

LEE Incorporated

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May 12, 1995

Mr. Gary Moore
Alameda County Public Works
399 Elmhurst Street, Room 101
Hayward, CA 94544

*Yes this
done*

**Subject: Workplan For Fill Issue Resolution, Altamont Raceway Project,
17001 Midway Road, Tracy, Alameda County, CA**

Dear Mr. Moore:

Mr. James Baum of Altamont Raceway Park, Inc. requested LEE Incorporated (LEE) propose a workplan to address the environmental concern with the buried fill deposit at the project. In February and March 1995, LEE conducted a preliminary investigation of the triangular shaped area between the racetrack and roadways. The east portion of this area was found to be underlain by demolition debris fill. Investigation results were presented in LEE "Report of Soil Sampling at Altamont Raceway Project," dated April 11, 1995.

SCOPE OF WORK

The main purpose of the workplan is as follows:

- Propose a course of action to resolve the issue of the buried fill;
- Geochemical characterization of organic and non-organic constituents in the fill deposit and comparison with regulatory waste classification criteria;
- Hydrogeological and permeability characterization of native soils below the fill deposit, and testing of soils for possible impact by fill-derived leachate; and
- Decide whether or not remediation measures are needed and, if so, make recommendations.

TASK 2 LABORATORY ANALYSES

Four samples of the fill deposit will be analyzed by a state-certified laboratory for the following organic and non-organic toxic parameters:

- Total petroleum hydrocarbons as gasoline (TPHg/BTEX); total recoverable petroleum hydrocarbons (TRPH); and oil and grease (OG) by EPA methods;
- Volatile Organic Compounds (VOCs) by EPA Method 8240;
- Semi-Volatile Organic Compounds (Semi-VOCs) by EPA Method 8270;
- CAM 17 Metals: Soluble (Soluble Threshold Limit Concentrations, STLCs) CAM 17 metals by EPA Method 6000-7000 Series;
- RCI Panel: Reactivity, corrosivity and ignitability by Title 22 methods; and
- Toxicity Test: Screen LC50 bioassay testing with fatheads on one sample.

Ten samples of native soils will be tested for petroleum hydrocarbons (TPHg/BTEX, TRPH and OG). If no detectable levels are found, then two samples, representative of soils beneath the fill, will be analyzed additionally for VOCs, Semi-VOCs and CAM 17. Those samples with detectable hydrocarbons will be tested for these additional analytes.

TASK 3. GEOTECHNICAL TESTING

Five samples, representative of the native soils below the fill, will be tested by a geotechnical testing laboratory as follows:

Particle size analyses and hydrometer test by ASTM D-422 or equivalent;

Attenberg Limits by ASTM D-4318 or equivalent; and

Permeability by EPA 9010 or equivalent.

TASK 4. EVALUATION AND REPORT PREPARATION

LEE will evaluate the geological, hydrogeological and geochemical features of the site with reference to regulatory waste guidelines (Title 22, California Code of Regulations and Regional Water Quality Control Board's "The Designated Level Methodology For Waste Classification and Cleanup Level Determination"). Factors to be considered in fill closure decision include presence and concentration of toxins, hazardous versus non-hazardous waste classification criteria; natural permeability of soils below fill deposit; topography and groundwater conditions; and contribution of asphaltic particulate in sample OG detections. Closure options include in-situ closure as-is; in-situ closure with surface capping, grading and/or drainage control; and excavation and landfilling.

We look forward to your review of this workplan. If you have questions, please contact me by phone at 415-802-8358 or by pager at 408-951-0204.

Respectfully submitted,
LEE INCORPORATED



Paul Studemeister, CEG 1746
Project Geologist

Attachments: Study Area Map