



A U G E A S

January 10, 1996

Mr. Barney Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502

RE: Status of Ground Water Monitoring and Site Remediation at Foothill Square, 10700 Foothill Boulevard, Oakland

By Facsimile: (510) 337-9335

Dear Mr. Chan:

Augeas Corporation is encountering resistance from ARCO Products Company when we attempt to obtain access to the monitoring wells on the adjacent ARCO gas station, at 10600 MacArthur Boulevard. Our intention has been to measure the depths to ground water in these wells on the same day that we measure the depths to ground water in the Foothill Square wells. We do not intend to sample ARCO's wells, nor to have ground water samples from the wells analyzed.

The purpose of our request is to obtain an overall representation of the ground water gradient at the both Foothill Square and the neighboring filling station. Obtaining ground water depth data on the same day for both sites provides an indisputably accurate overview of the ground water flow conditions on the day of measurement. If we cannot obtain concurrent ground water depths for both sites, the gradient data from EMCON/ARCO cannot be properly compared with the data obtained from Foothill Square's wells. This comparison is important, because of the relative complexity of the ground water gradient at the Foothill Square site. To plot ground water gradients, we now have to use the best data available from ARCO, which are typically obtained several days to several weeks from the date on which we do our depth to ground water measurements at Foothill Square.

AUGEAS CORPORATION

750 PURISSIMA STREET HALL MOON BAY, CA 94019 PHONE: 415.726.1217 FAX: 415.726.1217

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When we asked ARCO for site access, we were informed by ARCO's attorney that they would not allow us to access these wells. We then asked ARCO's consultant if they would give us their sampling schedule so that we could coordinate our sampling with theirs, and they informed us that we would need to obtain this information from ARCO's attorney, who has not provided it. We believe that our request for access to ARCO's wells for depth to ground water measurements is reasonable in light of the potential significance of these data in formulating a PCE site cleanup plan, and to identify potentially responsible parties.

Augeas Corporation has prepared draft copies of ground water monitoring reports for the second and third quarters, 1995, for our client. The third quarter report includes analytical data on ground water samples collected from four wells installed by Augeas Corporation during our last phase of site investigation. Obtaining reliable ground water depth information for site-wide gradient calculations would be helpful as we finalize these reports.

We also wish to address the status of cleanup of the gasoline contamination from ARCO's fuel leaks. On review of ARCO's third quarter, 1995 report of groundwater monitoring and remediation system performance (EMCON, 1995), we noticed that ARCO's soil vapor extraction system was re-activated on August 1, 1995, but was then shut down on August 22, 1995 because of "low hydrocarbon removal rates." A review of the historical analytical results of ground water monitoring from ARCO's site-associated monitoring wells (EMCON, 1995) suggests that the soil vapor extraction system has not significantly impacted the petroleum-contaminated ground water on either the Foothill Square or the ARCO property. This leads us to recommend that Foothill Square proceed with remediation of the gasoline contaminated soil on its own property by excavation of the affected soil, most of which occurs near the ARCO property line. The process will effectively remove the Foothill Square soil that has been contaminated with petroleum hydrocarbons. We believe that removing Foothill Square's petroleum-contaminated soil will improve the quality of the ground water at Foothill Square.

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If you have comments or questions about this letter, please call at any time at (415) 726-7700. Thank you very much.

Sincerely,

Charles D. Conway

Charles D. Conway
Augeas Corporation