site. We had originally requested a two week deadline extension for the offsite investigation workplan addendum. As you requested in our telephone conversation today, we will add a larger site vicinity map including all concerned properties and proposed well locations. I believe that Atlantic Richfield Company Remediation Management (RM) is still in negotiation with the Denny's and Powell Street Plaza properties for access agreement, so those proposed well locations are still under consideration. The addition of this larger map, and the additional Environmental Screening Level data that you requested will require additional time to prepare, especially with staff shortage over the holiday season. Therefore as we discussed, I am requesting an additional 30 day deadline extension to January 22, 2005 for

submittal of the offsite investigation workplan workplan addendum. Please let me know as soon as possible if this is acceptable, as after today I will be out of the office until January 4, 2005.

Thank You,

Leonard P. Niles, R.G./C.H.G
Senior Geologist / Project Manager
URS Corporation
1333 Broadway, Suite 800
Oakland, CA 94612
Direct: 510.874.1720
Fax: 510.874.3268

ATTACHMENT B

Former BP Site #11126 Monitoring Well Logs (MW-3; MW-7)



SEE SITE PLAN

ALISTO PROJECT NO: 10-061

DATE DRILLED: 10/20/92

CLIENT: BP Oil Company

LOCATION: 1700 Powell Street, Emeryville, California

DRILLING METHOD: Hollow-Stem Auger (8")

DRILLING COMPANY: Great Sierra Exploration CASING ELEVATION: 5.26' MSL

LOGGED BY: Ted Morse

APPROVED BY: A. Sevilla

BLOMS/O IN.	PID VALUES	WELL DIAGRAM	DEPTH feet	SAMPLES	GRAPHIC LOG	SOIL CLASS	GEOLOGIC DESCRIPTION
50/5"	0.2	<p>0.010" slotted PVC screen 2" Sch. 40 PVC grout #2/12 Lonestar Sand Bentonite seal</p>	0				3" Asphalt.
4,8,6			5	☒		SW	gravelly SAND: tan, damp, loose, medium- to very coarse-grained sand, gravel to 1".
3,4,5			10	■		SM	Concrete slab.
4,3,4			11			CL	silty SAND: black, wet, loose, very fine- to medium-grained sand, abundant silt, minor gravel to 1/2".
			15				silty CLAY: blue/green, damp, medium firm, minor silt, rootlets.
			20				
			25				
			30				



SEE SITE PLAN

ALISTO PROJECT NO: 10-061-02

DATE DRILLED: 09/03/93

CLIENT: BP Oil Company

LOCATION: 1700 Powell Street, Emeryville, California

DRILLING METHOD: Hollow-Stem Auger (8")

DRILLING COMPANY: Great Sierra Exploration CASING ELEVATION: 7.81' MSL

LOGGED BY: Ted Maise

APPROVED BY: Al Sevilla

BLOWS/6 IN.	PTD VALUES	WELL DIAGRAM	DEPTH feet	SAMPLES	GRAPHIC LOG	SOIL CLASS	GEOLOGIC DESCRIPTION	
7.7.5	17	<p>0.010" slotted PVC screen</p> <p>grout</p> <p>#2/12 Lanester Sand</p> <p>Bentonite seal</p>	5	■		SP	4" Asphalt.	
6.7.2	10							gravelly SAND: brown, damp, loose; fine- to medium-grained sand; concrete blocks and bricks.
2.3.7	15							SAND: gray, damp, loose; fine- to medium-grained sand.
			15			CL	Same: black, wet.	
			15				silty CLAY: gray/blue, medium firm.	
			20					
			25					
			30					