CAMBRIA

May 24, 2006

Mr. Barney Chan
Alameda County Environmental Health Services (ACEHS)
Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

RE: **Proposed Kaiser Development**
Former Chevron Service Station #9-1026
3701 Broadway
Oakland, California

Dear Mr. Chan;

Cambria Environmental Technology, Inc. (Cambria) proposes the following additional scope of work in response to your May 1, 2006 letter (Attachment A) for the site referenced above (Figure 1). The proposed work is to be performed in lieu of the April 2006 *Waste Profile for Disposal Workplan.*

PROPOSED WORK

Our objective is to address concerns raised by Alameda County Environmental Health Services (ACEHS), as well as profile soil conditions for off-haul and disposal. ACEHS requested the following information in their May 1, 2006 letter:

- An explanation of how the vertical extent of hydrocarbons will be determined, particularly in the locations where concentrations appear to be increasing with depth and where these concentrations exceed cleanup levels?
- An alternative method to estimate hydrocarbon concentrations left in place behind shoring;
- A diagram of the proposed drainage system indicating source areas, how they were identified and how they will be treated by the drainage system, and the proposed sampling frequency;
- Clarification of the specific site development plan for the property at 3701 Broadway, and proposed cleanup levels.

Cambria Environmental Technology, Inc.

5900 Hollis Street
Suite A
Emeryville, CA 94608
Tel (510) 420-0700
Fax (510) 420-9170

Additional requested information in the May 1, 2006 ACEHS letter refers to parcels beyond the Chevron facility and will not be addressed in this document.

COMMENTS TO ACEHS LETTER

Vertical Delineation of Hydrocarbons in the Subsurface: Cambria will advance 15 soil borings using a direct push drill rig within the proposed excavation limits to delineate the vertical extent of hydrocarbons in the subsurface. Borings will be advanced at locations where previous concentrations were detected above Regional Water Quality Control Board (RWQCB) environmental screen levels (ESLs) at depths greater than 18 feet below grade (fbg) (Figure 2). Soil samples will be collected between 18 and 30 fbg at five-foot intervals or where odor and/or staining are indicative of hydrocarbon impact. Additional samples will be collected from these borings between 0-20 fbg to profile soils for disposal. Four samples from each boring will be collected, two samples between 0-10 fbg and two samples between 10-20 fbg. These samples will be combined to create three four-point composites for each depth interval, and submitted to the laboratory as waste profile samples. Secor's March 6, 2006 *Site Characterization Report* indicated that lead was detected at 1,500 mg/kg in a sample collected from SB-38 at 4.5 fbg. Therefore, borings to 10 fbg will be advanced in the vicinity of SB-38 to define the extent of lead in soil (Figure 2).

Alternative to Sidewall Sampling: To facilitate calculation of hydrocarbon mass left in soil beyond the site perimeter after excavation, Cambria will advance 14 soil borings to 20 fbg along the sidewalk on MacArthur Boulevard and Broadway (Figure 2). Borings will be advanced approximately every 20 linear feet along the sidewalk and sampled at five-foot intervals.

Proposed Dewatering System: The dewatering system will be designed to facilitate excavation activities below the water table. The system will not be designed to remediate groundwater as a long term pump-and-treat system. Therefore, source areas are not a concern nor will they be specifically targeted for groundwater removal. Groundwater extracted during excavation will be pumped into a 20,000-gallon holding tank with a submersible electric pump installed at the lowest point of the excavation. Suspended sediment in the extracted groundwater will be allowed to settle in the holding tank. Once sediment has settled out, groundwater will be pumped through the treatment system consisting of a particulate filter and two 2,000-pound activated carbon vessels connected in series. Treated water will then be discharged into the sanitary sewer under permit from East Bay Municipal Utility District (EBMUD). Groundwater discharged to the sewer will be quantified by a totalizer flow meter installed on the discharge line (Figure 3). We have designed the system to handle up to 100 gallons per minute. The actual flow rate is likely to

far less once the excavation has been dewatered. Groundwater influent and effluent concentrations will be sampled as required by the EBMUD discharge permit.

Site Development Plan: According to Mr. Jay Asercion, architect for the proposed Kaiser facility, the site is to be developed as part of a medical office building with out-patient services only. This building is not to be used as a residence and therefore the industrial/commercial ESL's are appropriate cleanup goals for the site.

Underground Utility Location: Cambria will contact Underground Service Alert to clear all proposed boring locations. An underground utility locator will also be utilized to ensure that utilities are not a encountered within borings. Boring locations in the public right-of-way will be hand augered to a total depth of 10 fbg and boring locations within the property boundary will be hand augered to a total depth of 8 fbg for clearing purposes.

Site Health and Safety Plan: Cambria will prepare a site health and safety plan to protect site workers. The plan will be reviewed and signed by all site workers/visitors and kept on-site at all times.

Permits: Cambria will obtain a boring permit from the Alameda County Department of Public Works (ACDPW) and an encroachment permit from the City of Oakland prior to field activities.

Sampling Protocol: Samples will be collected by cutting a 6-inch core from each 4-foot sampling sleeve and sealed by covering the ends with Teflon tape and plastic end caps. Each sample will be logged onto a chain of custody form, properly preserved on ice and delivered to the appropriate laboratory for analyses.

Chemical Analyses: Deep soil samples and samples collected along the western property line will be analyzed for the following:

- Total petroleum hydrocarbons as gasoline (TPHg) by EPA method 8015M and,
- Benzene, toluene, ethylbenzene, and xylenes (BTEX) by modified EPA Method 8260B.

To satisfy landfill requirements when profiling soil for disposal, three borings within the excavation limits from the vicinity of the former used-oil tank will additionally be analyzed for the following:

- Volatile organic compounds (VOCs) by method 8260,
- TPH diesel and motor oil (TPHd and mo) by method 8015M,

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- Semi volatiles by EPA method 8270, and
- CAM 17 metals by method 6010.

Soil Samples for Waste Characterization will be analyzed for the following:

- TPHg by EPA method 8015M,
- BTEX by method 8260B, and
- Total lead by EPA method 6010.

SOIL DISPOSAL

Soil produced during field activities will be temporarily stockpiled on-site and covered with plastic sheeting. Following review of analytic results, the soil will be transported to an appropriate Chevron-approved facility for disposal.

SCHEDULE

Cambria anticipates beginning this work June 20, 2006 pending approval from ACEHS. The site excavation is anticipated for July of this year.

CLOSING

We appreciate this opportunity to work with you on this project. Please call Laura Genin at (510) 420-3367 if you have any questions or comments.

Sincerely;
Cambria Environmental Technology, Inc.

Laura Genin
Project Geologist

Brandon S. Wilken
Senior Project Geologist PG #7564

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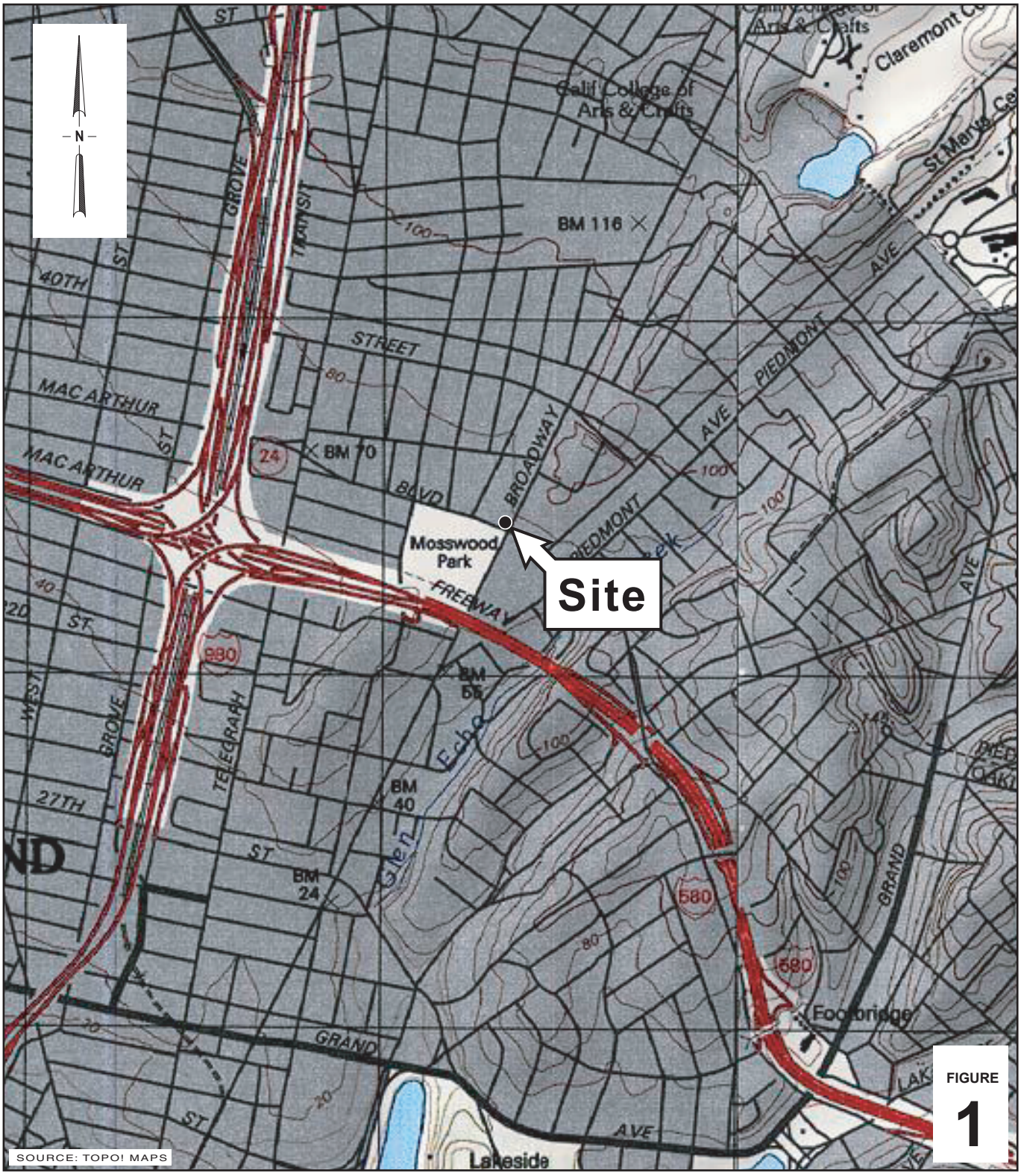
Figures: 1 – Site Vicinity Map
2 – Proposed Boring Locations
3 – Groundwater Dewatering System

Attachment: A – ACEHS May 1, 2006 Letter
B – Standard Procedures for Geoprobe Soil Sampling

cc: J. Mark Inglis, Chevron, 6001 Bollinger Canyon Road, San Ramon, CA 94583
David Grede, Kaiser, 1950 Franklin St. 12th Floor, Oakland, CA 94612

08/27/03



SOURCE: TOPO! MAPS

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FIGURE 1

0 1/8 1/4 1/2 1

SCALE : 1" = 1/4 MILE

Former Chevron Station 9-1026

3701 Broadway

Oakland, California

Vicinity Map

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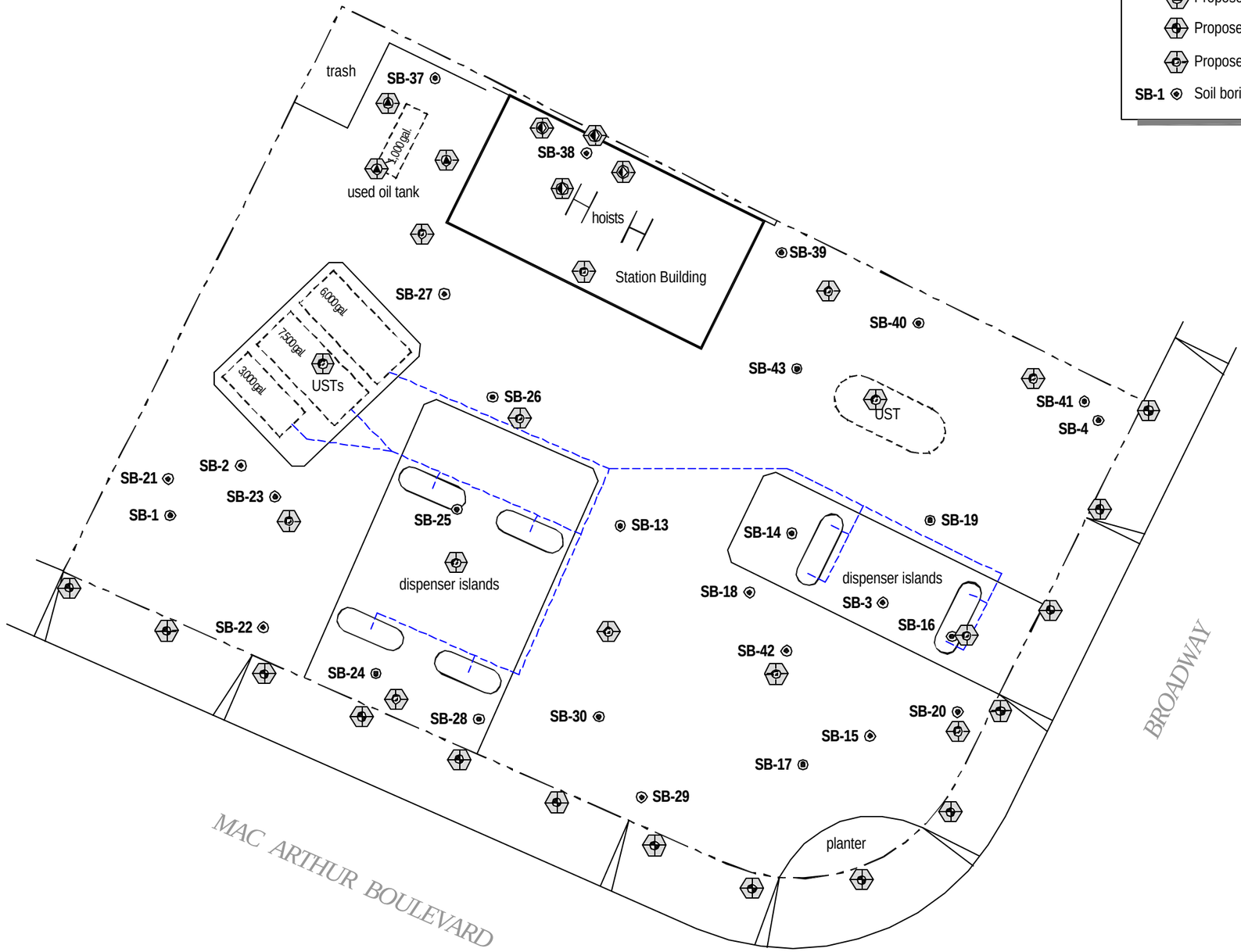
05/23/06

Proposed Boring Locations

EXPLANATION

- Proposed soil boring for lead
- Proposed used oil tank soil borings
- Proposed sidewall sample borings
- Proposed waste and deep sample borings
- **SB-1** Soil boring location



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0 10 20 40

Scale (ft)

Basemap modified from 1957 Standard Oil drawing

FIGURE

2

Chevron Service Station 9-1026

3701 Broadway

Oakland, California

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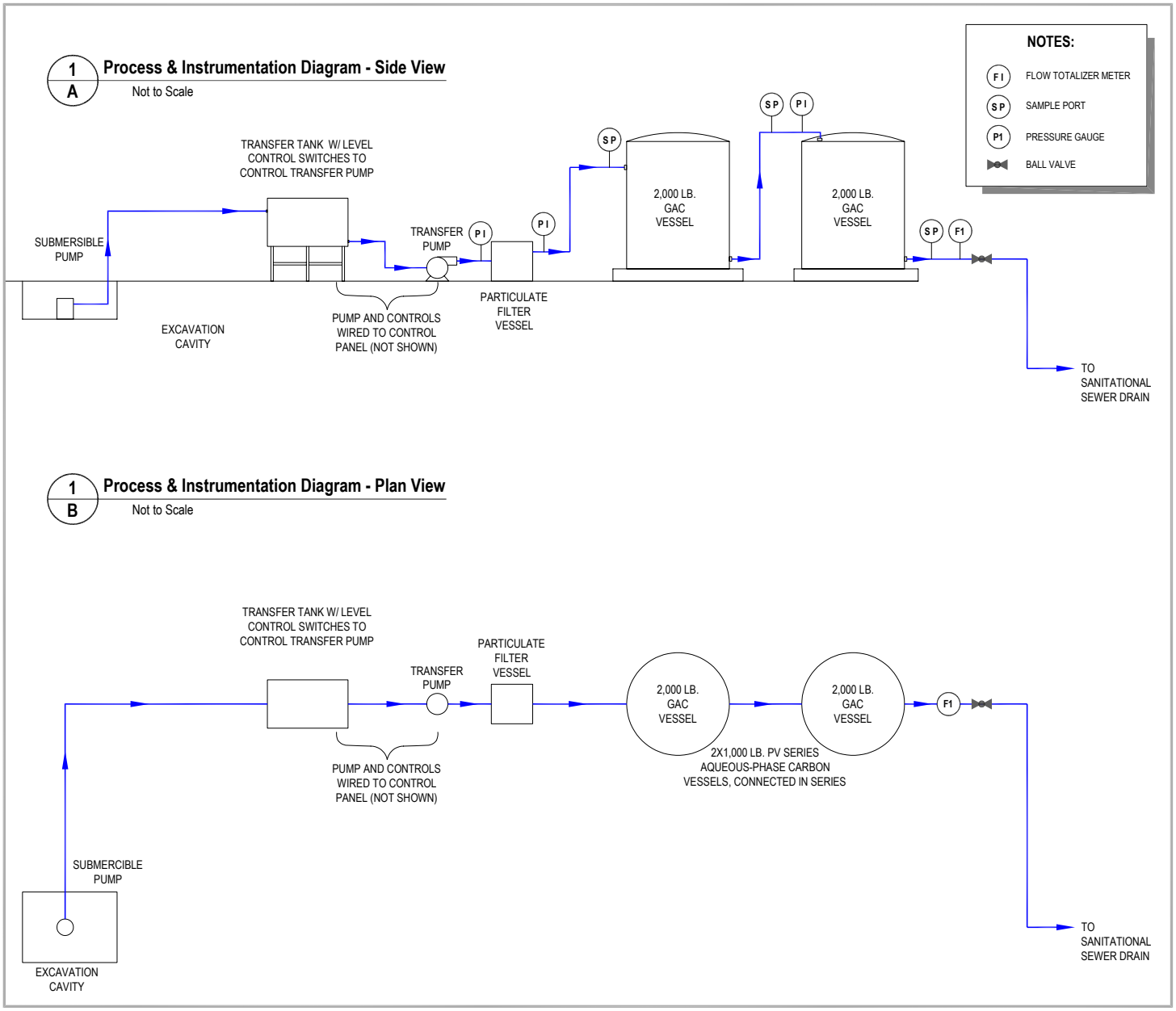

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Former Chevron Site No. 9-1026
3701 Broadway
Oakland, California

Proposed Dewatering Treatment System

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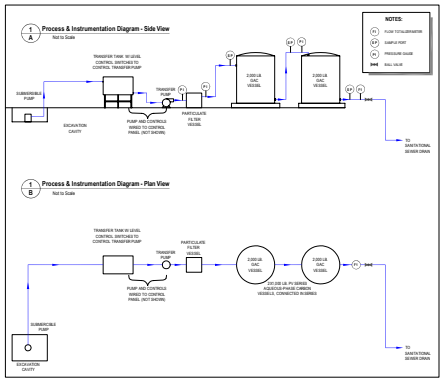

FIGURE **3**

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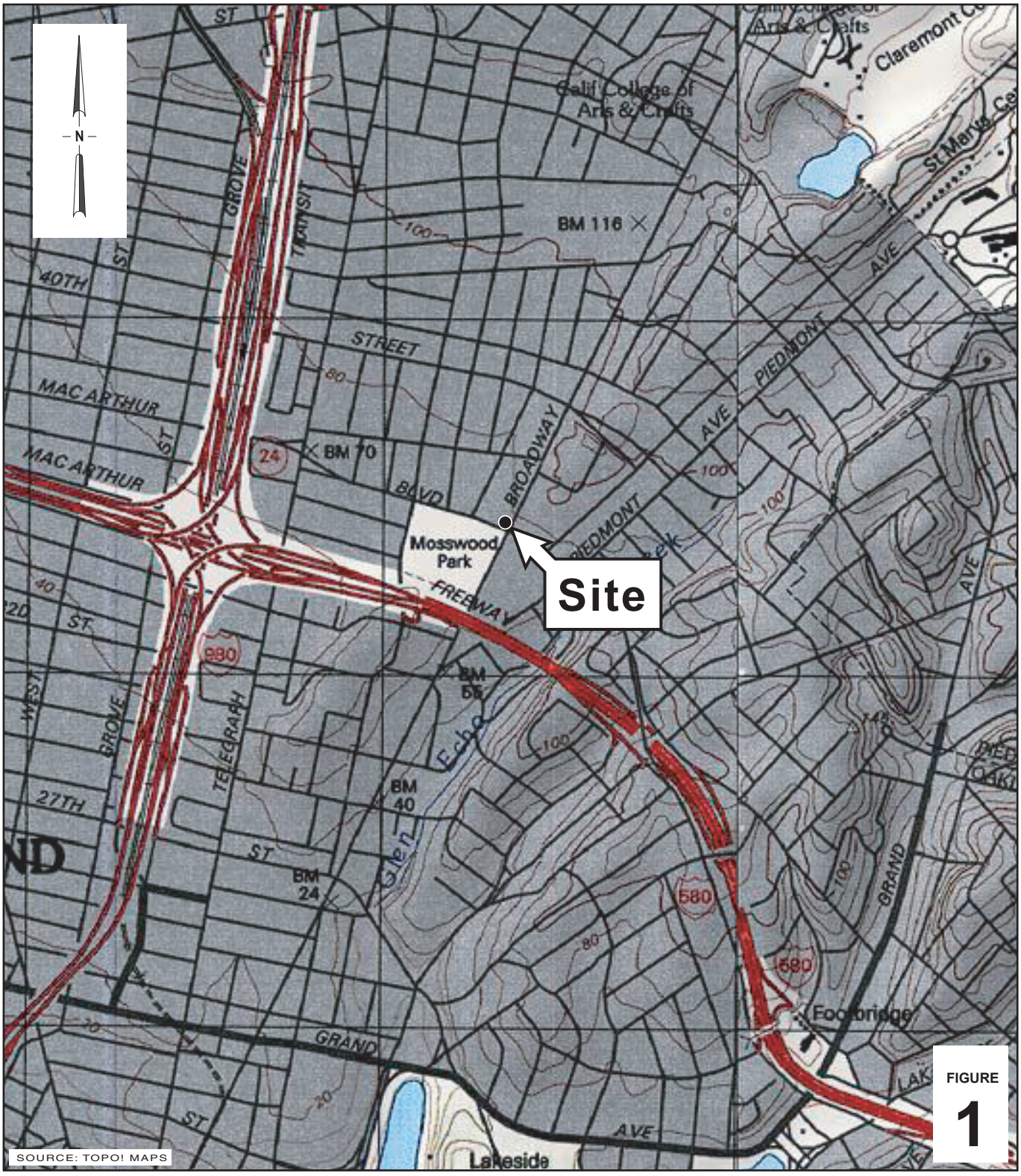

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Former Chevron Station 9-1026

3701 Broadway

Oakland, California

Vicinity Map

CAMBRIA

05/23/06

Proposed Boring Locations

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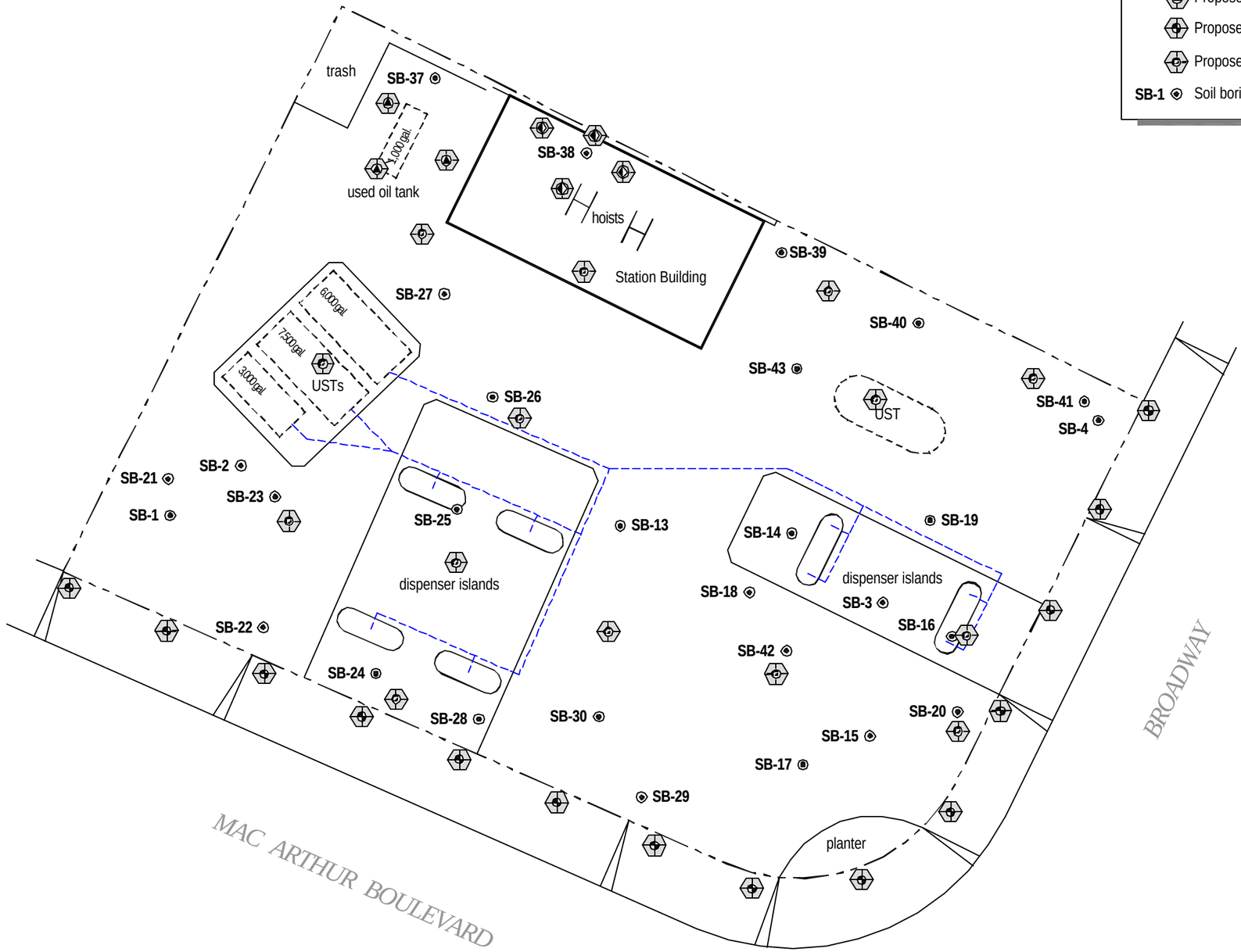

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Scale (ft)

Basemap modified from 1957 Standard Oil drawing

FIGURE

2

Chevron Service Station 9-1026

3701 Broadway

Oakland, California

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

MAY - 4 2006

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

May 1, 2006

Mr. Mark Inglis
Chevron
6001 Bollinger Canyon Rd., Rm K2256
San Ramon, CA 94583-2324

Mr. Tim Havel
Director, Western Environmental, Health and Safety Service Hub
Kaiser Permanente
100 S. Los Robles, Ste. 410
Pasadena, CA 91188

Dear Messrs. Inglis and Havel:

Subject: Fuel Leak Cases RO500 and RO205, 3701 and 3741 Broadway, Oakland, CA 94611 (Proposed Kaiser Development)

Alameda County Environmental Health (ACEH) staff has reviewed the March 6, 2006 Soil Characterization Report Kaiser Oakland MOB 3701-3757 Broadway Oakland, California prepared by Secor, Cambria's April 13, 2006, Waste Profile for Disposal Workplan and Cambria's April 18, 2006 Soil and Groundwater Management Plan Planned Site Excavation for 3701 Broadway. As you are aware, our office is working with Chevron with their investigation at their former service station at 3701 Broadway as well as overseeing the releases observed on 3735-3737 and 3741 Broadway, properties owned by Kaiser. We previously offered comment to the Secor December 22, 2005 *Additional Characterization Work Plan* in the County's 1/31/06 letter. That work plan followed up the February 10, 2004 Secor *Phase II Environmental Site Assessment Report*. Unfortunately, it appears our comments were not incorporated in the recent investigation. Although the investigation was helpful with Chevron's evaluation of soil impacts at 3701 Broadway, it appears that there are still data gaps to address prior to concurrence for redevelopment or site closure. We recommend Chevron and Kaiser work together to address the following technical comments and submit the technical reports requested below.

TECHNICAL COMMENTS

1. 3701 Broadway- Multiple borings and soil samples on this property were analyzed and reported in Secor's March 6, 2006 report. Although we previously recommended sampling to depths necessary to define the vertical extent of contamination and the sampling of groundwater, this was not done. Chevron's Soil and Groundwater Management Plan (SGMP) proposes to excavate the entire site, to the extent possible, to a maximum depth of ~18' bgs. A drainage system is proposed to direct groundwater to a sump basin that will then be pumped to a holding tank for proper disposal. Please address the following questions/concerns:

- How will the vertical extent of contamination be determined, particularly in the locations where concentrations appear to be increasing with depth and where these concentrations exceed cleanup levels?
- The inability to collect sidewall confirmation samples poses a problem when attempting to estimate risk to occupants of the proposed subsurface building. There is a potential that the floor confirmation samples will underestimate actual residual concentrations. An attempt to estimate sidewall samples should be done, possibly at some intermediate stage of the excavation. Please provide a supplemental sampling proposal.
- Please provide a diagram of the proposed drainage system. Please indicate how the source areas were identified and how they will be treated by the drainage system. How and with what frequency will groundwater be sampled? Will the system allow preferential drainage from specific areas? What will determine the duration of the groundwater removal system?
- Please clarify the specific site development planned for the 3701 Broadway site and the other properties by providing our office a copy of these plans. The SGMP states that a subsurface building at a depth of 15' bgs is proposed. Will a moisture vapor barrier be used?
- Please provide proposed cleanup levels for soil and groundwater at the site. Those of Chevron appear to differ from those proposed by Secor in behalf of Kaiser.
- We concur that a risk assessment should be performed and approved prior to site development.
- The Waste Profile for Disposal Workplan proposes 13 soil borings advanced to approximately 20' bg to characterize the residual concentrations. Shallower samples will characterize soil for disposal purposes. Given the amount of information already known at the site, the locations of these samples should be selected authoritatively not randomly. Please provide a sampling plan and sampling rationale. As mentioned, all efforts should be taken to define contaminants vertically to below cleanup levels. As noted in the SGMP, some soil samples should also be analyzed for TPHd and TPHmo in addition to TPHg, BTEX and lead.

2. Please provide a copy of the Phase I investigation for the other properties of this site ie 3741, 3735-3737 and 3751-3757 Broadway. This information is necessary to determine the adequacy of the sampling performed at these sites.

3. 3741 Broadway- This address is the area identified on the Val Strough Honda lot where the main sales office, storage room with a door covering the floor and a floor drain were located. The prior Secor investigation identified elevated levels of TPHmo, TPHd and heavy metals in soil samples. Based on the results of the 1/06 investigation the extent of TPH and metals contamination appears limited to near SB-12 and SB-32. Will these areas be excavated prior to development?

4. 3735-3737 Broadway- This address is the area where the former Rainbow Car Wash, sump and three underground storage tanks had been located. Based the limited sampling of the initial Secor investigation, results from boring B6 indicate a significant release to groundwater may have occurred from the former underground tanks. We recommended additional sampling be done to determine the limits of this release to groundwater. Since no sampling was performed in the 1/06 investigation

it is unclear to what extent the 3701 Broadway site has been impacted by this release. The former USTs on this site must be further investigated. Please provide a work plan to determine the extent of soil and groundwater contamination from this area. In the absence of any tank removal data, we recommend sampling the former tank pit area. It is also noted that elevated petroleum contamination was detected in soil samples on the 3701 Broadway site along the boundary with this site. It is unclear which site(s) are the source(s) of the contamination, however, additional soil and groundwater characterization on the 3735-3737 Broadway property is required to delineate this detected contamination. We require Chevron and Kaiser work together and include this investigation in the requested work plan.

5. 3751-3757 Broadway- This address is indicated as where repair and service occurred. Two additional samples were taken in the 1/06 investigation. It appears that there may be localized TPH mo and TPHd as reported in SB-48. Please determine if this result is consistent with your Phase I results or whether additional sampling is warranted.

TECHNICAL REPORT REQUEST

Please submit the technical information according to the following schedule:

- July 3, 2006- Written response to above items, sampling plan for sidewalls, diagram for drainage system, copy of development plans, proposed cleanup levels, post-excavation sampling plan, sampling plan for 3735-3737 Broadway and Phase I reports.
- 90 days after soil and groundwater investigation- Risk Assessment

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years,

responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

If you have any questions, please call me at (510) 567-6765.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions (Messrs. Foss & Hoehn)

cc: files, D. Drogos
Mr. Greg Hoehn, Secor, 57 Lafayette Circle, 2nd Floor, Lafayette, CA 94549
Mr. Bob Foss, Cambria, 5900 Hollis Street, Suite A, Emeryville, CA 94608
Mr. Jay Asercion, Kaiser Permanente, 1100 San Leandro Blvd., Suite 200, San Leandro, CA 94577

4_27_06 3701_3757 Broadway

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	**ISSUE DATE:** July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	**SUBJECT:** Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted**.
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
  RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

Submission Instructions

1) Obtain User Name and Password:
   a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
      i) Send an e-mail to dehloptoxic@acgov.org
      or
      ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
   b) In the subject line of your request, be sure to include **"ftp PASSWORD REQUEST"** and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for**.

2) Upload Files to the ftp Site
   a) Using Internet Explorer (IE4+), go to ftp://alcoftp1.acgov.org
      (i) Note: Netscape and Firefox browsers will not open the FTP site.
   b) Click on File, then on Login As.
   c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
   d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
   e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.

3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
   a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
   b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
   c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)

STANDARD FIELD PROCEDURES FOR SOIL SAMPLING

This document presents standard field methods for drilling and sampling soil borings and installing, developing and sampling groundwater monitoring wells. These procedures are designed to comply with Federal, State and local regulatory guidelines. Specific field procedures are summarized below.

SOIL BORINGS

Objectives

Soil samples are collected to characterize subsurface lithology, assess whether the soils exhibit obvious hydrocarbon or other compound vapor or staining, and to collect samples for analysis at a State-certified laboratory. All borings are logged using the Unified Soil Classification System by a trained geologist working under the supervision of a California Professional Geologist (P.G.) or Professional Engineer (P.E.).

Soil Boring and Sampling

Soil borings are typically drilled using hollow-stem augers or direct-push technologies such as the Geoprobe®. Soil samples are collected at least every five ft to characterize the subsurface sediments and for possible chemical analysis. Additional soil samples are collected near the water table and at lithologic changes. Samples are collected using lined split-barrel or equivalent samplers driven into undisturbed sediments at the bottom of the borehole.

Drilling and sampling equipment is steam-cleaned prior to drilling and between borings to prevent cross-contamination. Sampling equipment is washed between samples with trisodium phosphate or an equivalent EPA-approved detergent.

Sample Analysis

Sampling tubes chosen for analysis are trimmed of excess soil and capped with Teflon tape and plastic end caps. Soil samples are labeled and stored at or below 4^{o} C on either crushed or dry ice, depending upon local regulations. Samples are transported under chain-of-custody to a State-certified analytic laboratory.

Field Screening

One of the remaining tubes is partially emptied leaving about one-third of the soil in the tube. The tube is capped with plastic end caps and set aside to allow hydrocarbons to volatilize from the soil. After ten to fifteen minutes, a portable volatile vapor analyzer measures volatile hydrocarbon vapor concentrations in the tube headspace, extracting the vapor through a slit in the cap. Volatile vapor analyzer measurements are used along with the field observations, odors, stratigraphy and groundwater depth to select soil samples for analysis.

Water Sampling

Water samples, if they are collected from the boring, are either collected using a driven Hydropunch® type sampler or are collected from the open borehole using bailers. The groundwater samples are decanted into the appropriate containers supplied by the analytic laboratory. Samples are labeled, placed in protective foam sleeves, stored on crushed ice at or below 4°C, and transported under chain-of-custody to the laboratory. Laboratory-supplied trip blanks accompany the samples and are analyzed to check for cross-contamination. An equipment blank may be analyzed if non-dedicated sampling equipment is used.

Grouting

If the borings are not completed as wells, the borings are filled to the ground surface with cement grout poured or pumped through a tremie pipe.

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