Weiss Associates
5500 Shellmound Street, Emeryville, CA 94608-2411
Environmental and Geologic Services
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FAX TRANSMITTAL

DATE: January 27, 1993

TO: Mr. Paul Smith **FAX PHONE:** (510) 569-4757

COMPANY: Alameda County Health Care Services **BUSINESS PHONE:** (510) 271-4320

FROM: Bob Devany **PROJECT #:** 84-486-00

SUBJECT: Learner Investment

768 46th Ave,
Oakland, CA 94601

 # PAGES: 5
(including this cover)

☒ Hard Copy to follow if checked

COMMENTS & ACTIONS REQUIRED:

Please deliver to Mr. Smith as soon as possible for his review.

NOTE: Please call (510) 547-5420 if you do not receive all pages.

Weiss Associates Environmental and Geologic Services

5500 Shellmound Street, Emeryville, CA 94608-2411 Fax: 510-547-5043 Phone: **510-547-5420**

Bob Devaney
direct #
450-6144

May 5, 1993

VIA FAX AND FIRST CLASS MAIL

Paul M. Smith
Alameda County Health Care Services Agency
Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, California 94621

Re: Site Assessment Work Plan
Learner Investment Company
768-46th Avenue
Oakland, California 94601
WA Job No. 84-486-00

Dear Mr. Smith:

This letter responds to modifications and inclusions requested by the Alameda County Health Care Services, Department of Environmental Health (DEH) for the Weiss Associates (WA) workplan dated February 16, 1993. The DEH letter dated April 7, 1993 lists four modification/comments. This response is organized according to that format.

COMMENT 1

Regarding placement of monitoring wells: we intend to use *all* available data to base our decisions on monitoring well placement. This includes results from ground water and sediment samples acquired during the upcoming investigation, and all existing data, including those cited in your letter. Because existing data does not define the vertical extent of potential constituents of concern and whether they have reached ground water, we plan to collect deep sediment samples and install temporary wells to investigate the potential for ground water contamination. After the analytical results of this investigation are reviewed, we will return to the site to install three ground water monitoring wells.

In their April 7 letter, DEH indicates that when hydrocarbons exceed "100 parts per

million (ppm) in soil, ground water monitoring wells are required within 10 ft in the downgradient direction" based on guidance in the "Tri-regional Board Staff Recommendations for Preliminary Evaluations and Investigation of Underground Tank Sites." We argue that these guidelines do not apply to this site since they are intended for leaking underground tanks, generally a "point source."

As you know, chemicals that may affect ground water at the subject property are not limited to hydrocarbons and could include metals and possible organic compounds. These chemicals of concern (including hydrocarbons) may originate from an onsite surface spills, the use of oil for dust mitigation, regional sources such as air-born lead from industrial activities and/or automobile exhaust, leaking storm and sanitary sewers, and other unidentified offsite sources. Thus, they are not considered "point sources" like a leaking underground tank.
localized spills can be considered point sources

Because of the potential ubiquitous nature of chemicals in ground water, as well as general uncertainty of the rate and direction of ground water flow and the site's hydrogeology, we feel a rigid requirement of ground water monitoring within 10 ft of petroleum hydrocarbons exceeding 100 ppm is too limiting and potentially not cost effective.

Instead, if the initial ground water grab sample screening indicates that ground water is affected, we propose to locate ground water monitoring wells to: 1) achieve adequate inter-well spacing to define the hydraulic gradient; 2) monitor upgradient of potential onsite source(s) to evaluate if the any chemicals originate offsite; 3) monitor downgradient of potential onsite source(s) to determine whether ground water is affected and define the lateral extent of the chemicals in ground water, if possible. Grab water sampling, from temporary monitoring wells installed in boreholes at several potential hot spots during this phase of investigation (see workplan) will indicate if ground water is locally affected and the location(s) of highest concentrations. If deemed necessary, in later phases of work we will install larger-diameter monitoring/ground water extraction wells optimally located to monitor the highest concentrations and facilitate remediation. If, during the initial ground water screening, there is no indication that ground water is affected by chemicals, then we will install a monitoring well about 10 ft downgradient of the hydrocarbons in soil that have the highest potential of affecting ground water.

COMMENT 2

Regarding the design and sampling plan for monitoring wells: we will install 2-in. i.d. PVC casing and 0.020 in. or 0.015 in. slotted screens extending 2 to 5 ft above the static water table to the bottom of the first water-bearing zone to detect potential floating hydrocarbons. The screen length will not exceed 20 ft and not more than one water-bearing horizons will be screened. A formation stabilizer, consisting of washed Monterey-type sand of appropriate grain size, will be installed adjacent to the screen. All wells will be permitted by Alameda County and constructed in accordance with the permit requirements and California Department of Water Resources Bulletin 74-90. After the annular seal has set for at least 48 hours, the wells will be developed until sediment free, if possible.

We will begin quarterly sampling of all wells within one month of their installation. At a minimum, the wells will be sampled for total extractable hydrocarbons, and lead, zinc, cadmium, chromium, and nickel. We will also analyze ground water for any additional chemicals of concern identified during upcoming investigation and submit quarterly results to DEH. After results from the fourth quarter samples are received, the sampling frequency will be reevaluated. – wells sampled for every pollutant detected in on site

COMMENT 3

Regarding notification of implementing the workplan: the Learner Company and WA are planning to begin the field investigation soon as possible. Thus, if we do not receive written or verbal comments on this letter by May 12, field work will begin May 17, 1993.

COMMENT 4

Regarding the site safety plan: we are preparing a site safety plan and will submit it to DEH by May 12, 1993.

Please call or write if you have any questions or additional comments.

Sincerely,
Weiss Associates

Robert O. Devany, C.E.G.
Project Hydrogeologist

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cc: Jack Hecht; Learner Investment Company; 2711 Navy Drive; Stockton, California 95206

David Sadwick, Esq.; Cadwalader, Wickersham and Taft; 660 S. Figueroa St.; Los Angeles, California 90017