June 19, 2012

Alameda County Health Care Services Agency
Department of Environmental Health Services
1131 Harbor Bay Parkway
Alameda, California 94502-6577

Attention: Ms. Barbara Jakub, PG
Hazardous Materials Specialist

Subject: Cleanup Case No. RO0003010 and GeoTracker Global ID. T10000001613
U.S. General Services Administration
Federal Building 2C
620 Central Avenue
Alameda, California

Dear Ms. Jakub:

Please find enclosed the response to your letter of March 28, 2012.

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.

Please do not hesitate to call if you have any questions or comments.

Sincerely,
U.S. GENERAL SERVICES ADMINISTRATION

Carolyn A. Cooley
Assistant Property Manager

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26 April 2012
File No. 36835

Ms. Barbara Jakub, PG
Hazardous Materials Specialist
Alameda County Health Care Services Agency
Department of Environmental Health Services
1131 Harbor Bay Parkway
Alameda, California 94502-6577

Subject: Cleanup Case No. RO0003010 and GeoTracker Global ID T10000001613
U.S. General Services Administration
Federal Building 2C
620 Central Avenue
Alameda, California

Dear Ms. Jakub:

The following is in response to your letter dated 28 March 2012 regarding the subject Cleanup Case pertaining to the U.S. General Services Administration Federal Building 2C, located at 620 Central Avenue, Alameda, California. Your letter provides technical comments to the report titled *Summary of Work Performed to Date and Additional Site Characterization Results* dated 6 December 2010. We would like to point out that on 27 April 2011 the General Services Administration (GSA) submitted an updated version of this document, dated 26 April 2011, to the Alameda County Health Care Services Agency and which can be found on the Alameda County Environmental GIS Mapping Web Application website as GWM_R_2011-04-26.pdf. This report was submitted to address and further clarify the technical comments you provided in your letter of 12 August 2010.

On 28 March 2012 you issued a second letter providing comments on the 6 December 2010 submittal, apparently unaware of the existence of the later 26 April 2011 report. The 26 April 2011 report provides the majority of the information requested in your 28 March 2012 letter. The following are your technical comments and our response to those comments.

Technical Comment #1: ***Soil Boring Logs*** **-** *The report states that lithology was described and that boring logs were prepared. However, no boring/temporary well construction logs were provided. Both soil and groundwater samples were collected but the depths of the groundwater (both static and first encountered) were not provided. Please submit the boring logs with this information in the SWI addendum requested below.*

Response: Unfortunately we have been unable to locate the boring/temporary well construction logs in our files and the individual who completed the logs is no longer employed by Haley & Aldrich. However, a description of the lithology and depth to groundwater are provided on page 4 of the 26 April report under the “Results” section.

Technical Comment #2: ***Soil Sample Collection*** – *The March 22, 2010 work plan says that samples will be collected using either direct push or hollow-stem auger which collects discrete samples in brass or butyrate liners. The report states that samples were collected using a hand auger and placed in a glass jar. This is not standard State of California procedure. In addition, no samples were collected from 5 and 10 feet as recommended, leaving the vertical extent of the contamination undefined. Please address this comment in the addendum below.*

Response: An earlier work plan submitted to ACEH, dated 23 September 2009, for the initial phase of this project stated on page 2 that "Soil samples will be collected in glass jars or brass or stainless steel sleeves capped with Teflon and end caps." This generated no comments from ACEH regarding collecting samples in glass jars. Using hand augering in the upper 5 feet of borings to avoid damaging utilities is standard practice in California. Because groundwater was encountered between 4 and 5 feet below ground surface, and hydraulic oil, the contaminant of concern at this site, is a floating product, and ACEH requested that the groundwater samples be collected at the soil/groundwater interface, we felt that it was not prudent to drill deeper and risk carrying contaminants to greater depths. Therefore, there was no need to incur the expense of mobilizing a drill rig to the site to drill an additional 2 feet when this could easily be accomplished using the hand auger.

Technical Comment #3: ***Soil and Groundwater Data Tabulation*** – *As requested in ACEH's August 12, 2010 letter, please tabulate all soil and water data from your reports. Please include the detection limits for data that are reported as non detected, sample depths, and dates for all sample data. Please include separate comprehensive tables for both soil and groundwater data in the SWI Addendum requested below.*

Response: The requested tables are provided following the text of the 26 April 2011 report.

Technical Comment #4: ***Location of Piping Leak*** – *As requested in ACEH's August 12, 2010 letter, please identify the piping leak area(s) on the report graphics and include this map in the SWI Addendum requested below.*

Response: The requested pipe leak location is shown on Figures 2 and 3 of the 26 April 2011 report, coincident with sample location PL-7.

Technical Comment #5: ***Soil Disposal Manifests*** – *In an e-mail dated October 28, 2010, Haley and Aldrich requested an extension so they could provide the soil disposal manifests in the report. ACEH concurred with this extension request, yet the soil disposal manifests were not provided in the reports. Please include copies of the soil manifests for the soil disposed during the piping replacement in the SWI Addendum requested below.*

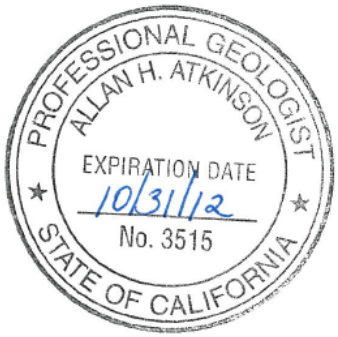
Response: The requested soil disposal manifests are provided in Appendix D of the 26 April 2011 report, following the analytical data reports.

In the 7 December 2010 report and again in the 26 April 2011 report Haley & Aldrich concluded that, based on the lack of volatile and carcinogenic compounds and current use of the area (roadway), human

health risk is minimal and based on the limited mobility and extent of TPHho, the difficult excavation in a roadway with utilities, the lack of health risk, and the current use of the property, Haley & Aldrich feels this is a low risk case. Haley & Aldrich recommended that no further action be required for this case. On 28 March 2012, nearly a year after we provided the 26 April 2011 report with the information previously requested, ACEH submitted a letter with review comments for the report dated 7 December 2010 that 1) is over two years old and 2) it seems to us that questions from the 7 December 2010 report were addressed in the 26 April 2011 report. If any questions did remain at that time, they could have easily and quickly been resolved in a conference call or short meeting. This delay and having to re-address questions that have already been addressed has cost both the U.S. General Services Administration and Haley & Aldrich a substantial amount of money. Once again, we recommend that this limited extent, low risk site be granted a no further action status.

Please do not hesitate to call us at 925.949.1015 if you have any questions or comments.

Sincerely yours,
HALEY & ALDRICH, INC.



Allan Atkinson, PG
Senior Geologist

Voytek Bajsarowicz
Senior Program Manager

c: General Services Administration; Attn: Carolyn Cooley
General Services Administration; Attn: Lisa Sharp

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