ENVIRONMENTAL COST MANAGEMENT, INC.
Managing Cost and Liability

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October 31, 2007

Jerry Wickham, PG
Alameda County Health Care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Re: WORKPLAN FOR SUPPLEMENTAL GROUNDWATER SAMPLING FOR POLYCHLORINATED BIPHENYLS (PCBs), CARNATION DAIRY, 1310 14th Street, OAKLAND, CA

Fuel Leak Case No. RO0000018 and Geotracker Global ID T0600100262

Dear Mr. Wickham:

On behalf of Nestlé USA, Inc. (Nestlé), Environmental Cost Management, Inc. (ECM) prepared this work plan proposing supplemental sampling at a site located at 1310 14th Street in Oakland, California (Figure 1, "the Site"). This work plan is submitted in partial response to the September 28, 2007, directive (Directive) from the Alameda County Health Care Services Agency (ACHC) to Nestlé and Encinal 14th Street, LLC. Directive Item #10 notes that PCBs were reported at well location formerly known as PR12. Anania Geologic Engineering (AGE) reported PCBs at 0.06 milligrams per liter (mg/L) in groundwater in a 1989 unauthorized release report. The Directive requests further identification of this reported detection at PR12.

A review of previous AGE reports shows inconsistent PCB findings at the Site. To clarify the existence or absence of PCBs in light of these inconsistent findings, ECM, on behalf of Nestlé, is proposing additional groundwater sampling in the area of former well PR12. As shown in Figure 2, additional groundwater sampling is proposed adjacent to the former location of well PR12. A direct-push rig will be used to advance Hydropunch® borings to the depth of groundwater (estimated at approximately 9 feet bgs) to collect a grab groundwater sample at this location.

FIELD PROCEDURES

ECM will obtain soil boring permits from the Alameda County Public Works Agency, will mark the drilling area in white paint, and will notify Underground Service Alert (USA) at (800) 227-2600 at least two working days prior to drilling. An experienced field geologist, under the supervision of a California-licensed professional geologist or civil engineer, will oversee all drilling and sampling efforts.

GROUNDWATER SAMPLING

ECM will use a direct-push rig to advance the Hydropunch® borings at each boring location shown on Figure 2. ECM will obtain a grab groundwater sample from the shallow water-bearing zone. The shallow water-bearing zone is estimated at approximately 9 feet bgs. The driller will advance the Hydropunch® sampler using direct-push methods and equipment. At the desired depth, the driller will then retract the outer casing to expose the screened interval and allow it to fill under hydrostatic pressure. The groundwater collected in the screened interval will be sampled using new, dedicated, Teflon® tubing and a low-flow peristaltic pump or a new, disposable, Teflon® bailer. The use of new disposable tubing or bailers will eliminate the need for decontamination.

The laboratory will provide pre-preserved containers for collection of all groundwater samples. Labels, applied at the time of sample collection and documented on chain-of-custody forms, will identify the borehole of origin for each sample, as well as the depth from which the sample was collected, the date, and the project name. This information will be transferred to the chain-of-custody form along with the desired laboratory analysis.

DECONTAMINATION

New sample containers, bailers, and tubing will be used to collect samples. The supplier will certify that all sample containers are free of contaminants.

For any components that are reusable, the driller will decontaminate the components to prevent cross contamination. All reusable equipment will undergo either a three-stage wash and rinse (e.g., wash equipment with a nonphosphate detergent, rinse with tap water, and final rinse with distilled water) or a steam cleaning process.

QA/QC SAMPLING

As part of field QA/QC:

- a trip blank (provided by the laboratory) will accompany each cooler and
- Equipment blanks (decontamination water) will be sent to the laboratory for analysis to verify the effectiveness of decontamination procedures.
- One duplicate samples (groundwater only) will be collected.

SAMPLE HANDLING AND ANALYSES

Samples will be labeled and preserved in the field. Each sample will be placed in a water-tight plastic bag, and then packed in a plastic ice chest with sufficient ice to maintain 4°C ± 2°C during transport to the laboratory. The ice will be double-bagged to prevent contact of the melt water with the samples. The field personnel will be instructed to check to see that the cooler lid is closed prior to shipment to ensure the integrity of all samples. All coolers will be sealed with signed custody seals or evidence tape before shipping.

Chain-of-Custody forms identifying all the sample containers, chemical analysis requirements, and other field data required by the laboratory will be completed and affixed to each sample cooler and shipped to the off-site laboratory. Upon arrival at the laboratory, the designated laboratory personnel will open the cooler, inspect and record the condition of each sampling container, and sign the chain-of-custody form.

Nestlé will retain the services of a California-certified environmental laboratory to analyze water samples for PCBs using US EPA method 8082

WASTE HANDLING

Drilling-derived wastes will consist of soil cores, decontamination and purge water, used personal protective equipment (PPE), disposable sampling supplies, and miscellaneous debris. Wastes will be placed within U.S. Department of Transportation (DOT)-approved 55-gallon drums at the boring locations. The waste disposal method will be determined based on the laboratory results of composite waste samples collected from the drums.

Decontamination water and purge water will be transferred to drums and will be stored onsite until the groundwater sample results are obtained. The water disposal method will be determined based on the results of the sampling analysis.

All used PPE and used disposable sampling equipment will be securely contained in plastic bags and stored on-site until final disposal is arranged.

HEALTH AND SAFETY

All work conducted by ECM personnel will be performed in a safe manner following the company policies and procedures. Only field personnel with current Hazardous Waste Operations and Emergency Response (HAZWOPER) training in accordance with the Occupational Safety and Health Administration (OSHA) will be allowed on the job site.

DATA EVALUATION AND REPORTING

ECM will report the findings of these activities within 60 days of the completion of field activities. The written letter report will document the results of the drilling and laboratory analysis for PCBs in groundwater samples. The report will include an evaluation of the sampling results of the PCBs in groundwater as related to previous PCB sampling discussed in the 1989 AGE release report referenced above. This written report will

provide the information and analysis requested by the ACHC in the Directive regarding current status of PCBs in the vicinity of former well PR12.

Your prompt review and approval of this work plan is respectfully requested. Nestlé's further timely response to the Directive is dependent upon moving forward with this sampling expeditiously.

Regards,
Environmental Cost Management, Inc.

Binayak Acharya Brent Searcy, P.E.

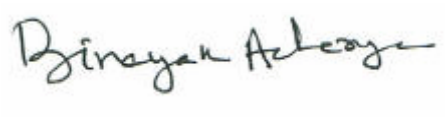
Encl.: Perjury Staement
Figure 1 : Site Location Map
Figure 2 : Proposed Boring Locations

CC: Mike Desso – NUSA
Ken Cheitlin, Hall Equities
Nestlé USA, Inc. File
ECM - File

BCC: Noelia Marti-Colon – NUSA, Legal
Jennifer Costanza

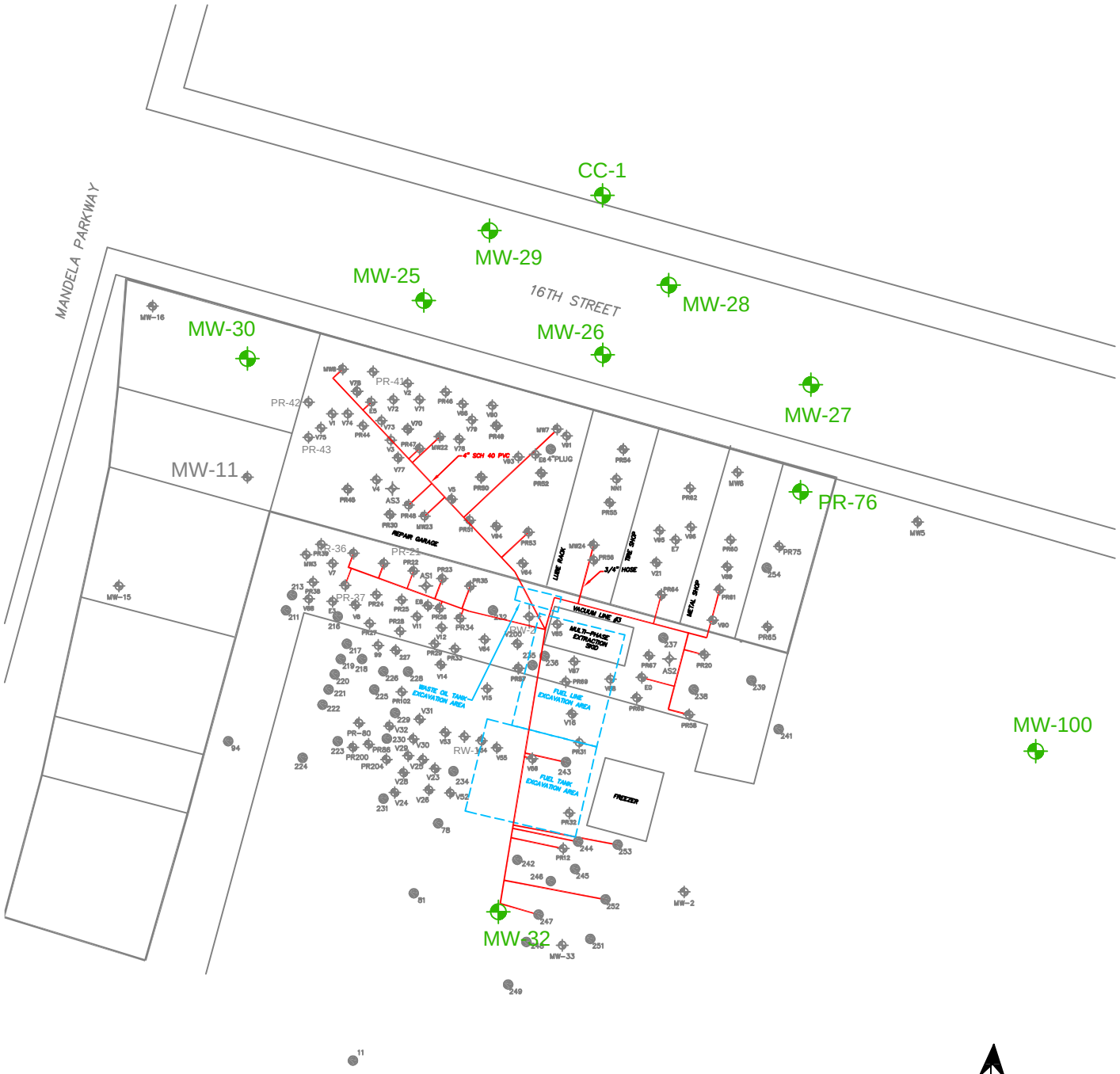
Perjury Statement

I declare, under penalty of perjury, that the information and /or recommendations contained in the above documnet is true and correct tot eh best of my knowledge



Binayak Acharya Dated October 31, 2007

Project: Nestlé Oakland
Proj. Manager: Brent Searcy
Date drafted:
Chkd by:
Drafter: HAT
File Path: ECM Documents\Nestle\Oakland



LEGEND

- EXISTING GROUNDWATER MONITORING WELL
- FORMER AIR SPARGE WELL
- FORMER WELL OF UNKNOWN CONSTRUCTION
- REMEDIATION SYSTEM VACUUM PIPING

Former Nestlé Facility
1310, 14th Street
Oakland, California 94607

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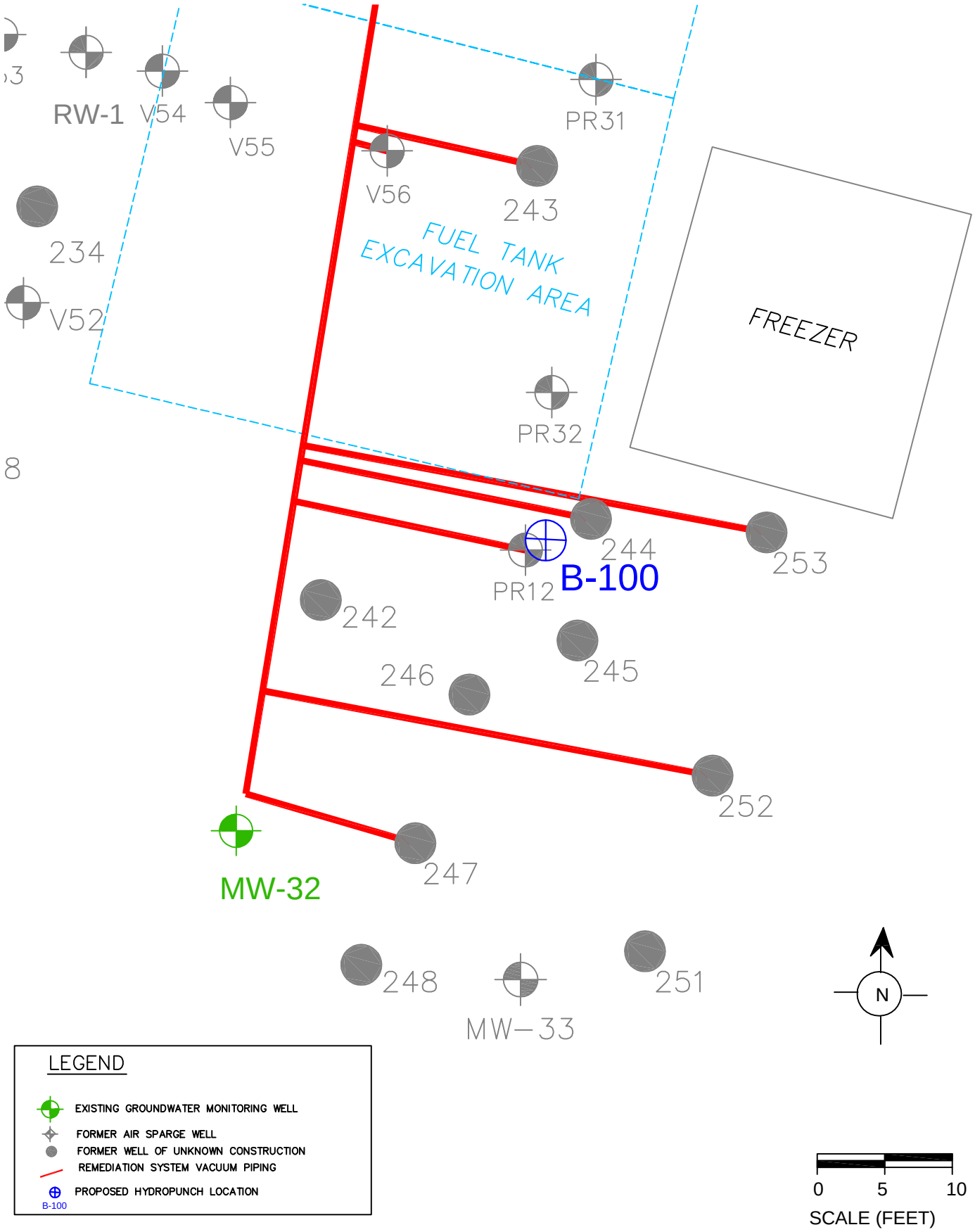
SITE LOCATION MAP
AND KEY FEATURES
OCTOBER 2007

Figure
1



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PROPOSED HYDROPUNCH SAMPLING LOCATION

OCTOBER 2007

Figure 2

Project: Nestlé Oakland
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Chkd by:
Drafter: HAT
File Path: ECM Documents\Nestle\Oakland