

June 1, 2015

Mr. Jerry Wickham, PG  
Alameda Heath Care Services Agency  
1131 Harbor Bay Parkway  
Suite 250  
Alameda, California 94502-6577

Subject: Comments on CRA Report Dated May 19, 2015  
For the Property Located at 6039 College Avenue, Oakland, California

Dear Jerry:

SOMA Environmental Engineering, Inc. ("SOMA"), on behalf of property owners, Russell J. Bruzzone, Inc., and Montrose Investment Company, is pleased to submit the following comments in connection with Conestoga-Rovers & Associates ("CRA") report dated May 19, 2015 entitled "Subsurface Investigation Report". The report has been prepared based on the CRA's workplan dated May 28, 2014.

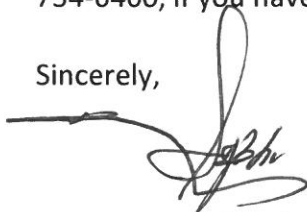
The report documents the analytical results of the soil, groundwater and soil vapor samples collected at the site and concludes that the site meets closure criteria using Low Threat Closure Policy (LTCP) set forth by the Regional Water Quality Control Board (RWQCB). This conclusion is based on the physical evidence that soil contamination exists below 10 feet bgs and therefore, according to LTCP criteria the site is eligible to receive a no further action (NFA) status from Alameda County Environmental Health Agency (ACEHA). However, as the data shows elevated levels of TPH-g, TPH-d, benzene and naphthalene exist at 15 feet bgs which is consistent with the previous report prepared by CRA during underground storage tank removal. The site would not qualify for a NFA status using LTCP criteria, if the contamination was at 10 feet bgs or shallower depths. SOMA and the property owners disagree with the contents and conclusions of CRA's report and offer the following comments based on the site's zoning, the planned future land use type, and current and historical soil, groundwater and soil vapor data:

- The cleanup must take into account that existing zoning permits mixed residential and commercial uses. The property owners intend to develop the site in accordance with such zoning, including both residential and commercial uses. As such, construction plans will include a three-story mixed commercial and residential building, while the basement will be constructed as a parking garage. Given the fact that construction of the parking garage will require excavation and lowering the ground elevation, the site would not qualify for a NFA under current conditions. The reason for this is that the excavation will lower the depth of existing chemical hot spots, which will violate the LTCP criteria.

- The presence of the hot spot was also noted in Tables 1 through 3, which compares existing contamination levels in soil, groundwater and soil vapor with that of the RWQCB's ESLs. The data clearly shows that the existing soil and groundwater data exceeds the ESLs, even for commercial land uses.
- During the recent investigation conducted by CRA, elevated levels of petroleum hydrocarbons including TPH-g up to 2,700 mg/kg, TPH-d up to 1,400 mg/kg, TPH-mo up to 270 mg/kg, benzene up to 3.9 mg/kg and naphthalene up to 9.5 mg/kg were detected at 15 feet bgs. Elevated levels of chemicals were also detected during underground storage tanks (USTs) removal in January 2013. The results of laboratory analysis showed up to 8,740 mg/kg oil and grease and 1,700 mg/kg TPH-g exists beneath the former USTs. The presence of elevated levels of chemicals at depths between 15-20 feet bgs will incrementally add to the site construction costs.
- Using the existing data SOMA has prepared two contour maps showing the extent of contaminants at two different depths. Figures 1 and 2 demonstrate the extent of contaminants at 15 and 20 feet bgs. By using this information SOMA has calculated the volume of impacted soils that needs to be removed per future construction plans. The calculated soil volume containing elevated levels of TPH-g, TPH-d, TPH-mo, benzene and naphthalene is roughly 500 cubic yards.
- The report does not compare the site data with LTCP recommended values. It compares the data against ESL values for commercial uses. Because residual contamination exceeds the ESLs, it fails to qualify for site closure.

I hope the above information can assist you in reviewing and considering CRA's report and their recommendation for the subject site. Meanwhile please do not hesitate to call me, at (925) 734-6400, if you have any questions or comments.

Sincerely,

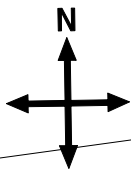


Mansour Sepehr, Ph.D., PE  
Principal

cc: Richard Bruzzone, Esq.  
Ms. Joan Bruzzone  
Ms. Linda Steidle

Enclosure: Figure 1 and Figure 2

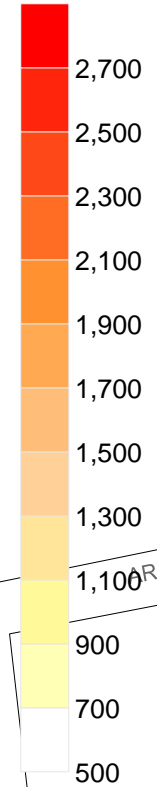




62nd STREET

- ▲ Monitoring Wells
- ▼ Tank Backfill Wells
- ▲ Soil Borings (jan 1990)
- ⊕ Soil Borings (Sep 2005)
- Soil Sample (May 2004)
- × Tank Pit Samples (Jan 2013)
- Soil Borings (Sep 1993)
- ⊕ Soil Borings (Feb 2015)

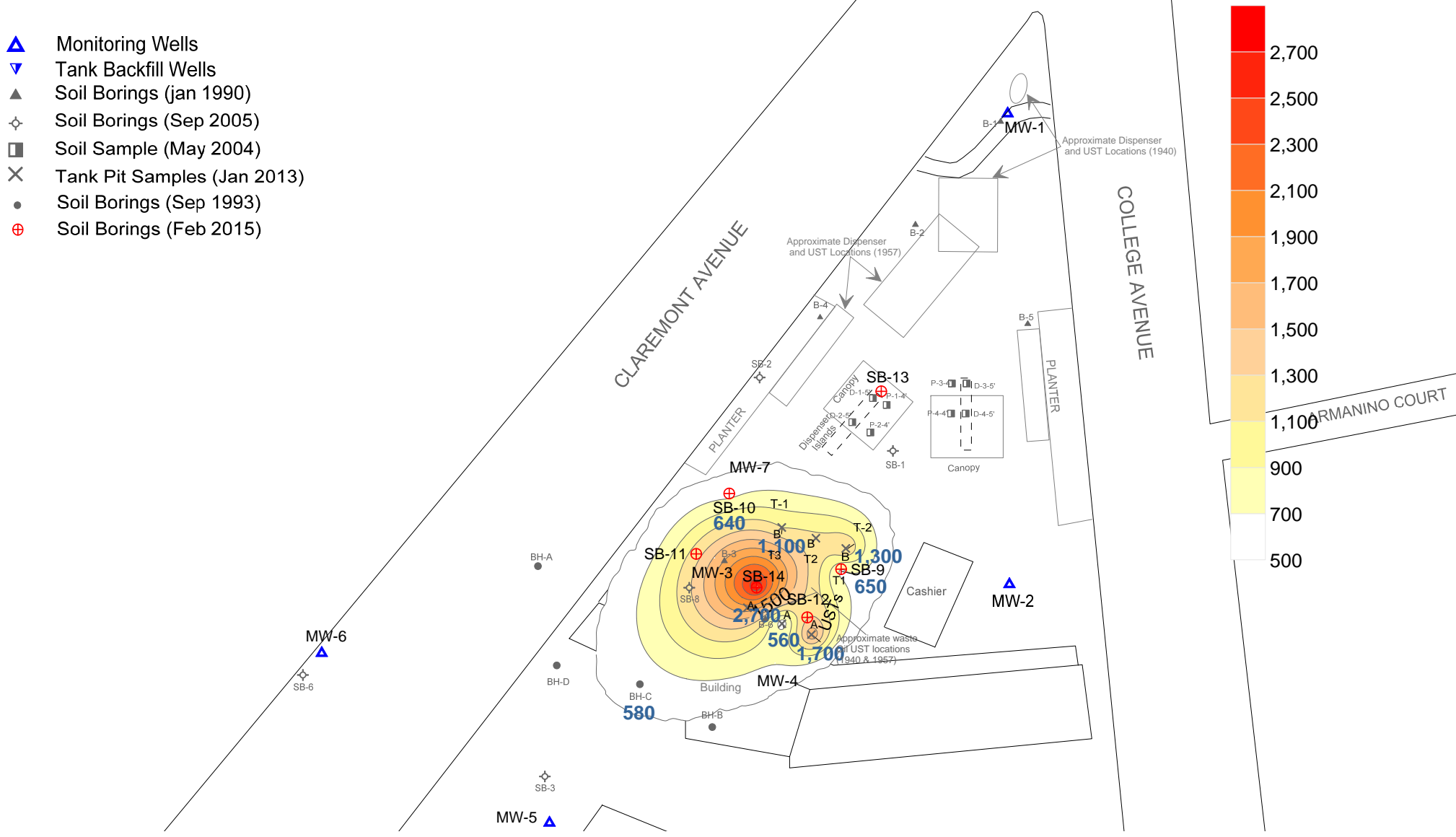
TPH-g  
mg/kg



CLAREMONT AVENUE

COLLEGE AVENUE

HERMANINO COURT



approximate scale in feet

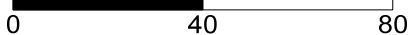
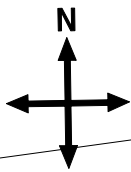


Figure 1: Residual TPH-g Contamination in Soil @ 15 ft bgs

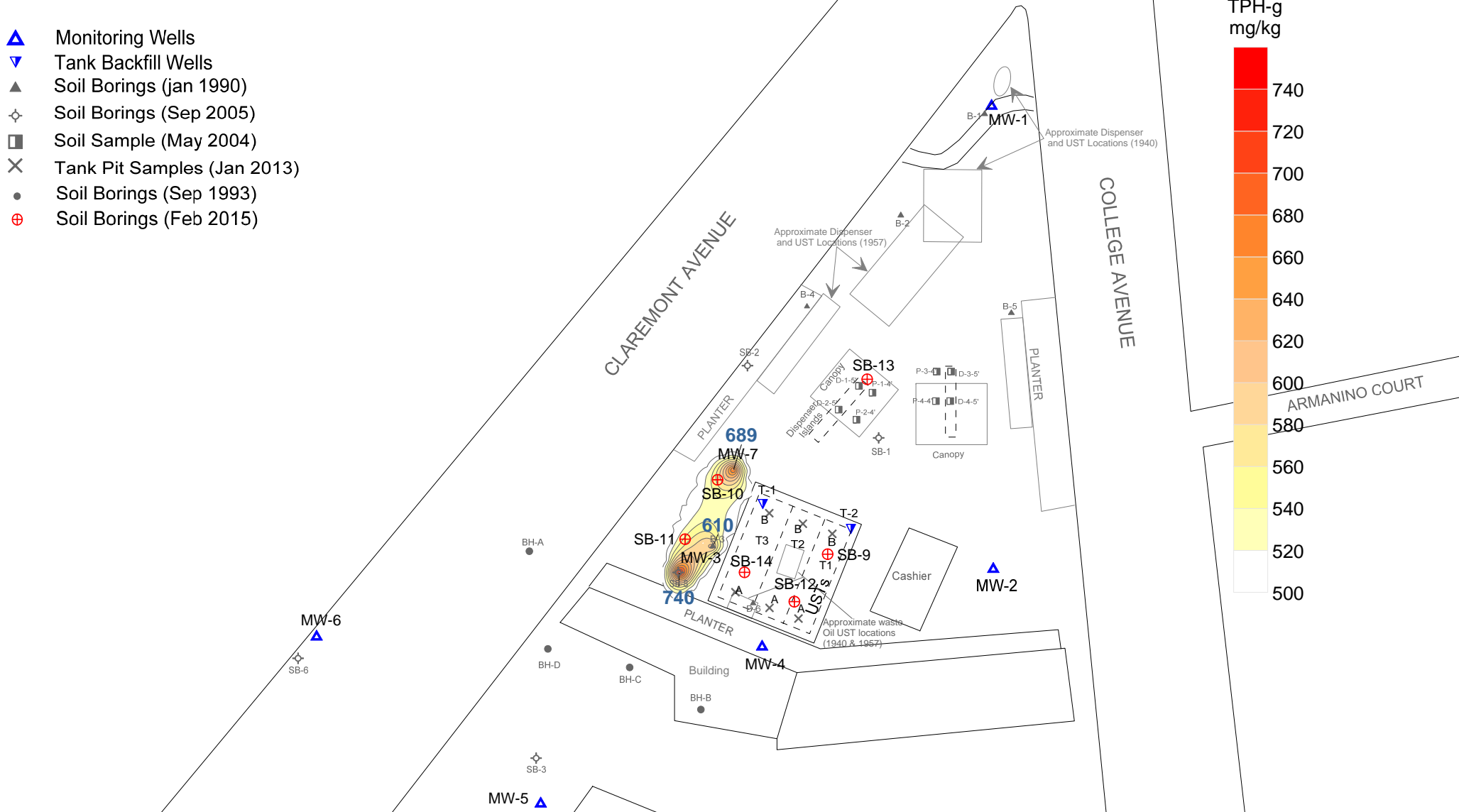
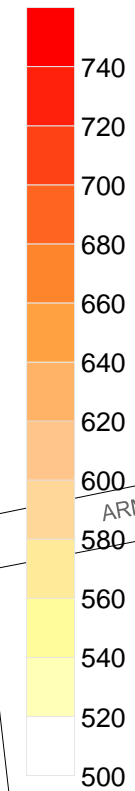




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TPH-g  
mg/kg



approximate scale in feet



Figure 2: Residual TPH-g Contamination in Soil between 19.5 & 22 ft bgs