

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
8-21-06

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

August 18, 2006

Richard Rinck
GE Healthcare
389 Oyster Point Blvd.
South San Francisco, CA 94080

August Blasquez and Paul Dresnick TRS
P.O. Box 66571
Scotts Valley, CA 95067

August Blasquez and Celia Villar
7026 Santa Teresa Blvd.
San Jose, CA 95139

Subject: SLIC Case No. RO0002874, GE Imatron/Caral Manufacturing, 578 Cleveland Avenue, Albany, CA

Dear Richard Rinck, August Blasquez and Paul Dresnick TRS, and Celia Villar:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site and the report entitled, "Remedial Action Work Plan," dated August 14, 2006, prepared on your behalf by Clayton Group Services, Inc. The Work Plan proposes to excavate soil along the west side of the warehouse building to a depth of 3 feet bgs to remove and dispose of soils containing elevated concentrations of metals. An estimated 111 cubic yards of soil would be transported off-site for disposal. The excavated soil would be replaced by clean fill. We generally concur with the proposed scope of work provided that the technical comments below are addressed during the remedial action.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Excavation Around Structures.** The area west of the warehouse contains several structures including the compressor receiver tanks, electrical pole, and buried electrical line. Although removal of soil to a depth of 3 feet may not be feasible, we request that surface soil around the structures and the edges of the building be removed to the maximum extent that is safe and practicable by hand excavation. Please present the results of the remedial excavation in the Remedial Excavation Report requested below.

Richard Rinck
August Blasquez and Paul Dresnick TRS
August Blasquez and Celia Villar
August 18, 2006
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TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **December 19, 2006** -- Remedial Excavation Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

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).

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.

Richard Rinck
August Blasquez and Paul Dresnick TRS
August Blasquez and Celia Villar
August 18, 2006
Page 3

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.

UNDERGROUND STORAGE TANK CLEANUP FUND

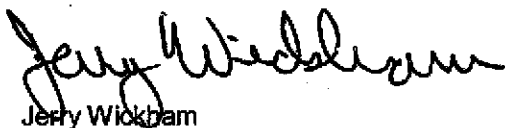
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Michael Zimmerman
Clayton Group Services, Inc.
6920 Koll Center Parkway
Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
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July 7, 2006

Richard Rinck
GE Healthcare
389 Oyster Point Blvd.
South San Francisco, CA 94080

August Blasquez and Paul Dresnick TRS
P.O. Box 66571
Scotts Valley, CA 95067

August Blasquez and Celia Villar
7026 Santa Teresa Blvd.
San Jose, CA 95139

Subject: SLIC Case No. RO0002874, GE Imatron/Caral Manufacturing, 578 Cleveland Avenue, Albany, CA

Dear Richard Rinck, August Blasquez and Paul Dresnick TRS, and Celia Villar:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site and the report entitled, "Revised Site Investigation Report for SLIC Case No. RO0002874," dated June 20, 2006, prepared on your behalf by Clayton Group Services, Inc. This report presents the results from a site investigation conducted in February 2006 that included 17 soil borings and a site investigation conducted in May 2006 that included the collection of shallow soil samples from 11 of the 17 previous soil boring locations.

Based on our review of the "Revised Site Investigation Report for SLIC Case No. RO0002874," dated June 20, 2006, and previous results, we concur with the conclusions and recommendations in the June 20, 2004 report that no further investigation or remedial action is required in the North Yard and the sumps inside the building. As discussed in the technical comments below, we do not concur with the conclusions for the area west of the warehouse. Elevated concentrations of metals were consistently detected in shallow soils within the area west of the warehouse. Remedial action followed by confirmation sampling is required for shallow soils in the area west of the warehouse. We request that you submit a Remedial Work Plan to address the elevated concentrations of metals in surface soils in the area west of the warehouse **by September 21, 2006.**

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1. Elevated Concentrations of Metals in Shallow Soil West of Warehouse.** The purpose of the February and May 2006 soil sampling in the area west of the warehouse was to confirm the previous arsenic concentration in area of boring B-5 and define the lateral and vertical extent of elevated concentrations of metals in the area of previous boring B-5 and surface soil sample SS-1. Soil samples were initially collected in February 2006 uniformly at depths of 3 and 6 feet below ground surface (bgs). These depths were different than those proposed in the December 27, 2005 Work Plan and below the depths where most of the contamination was detected during previous investigations. At the request of ACEH, shallow soil samples were collected in May 2006, at 1 to 2 feet bgs at 5 previous (February 2006) sampling locations west of the warehouse. Arsenic was not detected at concentrations exceeding the residential or commercial ESL (Water Board February 2005) at any of the 2006 sampling locations. Therefore, the detection of 2,200 milligrams per kilogram (mg/kg) of arsenic in surface soil sample SS-1 appears to be isolated. However, the concentrations of other metals including cobalt, copper, lead, mercury, and zinc detected in the shallow soil samples west of the warehouse were generally significantly higher than the concentrations of metals detected in samples collected at 3 and 6 feet bgs. As an example, the concentration of lead detected in the 1-foot sample exceeded the lead concentrations detected in the 3 and 6-foot bgs samples collected at the five soil sampling locations west of the warehouse by factors ranging from 4 to 133. The concentration of one or more metals exceeded the commercial ESL at 5 of the 7 soil sampling locations west of the warehouse. The concentration of one or more metals exceeded the residential ESL at 6 of the 7 soil sampling locations west of the warehouse. Based on these results, cleanup of shallow soil in the area west of the warehouse is required.
- 2. Conclusions Regarding Regional Background Values.** We do not agree with the statement in the Conclusions and Recommendations section of the "Revised Site Investigation Report for SLIC Case No. RO0002874," dated June 20, 2006 (page 5, section 5.0) that the concentrations of metals in soil "appear to be isolated and within the range of regional background values." As discussed in technical comment 1, the detections of elevated metals concentrations in shallow soil west of the warehouse are not isolated nor are they within regional background values.
- 3. Discussion of PCBs.** The detection of 210 µg/kg of Aroclor 1260 and 240 µg/kg of Aroclor 1268 at sampling location SS-1, previously reported in the Phase I report, was omitted from Table 5. As we previously requested (November 23, 2005 correspondence), please include these results in future data tables. Section 2.3 reports that PCBs were detected at a concentration of 240 mg/kg in soil from SS-1, exceeding the ESL of 0.74 mg/kg. Please note that PCBs were detected at concentrations up to 240 µg/kg rather than 240 mg/kg and the concentrations do not exceed ESLs.
- 4. Boring B-9.** Figure 2 shows boring B-9 outside the area of excavation near the chemical storage shed. However, the text of the report indicates that the soil around boring B-9 was excavated. Please confirm that the area of excavation included boring B-9 and correct the location of boring B-9 or the area of excavation in future figures of the North Yard.

Richard Rinck
August Blasquez and Paul Dresnick TRS
August Blasquez and Celia Villar
July 7, 2006
Page 3

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **September 28, 2006** – Remedial Action Work Plan

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

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.

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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.

Richard Rinck
August Blasquez and Paul Dresnick TRS
August Blasquez and Celia Villar
July 7, 2006
Page 4

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.

UNDERGROUND STORAGE TANK CLEANUP FUND

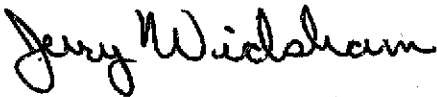
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Michael Zimmerman
Clayton Group Services, Inc.
6920 Koll Center Parkway
Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: May 31, 2006
	PREVIOUS REVISIONS: October 31, 2005, December 16, 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: **ftp Site Coordinator**.
- 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)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SGN 06-30-06

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

June 29, 2006

Richard Rinck
GE Healthcare
389 Oyster Point Blvd.
South San Francisco, CA 94080

August Blasquez and Paul Dresnick TRS
P.O. Box 66571
Scotts Valley, CA 95067

August Blasquez and Celia Villar
7026 Santa Teresa Blvd.
San Jose, CA 95139

Subject: SLIC Case No. RO0002874, GE Imatron/Caral Manufacturing, 578 Cleveland Avenue, Albany, CA

Dear Richard Rinck, August Blasquez and Paul Dresnick TRS, and Celia Villar:

Alameda County Environmental Health (ACEH) staff has received a hard copy of a report entitled, "Revised Site Investigation Report for SLIC Case No. RO0002874," dated June 20, 2006, prepared on your behalf by Clayton Group Services, Inc. This report was received by ACEH on June 23, 2006. Please note that 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. Hard copies of reports are no longer accepted. **Therefore, please upload the "Revised Site Investigation Report for SLIC Case No. RO0002874," dated June 20, 2006, and all future reports to the Alameda County FTP site as outlined in the following discussion of "Electronic Submittal of Reports," and the enclosed, "Electronic Report Upload (ftp) Instructions."**

A review of the case file and the State Water Resources Control Board's (SWRCB) Geotracker website indicate that electronic copies of analytical data have not been submitted for your site. Beginning July 1, 2005, electronic submittal of a complete copy of all reports (LUFT or SLIC) is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all SLIC analytical data and copies of reports post July 1, 2005, to the SWRCB's Geotracker database website in accordance with the above-cited regulation. Please perform the electronic submittals for applicable data and submit verification to this Agency by **July 31, 2006.**

ELECTRONIC SUBMITTAL OF REPORTS

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Richard Rinck
August Blasquez
Paul Dresnick
June 29, 2006
Page 2

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).

PERJURY STATEMENT

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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.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

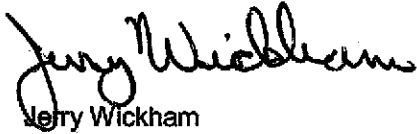
If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including

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June 29, 2006
Page 3

the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Michael Zimmerman
Clayton Group Services, Inc.
6920 Koll Center Parkway, Suite 216
Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
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MEDA COUNTY
ALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



3051
5-3-86

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

May 2, 2006

Mr. Richard Rinck
GE Healthcare
389 Oyster Point Blvd.
South San Francisco, CA 94080

Subject: SLIC Case No. RO0002874, GE Imatron/Caral Manufacturing, 578 Cleveland Avenue, Albany, CA

Dear Mr. Rinck:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site and the report entitled, "Site Investigation Report, Former GE Caral Manufacturing Facility, 578 Cleveland Avenue, Albany, CA," dated April 13, 2006, prepared on your behalf by Clayton Group Services, Inc. The report presents the results of a site investigation conducted in February 2006. The site investigation included soil and groundwater sampling from a total of 17 borings. The Site Investigation was based on a Work Plan submitted to ACEH on December 27, 2005. Based on our review, we request that you conduct the additional soil sampling requested below in technical comment 1 and prepare a revised Site Investigation Report by August 10, 2006.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1. Depth of Shallow Soil Samples.** Soil samples appear to have been collected uniformly at depths of 3 and 6 feet below ground surface (bgs) in each of the February 2006 soil borings. These depths are different than those proposed in the December 27, 2005 Work Plan. Section 3.2 of the December 27, 290905 Work Plan states that two soil samples will be collected from each soil boring at the following depths: "one at near surface or a depth of 1 to 2 feet bgs and one at a depth of 3 to 6 feet bgs." The proposed depths in the Work Plan are appropriate based on the depth at which contamination was encountered during previous investigations of the North Yard Area, Oil Water Separator Area, and Areas West of the Main Building. As shown on Table 1 of the report, 10 of the 14 soil samples collected during the May 2004 Phase I investigation that have concentrations exceeding ESLs were collected at depths less than 2 feet bgs. As noted in the summary of previous investigations, contaminant concentrations generally decrease significantly with depth. Therefore, the collection of the shallowest sample at 3 feet bgs is not sufficient to assess the extent of shallow contamination. We request that you remobilize and collect shallow soil samples from soil boring locations SB-1 through SB-10 and SB-13 through SB-17 at a depth of 1 to 2 feet bgs. The soil samples are to be analyzed as proposed in the December 27, 2005 Work Plan. Soil borings may be advanced using a hand auger to a depth of 1 foot

adjacent to the February 2006 boring locations. A slide hammer or similar device is to be used for collection of soil samples from a depth of 1 to 2 feet bgs. Please incorporate the results from the shallow soil sampling into a revised Site Investigation Report as requested below.

2. **Soil Boring Logs.** Appendix B included soil boring logs for borings SB-1 through SB-10 only. Please include boring logs for soil borings SB-11 through SB-17 in the revised Site Investigation Report requested below. No soil boring logs are required for the shallow soil sampling requested in technical comment 1.
3. **Groundwater Results.** We concur with the recommendation in the Site Investigation Report that further investigation or remediation of groundwater is not required at this time.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **August 10, 2006 – Revised Site Investigation Report**

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

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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](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

Mr. Richard Rinck
May 2, 2006
Page 3

addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@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.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Mr. Richard Rinck
May 2, 2006
Page 4

cc: Michael Zimmerman
Clayton Group Services, Inc.
6920 Koll Center Parkway
Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
02-15-06

February 14, 2006

Mr. Richard Rinck
GE Healthcare
389 Oyster Point Blvd.
South San Francisco, CA 9408

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

Subject: SLIC Case No. RO0002874, GE Imatron/Carai Manufacturing, 578 Cleveland Avenue, Albany, CA

Dear Mr. Rinck

Our records indicate that the current balance on the above-referenced SLIC oversight account is a negative \$37.60. In order to continue to provide regulatory oversight, we are requesting the submittal of a check made payable to Alameda County Environmental Health in the amount of \$3,000.00. Please send your check to the attention of our Finance Department.

This initial deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$166.00 per hour.

Please write "SLIC" (the type of project), the site address, and the AR# 0314827 on your check.

If you have any questions, please contact Jerry Wickham at (510) 567-6791.

Sincerely,


Ariu Lev
Division Chief

cc: D. Drogos, J. Jacobs, Jerry Wickham

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



STWT
01-06-06

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

January 5, 2006

Mr. Richard Rinck
GE Healthcare
389 Oyster Point Blvd.
South San Francisco, CA 94080

Subject: SLIC Case No. RO0002874, GE Imatron/Caral Manufacturing, 578 Cleveland Avenue, Albany, CA – Work Plan Approval

Dear Mr. Rinck:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site and the document entitled, "Site Investigation Workplan," dated December 27, 2005, prepared on your behalf by Clayton Group Services, Inc. The "Site Investigation Workplan" was previously submitted on November 18, 2005 but was revised to address ACEH's technical comments presented in correspondence dated November 23, 2005. The revised December 27, 2005 "Site Investigation Workplan" adequately addresses ACEH's technical comments. Please perform the proposed work and send us the technical reports requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **May 5, 2006** - Soil and Groundwater Investigation Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

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 jerry.wickham@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.

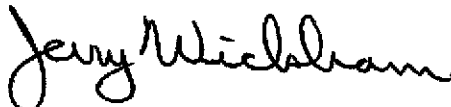
Mr. Richard Rinck
January 5, 2006
Page 3

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Michael Zimmerman
Clayton Group Services, Inc.
6920 Koll Center Parkway, Suite 216
Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

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

November 23, 2005

Mr. Richard Rinck
GE Healthcare
389 Oyster Point Blvd.
South San Francisco, CA 94080

Subject: SLIC Case No. RO0002874, GE Imatron/Caral Manufacturing, 578 Cleveland Avenue, Albany, CA

Dear Mr. Rinck:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site and the document entitled, "Site Investigation Workplan," dated November 18, 2005, prepared on your behalf by Clayton Group Services, Inc. Please review the technical comments below and submit a Response to Comments or Work Plan Addendum by December 30, 2005, prior to initiating field activities. Upon ACEH approval of the Response to Comments or Work Plan Addendum, we request that you perform the proposed work and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Table 1.** In future analytical data tables, please show in the headers or footnotes, the units for the concentrations shown on the table. The data in Table 1 appear to be in milligrams per kilogram with the exception of PCBs. Based on the Phase I report, the PCB concentrations shown on Table 1 are in micrograms per kilogram ($\mu\text{g}/\text{kg}$) but the ESL for commercial/industrial land use shown at the bottom of the page is in milligrams per kilogram. Therefore, the PCB concentrations shown in bold on Table 1 do not exceed ESLs for commercial/industrial (740 $\mu\text{g}/\text{kg}$) or residential (220 $\mu\text{g}/\text{kg}$) land use. The detection of 240 $\mu\text{g}/\text{kg}$ of PCBs previously reported in the Phase I report was omitted from Table 1. Table 1 also omits detections of thallium at concentrations exceeding ESLs in several soil samples. Please correct these items in future analytical data tables.
2. **Soil Sampling.** ACEH concurs with the proposed depths for collection of soil samples for laboratory analysis provided that soil samples are also collected from zones where staining, odor, or elevated PID readings are observed. In order to screen the soil samples, ACEH requests that soils be continuously sampled and logged in the direct push borings. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the contamination within this interval.
3. **Proposed Boring Locations in North Yard Area.** ACEH requests that three additional borings be included in the site investigation of the North Yard Area as shown on the

attached figure of requested boring locations. ACEH also requests that two of the proposed borings in the area of B-2 be moved as shown on the attached figure.

4. **Proposed Laboratory Analysis for Borings in North Yard Area.** The Work Plan indicates that two samples will be collected from each boring for laboratory analysis, one at a depth of 1 to 2 feet bgs and one at a depth of 3 to 6 feet bgs. The Work Plan proposes that the lower sample will not be analyzed for metals unless the shallow soil sample contains metals at concentrations exceeding ESLs. This assumes that metals contamination will not be present in deep samples if elevated concentrations of metals are not present in shallow samples. In samples collected from similar depths in boring B-5, the concentrations of most metals were higher in the deeper sample. Because the shallow soil sample may not provide reliable indications of contamination in the lower interval, ACEH requests that both the shallow and deep soil samples be analyzed for metals. ACEH requests that soil samples be analyzed for the 17 Appendix IX metals rather than only total chromium and nickel.
5. **Proposed Boring Locations In Area West of Main Building.** ACEH concurs with the proposed boring locations but requests that an additional boring be located adjacent to surface sample SS-1. Only one surface soil sample has been collected at location SS-1. Therefore, the depth of contamination at this location has not been determined. Please include one boring in the vicinity of SS-1 to assess the vertical extent of contamination in this area.
6. **Proposed Laboratory Analysis for Borings Area West of Main Building.** ACEH requests that all soil samples collected in the Area West of Main Building be analyzed for the 17 Appendix IX metals rather than only arsenic, chromium, and lead.
7. **Proposed Groundwater Sampling.** The Work plan does not describe the method for collection of grab groundwater samples. Please provide a description of the direct push sampling device or temporary sampling point that will be used to collect the grab groundwater samples. ACEH concurs with the proposed grab groundwater sampling locations and laboratory analyses but requests that one groundwater sample be collected adjacent to B-2 as shown on the attached figure showing requested boring locations. ACEH also requests that the proposed groundwater sampling location in the Area West of the Main Building be moved south as shown on the attached figure.
8. **Geotracker EDF Submittals.** Pursuant to CCR Sections 2729 and 2729.1, beginning July 1, 2005, all analytical data submitted in a report to a regulatory agency as part of the SLIC program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please upload all required data collected after July 1, 2005 to the SWRCB's Geotracker database website in accordance with the above-cited regulation.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **December 30, 2005** – Response to Agency Comments or Work Plan Addendum
- **April 7, 2006** - Soil and Groundwater Investigation Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to 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 Instructions." 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. 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

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

Mr. Richard Rinck
November 23, 2005
Page 4

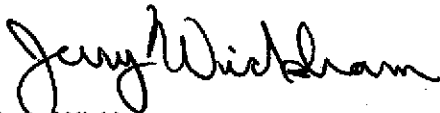
appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

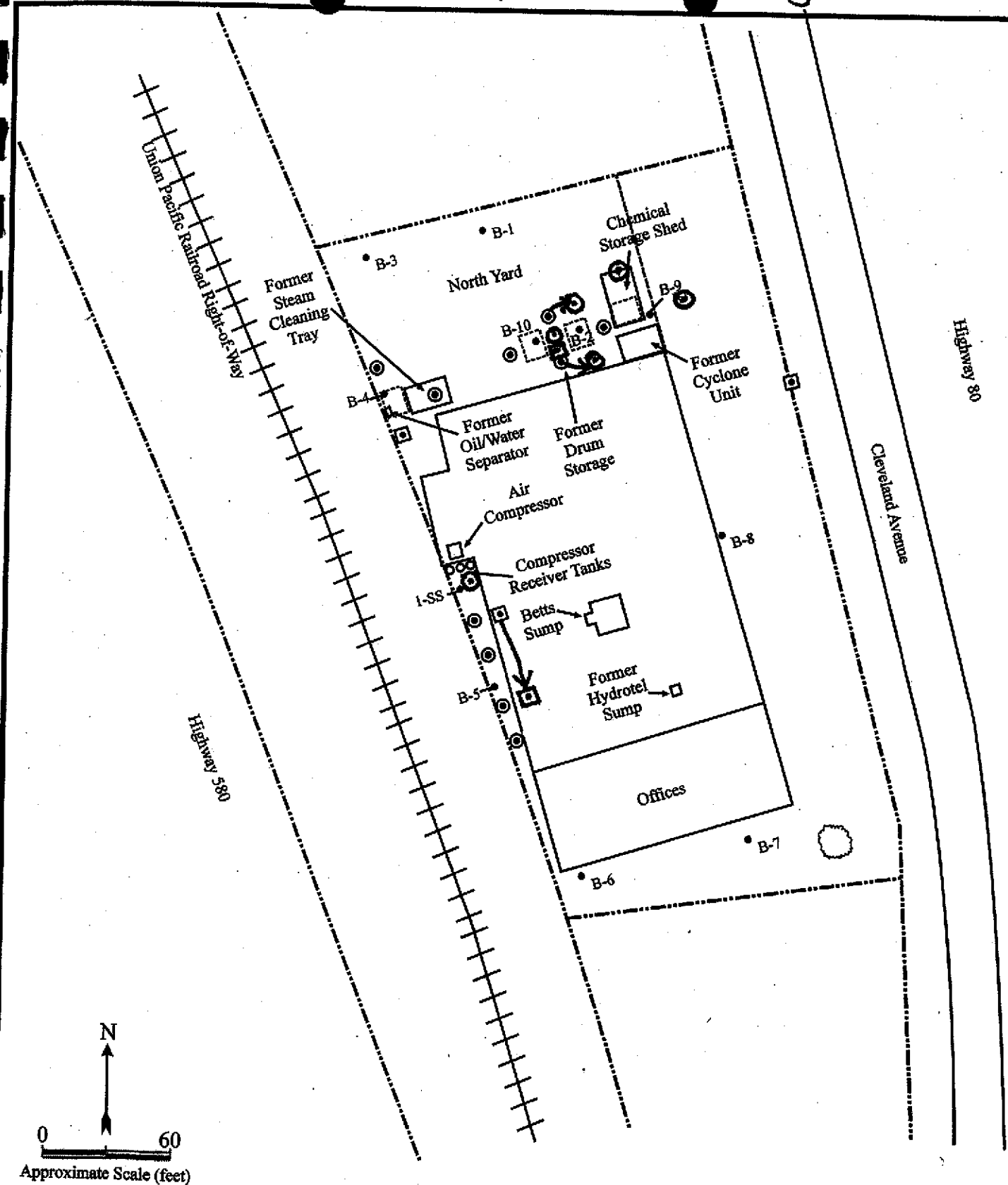
Attachment A: Requested Boring Locations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Michael Zimmerman
Clayton Group Services, Inc.
6920 Koll Center Parkway, Suite 216
Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Attachment A: Requested Boring Locations



LEGEND

- Approximate Property Line
- Boring Completed by ERM prior to May 2004
- ⊙ Proposed Soil Boring Location
- Proposed Grab Groundwater Sample Location
- North Yard Excavation Completed in 2004

FACILITY SITE PLAN

GE Healthcare
 Caral Division
 578 Cleveland Avenue
 Albany, California
 Clayton Project No. 70-04583.02.000

FIGURE

2



BUREAU
 VERITAS

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
10-13-05

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

October 13, 2005

Mr. Richard Rinck
GE Healthcare
389 Oyster Point Blvd.
South San Francisco, CA 94080

Subject: SLIC Case No. RO0002874, GE Imatron/Caral Manufacturing, 578 Cleveland Avenue, Albany, CA

Dear Mr. Rinck:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site and the reports entitled, "Closure Report," dated May 24, 2005, prepared on your behalf by Clayton Group Services, Inc. and "Phase I Update, Caral Manufacturing Facility," dated May 2004, prepared on your behalf by Environmental Resources Management. ACEH reviewed the reports to assess whether site investigation and remedial action for soil and groundwater contamination was complete or whether further actions were needed. The scope of this review was limited to soil and groundwater contamination and did not include review of other environmental conditions such as asbestos within buildings, lead-based paint, or decontamination of building surfaces.

The "Closure Report" documents the results of hazardous waste closure activities, waste removal, cleanup, and sampling activities conducted in 2004. The "Phase I Update" presents the results of soil, sediment, and groundwater sampling conducted at the site in 2001 and 2002. Soil sampling has indicated the presence of elevated concentrations of petroleum hydrocarbons in several areas of the site. Trichloroethene was detected in soil at concentrations up to 29 milligrams per kilogram (mg/kg) in the area north of the main building. Elevated concentrations of metals have been detected in soils along the western side of the building and in soils in the area north of the building. The soils have been excavated to remove petroleum hydrocarbons in the area of one sump and at four isolated locations north of the main building. Only one groundwater sample has been collected to date at the site. Pentachlorophenol was detected at a concentration of 210 micrograms per liter ($\mu\text{g/L}$), which significantly exceeds water quality criteria for the site. The lateral and vertical extent of contamination at the site does not appear to have been fully defined. Therefore, we request that you submit a work plan to fully define the extent of contamination in soil and groundwater for the site by December 16, 2005.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Assessment of Betts Sump.** Soil samples were collected from four soil borings located around the perimeter of the Betts sump. No VOCs, SVOCs, or PCBs were detected in the

soil samples. Total oil and grease was detected at concentrations of 43 to 61 mg/kg in the four soil samples. Based on these results for the borings around the perimeter of the Betts Sump, no further investigation or cleanup is required in the area of the Betts Sump.

2. **Cleanup and Assessment of Hydrotel Sump.** Elevated concentrations of petroleum hydrocarbons were detected in soil samples collected around the perimeter of the Hydrotel sump. Several VOCs, SVOCs, and metals were also detected in the soil samples. PCBs were not detected. Total oil and grease was detected in soil at concentrations of 3,100 to 38,000 mg/kg. GE Healthcare excavated contaminated soil around the Hydrotel sump in the warehouse and office areas. Based on confirmation sampling results, no further excavation is required to remove contaminated soil in the area of the Hydrotel sump.
3. **Boring Locations B-2, B-9, and B-10 in North Yard Area.** Elevated concentrations of petroleum hydrocarbons were detected in soil samples from borings B-2, B-9, and B-10, which are located outside the north end of the building. Trichloroethene was detected in two soil samples from boring B-2 at concentrations of 14 and 29 mg/kg, respectively. Elevated concentrations of chromium and nickel were also detected in shallow soil samples from borings B-9 and B-10. A lens of odorous soil was observed in borings B-2 and B-10. GE Healthcare excavated and removed soils from each of boring locations B-2, B-9, and B-10. However, the dimensions of the excavations were limited to the areas of approximately 35 to 50 square feet surrounding the borings. Further investigation is required in the area north of the main building in the area of borings B-2, B-9, and B-10 to confirm that contaminated soils in this area have been removed.
4. **Boring B-4 and Oil/Water Separator.** The excavation in the area of the former oil/water separator was limited to an approximately 9.3 feet long by 8.5 feet wide, and 3.3 feet deep near the former oil/water separator. No samples appear to have been collected in the area of the former tray used for steam cleaning. Further investigation is required in this area to confirm that contaminated soils in the area of the former oil/water separator have been removed and to investigate the area of the former steam cleaning tray including the area where drainage from the steam cleaning tray may have flowed at the surface.
5. **Area West of Main Building.** Arsenic was detected at a concentration of 2,200 mg/kg in a soil sample collected at a depth of 1.5 feet bgs in boring B5. This concentration greatly exceeds the ESL for shallow soil of 5.5 mg/kg and the California-Modified Preliminary Remediation Goal (PRG) of 0.25 mg/kg for industrial sites. Elevated concentrations of lead and chromium were detected in soil sample SS-1. PCBs were also detected in soil and sediment samples collected west of the building near the air compressor system. Further investigation is required in the area of borings B-5 and SS-1 west of the building to define the lateral and vertical extent of elevated concentrations of soil contamination.
6. **Groundwater.** Only one groundwater sample has been collected at the site (B-4W). Pentachlorophenol was detected in the groundwater sample at a concentration of 210 µg/L. In addition, TPH as diesel was also detected in the groundwater sample at a concentration of 150 µg/L. Based on the detection of elevated concentrations of TPH, VOCs, and metals in soils and the elevated concentration of pentachlorophenol detected in groundwater, additional groundwater sampling is required to define the extent of groundwater contamination at the site. Please present plans to collect groundwater samples in the work plan requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **December 16, 2005 - Work Plan for Soil and Groundwater Investigation**
- **120 days after ACEH approval of Work Plan – Subsurface Investigation Report**

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to 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 Instructions." 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. 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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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.

UNDERGROUND STORAGE TANK CLEANUP FUND

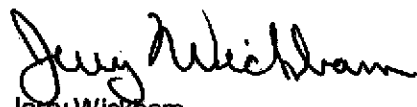
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
9-1-05

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

August 17, 2005

Mr. Richard Rinck
GE Healthcare
389 Oyster Point Blvd.
South San Francisco, CA 94080

Dear Mr. Richard Rinck:

Subject: TOXICS Case RO0002874, GE Imatron/Caral Manufacturing, 578 Cleveland Ave.,
Albany, CA 94710

In order for ACEH to review reports for your site, we would require an oversight account for the above-referenced site. To set up your account, please send a check in the amount of \$6000.00 payable to Alameda County Environmental Health. Please send your check to the attention of our Finance Department.

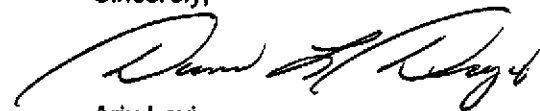
This initial deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$166.00 per hour.

Please write "TOXICS" (the type of project) the site address and the AR# 0314827 on your check.

If you have any questions, please contact Jerry Wickham at (510) 567-6791.

Sincerely,


Ariu Levi
Division Chief

cc: D. Drogos, J. Jacobs, J. Wickham

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02874 (578 Cleveland)

July 25, 1991

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

Mr. Michael Musheno
McLaren/Hart Environmental Engineering Corp.
Airport Business Center
International Court Two, Suite 300
200 Stevens Drive
Lester, PA 19113

Re: Site search for soil and/or groundwater contamination at two
Alameda County sites

Dear Mr. Musheno:

I have researched the files for two sites:

Caral Division
Kue-Ken Corporation
578 Cleveland Ave.
Albany, Ca 94710

Kue-Ken Corporation
8383 Baldwin St.
Oakland, Ca 94621

There is no information in our records noting any soil and/or
groundwater contamination at the above two addresses. This letter
is limited to information currently available to this department
and does not reflect any other information which maybe accessible
from other local agencies involved with this business.

You will be billed for the provision of this service. Please find
enclosed a copy of the invoice sent to our billing unit.

If you have any questions concerning this matter, please contact me
at 415-271-4320.

Sincerely,

Handwritten signature of F. Young Fong in cursive.

F. Young Fong
Environmental Health Specialist

FYF:lp