ALTREA, LLC.

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March 6, 2007

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

RE: Revised Work Plan for Subsurface Investigation of Below-Ground Hydraulic Elevator Unit, 7200 Johnson Drive, Pleasanton, CA

Dear Mr Wickham:

On behalf of Clorox Services Company (Clorox), Altrea, LLC (Altrea) has prepared the following revision to the work plan for a subsurface investigation of a below-ground hydraulic freight elevator unit located in Building No. 3 at 7200 Johnson Drive in Pleasanton, Alameda County, California (*subject site)*. The work plan was dated December 20, 2006, "*Work Plan for Subsurface Investigation of Below-Ground Elevator Unit, 7200 Johnson Drive, Pleasanton, Alameda County, CA*." In your review of the work plan presented by letter dated February 13, 2007, you requested further information on the construction details of the below-grade hydraulic elevator components, and the proposed sampling technique. The pre-field tasks in the December 20, 2006 work plan also called for an assessment of the elevator construction details and a site inspection to develop the details for the proposed soil and groundwater sampling. This revision addresses your comments and the pre-field assessment tasks in the work plan.

The attached **Figure 1** presents the location of the freight elevator subject of the investigation. Altrea proposes to collect soil and groundwater samples in the vicinity of the former below-grade, steel encased hydraulic elevator jack assembly, submit soil and groundwater samples for laboratory analyses for hydraulic oil-range petroleum hydrocarbons, and prepare a technical report on the investigation results.

Construction of Jack Assembly and Steel Casing

On February 20, 2007, a representative for Altrea visited the elevator pit area in the basement of Building No. 3. The elevator jack assembly consisted of a cylindrical piston of approximately 6-inch diameter inside a steel cylinder of approximately 10-inch diameter with a closed bottom. The jack assembly was removed in December 2006 by the elevator service contractor for Clorox,

Thyssen Krupp Elevator (TKE). The jack assembly was housed in an outer steel casing of approximately 22-inch diameter that was suspected to be open at the bottom. The outer steel casing was left in-situ. The removal of the below-grade hydraulic jack assembly and drilling out of the filler within the outer steel casing were documented in a technical report by Altrea dated December 18, 2006 ("*Leaking Subsurface Hydraulic Elevator Cylinder, Clorox Facility Located at 7200 Johnson Drive, Pleasanton, California 94588*"). In a letter dated January 31, 2007, the Livermore-Pleasanton Fire Department documented the hydraulic oil leak in the jack assembly; the leak was confirmed by TKE in December 2006. TKE reported that the jack assembly had a hole at approximately 28 feet below the elevator pit floor.

On February 20, 2007, Altrea reviewed the collection of plans and facility documents for Building No. 3 available at the maintenance staff office in Building No. 3. There were no plans or construction details found for the freight elevator. Altrea also visited the City of Pleasanton Building Department and inquired on the availability of as-built plans or records for Building No. 3, Clorox Facility. No records or as-built plans were found in the Pleasanton Building Department for the freight elevator of Building No. 3.

Figure 1 shows the location of the hydraulic elevator system. The hydraulic elevator system is currently not in operation. In December 2006, TKE drained the hydraulic oil from the system, locked the elevator cab in place, and removed the below-ground jack assembly (Altrea, December 18, 2006). Also in December 2006, the drilling contractor (McRae, Inc.) drilled out the sand and pumped out groundwater from the outer steel casing that was left in-situ below the elevator pit. A temporary plug was placed on the exposed top of the steel casing and the area was secured.

Based on inspection and discussions with Clorox and McRae, the elevator system was comprised of a subsurface closed loop system consisting of a jack assembly (piston and cylinder) installed in an outer steel casing. The jack assembly extended to approximately forty (40) feet below the elevator pit floor. The bottom of the outer steel casing terminated at approximately 42 feet below the elevator pit floor. The elevator pit floor is approximately 4.5 feet below the basement floor. The attached **Figure 2** is a plan view and cross-section of the elevator pit in the basement of Building No. 3.

The hydraulic oil storage tank for the below-ground jack assembly was located at floor level in a utility room in the basement, approximately twenty (20) feet northwest of the elevator pit (**Figure 2**). The hydraulic piping extended above-ground along walls and the basement ceiling from the storage tank to the jack assembly in the elevator pit.

The outer steel casing that housed the jack assembly was not accessible for visual inspection on February 20, 2007 because the top is plugged and the casing is occupied by groundwater. Visual inspection of the condition of the upper portion of the steel casing with respect to location of joints and possible evidence of steel corrosion or deterioration could not be performed. Before the casing was plugged, in December 2006, McRae's visual inspection indicated 22-inch outside diameter steel casing with 0.250-inch steel which is typically butt welded in sections for installation.

Prior to the drilling of the proposed borings, Altrea plans to partially dewater the outer casing and then attempt to make a visual assessment of the exposed surface in the top portion of the steel casing.

Site Plan

Figure 2 is a plan view and cross-sectional view of the elevator pit area in the basement of Building No. 3. The figure presents a preliminary schematic of the jack assembly and outer steel casing, as requested in your letter of February 13, 2007. **Figure 2** also presents the proposed boring locations.

Soil Sampling

Based on our review of the construction details and jack assembly records, Altrea presents the following additional details of the proposed sampling presented in the work plan of December 20, 2006:

- Information provided by McRae indicates possible artesian groundwater conditions in the existing steel-encased borehole of the former jack assembly in the elevator pit. Altrea proposes to install a temporary dewatering system in the elevator pit to lower the water table below the bottom of the elevator pit floor slab and facilitate the drilling and soil sampling activities. A pump will be installed in the steel-encased borehole. Using concrete cutting equipment, two (2) holes of between eight (8) and ten (10) inch diameter will be drilled through the elevator pit floor slab. If significant groundwater is encountered in the cored holes, then pumping will be performed to maintain the water level below the base of the floor slab during the drilling and sampling activities. Temporary water-tight plugs will be installed in the cored holes, if needed, until McRae begins drilling each boring. Water pumped from the elevator pit will be conveyed by flexible hoses to temporary storage containers. The water will be stored on-site until the project is completed. The water will be properly characterized and manifested for disposition at an off-site licensed facility.

- Altrea proposes to drill two (2) boring locations in the elevator pit (**Figure 2**). These borings (B1 and B2) will be drilled in the cored holes described above for access to the subsurface soil materials. These borings will be drilled utilizing portable, continuous-flight hollow-stem auger equipment to be installed in the elevator pit. The diameter of the borings will be approximately 6.5 inches in diameter. An attempt will be make to advance each boring to maximum depth of approximately forty-two (42) feet below the elevator pit floor. A soil sampler consisting of a hollow steel cylinder approximately two (2) feet long and 1.5-inch diameter will be used to retrieve soil samples. The sampler will loaded with retractable steel sleeves that will contain the soil samples. After advancing the auger flight to the desired sampling depth, the soil sampler will be driven by percussion approximately two (2) feet into the undisturbed soil at the base of the auger flight. The sampler will be retrieved and the geologist will inspect the soil sleeve samples using the Unified Soil Classification System. The soil will be field screened with a portable photo-ionization detector (PID). A selection of soil samples will be collected from each boring for submittal for laboratory analyses. The soil sampler will be cleaned and decontaminated, and loaded with a new set of inner sleeves for the next sampling interval. The borehole will be advanced to the next sampling depth and the soil sampling process repeated. Starting at the base of the elevator pit slab, Altrea plans to collect soil samples at approximately four (4) feet depth intervals for purposes of field inspection and screening. However, Altrea will attempt to perform continuous soil sampling in the 26 to 30 feet depth interval, around the 28-feet depth where the alleged oil leak in the jack assembly occurred.

- Soil samples will be collected from each of Borings B1 and B2 for laboratory analyses as follows. A soil sample will be collected from the top of the borehole from within 2 feet of the bottom of the elevator pit slab. A second soil sample will be collected at or about 28 feet depth where the alleged oil leak in the jack assembly was reported. A third soil sample will be collected from the bottom of the borehole from approximately 42 to 44 feet depth interval, below the base of the outer steel casing. Furthermore, additional soil samples will be collected as-needed for laboratory analyses at significant vertical changes in soil type and from zones where there is visible staining, odor or elevated PID readings observed. If visible staining, odor or elevated PID readings are observed, then soil samples will be collected to characterize the vertical interval over which the contamination occurs.

- Sleeve soil samples selected for laboratory analyses will be sealed with Teflon tape and plastic end caps, labeled appropriately and placed in a cooler for preservation.

- In addition, Altrea proposes to collect a bottom soil sample from the existing steel encased borehole that held the jack assembly in the elevator pit. The soil sample will be collected from the 42 to 44 feet depth interval by lowering the sampler into the open encased borehole. The soil sampling will be performed so as to collect an undisturbed soil sample (without slough) from below the base of the steel casing.

- NOTE: The subsurface conditions, confined work environment and safety considerations may have a significant impact on work plan implementation. If unforeseen conditions are encountered during the drilling and sampling activities, the professional-in-charge will make a determination of the best remedy to follow in order to safely accomplish the proposed objectives for soil and groundwater characterization. Altrea will contact you and inform of any changes. Altrea is proposing to collect soil and groundwater samples from two new (2) borings (B1 and B2), and from the existing steel-encased borehole in the elevator pit. In the event obstructions or other conditions preclude advancing Borings B1 and B2 to the target depth of 42 feet below the elevator pit floor, the collection of a bottom soil sample will probably still be achievable from the existing steel-encased borehole. The bottom soil sampling is to assist in evaluating the likelihood that hydraulic oil was released from the open bottom of the jack assembly's outer steel casing.

Other Work Plan Tasks

- The technical report for this project will include figures based on the attached **Figure 1** and **Figure 2**, and include more details of the elevator system, boring locations, sampling depths, and other information.

- Groundwater sampling will be performed, as described in the work plan of December 20, 2006.

- Other details of the proposed investigation are presented in the work plan dated December 20, 2006.

- As per the work plan, Altrea will prepare a technical report and electronically upload the report to the Alameda County Environmental Cleanup Oversight Program database. Altrea will also upload the report and other data as-needed into the State's Geotracker database, as you requested in your letter of February 13, 2007.

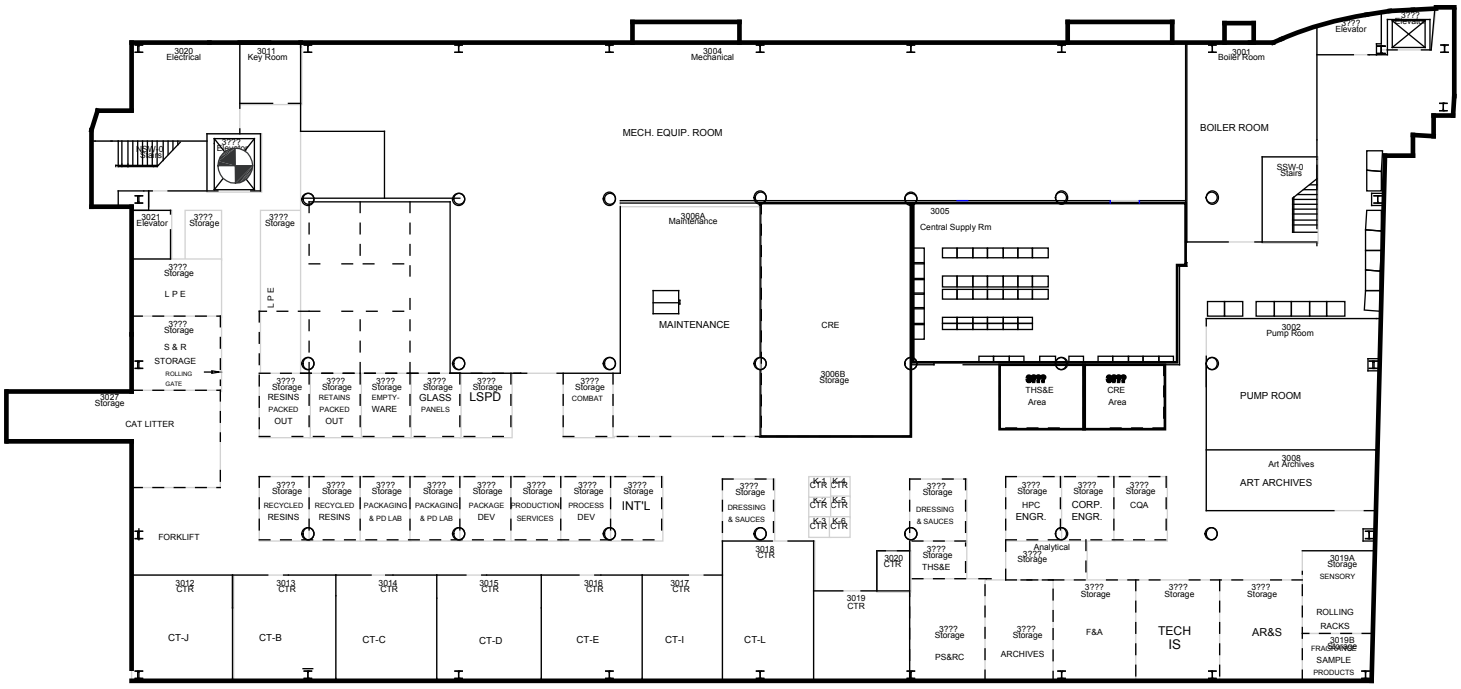
Please call 916-548-1762 if you have questions.

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.

Sincerely,

Paul Studemeister
Professional Geologist, PG 4635/CEG 1746

Attachment: Figure 1. Plan View of Basement of Building No. 3
Figure 2. Plan View and Cross-Sectional View of Elevator Pit Area in Basement of Building No. 3



Building No. 3 Basement

Parking Lot

Johnson Drive

ALTREA, LLC.

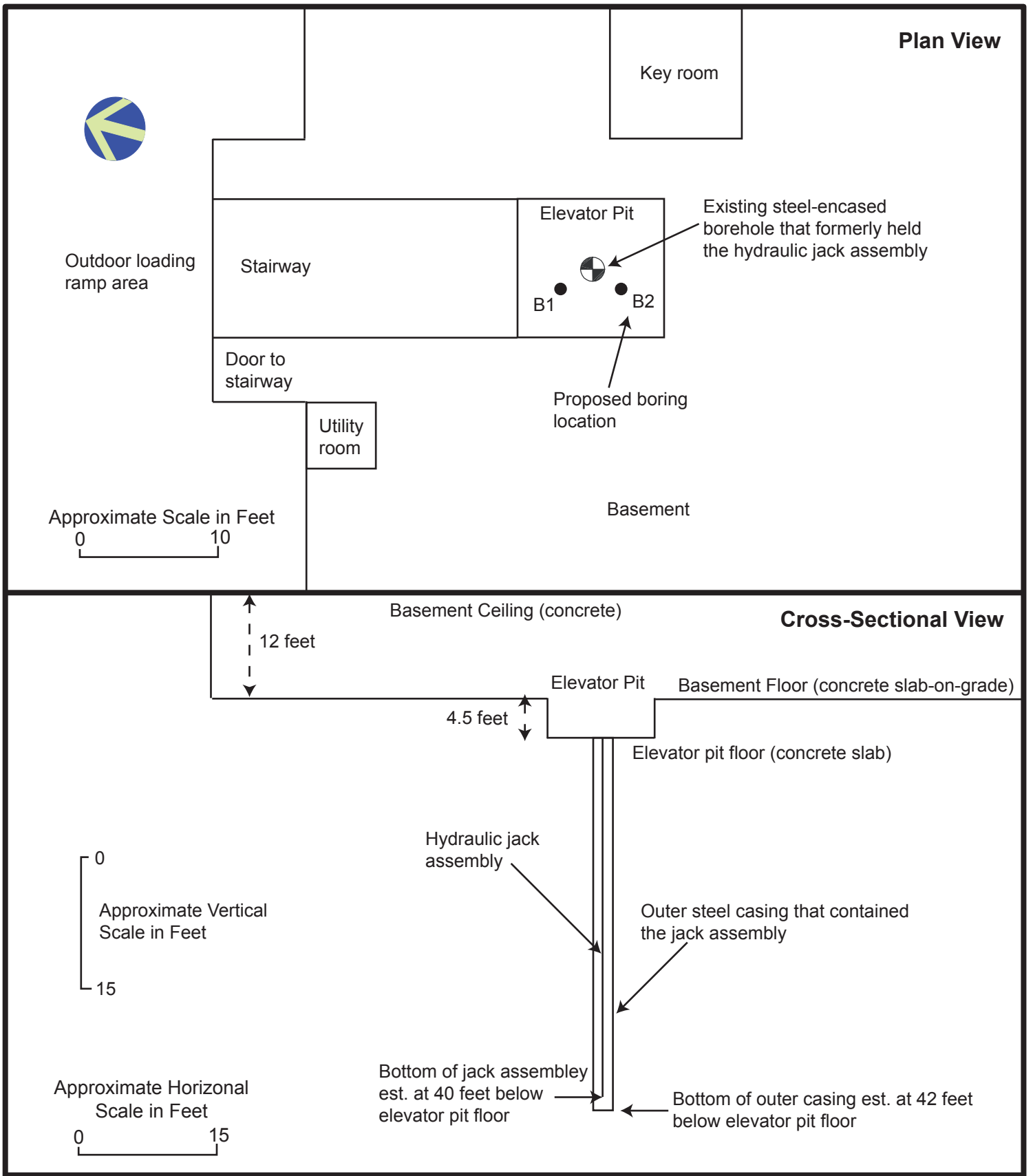
P. O. Box 255251, Sacramento, CA 95865

Location of Elevator Pit in Basement of Building No. 3

Approximate Scale in Feet

0 40

FIGURE 1:
Plan View of Basement of Building No. 3
Clorox Services Facility
7200 Johnson Drive
Pleasanton, CA 94588



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Clorox Services Facility
7200 Johnson Drive
Pleasanton, CA

February 2007

Figure 2:
Plan View and Cross-Sectional View of Elevator Pit Area in Basement Building No. 3