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Alameda County
Environmental Health

Via E-mail:

patrick@ellwoodcommercial.com

July 23, 2008
08-ENV1251

Ellwood Commercial Real Estate
1345 Grand Avenue #101
Piedmont, CA 94610

Attention: Mr. Patrick Ellwood

Subject: Local Regulatory Agency File Review
6251 College Avenue (Historic Kay's Cleaners)
Oakland, CA

Dear Mr. Ellwood:

Basics Environmental, Inc. (Basics) is pleased to present the results of our local regulatory agency file review for the site located at 6251 College Avenue, Oakland, California.

Background

A *Phase I Environmental Site Assessment* and *Phase II Subsurface Investigation* was completed by AEI Consultants (AEI) on March 17, 2005 and May 17 2005. AEI's findings revealed that the property at 6235 College Avenue was occupied by a plumbing supply company and later, a dry cleaner. AEI reviewed a building plan that indicated a 1,000-gallon underground storage tank (UST) may have been located at the northwest corner of the property as late as 1986. The location of the UST was undetermined; however, a fill pipe was noted on the plans at the northwestern portion of the subject site. Permits indicated that Berkeley Fuel and Supply occupied the site in 1941. However, it was unknown whether the former UST was associated with this business. In addition, AEI's assessment revealed that dry cleaning operations have been conducted at the site since at least 1987. Based on the use of chlorinated solvents typical of dry cleaning operations and the potential UST depicted in the building records, AEI recommended a geophysical survey and a subsurface investigation in connection with the former UST and long-term dry cleaning operations.

On May 22, 2005, AEI conducted a geophysical survey using electro-magnetic survey (E-M Survey) and ground penetrating radar (GPR) in the northwest corner of the site and in the area around the dry cleaning machines where the soil borings were planned. An anomalous area was found just inside the gate with no re-bar was identified. The anomalous area appeared to be backfilled excavation approximately 8 feet deep. The GPR also identified a shallow, narrow backfilled trench that ran through the center of the parking area. A decision was made to drill an additional (5th) soil boring through this anomaly and analyze a soil sample (SB-5) for total petroleum hydrocarbons as gasoline (TPH-g), total petroleum hydrocarbons as diesel (TPH-d), total petroleum hydrocarbons as motor oil (TPH-mo), and for Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX) and methyl tertiary-butyl ether (MTBE). Soil samples from soil borings SB-1 through SB-4 were analyzed for halogenated volatile organic compounds (HVOCs).

No detectable concentrations of TPH-g, TPH-d, or TPH-mo were reported in the soil sample from SB-5. Tetrachloroethene (PCE) was detected in soil borings B-1 through B-4 at concentrations ranging from 0.080 µg/L (micrograms per liter) (SB-2) to 0.26 µg/L (SB-4). No other HVOC analytes were detected in the soil samples. PCE was detected in the groundwater sample collected from SB-1 at a concentration of 48 µg/L. Chloroform was reported at a concentration of 0.83 µg/L. No other HVOC analytes were detected in the groundwater sample from SB-1. AEI concluded that a small release of PCE has occurred in the area of the dry cleaning facility and the presence of chloroform in the groundwater was probably a result of the interaction between PCE and chlorine released by breakdown of the PCE with naturally occurring organic compounds in the soil or groundwater beneath the site. AEI recommended no further investigation of the former UST, submitting the Phase II report to the Alameda County Health Care Services Agency (ACHCSA), and requesting an immediate determination as to whether any further action will be required relative to the HVOCs detected.

On May 31, 2005, EFI sent a proposal to “prepare a summary letter regarding soil and groundwater conditions at the property located at 6293 (6239) College Avenue, Oakland, California” to Valliance Capital Group, LLC. EFI proposed briefly summarizing the findings of the Phase I and Phase II investigation completed by AEI and requesting No Further Action for future investigation and/or remediation of low concentrations of PCE in shallow soil and groundwater. EFI indicated that the letter would be submitted to ACHCSA (the County).

A report entitled “Request for No Further Action – *Red Hanger Cleaners (6235 College Avenue)* completed by EFI Global (EFI) on June 2, 2005 was submitted to the Oakland Fire Department (not ACHCSA) for review. EFI summarized the results reported in the AEI Phase I and Phase II reports. Based on the data reported in the Phase I and Phase II investigations by AEI, EFI concluded that it is possible that the low concentration of PCE detected in the groundwater is not attributed to PCE in shallow soil at the site. EFI indicated that there were two nearby and one historic dry cleaner as follows: Rockridge Royal Cleaners located at 5445 College Avenue and down-gradient to cross-gradient; Garden Cleaners located at 5808 College Avenue and down-gradient to cross-gradient; and historically adjacent Kay’s Cleaner located at 6251 College Avenue and directly up-gradient to the Red Hanger Cleaners. EFI recommended no further

assessment of the PCE in the soil and groundwater at the site and requested a “no further action” letter from the City of Oakland Fire Department (OFD).

A report entitled *Confirmation Sample Results – Red Hanger Cleaners (6235 College Avenue)* completed by EFI Global (EFI) on June 28, 2005 was submitted to the Oakland Fire Department for review. According to EFI, one grab groundwater sample was collected from the (presumed) down-gradient direction of the dry cleaning units and analyzed for volatile organic compounds (VOCs) on June 28, 2005. The (same day) results from the laboratory indicated that PCE was detected in the groundwater sample at a concentration of 15 parts per billion (ppb) (or µg/L) and chloroform at a concentration of 0.83 ppb. EFI confirmed the presence of PCE and chloroform in the groundwater beneath the site. Based on the soil sampling data previously conducted by AEI, EFI concluded that it is possible that the low concentration of PCE detected in the groundwater was not attributed to the low levels of PCE detected in the shallow soil beneath the site. The source of PCE in the groundwater was not determined. EFI recommended no further assessment of the PCE in the soil and groundwater at the site and requested a “no further action” letter from the OFD.

On July 15, 2005, the OFD issued a letter stating that “no further action” was required by the OFD.

Although, the OFD issued a “no further action letter” for the site, OFD’s authority does not extend to sites where groundwater has been impacted. To date, it appears that the extent of PCE in groundwater has not been defined horizontally or vertically and the health risk posed by the contaminants has not been evaluated.

As such, Basics was contracted to perform a file review further research to evaluate hazardous materials handling practices conducted at 6251 College Avenue. The main objective of this file review is to obtain additional information, if any, regarding hazardous materials handling practices of the former Kay’s Cleaners (a.k.a. Kay Kleaner or Kay Cleaner) at 6251 College Avenue.

During this investigation, additional addresses were identified for the former Kay’s Cleaners and the building in which Kay’s Cleaners occupied. The addresses for Kay’s Cleaners included 6251, 6253, and 6255 College Avenue. Additional addresses for the building included 305 and 307 63rd Street. The 63rd Street addresses were occupied as commercial storefronts and apartments. Although these additional addresses were searched, only records relevant to the dry cleaning operations are discussed in this report.

Currently, Red Hanger Cleaners occupies the property addressed as 6235-6239 College Avenue, which also has the historic address of 315 63rd Street. For the purposes of this investigation, these addresses were also searched. However, only the records relevant to the dry cleaning operations are discussed in this report.

These two parcels are segregated by two adjacent parcels: 309 63rd Street is developed with an apartment building, and 6241-6247 College Avenue is developed with a commercial building. Although these addresses were also searched, they were found to be not relevant to this investigation and therefore are not discussed.

Local Agency File Review

On July 16, 2008, a Basics representative contacted the California EPA - Department of Toxic Substance Control (CAL EPA DTSC) in Berkeley, California, in regards to any information concerning the former Kay's Cleaners.

- **6251-6255 College Avenue**

No information regarding the subject site was available within the CAL EPA DTSC files. No information regarding hazardous materials, underground storage tanks (USTs) or unauthorized releases was available for the subject site.

On July 16, 2008, a Basics representative contacted the Regional Water Quality Control Board (RWQCB) in Oakland, California, in regards to any information concerning the former Kay's Cleaners.

- **6251-6255 College Avenue**

No information regarding the subject site was available within the RWQCB files. No information regarding hazardous materials, USTs, or unauthorized releases was available for the subject site.

On July 16, 2008, a Basics representative contacted the Alameda County Health Care Services Agency (ACHCSA) in Alameda, California for any information pertaining to the former Kay's Cleaners.

- **6251-6255 College Avenue**

No information regarding the subject site was available within the ACHCSA files. No information regarding hazardous materials, USTs, or unauthorized releases was available for the subject site.

On July 17, 2008, a Basics representative visited the Oakland Fire Department (OFD) in Oakland, California for any information pertaining the former Kay's Cleaners and Red Hanger Cleaners.

- **6235-6255 College Avenue**

6251 College Avenue

According to the files that were provided for review by the OFD, an ACHCSA record dated October 1985 indicated that Red Hanger Cleaners occupied 6251 College Avenue and assumed business at the property in "1970?" In 1987, a Billing Adjustment form indicated that Red Hanger Cleaners moved from 6251 College Avenue to 6239 College Avenue. No major violations pertaining to hazardous materials were reported. No other information regarding hazardous materials, USTs, or unauthorized releases was available for the property at 6251 College Avenue.

6239 College Avenue

The files were also provided for 6239 College Avenue for review. In February 1987, a note to the OFD indicated that Red Hanger Cleaners moved from 6251 College Avenue to 6239 College Avenue.

In April 1991, a Hazardous Materials Management Plan (HMMP) reported that 100 gallons of waste PERC was generated per year and 55 gallons of new PERC was stored onsite. Also in 1991, a complaint filed reported that drums possibly containing PERC were stored outside for approximately two years. A follow-up inspection noted no violations as the drums were properly labeled. Inspections dated in March, June, and October 1991 noted no major violations.

In May 1993, an inspection at Red Hanger Cleaners indicated that waste PERC filters were stored in two 15-gallon drums. No violations were noted.

In March 1994, an inspection provided by Alameda County Urban Run-off Clean Water Program indicated that a berm should be provided for the hazardous waste drum.

In February 1997, a Hazardous Materials Business Plan (HMBP) for Red Hanger Cleaners indicated that 140 gallons of PERC were stored onsite and two dry cleaning machines were operated onsite. An inspection noted no violations.

In January 2007, an inspection at Red Hanger Cleaners indicated that old waste should be properly disposed.

In January and March 2007, inspections at Red Hanger Cleaners indicated that no secondary containment was provided for a drum of PCE and a HMBP was required.

On July 17, 2008, a Basics representative reviewed the following files maintained by the City of Oakland Building Department (OBD) in Oakland, California for information pertaining to the former Kay's Cleaners and Red Hanger Cleaners.

- **6235-6255 College Avenue**

6235-6239 College Avenue

According to the files that were reviewed at the OBD, a building permit was issued in 1986 for the demolition of a single-story building (6237-6247 College Avenue), and to erect a metal warehouse building. A building permit was issued for the construction of a new three-story building in 1986 and a Temporary Certificate of Occupancy was issued to Red Hanger Cleaners. Permits for tenant improvements were issued for the property since 1986.

6251-6255 College Avenue

According to the files that were reviewed at the OBD, a permit was issued in 1925 for the construction of a three-story building at the corner of 63rd Street and College Avenue. In 1941, a permit was issued for termite repairs at 6251-6255 College Avenue. Building permits were issued for repairs at (6251 College Avenue) in 1948. In 1960, a permit for tenant improvement was issued. In 1964, a Certificate of Completion was issued to Kay's Cleaners (6253 College Avenue). In 1985, a mechanical permit was issued for Red Hanger Cleaners at 6251-6255 College Avenue. In 1987, permits were issued for tenant improvements at 6251-6255 College Avenue. Additional tenant improvements were issued in 1988, 2001, 2005, and 2006. No other information regarding hazardous materials, USTs, or unauthorized releases was available for the subject site.

On July 17, 2008, a Basics reviewed city directories within the library maintained by the City of Oakland, California:

In the city directories of 1950 and 1951, Kay Cleaners was not listed.

In the city directory of 1953, Kay Kleaners was listed at 6253-6255 College Avenue (as indicated in an advertisement).

In the city directories of 1955, 1960, and 1965, Kay Cleaners Inc. was listed at 6253 College Avenue.

In the city directory of 1970, Kay Cleaners Inc. was listed at 6251 College Avenue.

In the city directories of 1973 and 1977, 6251 College Avenue was listed as being occupied by Kay's Cleaners. 6235 and 6255 College Avenue were not listed.

In the city directory of 1982, 6251 and 6255 College Avenue was listed as being occupied by Red Hanger Cleaners. 6235 College Avenue was not listed.

In the city directory of 1987, 6251 College Avenue was listed as being occupied by Red Hanger Cleaners. 5235 College Avenue was not listed. 6255 College Avenue was listed at vacant.

In the city directory of 1992, 6251 College Avenue was listed as being occupied by Hazara Oriental Rug. 6252 College Avenue was listed as being occupied by Ultimo Salon. 6255 College Avenue was listed as being occupied by Silhouettes. 6235 College Avenue was listed as being occupied by Offices & Red Hanger.

In the city directory of 1997, 6251 College Avenue was listed as being occupied by Vivacity Women Wear. 6253 College Avenue was listed as being occupied by Ultimo Salon. 6255 College Avenue was listed as being vacant. 6235 College Avenue was not listed. 6239 College Avenue was listed as being occupied by Offices & Red Hanger.

In the city directory of 2002, 6251 College Avenue was listed as being occupied by Impressions, Inc. 6253 College Avenue was listed as being occupied by Ultimo Salon. 6255 College Avenue was listed as being occupied by Royal. 6235 College Avenue was listed as being occupied by Offices & Red Hanger.

In the city directory of 2007, 6251 College Avenue was listed as being occupied by Impressions, Inc. 6253 College Avenue was listed as being occupied by Lucero. 6255 College Avenue was listed as being vacant. 6235 College Avenue was listed as being occupied by Offices & Red Hanger.

Conclusions

Based on the historical resources reviewed, our findings indicate that the building addressed as 6251-6255 College Avenue was occupied by Kay's Cleaners (a.k.a. Kay Cleaners or Kay Kleaner) from 1953 to at least 1977. Kay's Cleaners was not listed at the site prior to 1951. From 1982 to 1987, the property at 6251-6255 College Avenue was occupied by Red Hanger Cleaners. In 1987, Red Hanger Cleaners moved off-site, to a neighboring property addressed as 6235-6239 College Avenue.

According to the local regulatory agency records that were reviewed, information regarding the use of hazardous materials was available for Red Hanger Cleaners at 6235-6239 College Avenue from approximately 1986/1987 to the present; however, no information regarding the use of hazardous materials was available for Red Hanger Cleaners or Kay's Cleaners at 6251-6255 College Avenue. Prior to 1986/1987, hazardous materials records were not formally tracked by the local enforcing agencies. In addition, review of local building and fire department records did not reveal any information regarding additional uses of hazardous materials at 6251-6255 College Avenue.

The site is not currently listed as a contaminated facility. However, given the potential for appreciable amounts of hazardous materials used over an extended period of time, it is conceivable that soil and/or groundwater may have been impacted. Inadvertent discharges of hazardous materials to the concrete porous surface are not always evident. However, years of usage of appreciable amounts of chemicals typically 55-gallons or more (over five to ten or more

years) plus any conduits to the subsurface (drains, sumps or cracks) increase the potential of inadvertent discharges to the subsurface.

Limitations

This file review has been prepared by the staff of Basics under the professional supervision of the Principal Consultant. The findings, interpretations of data, recommendations, specifications, or professional opinions are presented based upon the information presented within the files maintained by the agencies reviewed, in accordance with generally accepted professional environmental practice and within the requirements by the Client. There is no other warranty, either expressed or implied.

The findings of this file review are based on the available data and information presented within the files maintained by the agencies reviewed. We accept no liability on completeness or accuracy of the information presented and or provided to us, or any conclusions and decisions, which may be made by the Client or others regarding the subject site.

This file review was prepared solely for the benefit of Basic's Client. Basics consents to the release of this file review to third parties involved in the transaction for which the file review was prepared, including without limitation, lenders, title companies, public institutions, attorneys, and other consultants. However, any use of or reliance upon this file review shall be solely at the risk of such party and without legal recourse against Basics, or its subcontractors, affiliates, or their respective employees, officers, or directors, regardless of whether the action in which recovery of damage is sought is based upon contract, tort (including the sole, concurrent or other negligence and strict liability of Basics), statute or otherwise. This file review shall not be used or relied upon by a party that does not agree to be bound by the above statements.

Should you have any questions regarding this report, please contact the undersigned.

Sincerely,

Basics Environmental, Inc.



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Senior Project Manager

