12-6-94

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To M. O'Connor	From J. Eberle
Co.	Co.
Dept.	Phone #
Fax #	Fax #

PACIFIC ENVIRONMENTAL GROUP, INC.

94 MAY -9 AM 8:43
ALCO HAZMAT

May 6, 1994
Project 305-140.1A

Ms. Jennifer Eberle
Alameda County Health Care Services Agency
Department of Environmental Health
80 Swan Way, Room 200
Oakland, California 94621

Re: Work Plan Addendum
Former Service Station
1230 Fourteenth Street at Union Street
Oakland, California

Dear Ms. Eberle:

This letter presents an addendum to a work plan dated April 15, 1994 prepared by Pacific Environmental Group, Inc. (PACIFIC) on behalf of the responsible parties and potentially responsible parties identified in the letter regarding the *Legal Request for Submittal of a Technical Report Resulting from the Alameda County Department of Environmental Health's (ACDHEH) Pre-Enforcement Review Panel Meeting*, dated February 15, 1994. This addendum has been prepared in response to a letter from the ACDHEH dated April 19, 1994. This addendum addresses the two comments regarding soil samples and the location of Well MW-1, as well as a plan for the existing stockpiles and excavations on-site.

A soil sample from the capillary fringe will be analyzed in each boring or monitoring well boring that extends to groundwater.

PACIFIC will install Monitoring Well MW-1 northwest of the former waste oil tank. The new well location is shown on Figure 2. Additionally, if it is not possible to install Well MW-4 in the alternate location (location of Boring B-3) due to height restrictions associated with the canopy, the well will be installed immediately southeast of the canopy.

Given current site conditions, it is not feasible to perform the investigation as planned. To perform the investigation, the existing stockpiled soil should be

removed and the excavations backfilled. Presented below is a plan for achieving those objectives.

SCOPE OF WORK

The following work is proposed to ensure that the scope of work outlined in the April 15, 1994 workplan is feasible. The work will be performed in steps outlined below, and in the sequence outlined below. Approximate time frames for completion of each step are included.

1. Perform additional excavation and soil sampling in the waste oil tank area. Waste oil impacted soil will be excavated to levels acceptable to the ACDHEH. To establish acceptable levels, a Toxicity Characteristic Leaching Potential (TCLP) test will be performed on the soil sample containing the highest oil and grease concentrations proposed to remain in the soil. The TCLP test is designed to establish what concentrations (if any) of a constituent will leach out of a soil into groundwater. The TCLP test will establish oil and grease concentrations that could remain in soil at the site and not leach into groundwater. Approval will be sought from the ACDHEH on acceptable levels of oil and grease to remain in soil.

   The time frame to complete this task is approximately ~~60 days~~ 30 from approval by the ACDHEH. This will allow the responsible parties time to select a contractor and perform the work.

2. Following the overexcavation of the waste oil tank area, all existing stockpiles on site will be sampled and samples will be submitted to a state certified laboratory for analysis. This task is required to accurately profile the existing soil for disposal or on site remediation.

   The time frame to complete this task is approximately ~~30 days~~ 20 from approval by the ACDHEH of the extent of the waste oil tank excavation. This will allow the responsible parties time to sample the stockpiles and receive analytical results.

3. Following receipt of the analytical results from the stockpile sampling, the disposal/remedial alternatives for the soil will be evaluated.

try 25 too much time!

The time frame to complete this task is approximately ~~45 days~~ from receipt of analytical results.

4. The following options exist for disposing of the stockpiled soil on site:
   a. Disposal at a Class III landfill
   b. Disposal at a Class II landfill
   c. Disposal at a Class I landfill
   d. On site remediation followed by replacement of soil into the excavations, or a combination of backfilling and one or more of the above options.

   If option **d** is chosen, a plan to remediate the soil on site will be prepared and submitted to the ACDHEH. Following on site treatment, the stockpiles will be resampled, and the disposal alternatives will be reevaluated. Approval will be sought from the ACDHEH for backfilling the excavations with the remediated on site soil.

   d. will take too long... can't go ahead & install wells

   Additionally, some soil may be used as backfill and some soil may be disposed of off-site.

   The time frame to complete this task is variable depending on which alternative or combination of alternatives is chosen. A time schedule for completing this task will be presented following completion of Task 3 above.

5. Using stockpiled soil or imported clean fill, or a combination of the two, all excavations will be backfilled. If water is present in the tank excavation prior to backfilling, the water will be purged and disposed off-site prior to initiation of backfilling.

   The time frame to accomplish this task is approximately ~~60 days~~ 30. This will allow the responsible parties time to select a contractor and perform the work.

Laboratory Procedures

Soil samples from the waste oil tank excavation will be analyzed for total petroleum hydrocarbons calculated as gasoline (TPH-g), TPH calculated as diesel (TPH-d), benzene, toluene, ethylbenzene, and xylenes (BTEX compounds) and oil and grease. TPH-g, TPH-d, and BTEX compounds will be analyzed according to the

EPA Methods 8015, 8020, 5030 and 3510. Oil and grease will be analyzed according to SM 5520 E and F.

Stockpiled soil on site will be analyzed for constituents depending on origin. Soil from the fuel storage tank excavation will be analyzed for TPH-g and BTEX compounds. Soil from the waste oil tank excavation will be analyzed for TPH-g, TPH-d, BTEX compounds and oil and grease.

All analyses will be performed by a California State-certified laboratory.

If you have any questions regarding the contents of this letter, please call.

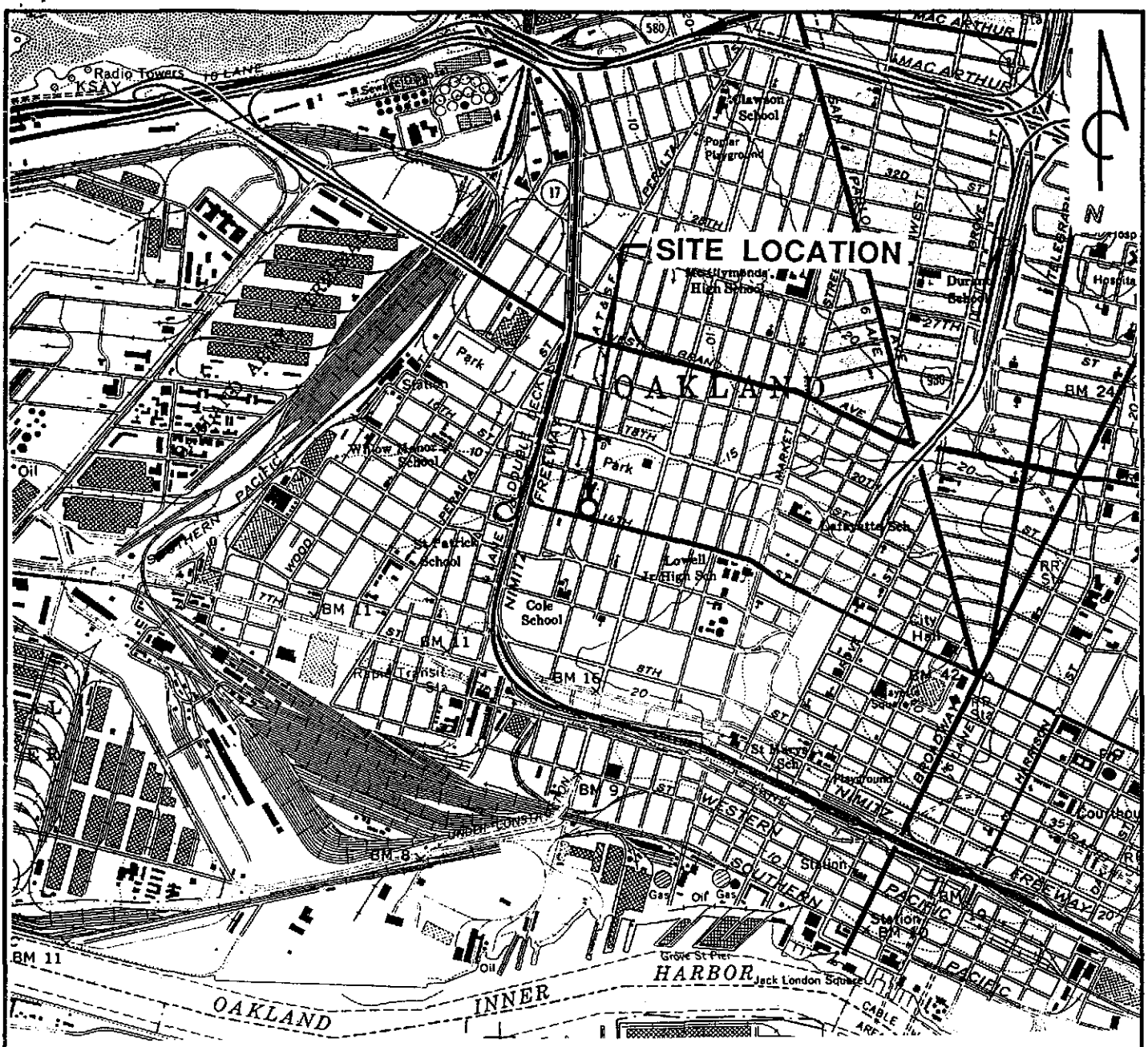
Sincerely,

Pacific Environmental Group, Inc.

Michael Hurd
Senior Geologist
RG 5319

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

cc: Mr. Lynn Walker, Shell Oil Company
Mr. Rich Hiett, Regional Water Quality Control Board
Mr. Andrew Saberi, Sabek Inc.
Mr. Som Gupta and Mr. Pawan Garg
Mr. Michael Johnson, Larson and Burnham



QUADRANGLE LOCATION

REFERENCES:
USGS 7.5 MIN. TOPOGRAPHIC MAP
TITLED: OAKLAND WEST, CALIFORNIA
DATED: 1959 REVISED: 1980

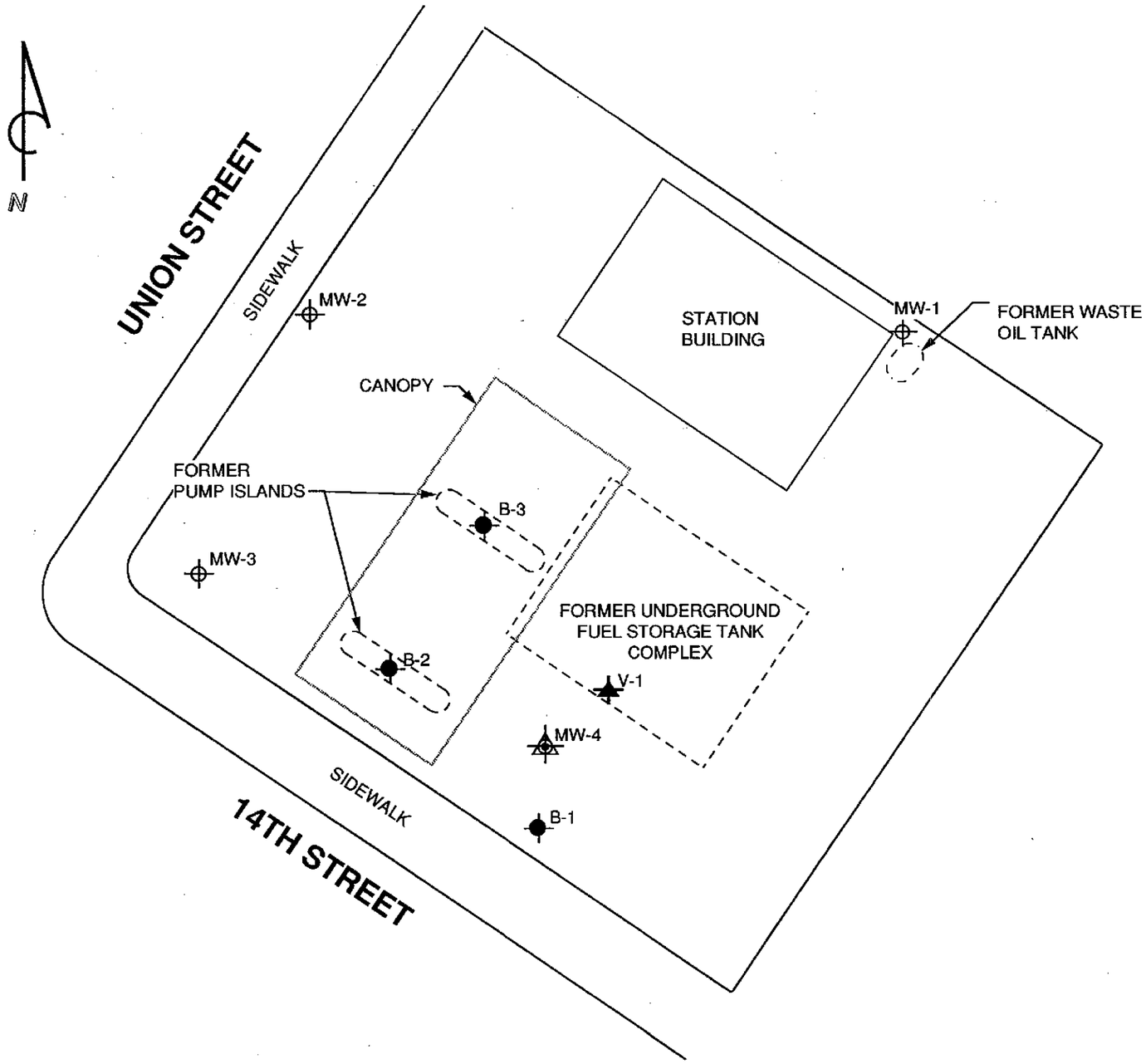
SCALE IN FEET
2000 0 2000

PACIFIC ENVIRONMENTAL GROUP, INC.

FORMER SERVICE STATION
1230 14th Street at Union Street
Oakland, California

SITE LOCATION MAP

FIGURE: 1
PROJECT: 305-140-1A



LEGEND

- MW-2 — PROPOSED GROUNDWATER MONITORING WELL AND DESIGNATION
- B-1 — PROPOSED SOIL BORING LOCATION AND DESIGNATION
- V-1 — PROPOSED SOIL VAPOR EXTRACTION WELL LOCATION AND DESIGNATION
- MW-4 — PROPOSED DUAL GROUNDWATER MONITORING/ SOIL VAPOR EXTRACTION WELL LOCATION AND DESIGNATION

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SCALE
0 20 40 FEET

FORMER SERVICE STATION
1230 14th Street at Union Street
Oakland, California

PROPOSED WELL LOCATION MAP

FIGURE: **2**
PROJECT: 305-140.1A

05/05/94