The Goodyear Tire & Rubber Company Akrom. Obio 44316 - 0001

CERTIFIED MAIL RETURN RECEIPT REQUESTED

November 22, 2002

Alameda County Health Care Services Agency Environmental Protection Division 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

Attention:

Mr. Amir Gholami, Hazardous Materials Specialist

Reference:

Nikonmental Health Former Merritt Tire Sales / Goodyear Leased Location (#9578

3430 Castro Valley Boulevard

Castro Valley, Alameda County, CA

STID #1715

Dear Mr. Gholami:

The Goodyear Tire & Rubber Company (Goodyear) is submitting one copy of the enclosed Work Plan for Enhanced Fluid Recovery (dated November 19, 2002) regarding the above referenced facility for your review.

Please do not hesitate to contact me at 330-796-1735 if you have any questions in your review of this work plan. For your convenience, I can also be reached by email at karen.burlingame@goodyear.com.

Respectfully,

Karen D. Burlingame

Global Environmental Services, D/110F The Goodyear Tire & Rubber Company

1144 East Market Street, Akron, OH 44316-0001

Enclosure

CC: Dennis Middleton, SECOR International

November 19, 2002

Project Number: 06GY.66050.00.0001



Mr. Amir Gholami Alameda County Health Care Services Agency Environmental Protection Division 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

Re: Work Plan for Enhanced Fluid Recovery at the Former Merritt Tire Sales/Goodyear Leased Location No. 9578 3430 Castro Valley Boulevard Castro Valley, Alameda County, CA STID #1715

Dear Mr. Gholami:

SECOR International Incorporated (SECOR) is pleased to submit this Work Plan on behalf of The Goodyear Tire and Rubber Company (Goodyear) describing additional field activities at the Former Merritt Tire Sales/Goodyear Leased Location No. 9578 (Goodyear #9578), at 3430 Castro Valley Boulevard, Castro Valley (the Site; see Figure 1). The purpose of this Work Plan is to ascertain the actual thickness of floating product in monitoring well MW-3, as described in SECOR's September 23, 2002 Letter Report to the Alameda County Health Care Services Agency, Environmental Protection Division (County), through enhanced fluid recovery (EFR), and a comparison of the concentration of chemicals of concern in on-Site monitoring wells since the previous sampling event of August 22, 2002. SECOR believes that the proposed scope of work described herein will allow Goodyear to more fully assess the extent of on-Site contamination and the persistence of floating product in MW-3 prior to proposing any further plume delineation.

PROPOSED SCOPE OF WORK

SECOR has developed the following tasks to address the presence of floating product in well MW-3 and the concentration of chemicals of concern in the existing on-Site monitoring wells.

Task 1 - Pre-field Activities

A Site-specific Health and Safety Plan (HASP) will be prepared for use by personnel implementing the Work Plan. The HASP will address the proposed fieldwork, and a copy of the HASP will be available on-Site at all times. Subcontractors performing field activities will be provided with a copy of the HASP prior to initiating work.

SECOR will notify the store manager of Rynck Tire and Auto Center, the current lessor of the Site, regarding the upcoming field activity.

Task 2 – Enhanced Fluid Recovery

SECOR proposes to initiate EFR on-Site to remove the floating product present in well MW-3, which historically contained free product. Based on a review of data collected during the most recent groundwater monitoring and sampling event, measurable free product has been detected only in well MW-3. EFR activities would entail performing a batch extraction event using a vacuum truck every two weeks, at well MW-3, for a period of one calendar quarter (6 events). A drop tube or "stinger" will be lowered into well MW-3 to a depth of approximately 2 inches below the free product/groundwater interface. The drop tubes will then be connected to the vacuum truck, and EFR will be initiated. SECOR anticipates that each extraction event will include the removal of approximately 150 gallons of free product and groundwater from well MW-3. Prior to and immediately following each batch extraction event, well MW-3 will be gauged to evaluate free product thickness using a Solinst 122 Interface Probe capable of detecting free product thicknesses to 1 millimeter.

In order to determine if the concentration of chemicals of concern have increased or decreased since the previous sampling event, SECOR will wait for three days after the final extraction event and allow for well recovery; then, SECOR proposes to sample and analyze the existing monitoring wells MW-1, MW-2, and MW-4 (and potentially MW-3) shortly thereafter the final EFR activity for the following analytes/compounds:

- 8015B for total petroleum hydrocarbons for gasoline (TPHg);
- 8015B/3510 for total petroleum hydrocarbons for diesel (TPHd);
- 418.1 for total recoverable petroleum hydrocarbons (TRPH);
- 8021B for benzene, toluene, ethylbenzene and xylenes (BTEX);
- 8021B for methyl tertiary-butyl ether (MTBE);
- 8260B for volatile organic compounds (VOCs), including MTBE (for confirmation); and
- 6010, lead only.

The extracted free product and groundwater generated during the EFR will be transported in the vacuum truck by a Department of Transportation-licensed waste transporter, under hazardous waste protocol to a local facility for disposal.

Task 3 - Letter Report

Following completion of the EFR, SECOR will prepare a report including groundwater contours, groundwater analytical results and the procedures and results of the EFR. SECOR will present conclusions regarding the effectiveness of the EFR and if additional on-Site delineation of the plume is warranted.

Mr. Amir Gholami November 19, 2002 Page 3 of 3

PROPOSED SCHEDULE

Upon receiving written approval of this Work Plan from the County, SECOR will proceed with the proposed work. SECOR anticipates submitting EFR and groundwater sampling results to the County within 30 days of completing the groundwater sampling event.

We appreciate the opportunity to submit this Work Plan to Alameda County and trust that this document meets with your approval. Please notify us of your approval as soon as practical. If you have any questions or concerns, feel free to contact the undersigned at (650) 691-0131 or (330) 896-9226.

Sincerely,

SECOR International Incorporated

Jack C. Hardin

Regional Coordinator

Dennis L. Middleton

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Project Manager

Attachments:

cc:

Figure 1 Site Location Map

Karen D. Burlingame, The Goodyear Tire and Rubber Company

