PACIFIC
ENVIRONMENTAL
GROUP INC.

February 7, 1995
Project 330-048.6A

Mr. Scott Seary
Alameda County Health Care Services Agency
Division of Hazardous Materials
1131 Harbor Bay Parkway, Room 250
Alameda, California 94502

Re: Meeting Minutes/Limited Work Plan
ARCO Service Station 2152
22141 Center Street
Castro Valley, California

Dear Mr. Seary:

This letter, prepared by Pacific Environmental Group, Inc. (PACIFIC) on behalf of ARCO Products Company (ARCO), presents minutes from the February 3, 1995, meeting regarding the site referenced above. In addition, as agreed during the meeting, this letter also presents a limited work plan for the drilling of two exploratory soil borings in the vicinity of the underground storage tank (UST) complex. Attendees at the meeting included Mr. Kelly C. Brown of PACIFIC, Mr. Scott Seary of the Alameda County Health Care Services Agency (ACHCSA), and Mr. Michael Whelan of ARCO. Presented below are minutes from the meeting and limited work plan.

MEETING MINUTES

The purpose of this meeting was to discuss the strategy and requirements for quick approval of site closure by the ACHCSA and Regional Water Quality Control Board (RWQCB). ARCO currently leases the site from a private party and may be losing their lease to Mc Donalds or another party in the near future. Regarding site closure, two scenarios were discussed: (1) requirements for closure if ARCO loses their lease and removes the USTs and product lines, and (2) ACHCSA requirements for closure if ARCO retains their lease and continues to operate the station with the existing double-walled USTs and product lines, with overfill protection.

First, all historical data from previous site investigations was reviewed, including the 1990 UST and product line replacement. Site soil analytical results collected from the drilling of soil borings, as well as UST and product line excavation soil samples were discussed. Additionally, groundwater analytical results were discussed. Groundwater analytical results indicate that hydrocarbons have not been detected in any site well since July 1991. Mr. Seary indicated that ~~non~~ 7/91 detectable hydrocarbon concentrations are most likely the result of laboratory error since they are noted in every well sampled. In addition, Mr. Seary indicated that the soils in the vicinity of Boring B-18 would not need additional assessment or excavation; this boring location has hydrocarbon concentrations of less than 220 parts per million (ppm) total petroleum hydrocarbons calculated as gasoline (TPH-g).

The area of main concern, as Mr. Seary stated, is beneath the former and present UST complex location in the area of the former product line vapor recovery sump. TPH-g concentrations is soil ranged between 2,300 and 37,000 ppm. Mr. Seary requested that ARCO propose a plan to target this area prior to the excavation of the USTs to determine if natural attenuation of hydrocarbons has occurred and to define the horizontal extent of hydrocarbons.

Mr. Seary asked about ARCO's lease agreement with the current property owner and whether language regarding the environmental conditions of the property was specified. Mr. Whelan indicated that he did not know what the exact lease agreement language was, but that he would look into this matter. Mr. Whelan also stated that ARCO was still in the process of trying to retain the lease and that the UST excavation may not occur as previously stated. Mr. Whelan also asked whether this fact would affect site closure. Mr. Seary asked whether Mr. Whelan had any knowledge of the location where MacDonalds has planned to place the proposed building footprint and whether a basement was planned for the site. Mr. Whelan stated that he did not know but said he would look into this through ARCO. The location of the proposed building footprint and basement (if part of the construction for the building) may affect closure for the site. Mr. Seary stated that he wanted to make sure that a basement was not going to be constructed in the area where hydrocarbons are located in soils at depth, since this may pose a threat to human health. If a basement is to be constructed at the site, a risk assessment would have to be included with site closure.

To proceed with closure and to address the concerns of hydrocarbons in the area of the former product line vapor recovery sump, Mr. Seary requested that two soil borings be drilled in this area, regardless of whether ARCO retains their lease and continues to operate a service station or leaves the site and removes the USTs and product lines. If the soil analytical results from the two borings show natural biodegradation, vertical

attenuation, and limited aerial extent, case closure would proceed. If ARCO retained their lease, Mr. Seary indicated that the site would be treated as an operating service station, but that a letter of "no further action" (NFA) for remediation would probably be issued. Mr. Seary also stated that the RWQCB was in agreement with proceeding with site closure, although this was based on the original plan and the excavation of the USTs. Mr. Seary stated that he did believe that the RWQCB would still grant closure or NFA for the site if the site remained an operating ARCO service station.

In the next section, a limited work plan is presented.

LIMITED WORK PLAN

As discussed during the February 3, 1995, meeting, this limited work plan has been prepared by PACIFIC on behalf of ARCO, proposing the drilling of two soil borings in the vicinity of the former product line vapor recovery sump. Discussed below are proposed scope of work, laboratory analysis, and reporting.

Scope of Work

Two soil borings are proposed to be drilled in the vicinity of the former product line vapor recovery sump located adjacent the former and present UST complex. One soil boring (B-21) will be drilled approximately 3 feet southwest of the concrete apron of the UST complex between Wells MW-1 and VW-4, and one soil boring (B-22) will be drilled in the conductor casing located in the UST complex, between the two northern most USTs. Soil boring locations are presented on Figure 1. Each soil boring will be advanced to groundwater at the approximate depth of 45 feet below ground surface (bgs). Soil samples will be collected at 5-foot depth intervals, at the change in lithology (approximately 40 feet bgs), and at groundwater to the total depth explored.

Laboratory Analysis

All soil samples collected will be taken to a California State-certified laboratory and analyzed for TPH-g and benzene, toluene, ethylbenzene, and xylenes (BTEX compounds), according to EPA Method 8015 (Modified) and 8020. Additionally, two soil samples will be analyzed for Toxicity Characteristic Leaching Procedure (TCLP) for TPH-g and BTEX compounds, according to EPA Method 1311, to determine the leaching potential of site soils beneath the former product line vapor recovery sump.

Note: When discuss of this site w/ Kevin Graves (RWQCB), we h been informed That:
1) USTs were be removed
2) soil excav tion wou excise al HC conta mination
3) closure would th be grante Since That time, UST removal a subsequent excavation may not occur.

Reporting

The results of the soil boring program will be documented in a technical report. The report will include soil analytical results table, two cross sections, boring logs, and certified analytical results.

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

Sincerely,

Pacific Environmental Group, Inc.

for Kelly C. Brown

Kelly C. Brown
Project Manager

Attachments: Figure 1 - Soil Boring Location Map

cc: Mr. Michael Whelan, ARCO Products Company
Mr. Kevin Graves, Regional Water Quality Control Board