



An Employee-Owned Company

August 23, 2011

Mr. Jerry Wickham, PG
Senior Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay parkway, Suite 250
Alameda, Ca 94502-6577

RE: Approval for Fill Material at the Red Star Site, 1396 5th Street, Oakland, Ca

Dear Mr. Wickham:

Thank you for taking the time to discuss several aspects of the remediation activities currently underway at this site. As you are aware, the primary contaminants of concern are lead and petroleum (oil and diesel range), and elevated lead concentrations appear to be widespread along the western half of the site down to at least 6 feet deep. Currently, we have excavated the western half of the site to a depth of about 5-6 feet and the eastern side to about 2-4 feet bgs. The western side of the site still has elevated lead at the base, and you informed me that if we leave soil contaminants at concentrations above the currently accepted screening levels at the base of the excavation, there is a strong possibility that the County will have to issue a deed restriction for this property. We want to avoid having a deed restriction on the property; and therefore, we will make a valid effort to extend the western pit 1-2 feet deeper (approximately 7 feet bgs) in an attempt to remove the remaining impacted soil.

Another important issue that requires your input is the import material we have selected has elevated arsenic concentrations (3-5.5 mg/Kg). This material is crushed concrete with perhaps a low percentage of asphalt, but it is optimal backfill material for this site. As we discussed on the phone, the background concentration of arsenic at the Subject Property is almost less than detectable, and we are wondering if we can still utilize this material as backfill even if the arsenic concentrations exceed the current California screening levels. Our argument supporting the use of this material as backfill is that the California EPA has produced evidence that background soils throughout Southern California contain elevated levels of Arsenic (sometimes over 10 mg/Kg). Therefore, even if we found other sources of backfill, the material is likely to have arsenic above the current regulatory standards and above the concentrations found at this site.

We are planning on finishing the excavation activities by Thursday and importing material by the end of Thursday. Is there a chance you could provide some feedback on this issue sometime tomorrow?

If you have any questions or comments, you can reach me on my cellular phone at 310-567-5743.

Sincerely,
Citadel Environmental Services, Inc.

Dan Louks, P.E.
Project Manager

CITADEL **Project No. 5076.088**

Request to Rescind General NPDES Permit No. CAG994004

1919 Santa Monica Boulevard Building

Santa Monica, California

May 21, 2007

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