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August 15, 2005

Mr. Jerry Wickham Alameda County Health Care Services Agency 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

Re: REVISED Response to Technical Comments, Notification of Field Work, and Request for Extension

Former Shell Service Station 2703 Martin Luther King Jr. Way Oakland, California SAP Code 129449 Incident No. 97093397

Dear Mr. Wickham:

Cambria Environmental Technology, Inc. (Cambria) prepared this submittal on behalf of Equilon Enterprises LLC dba Shell Oil Products US (Shell) to respond to technical comments presented in Alameda County Environmental Health (ACEH) correspondence dated June 6, 2005, to notify the ACEH of the scheduled field dates, and to request an extension for the submittal of the Site Investigation Report. The ACEH correspondence was prepared in response to Cambria's October 11, 2004 Groundwater Monitoring Report – Third Quarter 2004 and Soil Vapor Investigation Work Plan.

RESPONSE TO TECHNICAL COMMENTS

- 1. ACEH requests that proposed boring GP-4 be extended to groundwater for collection of soil and shallow groundwater samples, Cambria will implement this request and has modified our scope of work.
- 2. ACEH requests that soil samples be retained from the soil-water interface and from areas of obvious petroleum impact, as evidenced by staining, odor, or elevated PID readings. Cambria will implement this request and has modified our scope of work. Thus, at a minimum, soil samples will be retained from the soil-water interface and at five-foot intervals, if no obvious petroleum impact is encountered.
- ACEH requests that all soil samples be analyzed for total lead using EPA Method 6010B, in addition to the analyses proposed in the work plan. Cambria will implement this request and has modified our scope of work.

Cambria Environmental Technology, Inc.

270 Perkins Street Sonoma, CA 95476 Tel (707) 935-4850 Fax (707) 935-6649

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NOTIFICATION OF FIELD SCHEDULE AND SCOPE MODIFICATIONS

Field Schedule: Cambria conducted a site visit on June 22, 2005, and scheduled the field work with the drilling contractor. The earliest dates available were August 29 through 30, 2005. Please consider this as the requested 72-hour notification of the field activities, unless conflicts or issues arise. Cambria will notify the ACEH if there are any changes to this schedule.



Scope Modifications: During the site visit, Cambria field staff noted that the site showing the proposed boring locations did not accurately represent the site conditions. Apparently, the building is located closer to the northern property boundary than previously shown, and thus, the Geoprobe rig will be unable to access that area. It also appeared that the locations of monitoring wells MW-5, V-1, and V-2 needed adjustment. Attached is a Revised Proposed Soil Vapor Sample Locations map showing the revisions as measured during this field visit.

The locations of proposed borings GP-8 and GP-9 have been shifted to the southwest, so that they are not in the office building. Because of the low clearance beneath the car port and the lack of access to the rear of the property by the Geoprobe rig, Cambria proposes installing temporary soil vapor probes using hand auger equipment at the locations of GP-6 through GP-8 and possibly GP-9. The hand augured boring will be extended to approximately 4 feet below grade and Teflon tubing with a screened sample tip will be placed in the boring on top of 3- to 6- inches of sand. The sand filter pack will extend no more than 12-inches in total length and will be sealed from the surface using bentonite chips (2-inch layer) and bentonite grout (12-inch minimum). Soil vapor samples will be obtained from the temporary tubing between 3 – 5 hours after their installation. Following collection of the vapor samples, each temporary sample point will be removed and the grout and sand removed by hand auger. At the locations of GP-6 and GP-7, the hand auger will then be used to further extend the boring to approximately 10 fbg for collection of soil and groundwater samples, as proposed. Temporary PVC casing will be installed to assist with retrieving groundwater samples using a small diameter bailer. Each boring will be closed by filling with a cement-bentonite grout mixture to grade.

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REQUEST FOR EXTENSION

The ACEH letter requests that the technical report of findings for the site investigation activities be submitted by September 2, 2005. As presented above, the earliest date available to complete this work is the last week in August; thus, we will be unable to meet the report submittal deadline. Since the field work is scheduled to be completed by August 31, 2005, the sample results are anticipated to be received by September 15, 2005.

Thus, Cambria respectfully requests an extension for submittal of the site investigation report to 60 days following receipt of the analytical reports, or November 15, 2005.



CLOSING

If you have any questions regarding the contents of this document, please call Ana Friel at (707) 268-3812.

Sincerely,

Cambria Environmental Technology, Inc.

Ana Friel Geologist

PG 6452

No. 6927

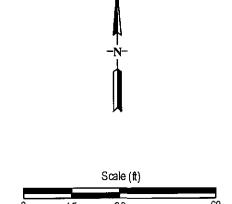
Attachment

Figure. Revised Proposed Soil Vapor Sample Locations

cc: Denis Brown, Shell

Rodney & Janet Kwan, property owners

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EXPLANATION

- Soil boring Monitoring well
- Soil vapor well
- Proposed boring

Yard/ Yard/ Yard/ driveway driveway driveway 663 28th Street Residential Vacant lot 2727-2729 MLK Residential 669 28th Street Residential 673 28th Street 679 28th Street Residential Residential 665 28th Street Residential 2719-2723 MLK Water Meters GP-7 GP-6 B-22 Car port GP-8 B-21 GP-5 Service bays MW-1 Office Former Shell Station B-13 GP-4 MW-5 GP-10 Residential 670 27th Street Residential 664 27th Street Residential 668 27th Street GP-3 B-20 Driveway **●** B-7 Former USTs B-4 .● Former dispenser GP-2 B-18 islands MW-4 MW-2

MARTIN LUTHER KING JR. WAY

27th STREET

占

B-10 GP-1

Driveway

Yard

FIGURE