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2:58 pm, Dec 19, 2008

Alameda County
Environmental Health

Ms. Teresa Clarke
Affordable Housing Associates
1250 Addison Street, Suite G
Berkeley, California 94702

RE: Opinion Letter - Stockpiled Soil
160 14th Street, Oakland, California
ACC Project Number 6179-014-02

Dear Mr. Clarke:

ACC Environmental Consultants, Inc. (ACC) is providing this Opinion Letter regarding soil presently stockpiled at 160 14th Street, Oakland, California (Figure 1) and generated during the installation of soldier piles onsite.

Soil Sampling Procedures

ACC personnel witnessed soil excavation activities associated with installation of soldier piles on July 21, 2006. Soil cuttings from soldier piles advanced in the vicinity of the former underground storage tanks (USTs) were segregated into two stockpiles. Soil from the surface to approximately 12 feet below ground surface was added to the soil planned for reuse onsite. Soil from approximately 12 feet bgs to 18 feet bgs which displayed field indications of subsurface impact such as soil discoloration and/or characteristic odor was stockpiled separately. The soil in this stockpile was noted to be free of fill materials and debris and consisted primarily of silt and silty clay.

ACC personnel collected two representative 4-point composites from the segregated soil stockpile, designating them COMP-1 and COMP-2. See Figure 2 for sample locations. These samples were transported under standard chain of custody protocols to Curtis & Tompkins, Ltd. (C&T), a state-certified analytical laboratory, and analyzed for: total petroleum hydrocarbons as gasoline (TPHg); benzene, toluene, ethyl-benzene, and total xylenes (BTEX); and methyl tert butyl ether (MTBE) by EPA Method 8260B. COMP-1 and COMP-2 analytical results are summarized in Table 1 below.

During a previous subsurface investigation conducted in April 2006, ACC collected representative soil samples from the vicinity of the former USTs. These samples were submitted to C&T, laboratory composited into sample B2-COMP, and analyzed them for the 17 California Assessment Manual

(CAM 17) metals by EPA Method 6010B. B2-COMP analytical results are summarized in Table 2 below.

Analytical Results

Both COMP-1 and COMP-2 soil sample analytical results reported concentrations below laboratory reporting limits for TPHg, BTEX, and MTBE. B2-COMP metal analyses reported concentrations well below the Regional Water Quality Control Board (RWQCB) Environmental Screening Levels values according to Table A, *Subsurface Soil and Groundwater Environmental Screening Levels (ESLs)*, from the RWQCB document *Application of Risk-Based Screening Levels and Decision Making to Sites with Impacted Soil and Groundwater (Interim Final - December 2005)*. A copy of analytical results attached.

TABLE 1 – TPHg/BTEX/MTBE SOIL RESULTS

| Sample ID | TPHg | Benzene | Toluene | Ethyl-benzene | Total Xylenes | MTBE |
|-----------|-------|---------|---------|---------------|---------------|---------|
| COMP-1 | <0.98 | <0.0049 | <0.0049 | <0.0049 | <0.0098 | <0.0049 |
| COMP-2 | <0.93 | <0.0046 | <0.0046 | <0.0046 | <0.0092 | <0.0046 |

TABLE 2 – CAM 17 METAL SOIL RESULTS

| Constituent | B2-COMP | North Bay Average* | Residential PRG** |
|-------------|---------|--------------------|-------------------|
| Antimony | <2.9 | 1.3-10 | 31 |
| Arsenic | 2.9 | 6-16 | 22 |
| Barium | 68 | 500 | 5,400 |
| Beryllium | 0.22 | <1 | 1,100 |
| Cadmium | <0.24 | --- | 1,400 |
| Chromium | 36 | 100-700 | 210 |
| Cobalt | 5.7 | 15-70 | 900 |
| Copper | 8.9 | 50-300 | 3,100 |
| Lead | 18 | 30-300 | 255 |
| Mercury | 0.066 | 0.082-0.13 | 23 |
| Molybdenum | <0.97 | <3 | 390 |
| Nickel | 23 | 30-200 | 1,600 |
| Selenium | <0.24 | 0.5 | 390 |
| Silver | <0.24 | --- | 390 |
| Thallium | <0.24 | --- | 5.2 |
| Vanadium | 32 | 150-500 | 78 |
| Zinc | 42 | 150-500 | 23,000 |

Notes: All soil results reported in micrograms per kilogram (mg/kg), approximately equal to parts per million

Ms. Teresa Clarke
160 14th Street, Oakland, California
July 25, 2006
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*< Sample tested below the laboratory minimum detection limit indicated
* According to United States Geologic Survey Professional Paper 1270
** Residential Preliminary Remediation Goal set by USEPA Region 9 as of October 2004*

Conclusion

Based on representative soil sample analytical results, ACC believes this soil should be profiled and accepted at a local permitted facility. Concentrations of constituents analyzed were reported at low to nondetect concentrations and meet soil acceptance criteria as non-hazardous soil.

If you have any questions, please contact me at (510) 638-8400, ext. 109.

Sincerely,

A handwritten signature in black ink that reads "David R. DeMent". The signature is written in a cursive style with a large, stylized "D" at the beginning.

David R. DeMent, PG, REA II
Senior Geologist

/trb:drd