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3:41 pm, Aug 31, 2009

Alameda County
Environmental Health

August 27, 2009

Mr. Paresh Khatri
Alameda County Health Care Services
Environmental Health Services
1131 Harbor Bay Parkway
Alameda, CA 94502-6577

Subject: ADDENDUM TO WORK PLAN TO COMPLETE A DETAILED UTILITY SURVEY AND SAMPLING, AND SOIL AND GROUNDWATER INVESTIGATION TO ADDRESS DATA GAPS, OWENS-BROCKWAY GLASS CONTAINER FACILITY, OAKLAND, CALIFORNIA.

Dear Mr. Khatri:

CKG Environmental, Inc. (CKG) is pleased to provide this work plan addendum to address comments presented in your letter dated August 13, 2009. CKG will repeat the comment then provide the response.

RESPONSE TO COMMENTS

- 1. Subsurface Utility Survey** – “In Task 2...However it is not clear whether backfill material or native soil...It is recommended that the soil sample be collected using a slide hammer”

CKG intends to expose utilities in key areas and will observe for the presence of petroleum hydrocarbon impact to evaluate the potential that the utility has acted as a conduit for the spread of contaminants. Observations will be documented in field notes and photographically. CKG also will collect a soil sample of native material below the bottom of the utility trench to obtain a quantitative analysis of potential petroleum hydrocarbon impact. CKG will use a slide hammer to collect the soil sample to reduce the loss of volatile constituents from the sample.

- 2. Geoprobe™ Investigation** – “In Task 3 CKG proposes to install up to 45 borings...Please clarify whether thirty-six or thirty-eight locations should be illustrated...Please include a revised figure that illustrates...but also the existing monitoring well network...”

CKG has revised Plate 2 to include all previous investigation points, including monitoring wells, and to include 38 proposed Geoprobe™ locations. CKG would like to emphasize however, that the locations shown on the Plate are not to be considered absolute. Underground utilities at the site are extensive and complex. In addition the site is an active glass bottle manufacturing facility

with busy truck traffic and physical changes that occur on a daily basis. CKG will select locations in the field to the best of our ability to address the data gap areas, but the safety of personnel and the need to protect on site equipment are paramount. CKG also will modify sampling locations based on observations made during the investigation. This is why there are 38 sample locations shown but a total of 45 locations are planned. The seven “reserve” locations will be used to provide additional assessment as needed.

3. Chemical Analysis – “In Task 4 CKG proposes to submit select soil samples for VOC analysis...Please provide clarification to address the above mentioned....”

Based on personal experience completing subsurface investigations at the site, and based on a review of previous data, the petroleum hydrocarbon impacts at this facility are dominated by fuel oil or diesel. The impacts are readily identified in the field based on the black staining, and obvious odor. In addition, previous VOC analyses, though not extensive, do not suggest that VOCs are an important contaminant of concern at this site. CKG will select samples for VOC analysis based on field observations (visual, and olfactory). The samples with greatest visual or olfactory impact will be analyzed for VOCs. CKG may also add VOC analysis to more samples (within the 14 day holding time) if the first results (which will be received within 5 working days) show significant impacts by VOCs. In other words if it appears that samples from a particular area are showing significant impacts by VOCs CKG may request VOC analysis from other samples collected within that area.

4. GeoTracker Compliance – “A review of the case file and the State Water Resources Control Board (SWRCB) GeoTracker web site...Electronic reporting is described below.”

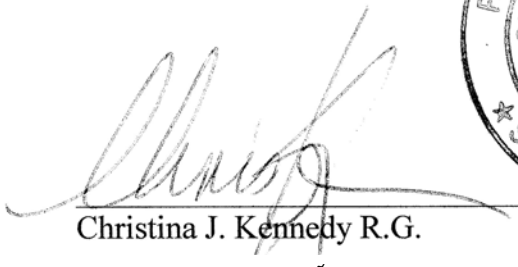
CKG has been working with the SWRCB to establish a GeoTracker database for the site and has attempted to upload reports. There appears to be a problem on the State’s side in properly setting up the site. CKG will continue to work with the State to get the reports uploaded. CKG will also make sure they get uploaded to the Alameda County website as well. CKG will try to meet the September 14, 2009 deadline however; we have no control over the State’s schedule regarding GeoTracker maintenance.

LIMITATIONS

CKG will perform the scope of work in a manner consistent with the standards of care and skill normally exercised by members of the profession practicing under similar conditions in the geographic vicinity and at the time the services will be performed. No warranty or guarantee expressed or implied is part of the services offered in this proposal.

CKG is pleased to prepare this addendum to the work plan and we look forward to working with you. If you need further information or would like more details regarding this work plan please feel free to call me at (707) 967-8080, or Mr. Bob Neal of Owens-Brockway at (510) 436-2174.

Sincerely
CKG Environmental, Inc.,



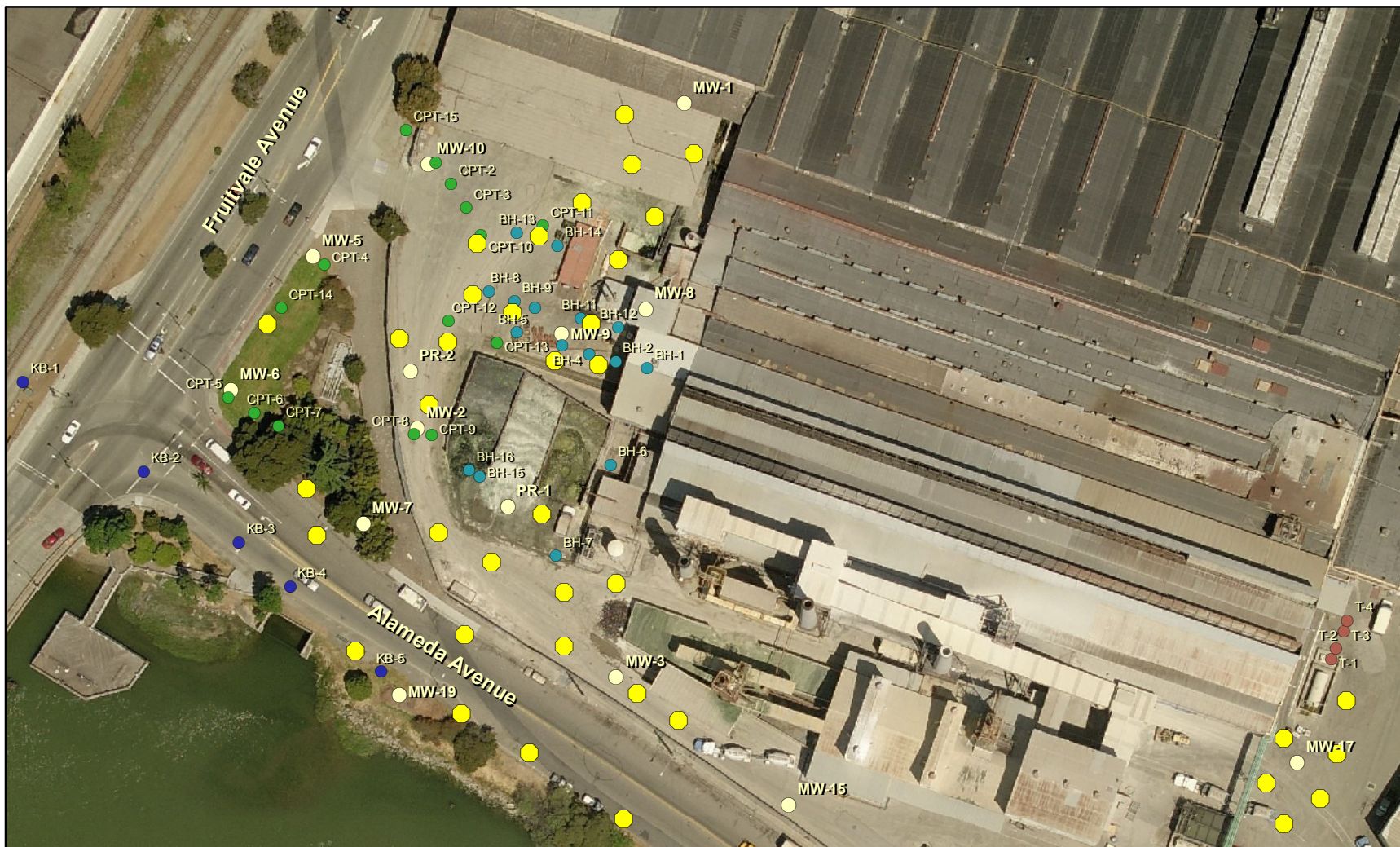
Christina J. Kennedy R.G.



Principal,

cc Mark Tussing – Owens-Brockway, Toledo
Bob Neal – Owens-Brockway, Oakland

Plate 2 – Revised Proposed Geoprobe™ Location Map



Drawn by P. Dellavalle. December 2009 Base layers are unmodified Pictometry Digital Data Sets.

EXPLANATION

- Monitoring Wells
- Proposed Geoprobe Locations; final locations subject to field verification and subsurface utility clearance.
- Auger Boring
- Cone Penetration Test
- Geoprobe
- Grab Sample

