

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

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

December 26, 2006

Mr. Peter McGing
Equity Office Properties
Two North Riverside Plaza, Suite 2100
Chicago, IL 60606

Subject: Fuel Leak Case No. RO0002900, SPK Industrial Property, 700 Independent Road, Oakland, CA 94621 – Work Plan Approval

Dear Mr. McGing:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site, including the recently submitted document entitled, "Work Plan for Further Site Investigation, 700 Independent Road, Oakland, California," dated December 12, 2006, prepared on your behalf by Kleinfelder, Inc. The work plan proposes the collection of soil vapor samples to assess potential indoor vapor intrusion, soil borings and monitoring wells to further delineate the extent of contamination, a well survey, a map of potential preferential pathways, and uploading site information to Geotracker. The proposed scope of work is generally acceptable provided that the technical comments below are addressed and incorporated during the field investigation. Submittal of a revised work plan is not required.

We request that you address the following technical comments, perform the proposed work, and send us the reports described 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. Proposed Soil Vapor Sampling.** The proposed locations and methods for soil vapor sampling are acceptable. However, the laboratory analytical methods are not described in the Work Plan. The soil vapor samples are to be analyzed for TPH as gasoline, BTEX, and MTBE by EPA Method 8260 or TO15. EPA Method 8260 is acceptable provided that a reporting limit of 85 micrograms per cubic meter can be achieved for benzene. Please present the results in the Site Investigation Report requested below.
- 2. Proposed Soil Boring Locations.** We request that one additional deeper soil boring be advanced near boring K-1 as shown on the attached Revised Plate 2. Elevated concentrations of dissolved phase hydrocarbons were previously detected in the lower groundwater sample collected from boring K-1. Therefore, vertical delineation is required in the area of boring K-1.
- 3. Proposed Soil Boring Depths and Methods.** We request that the deeper soil borings proposed to a depth of 40 feet bgs be extended to a minimum of 45 feet bgs. If soil staining, odor, or elevated PID readings are observed within the lower five feet of the boring, the soil borings should be extended more than 45 feet bgs until soil staining, odor, or elevated PID

readings are no longer observed. The proposed methods for continuous logging of soil borings and selection of soil samples for laboratory analysis are acceptable. Please present the results in the Site Investigation Report requested below.

4. **Proposed Groundwater Grab Sampling.** For the soil borings that are proposed to a depth of 25 feet bgs, grab groundwater samples are to be collected from the upper portion of the water table (approximately 10 feet bgs) and the sand layer that was encountered in previous soil borings at depths of 16 to 23 feet bgs. For the borings that are to be extended to 45 feet bgs or deeper, grab groundwater samples are to be collected from the upper portion of the water table (approximately 10 feet bgs), the sand layer that was encountered in previous soil borings at depths of 16 to 23 feet bgs, and any significant water-bearing layers encountered below 25 feet bgs. Proposed grab groundwater sampling methods are not fully described in the December 12, 2006 Work Plan. We request that the grab groundwater sampling methods that are described in section 3.3 of the April 28, 2006 Site Investigation Work Plan be used for this proposed investigation. Please present the grab groundwater sampling results in the Site Investigation Report requested below.
5. **Monitoring Well Installation.** Soils are to be logged continuously in order to identify fine-grained layers that potentially prevent vertical movement of groundwater. Periodically stopping drilling to allow groundwater to enter the borehole may be necessary, depending upon encountered conditions. It is important that monitoring well filter packs and screens do not breach confining layers or layers that form the base of a perched groundwater zone to avoid ambient vertical flow across these layers as a result of the well installation. The length of the filter pack and screen interval and the stratigraphic interval over which the filter pack and screen interval extend are to be adjusted as necessary to avoid breaching of confining or perching layers. In no case shall the well screen exceed a length of 10 feet and the filter pack exceed a length of 12 feet.
6. **Well Survey.** We request that you locate all water supply wells (monitoring and production wells: active, inactive, standby, decommissioned, abandoned and dewatering, drainage and cathodic protection wells) within 2,000 ft of the subject site. We recommend that you obtain well information from both the Alameda County Public Works Agency and the State of California Department of Water Resources, at a minimum. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data, including well construction details, collected as part of your survey are required. Well construction details are to include the well diameter, screen slot size, total depth of the boring, depths of the screened interval, depths of the filter pack, year of installation, and other construction details that may be relevant. The status of the water supply well, whether active, decommissioned, or unknown is to be included where known. Please present your results in the Site Investigation Report requested below.
7. **Preferential Pathways.** Please show on a site plan in the Site Investigation Report requested below, the utilities in the area of the former UST that potentially could act as preferential pathways for contaminant migration.
8. **Geotracker Submittals.** A review of the SWRCB Geotracker website indicates that no data or reports have been submitted to Geotracker for your site. Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be

transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload **by January 23, 2007** all analytical data (collected on or after September 1, 2001) and a copy, in PDF format, of all reports prepared after July 1, 2005.

TECHNICAL REPORT REQUEST

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

- **May 11, 2007** – 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

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.

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

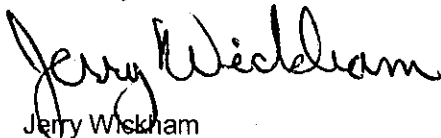
Please be aware that you may be eligible for reimbursement of the costs of investigation from the California Underground Storage Tank Cleanup Fund (Fund). In some cases, a deductible amount may apply. If you believe you meet the eligibility requirements, I strongly encourage you to call the Fund for an application.

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: Revised Plate 2

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Mr. Peter McGing
December 26, 2006
Page 5

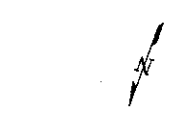
cc: Charles Almestad
Kleinfelder, Inc.
1970 Broadway, Suite 710
Oakland, CA 94612

Alvaro Dominguez
Kleinfelder, Inc.
1970 Broadway, Suite 710
Oakland, CA 94612

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

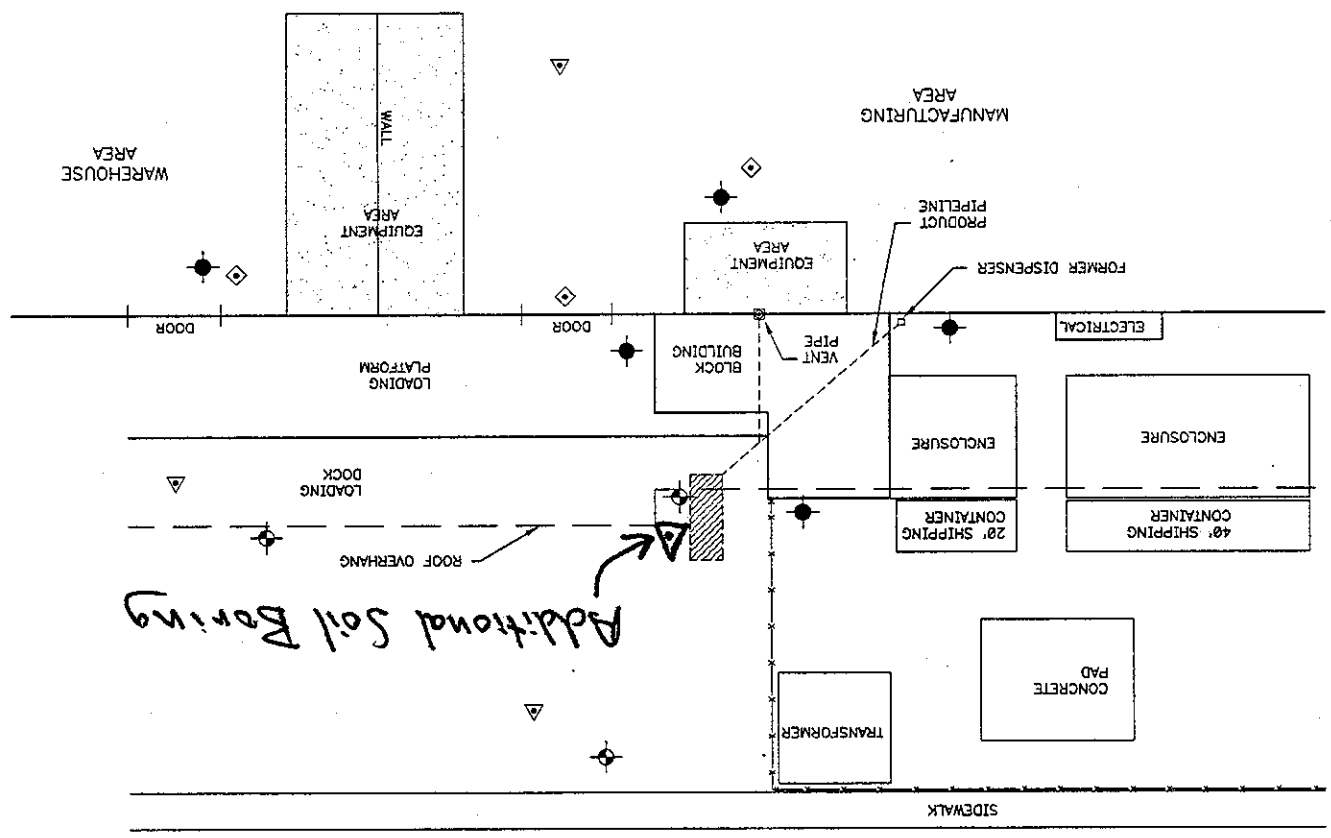
© by Kleinfelder Inc., 2006

APPROXIMATE SCALE (feet)
 20 10 0 20



NOTE: Locations are approximate.

- LEGEND**
- ◆ PROPOSED SOIL BORING 25 feet below ground surface
 - ▲ PROPOSED SOIL BORING 40 feet below ground surface
 - PROPOSED SOIL VAPOR LOCATION
 - ⊕ PROPOSED GROUNDWATER MONITORING WELL
 - ▨ FORMER UNDERGROUND STORAGE TANK
 - - - PRODUCT PIPELINE
 - FENCE



DRAWN BY: J. Sala
 REVISD BY:
 CHECKED BY: A. Dominguez
 DATE: DEC 2006
 APPROVED BY:

PROPOSED SAMPLING LOCATIONS

700 INDEPENDENT ROAD
 OAKLAND, CALIFORNIA

PROJECT: 545842 FILE NAME: PROP SAMPLING.dwg

KLEINFELDER

710 Broadway, Suite 710
 Oakland, CA 94612-2212
 Ph. (510) 628-9000 FAX. (510) 628-9009
 www.kleinfelder.com

PLATE
2

Revised Plate 2

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

October 6, 2006

Mr. Peter McGing
Equity Office Properties
Two North Riverside Plaza, Suite 2100
Chicago, IL 60606

Subject: Fuel Leak Case No. R00002900, SPK Industrial Property, 700 Independent Road, Oakland, CA 94621

Dear Mr. McGing:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site, including the report entitled, "Site Field Investigation, 700 Independent Road, Oakland, California," dated September 27, 2006, prepared on your behalf by Kleinfelder, Inc. The report summarizes results from soil and groundwater sampling completed in July and August 2006. Elevated concentrations of total petroleum hydrocarbons as gasoline (TPHg), TPH as diesel, and BTEX were detected in soil and groundwater samples collected from multiple soil borings in the area of the former UST. The extent of elevated concentrations of fuel hydrocarbons in soil and groundwater southeast of the former UST is not known. No soil removal or other remediation has been conducted at the site to date.

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

TECHNICAL COMMENTS

- 1. Potential Indoor Vapor Intrusion and Horizontal Extent of Contamination.** The report indicates that, "the area where benzene exceeds the indoor air ESL is below exterior pavement and not under building structures, except possibly the exterior corner of the block building." The soil samples collected from borings HA-1 and HA-2 were limited to depths of four feet bgs. The highest concentrations of fuel hydrocarbons detected in soil in other borings were typically detected at a depth of 8 feet bgs. No soil or groundwater samples have been collected to define the extent of elevated concentrations of benzene in soil and groundwater southeast of the former UST in the block building or warehouse. Please propose soil and groundwater sampling to define the extent of contamination east and southeast of the former USTs. We request that you conduct soil vapor or subslab sampling within the existing structures to assess the potential for indoor vapor intrusion. Please present plans for soil, groundwater, and soil vapor or subslab sampling within the Work Plan requested below.
- 2. Vertical Delineation.** The highest concentration of benzene detected in soil at the site was detected in the lowest soil sample collected from boring K-1 at a depth of 19 feet bgs. The highest concentration of benzene detected in groundwater was detected in the groundwater sample collected at a depth of 25 feet bgs from boring K-1. Based on the increasing

concentrations with depth observed in boring K-1, it does not appear that the vertical extent of contamination was defined. In addition, a sandy layer was encountered below a depth of approximately 19 feet bgs in the deeper borings K-1, K-7, K-12, and K-13. Staining, elevated PID readings, and elevated analytical results indicate that this sandy layer has been significantly impacted by the release from the UST. We request that you propose additional soil and groundwater sampling to assess the vertical extent of contamination and the extent of contamination within the sandy layer encountered below a depth of approximately 19 feet bgs in boring K-1, K-7, K-12, and K-13.

3. **Groundwater Beneficial Use.** Groundwater in the area of the site is a potential drinking water source (East Bay Plain Groundwater Basin Beneficial Use Evaluation Report, California Regional Water Quality Control Board, San Francisco Bay Region, June 1999). Therefore, comparison to Environmental Screening Levels (ESLs) for industrial sites where groundwater is not a current or potential source of drinking water is not appropriate. ESLs for industrial sites where groundwater is not a current or potential source of drinking water are not the lowest established ESLs as stated in the Site Field Investigation report. The site is located adjacent to the historic Fitchburg well field, which is an area with a high density of historic wells. The area near the Fitchburg well field is an area of higher concern (conceptual well head protection zone) due to the potential for historic wells to act as vertical conduits and allow shallow contamination to migrate into deeper aquifers (Figure B-3 of the East Bay Plain Groundwater Basin Beneficial Use Evaluation Report). Aquatic habitat ESLs are also applicable at the site since a tidal channel is located south of 66th Avenue.
4. **Monitoring Wells.** Installation of monitoring wells is required to define the local hydraulic gradient at the site and confirm that the plume is stable or shrinking. Please include plans to install, develop, and sample monitoring wells in the Work Plan requested below.
5. **Well Survey.** We request that you locate all water supply wells (monitoring and production wells: active, inactive, standby, decommissioned, abandoned and dewatering, drainage and cathodic protection wells) within 2,000 ft of the subject site. We recommend that you obtain well information from both the Alameda County Public Works Agency and the State of California Department of Water Resources, at a minimum. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data, including well construction details, collected as part of your survey are required. Well construction details are to include the well diameter, screen slot size, total depth of the boring, depths of the screened interval, depths of the filter pack, year of installation, and other construction details that may be relevant. The status of the water supply well, whether active, decommissioned, or unknown is to be included where known. Please present your results in the Work Plan requested below.
6. **Preferential Pathways.** Please show on a site plan the utilities in the area of the former UST that potentially could act as preferential pathways for contaminant migration.
7. **Interim Remediation.** No remediation has apparently been conducted at the site to date. Soil removed during the tank excavation was apparently used as backfill in the upper five feet of the excavation. Due to the elevated concentrations of fuel hydrocarbons detected in soil and groundwater at the site, remediation in the source area will be required. Interim remediation may be proposed in the Work Plan requested below or following delineation of the horizontal and vertical extent of contamination.

8. **Geotracker Submittals.** A review of the SWRCB Geotracker website indicates that no data or reports have been submitted to Geotracker for your site. Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload **by December 13, 2006**, all analytical data (collected on or after September 1, 2001) and a copy, in PDF format, of all reports prepared after July 1, 2005.

TECHNICAL REPORT REQUEST

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

- **December 13, 2006 – 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.

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.

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 be aware that you may be eligible for reimbursement of the costs of investigation from the California Underground Storage Tank Cleanup Fund (Fund). In some cases, a deductible amount may apply. If you believe you meet the eligibility requirements, I strongly encourage you to call the Fund for an application.

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

Mr. Peter McGing
October 6, 2006
Page 5

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Charles Almestad
Kleinfelder, Inc.
1970 Broadway, Suite 710
Oakland, CA 94612

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Drogos, Donna, Env. Health

From: Drogos, Donna, Env. Health
Sent: Monday, August 28, 2006 4:25 PM
To: Hernan Gomez (hegomez@oaklandnet.com)
Cc: Leroy Griffin (lgriffin@oaklandnet.com)
Subject: 700 Independent Rd, Oakland 94621

Hernan,

Please send me the tank removal permits & the unauthorized release form for this site. Thanks, Donna

Donna L. Drogos, PE
LOP Program Manager
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502

510-567-6721
donna.drogos@acgov.org

Wickham, Jerry, Env. Health

To: Charlie Almestad
Cc: Pete_McGing@equityoffice.com; markfurse@furselaw.com
Subject: RE: Letter of May 11, 2006, RO0002900, 700 Independent Road

Charlie

You are correct that you are not required to re-submit the Work Plan to us. Our comment letter was written such that submittal of a revised Work Plan is not required as long as the comments are addressed during the investigation. Thank you for submittal of the information from Golder Associates work at the site. The subject heading on all letters includes the name given to the case when it is opened rather than the owner of the property. Once the case is given a name in Alameda County's database and Geotracker, the name is not changed for purposes of consistency.

Regards,
Jerry Wickham
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 Fax
jerry.wickham@acgov.org

From: Charlie Almestad [mailto:CALmestad@kleinfelder.com]
Sent: Wednesday, May 24, 2006 10:24 AM
To: Wickham, Jerry, Env. Health
Cc: Pete_McGing@equityoffice.com; markfurse@furselaw.com
Subject: Letter of May 11, 2006, RO0002900, 700 Independent Road

Hi Jerry:

We received your letter of May 11, 2006 concerning the work plan we prepared for the 700 Independent Road site (RO0002900). We are in agreement with your comments concerning: 1) collection of additional soil samples for chemical analysis if we observe staining, elevated PID readings, etc., 2) being prepared to advance step-out borings to further characterize the horizontal extent of impacted soil and ground water, 3) drilling two of the borings to a depth of 30 feet bgs to characterize the vertical extent of impacts, 4) request that the analytical laboratory additionally analyze the samples for ethylene dibromide and 1,2 dichloroethane, and 5) setup and upload data to the GeoTracker site. As your letter did not state that you required that the Work Plan be amended and resubmitted to note these items we will not do that, however we do, by way of this message, want to convey to you that we acknowledge your request and will carry it out. Results of this additional work will be reported in the investigation report due September 27, 2006. Also, we will provide you with written notification at least 72 hours in advance prior to the start of field activities.

Concerning work performed at the site by Golder Associates, we responded to your inquiry about a copy of a phase I report in an email message I sent you March 21, 2006. In that message we noted that the prospective buyer who retained Golder to do the work decided not to purchase the building before a report was prepared. Therefore, no report was prepared. We do have logs for borings they drilled and a copy of the laboratory report. I have attached a pdf file containing the lab report and Golder's logs to this email message for our

5/24/2006

information and use. Please note that Golder had a subcontractor advance and sample the borings as indicated on the logs.

Finally, we note that the subject heading on your letter references "SPK Industrial Property". The owner of the property is:
EOP-Industrial Portfolio, LLC, a Delaware limited liability company.

If you have any questions, comments or otherwise wish to discuss the property, please do not hesitate to call.
Thanks.

Charlie Almestad P.G., C.HG.
Kleinfelder Inc.
1970 Broadway
Suite 710
Oakland, CA 94612
510-628-9000
510-628-9009 fax

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



7

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

May 11, 2006

Mr. Peter McGing
Equity Office Properties
Two North Riverside Plaza, Suite 2100
Chicago, IL 60606

Subject: Fuel Leak Case No. RO0002900, SPK Industrial Property, 700 Independent Road, Oakland, CA 94621 – Work Plan Approval

Dear Mr. McGing:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site, including the report entitled, "Site Investigation Work Plan," dated April 28, 2006, prepared on your behalf by Kleinfelder, Inc. The Work Plan proposes advancing soil borings with collection of soil and groundwater samples in a grid pattern across the site to define the extent of contamination. The proposed scope of work contamination is generally acceptable provided that the technical comments below are addressed and incorporated during the field investigation.

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

REQUEST FOR INFORMATION

We previously requested a copy of a Phase I environmental site assessment report prepared by Golder Associates in 2004. Results from this report are referenced in the Work Plan. We again request that you submit a copy of this report. Unless this report is submitted, additional analyses may be required to confirm the referenced results.

TECHNICAL COMMENTS

1. **Soil Samples.** We concur with the collection of continuous soil samples for logging purposes in each boring. We also concur with the proposed method for selecting soil samples for laboratory analyses. One soil sample collected from the capillary fringe is to be submitted for laboratory analyses from each boring. If contamination is observed, soil samples are to be submitted for laboratory analyses for all depth intervals where the staining, odor, or elevated PID readings are observed. 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 fuel hydrocarbon concentrations within this interval. Please present the results in the Soil and Groundwater Investigation Report requested below.

2. **Soil Boring Locations.** We concur with the proposed grid pattern of soil borings. However, we request that step out borings be added as necessary in order to characterize the lateral extent of contamination if significant contamination is observed in the proposed borings during the field investigation.
3. **Depth of Soil Borings.** We request that two of the proposed soil borings, one in the vicinity of the former UST and one in a suspected downgradient location, be extended to a depth of approximately 30 feet bgs in order to characterize the vertical extent of contamination. Soil samples are to be collected as discussed in technical comment 1. For the two soil borings extended to 30 feet bgs, we request that you collect one grab groundwater sample from first-encountered groundwater and one or more grab groundwater samples from any coarse-grained water-bearing layers encountered below first-encountered groundwater. Please present the results in the Soil and Groundwater Investigation Report requested below.
4. **Laboratory Analyses.** We request with the proposed laboratory analyses but request that ethylene dibromide and 1,2-dichloroethane are also included as laboratory analytes.
5. **Geotracker EDF Submittals.** Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all analytical data (collected on or after September 1, 2001) and a copy, in PDF format, of all reports prepared after July 1, 2005.

TECHNICAL REPORT REQUEST

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

- **September 27, 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).

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.

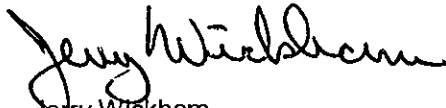
AGENCY OVERSIGHT

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.

Mr. Peter McGing
May 11, 2006
Page 4

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: Charles Almestad
Kleinfelder, Inc.
1970 Broadway, Suite 710
Oakland, CA 94612

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

R02900

Wickham, Jerry, Env. Health

From: Pete_McGing@equityoffice.com
Sent: Tuesday, March 21, 2006 6:34 PM
To: Wickham, Jerry, Env. Health
Cc: Charlie Almestad
Subject: RE: 700 Independent Road, RO0002900

Jerry - greetings, my name is Peter McGing, and I represent the owner. Long story short, this property was acquired by Equity Office Properties (EOP) as part of the merger of Spieker Properties (SPK) and Equity Office Properties in 2001. I am not sure why the assessor's records are not current. Please let me know if you need any type of formal documentation.

Regards.

Peter A. McGing, P.E.
VP - Investments Engineering
Equity Office Properties
Two North Riverside Plaza
Chicago, IL 60606

pete_mcing@equityoffice.com

Phone: (312) 466-3576
Fax: (312) 775-6568
Cell: (312) 953-1879

"Wickham, Jerry,
Env. Health"
<jerry.wickham@ac.gov.org>

03/21/2006 06:14
PM

To
"Charlie Almestad"
<CALmestad@kleinfelder.com>
cc
<Pete_McGing@equityoffice.com>
Subject
RE: 700 Independent Road, RO0002900

Charlie,

Presenting the Phase I analytical data and borings logs by Golder Associates as an appendix to the Work Plan is acceptable. I have received your letter submitted in response to the request for a list of record fee title holders. The letter identifies EOP Industrial Portfolio, LLC as the current property owner. The County Assessor's office lists SPK Industrial Properties, LLC as the current owner. Was there a recent transaction that is not reflected in the Assessor's records?

Regards,
Jerry Wickham
Hazardous Materials Specialist
Alameda County Environmental Health

1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 Fax
jerry.wickham@acgov.org

From: Charlie Almestad [mailto:CALmestad@kleinfelder.com]
Sent: Tuesday, March 21, 2006 8:41 AM
To: Wickham, Jerry, Env. Health
Cc: Pete_McGing@equityoffice.com
Subject: 700 Independent Road, RO0002900

Jerry:

We are in the process of preparing the workplan you requested in your February 24, 2006 letter to Peter McGing concerning the fuel leak case at 700 Independent Road in Oakland (RO0002900). We will submit that workplan on or before your specified due date of April 28, 2006.

Reviewing your letter we note that you requested email addresses for interested and responsible parties. Other than myself, you should also send all electronic correspondence concerning this site to Pete McGing at:

Pete_McGing@equityoffice.com

Also, you requested a copy of a Phase I report by Golder Associates and other investigation reports for the site. It is our understanding that Golder never actually prepared a report for the site as their client decided not to purchase the property. However, we do have copies of their chemical analytical report and boring logs. We will include these documents as an appendix to the workplan if this is acceptable to you. There are no other field investigation reports for the site to our knowledge.

Finally, you requested a Notice of Responsibility statement. As your letter preceded our submittal of that statement by a couple of days we assume you got that letter. Please let me know if you did not receive it. Also, please note that the owner of the site is:

EOP-Industrial Portfolio, L.L.C., a Delaware limited liability company

Please call or write if you have any questions or you need additional information.

Charlie Almestad P.G., C.HG.
Senior Client Manager
Kleinfelder Inc.
1970 Broadway, Suite 710
Oakland, CA 94612
510-628-9000
510-628-9009 fax



March 1, 2006
File: 54504/002

Alameda County
MAR 03 2006
Environmental Health

Mr. Jerry Wickham
Alameda County Health Care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502-6577

**Subject: Notice of Responsibility, 700 Independent Road, Oakland, California
Case ID R0002900**

Dear Mr. Wickham:

This letter was prepared in response to a Notice of Responsibility (dated February 17, 2006) received by Mr. Peter A. McGing for the above referenced property. On behalf of EOP Industrial Portfolio, L.L.C., a Delaware limited liability company, please be advised the current and only owner of the property is EOP Industrial Portfolio, L.L.C., a Delaware limited liability company. SPK Industrial Property no longer owns or has anything to do with the property. The owner's address is Two North Riverside Plaza, Suite 2100, Chicago, IL 60606. The owner's site contact is Peter A. McGing (312-466-3576). The owner and responsible party are one and the same. Kleinfelder Inc. has been engaged to provide environmental services regarding the former fuel tank on the site.

With regard to the attachment to the notice, as of the date of this writing, Kleinfelder has uploaded site environmental documents to the County's ftp site.

If you have any questions or need additional information, please do not hesitate to call.

Sincerely,

KLEINFELDER INC.

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

Charles Almestad PG., C.HG
Senior Client Manager

cc: Peter A. McGing, EOP Industrial Portfolio
Mark Furse Esq. Furse Law

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Peter A. McGing
 Equity Office Properties
 Two North Riverside Plaza, Suite 2100
 Chicago, IL 60606

2. Article Number
 (Transfer from service label)

7002 2030 0006 9574 1570

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]* Agent Addressee

B. Received by (Printed Name) _____ C. Date of Delivery **FEB 27 2006**

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below: _____

3. Service Type: Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail P.O.

4. Restricted Delivery? (Extra Fee) Yes

Environmental Health
 MAR 0 11 06
 Alameda County

2006 MAR -2 PM 1:58



7

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

February 24, 2006

Mr. Peter McGing
Equity Office Properties
Two North Riverside Plaza, Suite 2100
Chicago, IL 60606

Subject: Fuel Leak Case No. RO0002900, SPK Industrial Property, 700 Independent Road, Oakland, CA 94621 – Request for Work Plan

Dear Mr. McGing:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site, including the report entitled, "Underground Storage Tank Removal Report," dated November 1, 2005, prepared on your behalf by Kleinfelder, Inc. The report summarizes results from the removal of one approximately 1,100-gallon underground storage tank (UST). Elevated concentrations of total petroleum hydrocarbons as gasoline (TPHg) and total petroleum hydrocarbons as diesel (TPHd) were detected in soil samples collected from the UST excavation. Stained soil was observed in soil left in place surrounding the former UST. Fuel hydrocarbons were also detected in a soil sample collected in the area of a former fuel dispenser. Additional subsurface characterization to define the nature and extent of soil and groundwater contamination is required for this site.

Please submit a work plan detailing your proposal to define the extent of soil and groundwater contamination **by April 28, 2006**. This report is being requested pursuant to the Regional Water Quality Control Board's authority under Section 13267 of the California Water Code. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

REQUEST FOR INFORMATION

The "Underground Storage Tank Removal Report," dated November 1, 2005, references a limited soil and groundwater investigation conducted for a Phase I environmental site assessment by Golder Associates in 2004. We request that you submit a copy of this report along with other reports you have documenting investigation activities or other environmental work related to this site.

TECHNICAL COMMENTS

1. **Product Line.** The Norcal geophysical report that is Appendix A to the "Underground Storage Tank Removal Report," dated November 1, 2005 describes an apparent product line extending from the UST fill port to an apparent concrete dispenser foundation. Please describe the final disposition of this product line and whether the line was encountered within the tank excavation and the depth of the product line. Please include plans to define the potential extent of contamination beneath the product line in the Work Plan requested below.
2. **Dispenser.** The "Underground Storage Tank Removal Report," dated November 1, 2005 does not indicate whether excavation was performed in the area of the former dispenser. Please describe the scope of activities conducted during the UST removal in the area of the dispenser and the location and depth of product lines in the area of the dispenser, if known. Please include plans to investigate the extent of contamination in the area of the fuel dispenser.

TECHNICAL REPORT REQUEST

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

- **April 28, 2006** – Work Plan for Site Assessment

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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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.

LANDOWNER NOTIFICATION REQUIREMENTS

Pursuant to California Health & Safety Code Section 25297.15, the active or primary responsible party for a fuel leak case must inform all current property owners of the site of cleanup actions or requests for closure. Furthermore, ACEH may not consider any cleanup proposals or requests for case closure without assurance that this notification requirement has been met. Additionally, the active or primary responsible party is required to forward to ACEH a complete mailing list of all record fee title holders to the site. If you have not already submitted a list of record fee title owners in response to the Notice of Responsibility we require that you submit a complete mailing list of all record fee title owners of the site by **April 3, 2006**, which states, at a minimum, the following:

A. *In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:*

- OR -

B. *In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that I am the sole landowner for the above site.*

(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)

In the future, for you to meet these requirements when submitting cleanup proposals or requests for case closure, ACEH requires that you:

1. Notify all current record owners of fee title to the site of any cleanup proposals or requests for case closure;
2. Submit a letter to ACEH which certifies that the notification requirement in 25297.15(a) of the Health and Safety Code has been met;
3. Forward to ACEH a copy of your complete mailing list of all record fee title holders to the site; and
4. Update your mailing list of all record fee title holders, and repeat the process outlined above prior to submittal of any additional *Corrective Action Plan* or your *Request for Case Closure*.

Your written certification to ACEH (Item 2 above) must state, at a minimum, the following:

A. *In accordance with Section 25297.15(a) of the Health & Safety Code, I, (name of primary responsible party), certify that I have notified all responsible landowners of the enclosed proposed action. (Check space for applicable proposed action(s)):*

cleanup proposal (Corrective Action Plan)

request for case closure

local agency intention to make a determination that no further action is required

local agency intention to issue a closure letter

- OR -

B. *In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that I am the sole landowner for the above site.*

(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)

UNDERGROUND STORAGE TANK CLEANUP FUND

Please be aware that you may be eligible for reimbursement of the costs of investigation from the California Underground Storage Tank Cleanup Fund (Fund). In some cases, a deductible amount may apply. If you believe you meet the eligibility requirements, I strongly encourage you to call the Fund for an application.

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: Charles Almestad
Kleinfelder, Inc.
1970 Broadway, Suite 710
Oakland, CA 94612

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Drogos, Donna, Env. Health

From: Drogos, Donna, Env. Health
Sent: Tuesday, January 10, 2006 5:40 PM
To: Leroy Griffin (lgriffin@oaklandnet.com)
Cc: hgomez@oaklandnet.com
Subject: 700 Independent Rd
Importance: High

Please send me a copy of the Unauthorized Release Form for this site.

Also do you have any UST Forms A & B for this site that would assist us in identifying RPs?

Thanks, Donna

CITY OF OAKLAND FIRE DEPARTMENT
Office Of Emergency Services
 1605 Martin Luther King Jr. Way, Oakland, CA 94612

Hazardous Materials Program

Contaminated Site Case Transfer Form

Alameda County
 DEC 16 2005

Referral To:

Date	12/7/05
Agency	Alameda County Environmental Health, 1131 Harbor Bay Parkway, Alameda, CA 94502
Attention	Donna L. Drogos, LOP/SLIC Program Manager

Site Information:

Site Responsible Party(s)	
Site Name	Com. SPK INDUSTRIAL PROPERTY
Site Address	700 Independent Rd.
Site Phone	N/A
Site Contractor/Consultant (if available)	Kleinfelder Inc.
Site DBA	

Site Conditions:

UST			
USTs removed? # removed: <u>1</u>	Date removed: <u>8/17/5</u>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Contents (circle): <u>gasoline & diesel</u> waste oil heating oil solvents kerosene stoddard solvent other (specify) _____		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Observations of system (holes, leaks)?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Observed contamination (free product, smell, soil/water discoloration)?		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Detectable concentrations of soil and/or groundwater contamination?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
o Highest Concentration Detected in Soil Contaminant (specify) <u>Diesel</u> Concentration <u>5,090</u> ^{mg/kg} ppm			
o Highest Concentration Detected in Water Contaminant (specify) <u>Benzene</u> Concentration <u>9.8</u> ^{mg/L} ppb			
Unauthorized Release Form filed?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Future intended use if known? Specify _____		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
NON-UST			
Former industrial use?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
Detectable concentrations of soil and/or groundwater contamination?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
o Highest Concentration Detected in Soil Contaminant (specify) _____ Concentration _____ ppm			
o Highest Concentration Detected in Water Contaminant (specify) _____ Concentration _____ ppb			
Future intended use if known? Specify _____		Yes <input type="checkbox"/>	No <input type="checkbox"/>
<i>If available, attach pertinent reports</i>			

Transferred as: (LOP) SLIC

Level of Update requested: distribution list all meetings all site visits closure sign off all the above

Transfer requested by Inspector: H. Goines Date: 12/07/05

Transfer accepted by (ACEH): [Signature] Date: 01/10/06