May 21, 2003

167.002.04.001

Mr. Don Hwang Alameda County Environmental Health Services 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

ADDENDUM TO WORKPLAN SUPPLEMENTAL SITE INVESTIGATION FORMER COX CADILLAC FACILITY 230 BAY PLACE OAKLAND, CALIFORNIA LOP CASE RO-0000148



Dear Mr. Hwang:

PES Environmental, Inc. (PES) presents this Addendum to the January 24, 2003 Workplan¹ for activities to be conducted at the former Cox Cadillac Facility, 230 Bay Place, Oakland, California (Site, Plate 1). This Addendum is submitted in response to a letter from Alameda County Environmental Health Services (ACEHS) dated April 16, 2003. A copy of the letter is attached to this Addendum. The Addendum has been completed on behalf of the Greater Bay Trust Company (GBTC), trustee for the Robert Shepard Trust, Brian F. Shepard Trust, Douglas C. Shepard Trust, and the Lisa C. Shepard Trust, the former owners of 230 Bay Place.

RESPONSE TO TECHNICAL COMMENTS

This Addendum to Workplan includes a response to the five Technical Comments (TCs) presented in the April 16, 2003 ACEHS letter. The responses to the TCs are presented below:

- TC 1) The groundwater analytical program will include ethanol analysis.
- TC 2) Rose diagrams indicating historical groundwater flow direction will be included on future groundwater monitoring maps.

Workplan, Monitoring Well Installation, Supplemental Site Investigation, Former Cox Cadillac Facility, 230 Bay Place, Oakland, California, LOP Case RO-0000148, January 24, 2003

Don Hwang May 21, 2003 Page 2

- TC-3) PES will provide ACEHS with additional information on the waste oil underground storage tank (UST) removal conducted in December 1988. PES will re-submit the "Underground Storage Tank Unauthorized Release (Leak)/Contamination Site Report" previously submitted by on December 5, 1988 R.S. Eagan and Company; the tank removal contractor. Additional correspondence from R.S. Eagan and Company regarding the former waste oil UST will also be provided to ACEHS.
- TC-4) The necessity of soil sampling in the vicinity of the former waste oil UST will be evaluated after submitting waste oil UST removal documentation and reviewing the documentation with ACEHS.
- TC-5) It is our understanding that the ACEHS requests deeper soil samples to be collected in the vicinity of the former gasoline UST. The proposed sampling in the vicinity of the former gasoline UST and piping excavation (Workplan Section 3.3) will be modified as follows:
 - Six borings will be drilled northwest of the former UST and piping excavation.
 - Soil samples will be collected from approximately 3 to 4 feet bgs from each of the six borings.
 - In addition, PES proposes to collect soil samples from 8 and 12 feet bgs from the three westernmost borings, located within the former show room, west of the former UST (Plate 3).
 - Groundwater samples will be collected from three of the six borings, as indicated on Plate 3.

SCHEDULE

As this site is part of the California UST Cleanup Fund (USTCF), GBTC will be requesting bids from environmental consulting firms to perform this investigation. Thus GBTC respectfully requests a schedule extension of 120 days to perform the investigation. This extension will allow for time for GBTC to request and review bids, and for the chosen consultant to perform the investigation.

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We trust this Addendum provides ACEHS with the information required at this time. If you have any questions or require additional information, please contact either of the undersigned.

Very truly yours,

PES ENVIRONMENTAL, INC.

François A. Bush Senior Geologist

Robert S. Creps, P.E.

Principal Engineer

Attachments: Plate 1 - Site Location Map

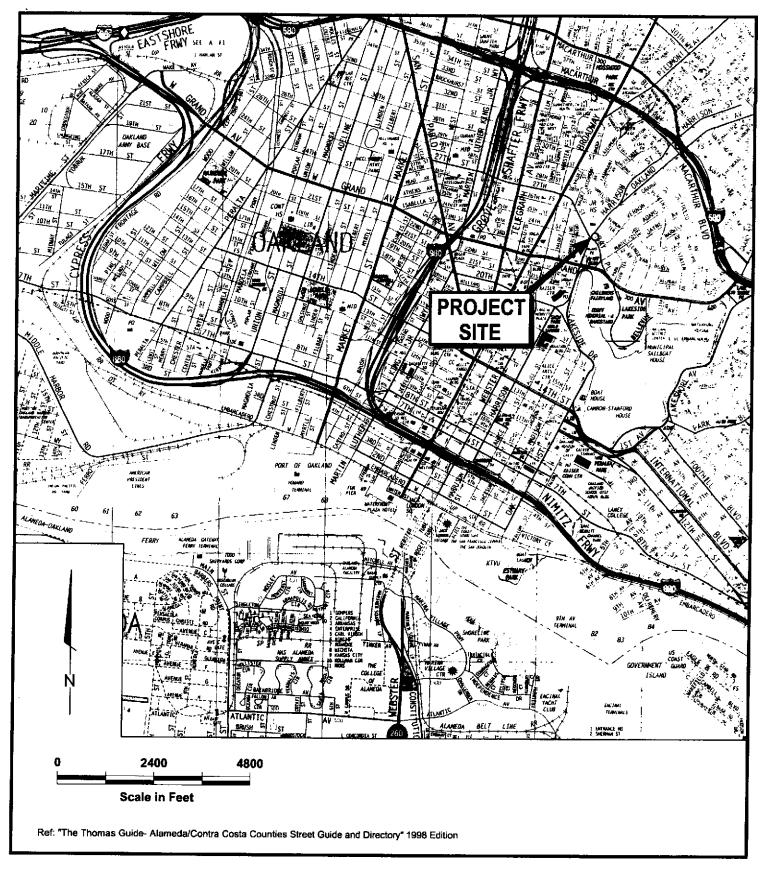
Plate 2 – Site Plan and Well Location Map Plate 3 – Proposed Sampling locations ACEHS Letter dated April 16, 2003

cc: Ms. Cheryl Howell - Greater Bay Trust Company

Lance Shoemaker, Esq. - Hanson, Bridgett, Marcus, Vlahos & Rudy

Mr. Mark Owens - California UST Cleanup Fund

Ms. Lita Freeman, LFR





Site Location Map Former Cox Cadillac-230 Bay Place Oakland, California PLATE

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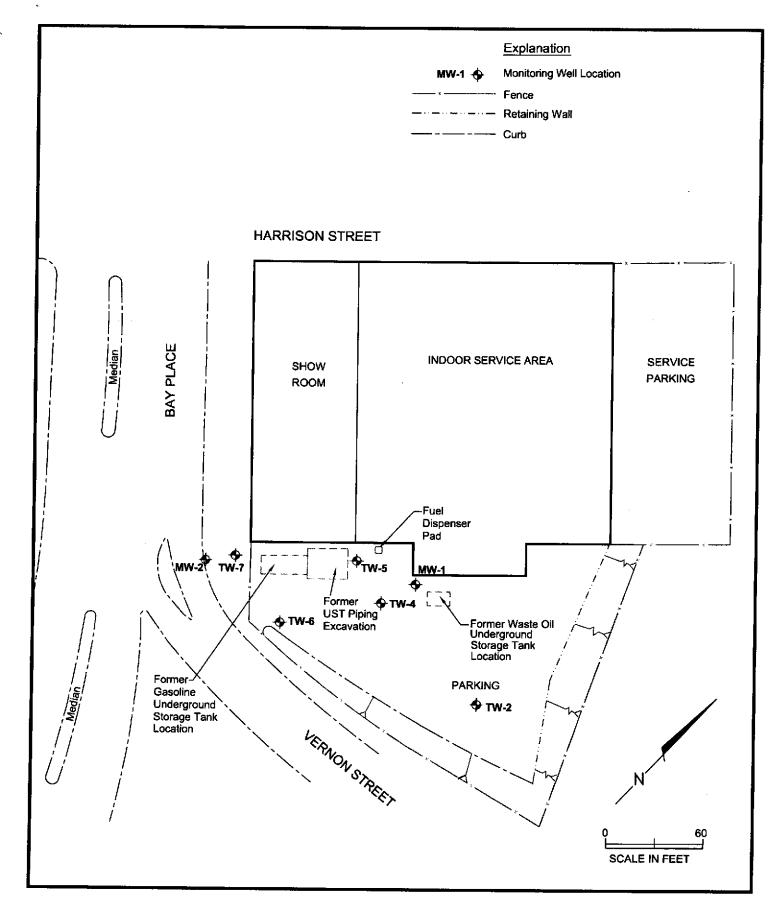
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Site Plan and Well Location Map Former Cox Cadillac-230 Bay Place Oakland, California

PLATE

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JOB NUMBER

10/02 DATE

Explanation MW-1 � Monitoring Well Location Proposed Grab Groundwater Sampling Location Proposed Groundwater and Soil Sampling Location Proposed Soif Sampling Location Potential Step-Out Sampling Location Fence Retaining Wall Curb HARRISON STREET INDOOR SERVICE AREA SERVICE SHOW **PARKING** ROOM 0 Fuel Dispenser_O Pad TW-7 ♥TW-5 0 Former • UST Piping Excavation Former Waste Oil Underground Storage Tank Location 0 Former-**PARKING** Gasoline Underground ♦ TW-2 Storage Tank Location SCALE IN FEET



Proposed Sampling Locations for Additional Site Investigation Former Cox Cadillac-230 Bay Place Oakland, California

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ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY



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DAVID J. KEARS, Agency Director

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

April 16, 2003

Greater Bay Trust Co. C/o Leah S. Goldberg, Esq. Hanson, Bridgett, Marcus, Vlahos & Rudy 333 Market St., Suite 2300 San Francisco, CA 94105-2173

Dear Ms. Goldberg:

Subject:

Fuel Leak Case No. RO0000148,

Former Cox Cadillac, 230 Bay Pl., Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Workplan Supplemental Site Investigation" dated January 24, 2003 by PES Environmental, Inc. It generally satisfies our concerns stated in our letter of July 31, 2002. Remediation and risk evaluation will not be addressed until after contamination at your site has been delineated. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) Groundwater analyses In addition to those requested and proposed, please also include: ethanol.
- 2) Historical Hydraulic Gradients A cumulative compilation is requested. Please show using a rose diagram with magnitude and direction on groundwater monitoring maps in the future.
- 3) Waste oil storage tank removal, December 1988 Up to 140,000 microgram (ug/l) Total Petroleum Hydrocarbons Gasoline (TPHG), 20,000 ug/l Benzene, and 2,800 ug/l Methyl Tertiary-Butyl Ether (MTBE) have been detected in nearby wells MW-1, TW-4, and TW-5. The most recent sampling event on October 22, 2002, found 42,000 ug/l TPHG and 2,800 ug/l Benzene. We do not have any information of the tank condition at the time of removal, observations of the excavation after removal of the tank, sampling of the excavation, or removal of soil or groundwater from the excavation. Please submit information on the tank removal and a completed "Underground Storage Tank Unauthorized Release (Leak) / Contamination Site Report".

Ms. Goldberg April 16, 2003 Page 2 of 2

- 4) Proposed Grab Groundwater Sampling by former Waste Oil Tank If the information on soil and groundwater sampling during tank removal is lacking, then the proposed grab groundwater sampling will be inadequate because lateral and vertical soil delineation from the Waste Oil Tank will need to be demonstrated. If this is the case, propose borings to sample soil and groundwater.
- 5) Depth of Proposed Borings Soil samples are proposed for collection at 3 to 4 feet below ground surface. We do not approve of soil sample collection at those depths because we believe that deeper depths are required to delineate the vertical extent of leaks from the tank. Propose deeper depths for your borings.

TECHNICAL REPORT REQUEST

Please send the following technical reports to Alameda County Environmental Health (Attention: Don Hwang) by:

June 16, 2003 - Utility Trenches Groundwater Sampling Report

June 16, 2003 - Boring Sampling by the former Gasoline Tank Report

June 16, 2003 - Waste Oil Tank Removal Report

June 16, 2003 - Proposal for Soil and Groundwater Sampling by the Waste Oil Tank

July 31, 2003 - Quarterly Report for the Second Quarter 2003

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang

Hazardous Materials Specialist Local Oversight Program

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Enclosure

François Bush, PES Environmental, Inc., 1682 Novato Blvd., Suite 100, Novato, CA 94947-7021

Donna Drogos

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