Please Refer To: AEMC Job No. 82580

13 November 1990

Ms. Bernadine Palka Sears, Roebuck & Co. Sears Tower Dept. 731, BSC 39-34 Chicago, Illinois 60684

RE: SOIL CONTAMINATION WORKPLAN AND REMEDIATION PROPOSAL MOTOR OIL TANK AREA SEARS, ROEBUCK & CO., OAKLAND, CALIFORNIA

Dear Ms. Palka:

This Workplan is prepared by American Environmental Management Corporation (AEMC) for Sears, Roebuck & Co. to investigate soil conditions at Sears Automotive Center, 2633 Telegraph Avenue, Oakland, California 94612 (Figure 1). This Workplan addresses only the motor oil tank area located to the east of the automotive service bays (Figure 2).

AEMC proposes to perform the following tasks:

- Task 1: AEMC will overexcavate contaminated soil from the bottom of the existing excavation in the area about Tank 5 and Tank 6. AEMC will remove any existing concrete or asphalt from the area if it is required to accomplish this task. The volume of contaminated soil is estimated to be 50 cubic yards or less.
- Task 2: AEMC will gather confirmatory soil samples from the undisturbed soil remaining in the excavation. The samples will be gathered with a brass tube, sealed with Teflon tape, plastic end caps, and electrical tape. All samples will then be labeled, refrigerated, and delivered to AEMC's State of California Certified Laboratory under chain-of-custody for analysis. These samples will be analyzed for Total Petroleum Hydrocarbons as Diesel (TPH-D), and Oil and Grease.
- Task 3: AEMC's Analytical Laboratory (State Certification No. 210) will analyze the samples for TPH-D by EPA Method 8015 Modified, and Oil and Grease by EPA Method 9071.
- Task 4: AEMC will place the excavated material into the previous stockpiles SP-1 and SP-2, and will continue to provide temporary fencing around the excavation to prevent unauthorized entry.
- Task 5: Based upon the results of the laboratory analyses of the soil samples gathered in Task 2, AEMC will line the excavation with Supac (TM) geotextile and backfill the excavation. Backfill material will be compacted to grade.

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> Task 6: AEMC will provide a Report of Findings to Sears, Roebuck & Co. and to Alameda County Health Department for regulatory review.

AEMC will dispose of contaminated soil in a cost-effective manner. Two Task 7: alternatives had been considered, onsite incineration and asphalt recycling. However, the permitting for onsite incineration cannot be approved by the San Francisco Bay Air Quality Management District for at least another four to six weeks. Therefore, AEMC is proceeding with the asphalt recycling

option immediately.

The cleanup goal for TPH-D at the site is 100 parts per million based on the Leaking Potential Analysis in the State Water Resources Control Board's Leaking Underground Fuel Tank Manual (October 1989). The Oil and Grease analysis is listed in the LUFT Manual under Table No. 2, "Recommended Minimum Verification Analysis for Underground Tank Leaks," and is being required by the Alameda County Health Department. The Oil and Grease analysis has no cleanup goal; it does, however, provide a guide for establishing additional sampling requirements.

At this time, AEMC is not considering any groundwater sampling to be conducted in this tank area. Plans formulated by AEMC are based on currently available information and were developed in accordance with currently acceptable engineering practices at this location. This Workplan was prepared under the direction of a California Registered Geologist. AEMC will initiate this Workplan on 15 November 1990.

If you have any questions, please feel free to contact either Mr. Phil Walsack or me at (916) 364-8872. EGISTERED GEOLOGIO

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JAMES F. FRUMM

No. 4207

Sincerely,

James F. Frumm, R.G., R.E.A.

Regional Manager Engineering Division

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cc: Mr. Paul Smith, Alameda County Department of Environmental Health



