



November 10, 1997

Mr. David Valeska
Associate Planner
City of Alameda
2263 Santa Clara Avenue, Rm. 120
Alameda, CA 94501

**Subject: South Shore Shopping Center, Alameda, California
Alameda County Health Care Services STID #1773**

Dear Mr. Valeska:

Please find attached a copy of a Risk Management Plan dated December 18, 1996 prepared by our consultant, Kleinfelder, Inc. ("Kleinfelder"), for the subject site in response to a request by Ms. Medhulla Logan of the Alameda County Health Care Services ("ACHCS") dated November 6, 1996.

Ms. Logan recently requested we forward a copy of the subject plan to you with this cover letter. Note that the subject plan has been approved by the ACHCS based on the current site use as indicated in Ms. Logan's letter of December 31, 1996, also enclosed. We will advise you should there be a change in plans for future site use.

If any additional information is required, please call the undersigned at (503) 242-2900.

Very truly yours,

A handwritten signature in cursive script that reads "Gregory H. Baum".

Gregory H. Baum
Vice President and General Counsel

GHB/lae

Enclosure(s)

cc: Ms. Medhulla, Logan - ACHCS

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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LEGAL DEPT.

December 31, 1996

Mr. Greg Baum
Harsch Investment Corporation
P.O Box 2708,
Portland, Oregon, - 97208

STID# 1773

**Ref: South Shore Shopping Center, located at Park Street, and Shore Line Drive,
Alameda, CA.**

Dear Mr. Baum:

This Department is in receipt of the document "Risk Management Plan", dated December 18, 1996 which was submitted in response to a request from this Department in a letter dated November 6, 1996. This risk management plan has been prepared to address any concerns due to the remaining residual contamination that may be present in the south/southwest half of the referenced site.

Based on the review of all pertinent documents submitted to this department and with the provision that the information provided to this agency is accurate and representative of site conditions, no further action is required on the south/southwest half of the referenced site. However, if current land use (commercial) changes, then additional evaluation may be needed.

If you have any questions, you may reach me at (510) 567-6764

Sincerely,

Madhulla Logan
Hazardous Material Specialist

C: Kleinfelder, 7133 Koll Center Parkway, Suite 100 Pleasanton, CA - 94566

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION (LOP)
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335



KLEINFELDER

An employee owned company

December 18, 1996
File No. 10-3003-01/006

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Mr. Gregory H. Baum
Vice President/General Counsel
Harsch Investment Corp.
P. O. Box 2708
Portland, Oregon 97208

**SUBJECT: Risk Management Plan
Harsch Investment Corp.
South Shore Shopping Center
Alameda, California**

Dear Mr. Baum:

Kleinfelder, Inc. (Kleinfelder) is pleased to provide you with this brief Risk Management Plan (RMP). This RMP is in response to the Alameda County Health Agency's (ACHA) letter to you, dated November 6, 1996 (attachment). During several conversations with representatives of the ACHA and specifically with Ms. Logan during a meeting on April 24, 1996, it was agreed that impacted soil had been removed and the site closed with regard to soil impacted by chlorinated hydrocarbons. We understand the ACHA has accepted our risk assessment dated June 1996, for final closure of the site, providing we address Ms. Logan's concerns, as highlighted below.

Kleinfelder also understands that Harsch Investment Corp. (Harsch), not Kleinfelder, assumes full responsibility for the implementation and enforcement of this RMP, including, but not limited to, notification of construction workers regarding the hazards associated with residual volatile organic compounds (VOCs) in the subsurface soil, use of appropriate safety equipment to mitigate any hazards associated with residual VOCs, and precautions to avoid making conduits that result in cross contamination of shallow and deep aquifers. Kleinfelder can assist Harsch with oversight, if required.

Extent of Contamination Present on the Property and Methods to Mitigate any Potential Negative Impacts Posed by any Residual Contamination Onsite, like Capping the Site, Using Liners, Barriers, etc.

To date, numerous soil and groundwater samples have been collected from the subject site area by Woodward-Clyde, Clayton Environmental, and the Mark Group, Inc. In 1990, soil samples were collected on the property at depths of five feet and analyzed by Environmental Protection Agency (EPA) Test Method 8010 for chlorinated hydrocarbons. Only tetrachloroethene (PCE) was detected above reporting limits in one of the soil samples at a concentration of 70 micrograms per kilogram ($\mu\text{g}/\text{kg}$). In 1991, toluene was detected at a concentration of 56 $\mu\text{g}/\text{kg}$ in the soil sample collected at a depth of 5 feet during installation of monitoring well MW-8.

Concentrations of compounds analyzed for in the groundwater monitoring wells onsite since November 1990 are shown on Plate 1. Most of the groundwater samples collected from the wells have not had any volatile organic compounds above reporting limits. PCE, trichloroethene (TCE), and cis-1,2-DCE have been detected in groundwater samples collected from monitoring wells MW-7 and MW-8; the concentrations are listed on Plate 1.

The site is capped by an asphalt covered parking lot for the neighboring Lyon's Restaurant. The only potential negative impact by residual impacted soils may be from minimal volatilization of residual VOCs, if the asphalt is cut, or in landscaped areas.

Strategy to Address any Risk Posed by Residual VOCs to the Construction Workers, etc. During Earth Moving Activities, etc.

Potential hazards to construction workers working with soils possibly containing residual concentrations of VOCs, include skin exposure and inhalation. Prior to any construction work at the site including utility trenching, construction workers should be notified by Harsch of the possible exposure to VOCs. The risk assessment and this risk management plan should be given to those in charge of operations at the South Shore Shopping Center, who then need to pass the information on to their construction subcontractors.

After informing construction workers of the potential VOCs in the soil, they may choose to use a blower to redirect vapors away from their breathing space, especially if trench work is planned. Workers should be notified to wash their hands and face after working and before eating, drinking or smoking. If a large earthwork project is to take place, the site owner should hire an environmental consultant to monitor vapors and assess the potential exposure of construction workers.

Precautions to Avoid Making Vertical or Lateral Conduits that may Cause Cross Contamination Between the Shallow and Deeper Aquifers

As a part of site closure, Kleinfelder recommends that the site monitoring wells be properly abandoned by overdrilling and grouting. The wells have a low potential to act as a conduit for contamination considering they are capped and locked. In addition, the people in charge of operations of the shopping center need to be made aware of the potential cross contamination of the shallow aquifer from the ground surface, and deeper aquifers from either ground surface or the shallow aquifer.

If possible, utilities should be placed above the water table, which was encountered between depths of 3.5 to 7 feet below ground surface. If utilities need to be placed lower, care should be taken by the construction contractor to avoid creating a preferential contaminant pathway by building flow stops and by creating a closed system so that no contaminant can enter the utility trench from aboveground. The property owner will need to inform utility contractors of site conditions and that these precautions should be considered prior to beginning work.

Need for Re-evaluation if the Site Use Changes to Residential Day Care, etc.

The human health risk assessment, which the ACHA has conditionally approved for the site, is valid for a reasonable period of time unless land use or zoning changes occur. At such time, as land use or zoning changes occur, ACHA may require a revision of the risk assessment to account for changes in the potential exposure pathways and receptors, and changes in the concentration, nature, or extent of residual contamination.

Limitations

This plan was prepared in general accordance with the accepted standard of practice which exists in Northern California at the time the plan was prepared. It should be recognized that definition and evaluation of environmental conditions is a difficult and inexact art. Judgements leading to conclusions and recommendations are generally made with an incomplete knowledge of the conditions present. More extensive studies, including additional environmental investigations, can tend to reduce the inherent uncertainties associated with such studies. If Harsch Investment Corp. wishes to reduce the uncertainty beyond the level associated with this study, Kleinfelder should be notified for additional consultation.

Our firm has prepared this plan for Harsch's exclusive use for this particular project and in accordance with generally accepted engineering practices within the area at the time of our investigation. No other representations, expressed or implied, and no warranty or guarantee is included or intended.

This plan may be used only by the Client and ACHA and other potentially responsible parties and Harsch's advisors, successors and assigns and only for the purposes stated, within a reasonable

time from its issuance. Land use, site conditions (both onsite and offsite) or other factors may change over time, and additional work may be required with the passage of time. Any party other than the client who wishes to use this plan shall notify Kleinfelder of such intended use. Based on the intended use of the plan, Kleinfelder may require that additional work be performed and that an updated plan be issued. Non-compliance with any of these requirements by the Client or anyone else will release Kleinfelder from any liability resulting from the use of this plan by any unauthorized party.

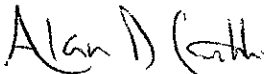
As requested, we are providing copies of this letter and attachments to the people cited below. If you have any questions, please call us at (510) 484-1700.

Sincerely,

KLEINFELDER, INC.



Scott D. Dwyer, Ph.D.
Senior Toxicologist



Alan D. Gibbs, R.G., C.H.G., R.E.A.
Environmental Manager

SDD:ADG:ks

Attachments

cc: Madhulla Logan, M.S. - Alameda County Health Agency
Ms. Debra Pryor - Texaco
Mr. Mike Dosen - Harsch - Oakland
Mr. Frank Hamedi - Soil Tech Engineering
Mr. Murray Stevens - Kamur Industries

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



November 6, 1996

Mr. Greg Baum
Harsch Investment Corporation
P.O. Box 2708,
Portland, Oregon, - 97208

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION (LOP)
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

STID# 1773

**Ref: South Shore Shopping Center, located at Park Street, and Shore Line Drive,
Alameda, CA.**

Dear Mr. Baum:

This Department is in receipt of the risk assessment prepared by Kleinfelder for the above referenced property in behalf of Harsch Investment Corporation. This risk assessment has been prepared to evaluate the potential risks of petroleum hydrocarbons and solvent contamination identified in the monitoring wells located in the south/southwest half of the referenced property. However, the risk assessment does not include the contamination identified in monitoring wells, MW-10, MW-12, MW-23, MW-24 and MW-25 located in the north/northeast half of the site. It was agreed in a meeting held on April 24, 1996 that this portion of the investigation will be conducted by Kamur Industries.

This Department has reviewed the risk assessment document and has found it acceptable for the current use (as a parking lot) in the south/southwest half of the property. The risk assessment evaluated the exposure to the solvent and petroleum hydrocarbons vapors to the outdoor area. The risk assessment did not evaluate the risk due to exposure of vapors to the indoor area as there are no buildings located in this half of the site. However, please note that since the risk assessment is being accepted is based on the current use of the property, the following information is still required before final closure can be granted:

1. A risk management plan that is acceptable to the regulatory agencies need to be submitted. This risk management plan should include at a minimum the following information:
 - the extent of the constamination present on the property and methods to mitigate any potential negative impacts posed by any residual contamination on site, like capping the site, using liners, barriers etc.
 - strategy to address any risk posed to the construction workers etc. during earth moving activities, etc.
 - precautions to avoid making vertical or lateral conduits like wells, drainage lines, water supply lines, etc that may cause cross contamination between the shallow and deeper aquifers.
 - Need for re-evaluation if the site use changes to residential, day care, etc.

Please submit the above required information within 30 days of receiving this letter. Please be advised that this is a formal request for technical information pursuant to California Water Code Section 13627 (b). Any extension of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency. If you have any questions, call me at (510) 567-6764.

Sincerely,



Madhulla Logan
Hazardous Material Specialist

Alan Gibbs, Kleinfelder, 7133, Koll Center Parkway, Suite 100, Pleasanton, CA - 94566

Frank Hamidi, Soil Tech Engineering, 1761, Junction Ave, San Jose, CA - 95112.

Murray Stevens, 2351 Shoreline Drive, Alameda, CA - 94501