CHEMICAL DATA MANAGEMENT SYSTEMS

RECEIVED
By Alameda County Environmental Health at 10:56 am, Sep 22, 2014

August 22, 2014

Mark Detterman
Senior Hazardous Material Specialist
Environmental Health Services
1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502

Re: Work Plan – Economy Trucking/AAA Truck Parts Co., 3884 Depot Road, Hayward, CA

Dear Mark:

We would like to submit our work plan in this letter and supportive documents for your approval for the sampling activities at 3884 Depot Road, Hayward, CA. Please note that the property has changed ownership and the new owner's company name is Economy Trucking. The supportive documents include Initial Site Conceptual Model, the Data Gaps and Proposed Investigation, and the Proposed Cleanup Activities reports, and Soil and Water Sampling SOP. These documents are attached to this letter.

The following is our work plan for the sampling at the site.

Sample soil will be acquired at 6 inches and 1 foot below ground surface. We will analyze the 6 inch samples first for contamination and hold the 1 foot samples. If the 6 inch samples are below the contamination levels no further analysis will be performed. If the 6 inch samples have the contamination levels above the thresholds, then the 1 foot samples will be analyzes. We will not penetrate the clay layer 2 feet below ground surface, to avoid penetrating protective clay level for the groundwater. Please see the "Soil and Water Sampling SOP", which is attached for the specific procedures for the sampling.

1. At the southern former hazardous waste storage slab sample the ground water from Monitor Well MW-1 and collect soil samples from locations 10 feet from the 4 sides of the former Hazardous Waste Storage cement slab. Analyze for TPH.

6515 Trinity Court, Suite 201, Dublin CA 94568 • (925)551-7300 • FAX (925)829-3886
2501 Cherry Avenue, Suite 170, Signal Hill, CA 90755 • (562) 988-0800

2 At the southern parts storage area collect soil samples from the vicinity of the 2001 soil boring P-7. Analyze for TPH.

3.At the central outdoor storage area sample the ground water from Monitor Well MW-2 and collect 3 soil samples from locations 10 feet apart west of the location of P-2 . Analyze for TPH.

4.At the brake and manifold storage racks area collect soil samples near the north end of the former brake and manifold storage racks. Analyze for metals.

Upon completion of the sampling and evaluation of the sampling results the following proposed clean actions will be considered.

1. Remove surface soil as necessary.
2. Obtain permits and Destroy MW-1 and MW-2.

Please let us know if you have any questions or if we can proceed with the proposed investigation.

Best Regards,

James N. Carro, REA

Fredric Hoffman
Professional Geologist #3929
Certified Hydrogeologist #83

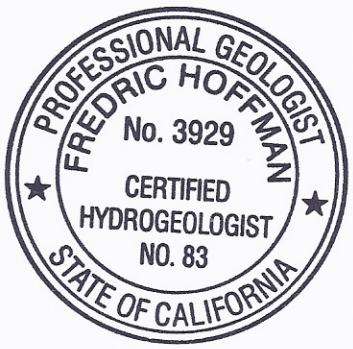


Table 1
Initial Site Conceptual Model

CSM Element	CSM Sub-Element	Description	Data Gap	How to Address
Geology and Hydrogeology	Regional	The site is in the east-central alluvial plain of the San Francisco Bay physiographic subregion and is underlain by a thick layer of Quaternary alluvium.	None	NA
	Site	**Geology:** Three shallow monitor wells were installed at the end of 2002 and reported in a report by Engeo in 2003. Two of the wells were installed on the subject property and the third on the property immediately to the east. 2.25 to 2.75 feet of gravelly fill was logged overlying and approximately 4-foot thick clay layer. Soil consisting of varying percentages of silts, clays, and sands weas logged beneath the clay layer. **Hydrogeology**: In the wells installed by Engeo (Dec. 2002), ground water was encountered between 8 and 9 feet below ground surface. Water elevations from the monitor wells taken in 2003 indicate a NNW flow direction. Data from the samples taken during the soil borings, and from the monitor wells indicate that the ground water was protected from contamination at the surface by the four-foot thick clay layer. **Land Use**: The site is located in an area used for light-industrial, commercial office, automotive salvage, sewage treatment plant, gas-fired power generation and salt ponds.	None	NA

Surface Water Bodies		The nearest surface water is a slough just west of the site that flows to San Francisco Bay about one mile to the west.	None	NA
Nearby Wells		The Geotracker GAMA site shows the nearest water supply well approximately 1 mile east of the site.	None	NA
Environment		The site was used for decades as an automotive salvage yard creating the potential for soil and ground water contamination with automotive fluids and fuels. Hazardous waste was collected in containers and drums and stored on a concrete slab. In 2001, in response to a reported spill, 8 shallow soil borings were conducted. Following the analytical results from the samples collected, three monitor wells were installed in 2002. One of the wells was installed near the hazardous waste storage area, another was drilled in an area of suspicious soil staining, and the third was drilled on property leased by AAA Truck Parts east of the adjacent property. When that property was closed the well was destroyed and sealed. None of the soil sampled during the installation of the wells contained contaminants above the ESLs. Water samples taken from the wells in 2003 also contained contaminants below the ESLs. Currently, all of the automotive salvage materials have been removed from the site as it is prepared for sale.	The extent of the surface contamination has not been evaluated since 2001 and the monitor wells have not been sampled since 2003.	Conduct surface soil sampling and sample water from the remaining 2 wells.
Land Use		The site is located in an area used for light-industrial, commercial office, automotive salvage, sewage treatment plant, gas-fired power generation and salt ponds.		

Table 2
Data Gaps and Proposed Investigation

Item	Data Gap	Proposed Investigation	Rationale	Analysis
1 Southern Former Hazardous Waste Storage Slab	Evaluate current Soil and Ground Water contamination	Sample the ground water from Monitor Well MW-1 and collect soil samples from locations 10 feet from the 4 sides of the former Haz Waste Storage cement slab. Analyze for TPH.	Ground water from monitor well MW-1 in 2003 was ND for Total Petroleum Hydrocarbons except for TPHd which was below the ESL. Sample will evaluate the current status of the ground water. A grab water sample taken from the P-3 boring in 2001 was above the ESLs for TPHg and TPHmo. The well is located immediately to the west of the slab near the western border of the site. The analysis of the soil samples taken from boring P-3 at 1 foot below ground surface in 2001 was ND for TPHg and showed levels of TPHd and TPHmo below the ESLs. Soil samples taken at 7-7.5' in the boring for MW-1 were below the ESLs for TPH. The sample taken at 1' from P-3 was above the ESL for Zinc, but below the ESL at 3'. New samples will be taken at 6" and 1' to evaluate current status of the surficial soil. 1' samples will be placed on hold pending the results from the 6" samples.	Analyze for TPH(Gas, Diesel and Oil) by EPA Method 8015/8020
2	Evaluate	Collect soil samples	In 2001 soil samples from P-7 were ND for	Analyze for

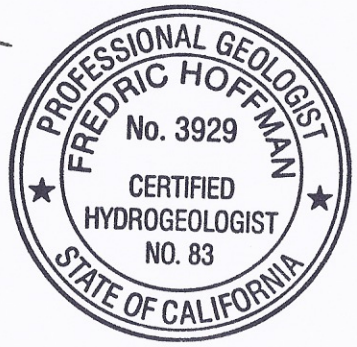
Southern parts Storage Area	current soil contamination	from the vicinity of the 2001 soil boring P-7. Analyze for TPH.	TPHg and exceeded the ESLs for TPHd and TPHmo at 1' was below the ESL for TPHd and exceeded the ESL for TPHmo at 3'. New samples will be taken at 6" and 1' to evaluate current status of the surficial soil. 1' samples will be placed on hold pending the results from the 6" samples.	TPH(Gas, Diesel and Oil) by EPA Method 8015/8020
3 Central Outdoor Parts Storage Area	Evaluate current Soil and Ground Water contamination	Sample the ground water from Monitor Well MW-2 and collect 3 soil samples from locations 10 feet apart west of the location of P-2 . Analyze for TPH.	In 2003 MW-2 was ND for TPH, and the soil samples taken at 7-7.5' in the boring for MW-2 were ND for TPH. In 2001 Soil boring P-2 was above the ESLs for TPHd and TPHmo at 1' BGS, but was below the ESLs at 3' BGS. A grab water sample from P-2 was below the ESLs for TPH. P-5 and P-6 in the same general area to the east of P-2 were below the ESLs for TPH. New samples will be taken at 6" and 1' to evaluate current status of the surficial soil. 1' samples will be placed on hold pending the results from the 6" samples.	Analyze for TPH(Gas, Diesel and Oil) by EPA Method 8015/8020 .
4 Brake and Manifold Storage Racks	Evaluate current soil contamination	Collect soil samples near the north end of the former brake and manifold storage racks. Analyze for metals.	The likely contaminants from this area are metals. Soil samples taken at 7-7.5' from the boring for MW-2 located at the southern end of this area were below the ESLs for metals. Ground water samples from MW-1 and MW-2 were ND for metals in 2003. New samples will be taken at 6" and 1' to evaluate current status of the surficial soil. 1' samples will be placed on hold pending the results from the 6" samples.	Analyze for cadmium, chrome nickel and zinc by EPA Method 6010.

5 Southwest Formerly Leased Area for Dismantling	None	No further action.	In 2001 soil boring P-8 showed indications of oil and grease, but was below the ESLs for TPHd and TPHmo at 1' BGS and ND for oil and grease and TPH at 3' BGS. The area has now been graded, remains unpaved and is used to park vehicles.	None

Table 3
Proposed Cleanup Activities

Item	Proposed Activity	Rationale
1-4	Remove surface soil as necessary.	If any of the soil samples indicate that the soil contains contaminants above regulatory limits the first 1 foot of soil will be removed. Since the clay layer appears to be protecting the ground water, it must not be disturbed.
1&3	Obtain permits and Destroy MW-1 and MW-2.	Protect the ground water from any surface contaminants that might find their way to the ground water using the wells as a conduit.

Prepared by: Fred Hoffman
Professional Geologist #3929
Certified Hydrogeologist #83



AAA Truck References

ENGEO Inc. October 22, 2001. Proposal for a Limited Site Characterization. Prepared for AAA Truck Parts. (From the Alameda County Environmental Health Website- AAA Truck Parts)

ENGEO Inc. November 15, 2001. AAA Trucking Site Plan. Prepared for AAA Truck Parts. (From the Alameda County Environmental Health Website- AAA Truck Parts)

ENGEO Inc. November 28, 2001. Analytical Report of Soil Borings. Prepared for AAA Truck Parts. (From the Alameda County Environmental Health Website- AAA Truck Parts)

ENGEO Inc. January 4, 2002. Report on Site Characterization. Prepared for AAA Truck Parts. (From the Alameda County Environmental Health Website- AAA Truck Parts)

ENGEO Inc. March 27, 2002. Work Plan for the Installation of Groundwater Monitoring Wells. Prepared for AAA Truck and Van Parts. . (From the Alameda County Environmental Health Website- AAA Truck Parts)

ENGEO Inc. July 15, 2003. Groundwater Monitoring Well Installation. Prepared for AAA Truck and Van Parts. . (From the Alameda County Environmental Health Website- AAA Truck Parts)

LFR Levine-Fricke. December 2, 2004. Phase I Environmental Site Assessment, 3862 and 3878 Depot Road, Hayward, California. Prepared for Calpine.

LFR Inc. November 8, 2006. Revised Draft, Phase II Environmental Site Assessment at 3810 Depot Road and 3700 Enterprise Avenue and Additional Soil and Groundwater Sampling Activities at 3862 and 3878 Depot Road, Hayward, California. Prepared for the Calpine Corporation.

ARCADIS. July 7, 2010. Soil Removal Action Report. Prepared for Russell City Energy Company. LLC.

AAA Truck Parts Compilation of data with ESLs from 12/2013 *

ORGANICS

Engeo July 15, 2003 Groundwater Monitoring Well Installation
Concentrations in PPM

	TPHg	TPHd	TPHmo	Benzene	Toluene	Ethylbenzene	Xylenes
ESL	500	110	500	1.2	9.3	4.7	11
Boring 1 (7.0'-7.5')	27	27	21	ND	0.012	0.025	0.041
Boring 2 (7.0'-7.5')	ND	ND	ND	ND	ND	ND	ND

Engeo July 15, 2003 Groundwater Monitoring Well Installation
Concentrations in PPB

ESL	500	640	640	46	130	43	100
MW-1	ND	76	ND	ND	ND	ND	ND
MW-2	ND	ND	ND	ND	ND	ND	ND

LUFT METALS

Engeo July 15, 2003 Groundwater Monitoring Well Installation
Concentrations in PPM

	Cd	Cr	Pb	Ni	Zn
ESL	12	2500	320	150	600
Boring 1 (7.0'-7.5')	ND	30	12	32	64
Boring 2 (7.0'-7.5')	ND	40	8.8	51	55

Engeo July 15, 2003 Groundwater Monitoring Well Installation
Concentrations in PPB

ESL	0.25	180	2.5	8.2	81
MW-1	ND	ND	ND	ND	ND
MW-2	ND	ND	ND	ND	ND

ORGANICS

Engeo January 4, 2002 Report on site Characterization

	Concentrations in PPM Oil and Grease	TPHg	1 = 1 foot TPHd	2 = 3 feet TPHmo	Benzene	Toluene	Ethylbenzene	Xylenes
ESL		500	110	500	1.2	9.3	4.7	11
2-1	35000	1.7	1100	7900	ND	0.12	0.017	0.11
2-2	200		19	65	ND	0.018	ND	ND
3-1	1100	ND	67	400	ND	ND	ND	ND
5-1	480	ND	2.5	51	ND	ND	ND	ND
6-1	300	ND	9.2	56	ND	ND	ND	ND
7-1	12000	ND	140	2400	ND	ND	ND	0.0083
7-2	5700		68	1100	ND	ND	ND	ND
8-1	4600	ND	59	130	ND	ND	ND	ND
8-2	ND		ND	ND	ND	ND	ND	ND

Engeo January 4, 2002 Report on sit

	Concentrations in PPB							
ESL		500	640	640	46	130	43	100
GW-2	ND	ND	110	ND	ND	ND	ND	ND
GW-3	13000	2200	1500	2200	110	14	120	230

LUFT METALS

Engeo January 4, 2002 Report on site Characterization

Concentrations in PPM

	Cd	Cr	Pb	Ni	Zn
ESL	12	2500	320	150	600
2-1	4.1	61	230	36	300
3-1	1	390	100	32	1100
3-2	ND	23	9.6	21	36
5-1	ND	48	13	32	88
6-1	2.5	260	310	40	1800
6.2	ND	19	16	21	47
7-1	1.2	27	150	28	170
8-1	0.74	220	60	51	500

Engeo January 4, 2002 Report on site Characterization

Concentrations in PPB

ESL	0.25	180	2.5	8.2	81	43	100
GW-2	ND	ND	ND	ND	ND	ND	ND
GW-3	ND	ND	ND	ND	ND	ND	ND

Note: * See Reference listed in the SCM report

ECONOMY TRUCKING SERVICES

Got Dirt?

P.O. BOX 525
UNION CITY, CA 94587
Phone. 510 733-9100
Fax. 510 733-9600

To: County of Alameda
Dept: Environmental Health Services
Attn: Mark Ditterman

"I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge.

Date 9/19/2014

Signature

Printed Name Kevin Singh