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Alameda County
Environmental Health

July 23, 2007

The Bank of New York Trust Company, N.A. as Corporate Co-Trustee for
Carpenters Pension Trust Fund for Northern California; Northern California Carpenters PTF, LLC
c/o Ms. Mary Schroeder, McMorgan & Company LLC
One Bush Street, Suite 800
San Francisco, California 94104

RE: Soil Excavation Work Plan
300 Hegenberger Road, Oakland, California
ACC Project Number 6748-017.02

Dear Ms. Schroeder:

ACC Environmental Consultants, Inc., (ACC) has prepared the enclosed Work Plan for remedial soil excavation to be conducted at 300 Hegenberger Road, Oakland, California. This work will be scheduled immediately following Work Plan approval from the Alameda County Environmental Health (ACEH). The Work Plan incorporates information and recommended remedial tasks presented in ACC's *Subsurface Investigation Report* dated February 22, 2007 and *Second Quarter 2007 Groundwater Monitoring Report* dated July 13, 2007.

The intent of remedial soil excavation is to remove identified and suspect petroleum hydrocarbon-impacted soil beneath the two former gasoline dispenser islands and significantly shorten the duration of confirmation groundwater monitoring necessary to justify full regulatory closure in a shorter timeframe. This remedial soil removal also constitutes source removal necessary to justify a commercial closure.

On your behalf, ACC has forwarded an electronic copy of this Work Plan to Mr. Barney Chan at ACEH for review and approval. If you have any questions regarding this Work Plan, please call me at (510) 638-8400, extension 109 or email me at ddement@accenv.com.

Sincerely,


David R. DeMent, PG, REA II
Division Manager / Senior Geologist

/krb:drd
Enclosure



SOIL EXCAVATION WORK PLAN

300 Hegenberger Road
Oakland, California

ACC Project Number 6748-017.02

Prepared for:

The Bank of New York Trust Company, N.A. as Corporate Co-Trustee for
Carpenters Pension Trust Fund for Northern California; N. California Carpenters PTF, LLC
c/o Ms. Mary Schroeder, McMorgan & Company LLC
One Bush Street, Suite 800
San Francisco, California 94104

July 23, 2007

Prepared by:

A handwritten signature in black ink, appearing to read 'Ken Blume', written over a horizontal line.

Kenneth Blume
Staff Geologist

Reviewed by:

A handwritten signature in black ink, appearing to read 'David R. DeMent', written over a horizontal line.

David R. DeMent, PG, REA II
Environmental Division Manager

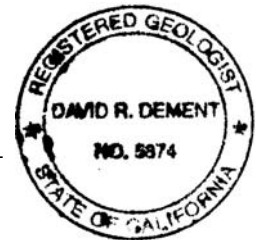


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SOIL EXCAVATION WORK PLAN

300 Hegenberger Road

Oakland, California

1.0 INTRODUCTION

At the request of McMorgan & Company LLC on behalf of The Bank of New York Trust Company, N.A. as Corporate Co-Trustee for Carpenters Pension Trust Fund for Northern California; Northern California Carpenters PTF, ACC Environmental Consultants, Inc. (ACC) has prepared this Work Plan to perform remedial soil excavation at 300 Hegenberger Road, Oakland, California (Site). Previous environmental investigations identified petroleum hydrocarbon-impacts in soil and groundwater at the Site. This proposed work specifically addresses removal of gasoline-impacted soil in the immediate vicinity of the two former gasoline dispenser islands that have historically impacted first-encountered groundwater at the Site.

1.1 Background

The Site is located at 300 Hegenberger Road in the southeast corner of the intersection of Hegenberger Road and Hegenberger Loop. The rectangular lot is approximately 250 feet long by 200 feet wide and is approximately 9 feet above mean sea level. The available data indicate that a series of subsurface investigations have been conducted at the Site since 1997. A site assessment in April 1997 indicated the presence of petroleum hydrocarbons in soils and groundwater beneath the Site but no reportable concentrations of methyl tertiary butyl ether (MTBE). A subsequent investigation conducted in July and October 1997 confirmed previous investigation findings and that no underground storage tanks (USTs) remained at the Site.

Tetra Tech EM Inc. (Tetra Tech) installed five 2-inch-diameter groundwater monitoring wells in November 1998. The five monitoring wells were screened from 5 to 20 feet below ground surface (bgs). Well MW-1 was subsequently destroyed in December 1999 and well MW-6 was installed in the estimated downgradient direction of the former waste oil tank. Well MW-6 was screened from 10 to 20 feet bgs. In December 2000, Tetra Tech installed offsite wells MW-7 and MW-8 estimated to be in the downgradient direction of the Site. Wells MW-7 and MW-8 were screened from 5 to 20 feet bgs. Groundwater monitoring was performed periodically from December 1998 to October 2001 in the existing wells.

Tetra Tech reported the findings of a Sensitive Receptor Survey in its March 8, 2001 *Fourth Quarter Groundwater Monitoring Report, December 2000*. According to the California Department of Water resources, 40 monitoring wells and two irrigation wells were located at 11 sites within the search distance. One irrigation well is reportedly located approximately 500 feet cross gradient from the Site and a second irrigation well is located approximately 2,800 feet crossgradient of the Site.

1.2 Previous Site Investigations

On September 25, 2006, ACC advanced eleven soil borings to further investigate current subsurface conditions and characterize soil and groundwater for suspect residual petroleum hydrocarbon impacts associated with former site use. ACC advanced its exploratory soil borings in select locations relative to probable sources, such as the former UST locations and the product dispenser islands, and in representative locations between existing groundwater monitoring wells.

Concentrations of MTBE in soil and grab groundwater samples were not detected above the laboratory detection limit. Elevated concentrations of total extractable petroleum hydrocarbons as gasoline (TPHg) and benzene, toluene, ethylbenzene, and xylenes (BTEX) were reported in shallow soil sampled collected beneath the dispenser islands (B1, B2, B3, B4, and B10) and are generally above their respective Environmental Screening Levels (ESLs), which warrant removal. Minor concentrations of TPHg and BTEX were reported in grab groundwater samples collected downgradient of the dispenser islands and in the vicinity of the former USTs.

A previously performed utility survey provided information that was incorporated as part of ACC's subsurface investigation and demonstrated that all USTs had been successfully removed from the Site. Available utility survey information also demonstrated that preferential migration and/or interception of impacted groundwater cannot occur. This finding is confirmed by the lack of significant concentrations of constituents of concern being reported in monitoring wells MW-7 and MW-8 during previous periodic groundwater monitoring events.

2.0 PROPOSED SCOPE OF WORK

2.1 Soil Excavation

Based on the results of groundwater monitoring and the subsurface soil investigations, residual sources of TPHg and BTEX above applicable environmental screening levels (ESLs) exist in soil in the vicinity of the two former gasoline dispenser islands. In ACC's February 22, 2007 *Subsurface Investigation Report*, ACC recommended that impacted soil adjacent in the vicinity of the two former gasoline dispenser islands be removed to a depth of 5 feet. This Work Plan proposes to excavate approximately 200 to 300 cubic yards of impacted soil. The proposed area of excavation is shown on Figure 3. To limit the amount of clean soil removed during remedial excavation, ACC will use field indications of petroleum hydrocarbon impact, such as visual observations and evidence of soil discoloration, characteristic odor, and photoionization detector (PID) readings, to help determine both the vertical and horizontal limits of remedial soil excavation and help document residual petroleum hydrocarbon impact at the extent of excavation.

ACC proposes to use 400 milligrams per kilogram (mg/kg) for TPHg in soil as a cleanup level. This concentration represents the San Francisco Bay Regional Water Quality Control Board (RWQCB)

commercial environmental screening level (ESL) for gasoline-range petroleum hydrocarbons. Confirmation soil samples will be collected and analyzed to determine if the established cleanup levels have been met. ACC proposes to collect eight confirmation soil samples, two from the excavation bottom and six from the four sidewalls, to evaluate the effectiveness of remedial soil excavation. All soil samples will be analyzed for TPHg, BTEX, and MTBE by EPA Method 8260B. Additionally, representative soil samples approximately every 3 to 4 feet of linear sidewall will be screened with a PID and documented.

2.2 Soil Stockpiling

Gasoline-impacted soil will be temporarily stockpiled on Site. Plastic sheeting (10-mil or thicker) will be placed beneath and over the stockpiled soil pending profiling of excavated soil into an accepting landfill and the soil will be slightly bermed at the edges to avoid any rainwater coming in contact with soil. Following initial soil excavation activities, one 4-point composite soil sample will be collected from the suspect clean soil pile and analyzed for TPHg, BTEX, and MTBE by EPA Method 8260B. Following completion of soil excavation activities, one to two 4-point composite soil samples will be collected from the impacted soil pile and analyzed for TPHg, BTEX, and MTBE by EPA Method 8260B and total lead by EPA Method 6010B.

Following soil stockpile covering, the consultant will document volatile constituent concentration in air around the soil pile with a PID. A second layer of plastic sheeting may be placed over the soil if measured volatiles exceed 30 parts per million (ppm) in air within 5 feet of the stockpiled soil, or the soil may be moistened with water and recovered. The application of water, if used, will not result in any visible runoff. The 30 ppm concentration in air represents 10 percent of the permissible exposure limit (PEL) for TPHg and represents a concentration that could potentially be noted in ambient air on adjacent properties.

2.3 Soil Excavation Limitations

A public sidewalk located to the north of the Site may limit the horizontal extent of the excavation in this direction. To ensure public safety and not undermine the chainlink fence or public sidewalk, ACC proposes to limit the extent of the excavation to approximately 3.0 feet from the northern property boundary. This may require leaving a relatively small volume of petroleum hydrocarbon-impacted soil in place adjacent to and beneath the existing sidewalk. ACC will collect two confirmation sidewall soil samples and screen soil in other locations approximately every 3 to 4 linear feet along the excavation boundary adjacent to the sidewalk (west sidewall) with a PID to further evaluate the effectiveness of soil excavation.

2.4 Air Monitoring and Odor Control

As required by the Bay Area Air Quality Management District (BAAQMD) Regulation 8, Rule 40, the environmental consultant will notify the BAAQMD regarding the date, location, expected

duration of excavation work, and expected gasoline concentrations in soil disturbed as part of this work. Based on a review of BAAQMD conditions, this work requires notification only and does not warrant any special permits. The notification requires the name of the excavation Contractor and will be submitted a minimum of 7 business days prior to the start of work.

During soil removal activities, the ACC will continuously monitor concentrations of volatiles in air both in proximity to the excavation and at the property boundaries. The intent of air monitoring is to: 1) document concentrations of volatile constituents in air during soil removal activities; 2) determine if additional odor or worker safety controls are warranted; 3) document potential human exposures both at the excavation and at the property perimeter; 4) determine that the soil removal rate is appropriate; and 5) determine that odor control measures are adequate for the stockpiled gasoline-impacted soil at the end of the work day.

Air monitoring will be performed with a ppbRAE photoionization detector (PID) calibrated to isobutane. Ambient air readings will be direct measured and soil will be screened by measuring air in the head space of plastic resealable 1-quart bags. Approximately one square inch of soil will be placed in a 1-quart plastic bag, sealed, the soil disseminated within the bag and allowed to equilibrate for approximately 1 minute, and then the air in the bag will be screened with the PID. Measured PID concentrations and the location of the soil sample will be documented in the report.

If strong gasoline odor is noted, or PID readings indicate that volatile concentrations are exceeding 30 ppm in air, excavation will cease until concentrations diminish. If volatile concentrations do not diminish rapidly, water will be minimally applied to the soil from a hose or Hudson-type sprayer to further diminish gasoline odor and PID concentrations.

2.5 Groundwater Removal

If other than incidental groundwater is observed in the excavation, it will be removed, placed in a temporary storage container or 55-gallon steel drums, and properly disposed offsite by a permitted facility. Incidental water is defined as approximately 200 gallons or less and/or the volume of water that would prevent proper compaction of backfill material in the excavation without removing the water first. Water will be removed with the use of an electric sump pump and containerized.

2.6 Soil Profiling and Disposal

To minimize excavation Contractor costs, gasoline-impacted soil should be stockpiled, sampled according to landfill requirements, and profiled into the closest accepting permitted landfill. Impacted soil should be temporarily stockpiled on concrete east of the dispenser islands (Figure 2). This location will generally maximize the distance from any occupied structures and facilitate loading trucks for offsite disposal.

Soil should be stockpiled onsite no longer than 15 business days, assuming 5 day analytical turnaround. Following the evaluation of soil stockpile analytical results, soil will be disposed at the closest accepting landfill.

2.7 Excavation Restoration

Following the completion of soil removal activities and following review of sidewall confirmation soil sample analytical results, the excavation will be backfilled with appropriate materials. The excavation will be backfilled with drainrock as necessary and “certified” clean soil and/or engineered fill, compacted to a minimum of 90 percent, to within 1 foot bgs of grade.

In the event the excavation is left open pending soil sample analytical results, and a volume of water greater than 200 gallons of water collects during this time, the water will be removed and containerized, and approximately 5 cubic yards of 1-inch drainrock will be placed in the bottom of the excavation as a base to facilitate backfilling.

2.8 General Precautions

The goal of remedial soil excavation is to cost-effectively remove residual gasoline concentrations in fine-grained soil in the vicinity of the former dispenser islands. Excavation will be performed to the extent feasible based on field indications of impact as characteristic soil discoloration, odor, and elevated PID readings. Excavation will stop approximately three feet from the northern property boundary and to the vertical extent of impact or approximately 5 feet bgs. Confirmation soil samples and recorded PID readings from other sidewall sections will be used to evaluate the effectiveness of soil removal.

The Contractor will be instructed to avoid contact with the existing monitoring wells, avoid blocking the driveways as feasible, to cleanup any incidental drips or releases from their equipment, and minimize noise to the extent feasible. In addition, the Contractor will be working according to Specifications being prepared under separate cover that further define the exact work tasks and contingencies. The Specifications will be used to solicit competitive bids to perform the work summarized in this Work Plan and require proper insurance coverage including general liability, pollution liability, workman’s compensation, and automobile.

Ideally, soil excavation can be performed in one to two business days. Based on the subsurface investigation performed in September 2006, current site conditions warrant waiting for confirmatory analytical results prior to backfilling. The site is currently fenced with 6-foot high chain link fencing. Caution tape will also be placed on the fencing to provide additional protection. Air monitoring will be performed to demonstrate that air emissions are acceptable pending restoration of the excavation and off-hauling of the impacted soil. The volume of groundwater in the excavation will be assessed prior to backfilling to determine if groundwater must be removed to

properly backfill or groundwater should be removed for purposes of additional source removal. Since excavation is expected to occur in early September, any groundwater in the excavation is anticipated to be incidental.

The primary goal of the order of work tasks, identified decisions to be made in the field, air monitoring, odor control, and minimizing emissions from the excavation and soil stockpile is to minimize potential liability related to an open excavation and prevent actions that could be later deemed negligent. The secondary goal of the work summarized in this Work Plan is to maximize the effectiveness of remedial soil removal while minimizing the cost.

3.0 HEALTH AND SAFETY PLAN

A site-specific health and safety plan that encompasses the proposed work within the area and complies with the requirements of 29 CFR Part 1910.120 will be prepared prior soil excavation activities. A copy of the Health and Safety Plan will be kept on site during field work operations and will be available for reference by appropriate parties during the work. ACC will act as the Site Safety Officer.

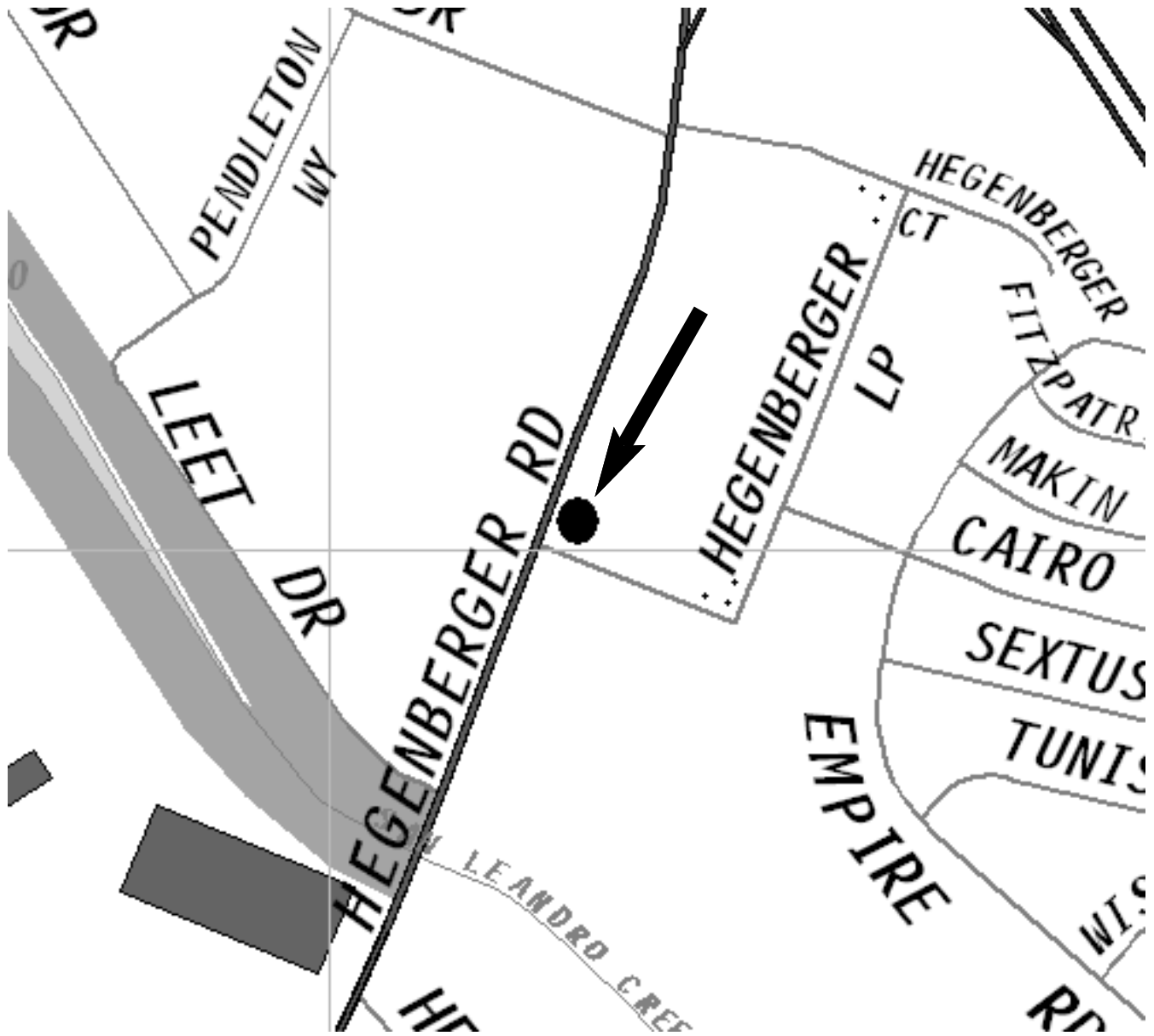
The excavation Contractor will prepare its own site-specific health and safety plan and be made aware there is no onsite water, power, or sanitary facilities.

4.0 TECHNICAL REPORTS


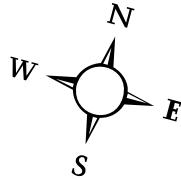
A technical report discussing the findings of the remedial action work will be prepared and submitted to ACEH. The report will summarize soil excavation activities, analytical results, air monitoring results, soil screening results, soil disposal, water disposal (if necessary), site restoration activities, and observations made in the field.

5.0 SCHEDULE

ACC will perform and complete the work within six weeks upon authorization to proceed from the Client and approval from ACEH. ACC will solicit competitive bids, determine exact soil acceptance criteria from selected landfills, and determine that required permits can be obtained in a timely manner.



Source: The Thomas Guide, Bay Area, 2004

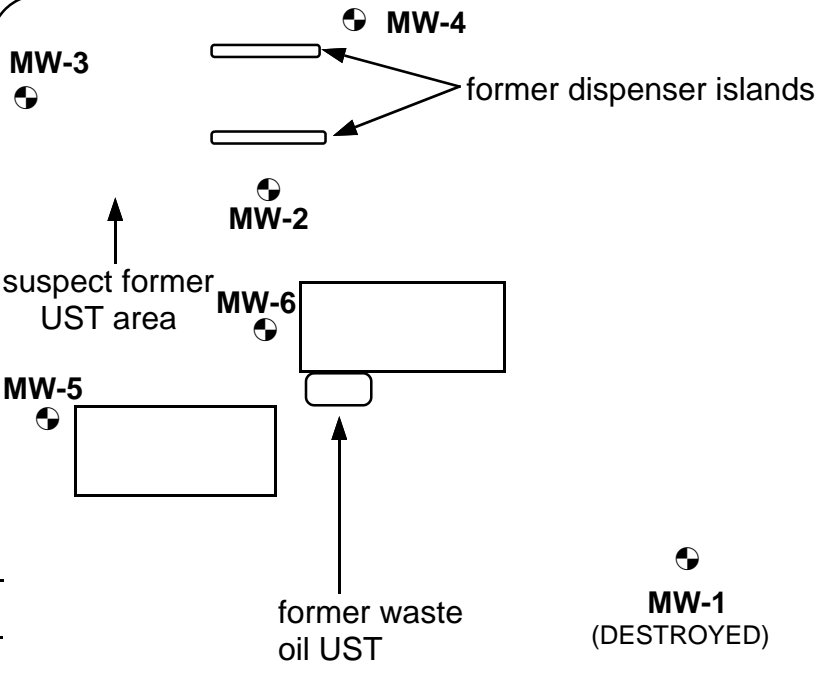
Title: Location Map 300 Hegenberger Road Oakland, California	
Figure Number: 1	Scale: None
Project Number: 6748-017.02	Drawn By: KRB
 7977 Capwell Drive, Suite 100 Oakland, California 94621 (510) 638-8400 Fax: (510) 638-8404	Date: 07/22/07
	


MW-8
(DESTROYED)

HEGENBERGER ROAD


MW-7

HEGENBERGER LOOP



Legend

 Groundwater Monitoring Well Location

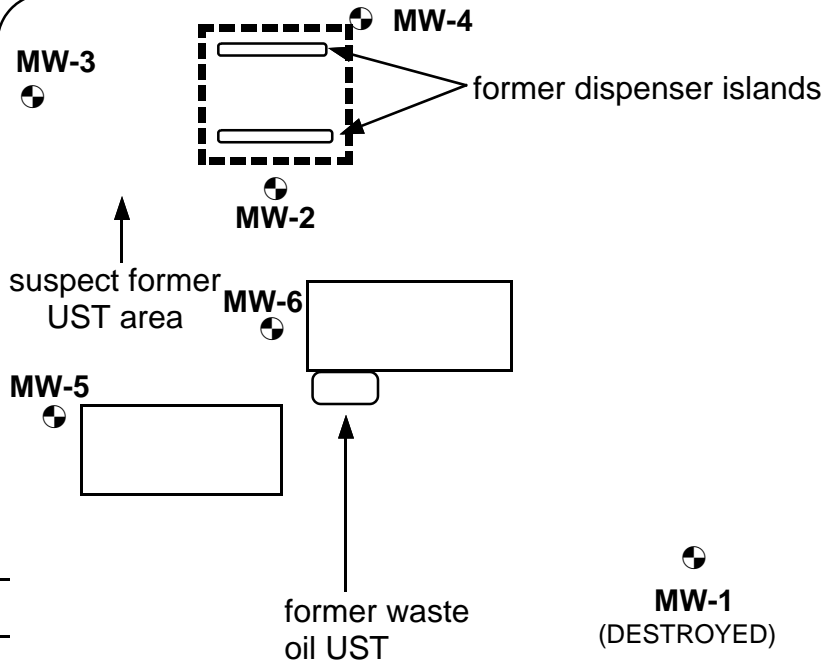
Title: Site Plan 300 Hegenberger Road Oakland, California	
Figure Number: 2	Scale: 1" = 60'
Project Number: 6748-017.02	Drawn By: KRB
 7977 Capwell Drive, Suite 100 Oakland, California 94621 (510) 638-8400 Fax: (510) 638-8404	Date: 07/23/07
	

● MW-8
(DESTROYED)

HEGENBERGER ROAD

● MW-7

HEGENBERGER LOOP



Legend

- Groundwater Monitoring Well Location
- Proposed Soil Excavation Area

Title: Proposed Excavation Plan 300 Hegenberger Road Oakland, California	
Figure Number: 3	Scale: 1" = 60'
Project Number: 6748-017.02	Drawn By: KRB
 7977 Capwell Drive, Suite 100 Oakland, California 94621 (510) 638-8400 Fax: (510) 638-8404	Date: 07/23/07