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By dehloptoxic at 1:31 pm, Nov 30, 2006

**Treadwell & Rollo**

28 November 2006  
Project 3494.01

Steven Plunkett  
Hazardous Materials Specialist  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway, 2<sup>nd</sup> Floor  
Alameda, CA 94502

Subject: Work Plan Addendum: Supplemental Soil and Groundwater Investigation  
Fuel Leak Case No. RO0000052  
Former Peterson Manufacturing Company Facility  
1600 63rd Street  
Emeryville, California

Dear Mr. Plunkett:

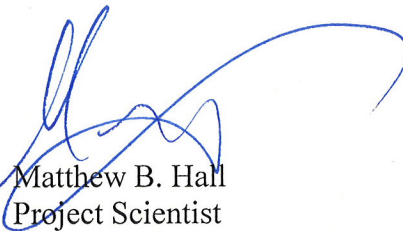
This addendum has been prepared by Treadwell & Rollo, Inc. on behalf of Wareham Property Group and 1600 63<sup>rd</sup> Street Associates, for submittal to the Alameda County Environmental Health Department (ACEH), to supplement our Work Plan dated 30 October 2006. The attached figure shows the location of the additional off-site boring location, as requested in the ACEH letter dated 16 November 2006 (copy attached).

If you have any questions, please call Matthew Hall at (510) 874-4500 at extension 556.

Sincerely yours,  
TREADWELL & ROLLO, INC.



David R. Kleesattel, P.G.  
Senior Geologist



Matthew B. Hall  
Project Scientist

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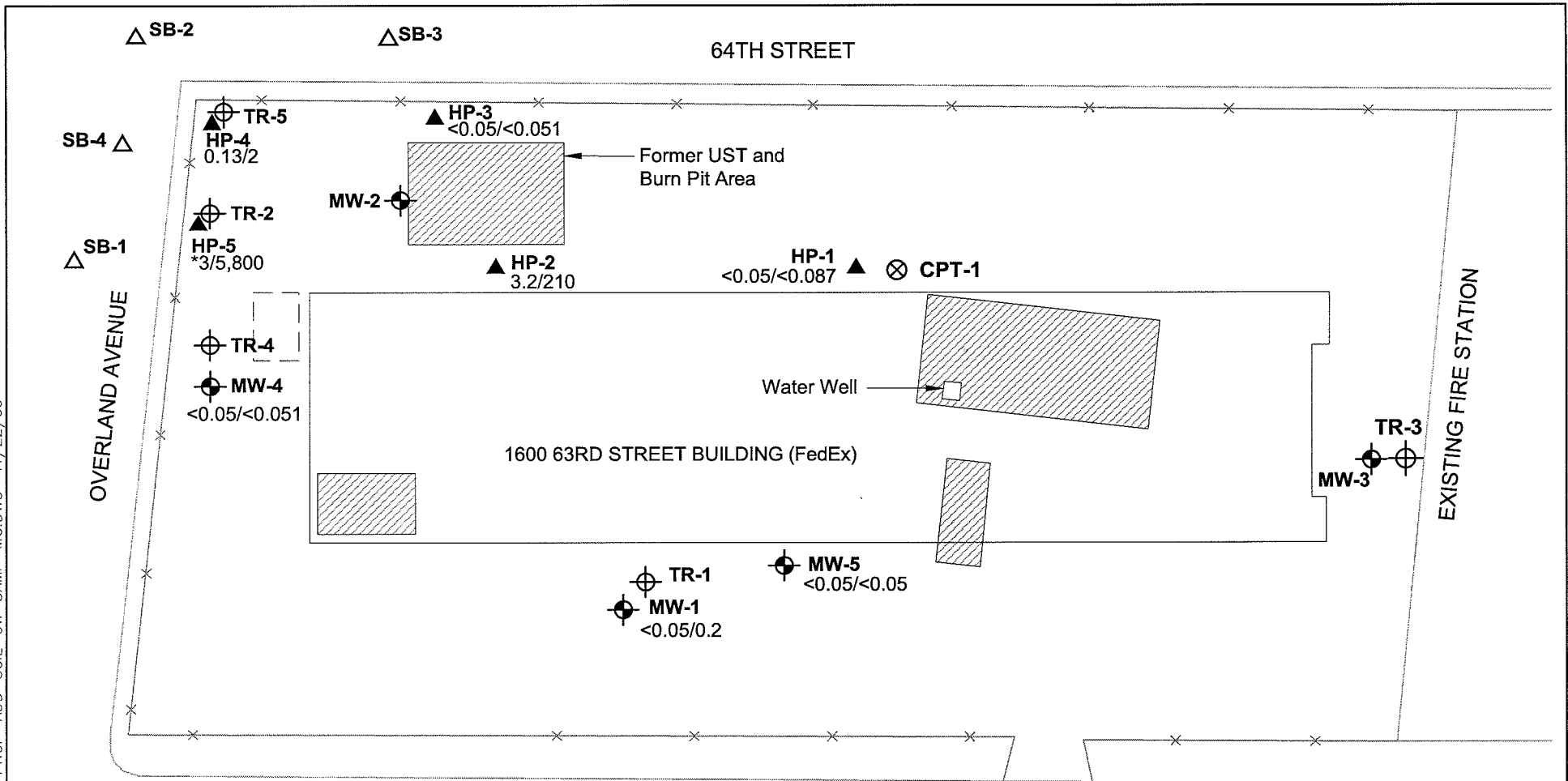
Attachments: Figure 1 – Proposed Additional Soil and Groundwater  
Sampling and Monitoring Well Locations (Revised 21 November 2006)  
ACEH letter dated 16 November 2006

cc: Richard Robbins, Wareham Property Group

**ATTACHMENTS**

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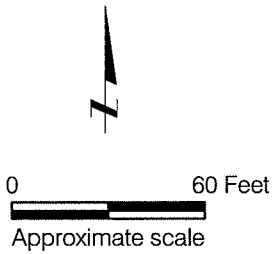
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**EXPLANATION**

- Approximate location of monitoring well
- Approximate location of grab groundwater sample, August 1999
- Approximate CPT sampling location
- Approximate location of proposed monitoring well
- Approximate location of proposed soil and groundwater grab sample

- Soil and Tank excavation areas
- 3.2/210 — TPHgas (ppm)
- 3.2/210 — TPHdiesel (ppm)
- \* Product observed in sample



<b>1600 63RD STREET</b> Emeryville, California		
<b>PROPOSED ADDITIONAL SOIL AND GROUNDWATER SAMPLING AND MONITORING WELL LOCATIONS (REVISED 21 NOVEMBER 2006)</b>		
Date 11/21/06	Project No. 3494.01	Figure 1
<b>Treadwell&amp;Rollo</b>		

Map Source: Harding Lawson Associates, 5/91, and SOMA, 2000.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

November 16, 2006

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TREADWELL & ROLLO

Mr. Richard Robbins  
Wareham Property Group  
11220 Nye Street, Suite 400  
San Rafael, CA 94901

Subject: Fuel Leak Case No. RO0000052, Peterson Manufacturing Company, 1600 63<sup>rd</sup> Street, Emeryville, CA – Work Plan Approval

Dear Mr. Robbins:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Work Plan: Supplemental Soil and Groundwater Investigation," dated October 30, 2006. The scope of work for the Soil and Groundwater Investigation (SWI) proposes the installation of three soil borings immediately downgradient of the site, installation of five onsite groundwater monitoring wells, rehabilitation and redevelopment of five existing onsite groundwater monitoring wells, a preferential pathway study and a limited free phase petroleum hydrocarbon recovery pilot test for. ACEH generally concurs with the proposed scope of work as stated in the Work Plan, provided the following technical comments are addressed prior to the implementation of the Work Plan.

We request that you perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to [steven.plunkett@acgov.org](mailto:steven.plunkett@acgov.org)) prior to the start of field activities.

**TECHNICAL COMMENTS**

- 1. Soil Boring Locations and Soil Sampling.** At present, no off site investigation has been conducted to determine the lateral and vertical extent of petroleum hydrocarbon impacts to soil and groundwater downgradient of the site. Figure 1 from the Work Plan, which identifies the proposed soil boring locations, indicates that the linear distance between soil borings SB-1 and SB-2 is approximately 80 feet. This linear separation may not provide accurate characterization of the dissolved petroleum hydrocarbon contamination plume. ACEH recommends the installation of an additional soil boring midway between SB-1 and SB-2 on Overland Avenue. This soil boring location will provide additional data to better define the downgradient extent of dissolved petroleum hydrocarbon plume. ACEH agrees with the soil sampling analysis as proposed by Treadwell & Rollo. Results from the downgradient investigation are to be presented in the Soil and Groundwater Investigation report requested below.
- 2. Monitoring Well Rehabilitation and Redevelopment.** ACEH requests that prior to monitoring well sampling, all onsite monitoring wells should be rehabilitated and/or

redeveloped; thus allowing the collection of a representative sample of formation groundwater. During well redevelopment, water quality parameter such as temperature, pH, conductivity and turbidity should be recorded after each well volume. Note that well redevelopment may require additional well volumes be removed to assure that water quality parameters are satisfied. Please present the results of the well redevelopment and rehabilitation activities in the SWI report requested below.

3. **Groundwater Sampling and Analysis.** The groundwater sampling and analysis suggested by Treadwell & Rollo in the Work Plan is acceptable. Please present the results from the well redevelopment, monitoring well installation and grab groundwater sampling in the SWI requested below.
4. **Monitoring Well Replacement.** Treadwell & Rollo has proposed the replacement of onsite monitoring wells MW-1, MW-3 and MW-4. Prior to the replacement of these monitoring wells, ACEH recommends a direct comparison between the geologic and hydrogeologic conditions in monitoring wells MW-1, MW-3 and MW-4 and the proposed soil borings TR-1, TR-3 and TR-4. The evaluation will then be used to determine if the installation of replacement monitoring wells is warranted. Should replacement monitoring wells be consider necessary, ACEH suggests the use of monitoring wells designed with screen intervals of between 2 to 5 feet, as these wells will likely be representative of depth discrete groundwater conditions. Prior to the installation of replacement monitoring wells, we request that Treadwell & Rollo provide ACEH with their rational for monitoring well replacement as well as their recommendations for monitoring well construction details.
5. **Pilot Test of Free Product Removal.** ACEH agrees with the proposal for free product removal by hand bailing for an initial period of approximately 3 months. However, we request that you recommend a more aggressive remedial strategy in order to mitigate free product contamination on site and dissolved phase petroleum hydrocarbon migration downgradient of the site. Please present your proposal for petroleum hydrocarbon remediation in the SWI requested below.

#### TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Steve Plunkett), according to the following schedule:

- **November 30, 2006** – Revised Work Plan for Soil and Groundwater Investigation
- **January 30, 2007** – Soil and Groundwater Investigation Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

#### ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

#### PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "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." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

#### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

#### UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

#### AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code,

Mr. Richard Robbins  
November 14, 2006  
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Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 383-1767.

Sincerely,



Steven Plunkett  
Hazardous Materials Specialist

cc: Mr. Glenn Leong  
Treadwell & Rollo  
501 14<sup>th</sup> Street, Third Floor  
Oakland, CA94612

Donna Drogos, ACEH  
Steven Plunkett, ACEH  
File