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July 25, 2005

Mr. Barney Chan
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

Alameda County
AUG 01 2005
Environmental Health

SUBJECT: ADDENDUM TO APRIL 26, 2005 WORKPLAN
1001 42nd Street
Oakland, California

Dear Mr. Chan:

This submittal addresses comments presented in the May 25, 2005 letter from the Alameda County Health Care Services Agency (ACHCSA) and presents an addendum to Aqua Science Engineers' April 26, 2005 workplan for additional soil and groundwater assessment at the above referenced site.

Technical Comment #1

The first comment in the ACHCSA letter regarding the site use history asks whether there is information regarding potential sources in the northeastern two-thirds of the site and requests that a Phase I be performed at the site.

As we discussed when we met on June 20, 2005 at your office, there have been two previous Phase I assessments performed at the site. In March 1998, National Assessment Corporation (NAC) prepared a Phase I Environmental Site Assessment for the site, and ASE prepared a second Phase I report in January 2004. Both of these Phase I investigations studied available historical information at the site including aerial photos and Sanborn maps. Copies of Phase I reports and available aerial photos have also been provided to you. The only relevant document regarding the period of time when Boysen Paint Company occupied only the eastern portion of the site is an aerial photo dated 1939. However, there is no evidence of tanks or chemical storage on this photograph.

Technical Comment #2

Based on the high mineral spirit concentrations detected in the southeastern portion of the site beneath the current building, there appears to have been a significant source of mineral spirits in this area. Although the exact source is not currently known, this area has been previously assessed, and the northern extent of elevated mineral spirit concentrations in this area will be defined during the upcoming assessment. This source area is believed to be the primary source of elevated mineral spirit concentrations (including free-product) at the site as explained in the site conceptual model in ASE's April 26, 2005 workplan. However, as we discussed at our June 28, 2005 meeting at your office, ASE will drill two additional borings in the northeastern portion of the site to verify that there are no additional source areas in the northern portion of the site. The location of these additional borings is shown on Figure 3 attached.

In addition, your letter requests continuous sampling through the vadose and capillary zones. As detailed in ASE's April 26, 2005 workplan, all soil borings will be sampled continuously for their entire length, including vadose, capillary and saturated zones. As also detailed in the workplan, one boring will be drilled into deeper water bearing zones to determine the vertical extent of elevated mineral spirit and VOC concentrations.

Technical Comment #3

In this comment, the ACHCSA stated that "we find the conclusion that the release from your site has not impacted the former Dunne Paint site unreasonable" and "low levels of contamination detected in MW-B3, MW-D1 and MW-D2 used to make this conclusion are likely the results of the extensive dewatering and site mediation at the Dunne Paint site."

Although there are not enough data at present to conclude definitively that significant mineral spirit concentrations have not migrated onto the Dunne Paint site, the current available data appear to support this conclusion. ASE proposed in the April 26, 2005 workplan one additional boring to fill the data gap along the former Dunne Paint property line. As discussed during our June 28 meeting, ASE will also drill a second additional boring further to the west along the northern property line of the former Dunne Paint property. This location is shown on Figure 3 attached.

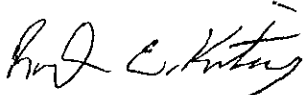
However, if elevated mineral spirit concentrations from the Kozel property were a significant contributor to contamination on the Dunne Paint property, the extensive dewatering on the Dunne Paint site should have pulled the plume from the Kozel property further to the south. The result should have been that the mineral spirit concentrations at the Dunne Paint property line should have risen, not fallen. If mineral spirits from the Kozel property were present on the Dunne Paint property line, then the concentrations should be increasing further to the north, closer to the free-floating hydrocarbons beneath the street. If the extensive dewatering was influencing the Kozel property plume, then water should be drawn from the north where the concentrations are higher and the hydrocarbon concentrations on the Dune Paint property should have risen – not fallen. This is not what appeared to have happened and is further evidence that the extent of the mineral spirit plume appears defined to the south. This conclusion is based on the current data and will be reevaluated once the data gaps are filled during the upcoming assessment.

In summary, in response to ACHCSA's comments, ASE has provided copies of the previous Phase I reports and aerial photographs and increased the number of additional borings proposed in the April 26, 2005 workplan from 7 to 10. When this phase of work is completed, the property investigation will include samples from a total of 40 borings and 6 monitoring wells in both onsite and offsite locations.

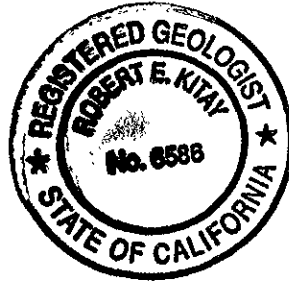
Should you have any questions or comments, please feel free to call us at (925) 820-9391.

Respectfully submitted,

AQUA SCIENCE ENGINEERS, INC.



Robert E. Kitay, R.G., R.E.A.
Senior Geologist



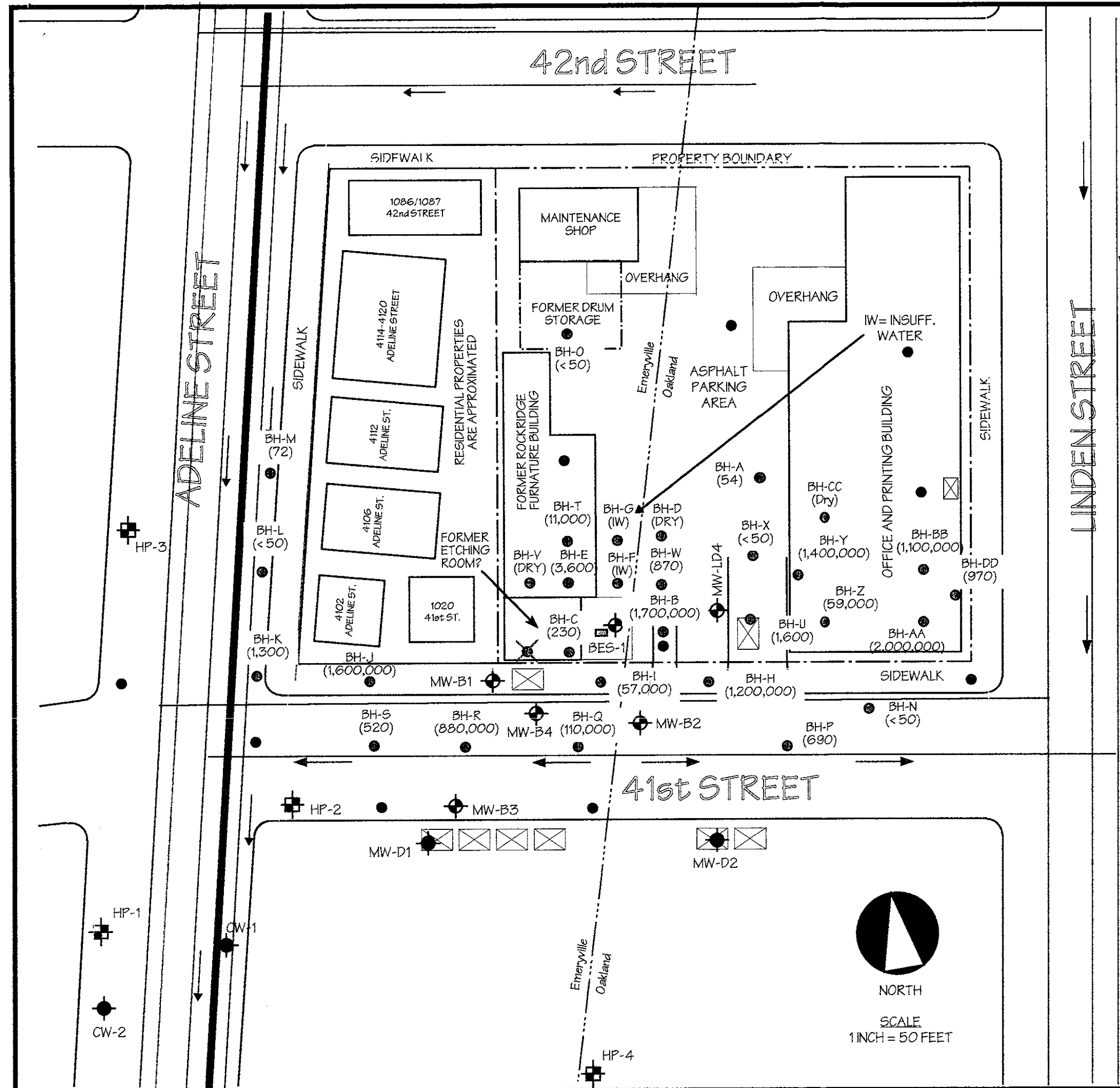
cc: Mr. Edward Kozel, Edward R. and Elizabeth A. Kozel Charitable Remainder Trust, 20 Oak Knoll Drive, Healdsburg, CA 95448-3108

Mr. Thomas Trapp, Barg Coffin Lewis & Trapp, LLP, One Market, Steuart Tower, Suite 2700, San Francisco, CA 94105-1475















Mr. Steven Goldberg, Friedmann Goldberg, LLP, 420 Aviation Boulevard, Suite 201, Santa Rosa, CA 95403

Mr. John McManus, Cushman and Wakefield, 1111 Broadway, Suite 1600, Oakland, CA 94607

Ms. Betty Graham, California Regional Water Quality Control Board, San Francisco Bay Region, 1515 Clay Street, Suite 1400, Oakland, CA 94612



LEGEND

-  FORMER UST
-  FORMER SUMP
-  MW-B4 MONITORING WELL FOR KOZEL PROPERTY
-  MW-D2 MONITORING WELL FOR DUNNE PAINTS
-  HP-4 TEMPORARY WELL LOCATION
-  GAS LINE
-  ELECTRIC LINE
-  TELEPHONE LINE
-  STORM SEWER LINE
-  SANITARY SEWER LINE
-  WATER LINE
-  GEOPROBE BORING LOCATION
-  PROPOSED BORING LOCATION
-  PROPOSED DEEPER SOIL BORING

REVISED BORING LOCATIONS WITH PREVIOUS TPH-MS CONCENTRATIONS IN GROUNDWATER IN PPB

Date: June 20, 2005 Scale: 1" = 50'

Kozel Property
1001 42nd Street
Oakland, California