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File No. 8-90-421-SI

June 26, 2006

File No. 8-90-421-SI

Mr. Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Drive
Alameda, California 94501

**SUBJECT: WORK PLAN FOR ADDITIONAL SITE ASSESSMENT-
SECOND REVISION AT THE PROPERTY**

Located at 400 San Pablo Avenue, in
Albany, California

Dear Mr. Stevens:

Enviro Soil Tech Consultants has reviewed the May 10, 2006 letter from Mr. Jerry Wickham of Alameda County Health Care Services Agency (ACHCSA) regarding the revised work plan that Enviro Soil Tech Consultants (ESTC) submitted on your behalf in April 2006. We also met with Mr. Wickham at the site on June 6 to discuss additional work. In this response, we address each of the numbered comments in Mr. Wickham's letter. We are hopeful that these responses will meet with the approval of ACHCSA.

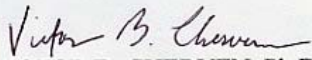
ENVIRO SOIL TECH CONSULTANTS


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If you have any questions or require additional information, please feel free to contact our office at 408-297-1500.

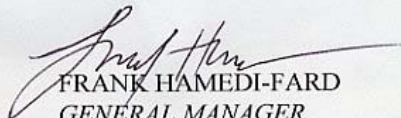
Sincerely,

ENVIRO SOIL TECH CONSULTANTS


VICTOR B. CHERVEN, Ph.D.
REGISTERED GEOLOGIST #3475


LAWRENCE KOO
C. E. #34928




FRANK HAMEDI-FARD
GENERAL MANAGER

ENVIRO SOIL TECH CONSULTANTS

RESPONSE TO TECHNICAL COMMENTS

1. As requested by Mr. Wickham, the upper 10 feet of all hollow-stem auger borings will be continuously sampled to observe contaminant distribution within the capillary fringe.
2. One soil sample from the capillary fringe in each boring will be submitted for laboratory analysis. Additional samples will be selected for analysis based on observations during drilling. If staining, odors, or PID readings indicate that contamination is present throughout a 10-foot interval, samples will be collected from the top, middle, and base of the interval.
3. Mr. Wickham has requested that soil samples be analyzed for TPH as gasoline, BTEX, 1,2-DCA, EDB, and the gasoline oxygenate MTBE by EPA method 8260B, as well as for total lead by EPA method 6010B. Although we have clearly shown in previous monitoring reports that MTBE has rarely been detected at this site and is NOT a contaminant of concern, we will comply with this request.
4. Mr. Wickham has requested information about the method and purpose of hydraulic conductivity testing of soil samples. Enclosed is an example of a laboratory report that was prepared on three samples from another site where ASTM method D5084 was utilized to measure various aquifer parameters. We have utilized aquifer data obtained in this way on numerous sites in order to obtain information on aquifer and aquitard characteristics prior to designing aquifer pumping tests and to develop interpretations about the groundwater flow regime. In their ability to determine permeability over a short depth interval and thereby identify the zones of maximum

and minimum permeability, these laboratory methods are superior to some other methods, such as CPT logs, which utilize a remote-sensing technique and “smooth” the data over a longer depth interval. Another advantage of laboratory tests is that they are an economical way to obtain hydraulic conductivity and porosity data when soil samples from hollow-stem auger borings are available. Further, in situations where the aquifer material is fine-grained and of low permeability, such as at this site, laboratory methods are probably preferable to in-situ aquifer tests because of low water yields.

5. Mr. Wickham has requested that monitoring wells be screened with 10 feet of PVC casing, and that the top of the casing be above the water table (7 feet in some cases). The screened interval will be determined on a well-by-well basis, depending on the static water level in the boring, but no wells will have more than 10 feet of screened casing. We will attempt to set the screened interval above the water table at the time of drilling, although we recognize that the depth of the water table may vary over time.
6. Mr. Wickham has requested ESTC to obtain and review reports that were prepared by Subsurface Consultants and IT Corporation in 1989 and 1990 for information about the storm drain that is located in the pavement behind (west of) Norge Cleaners. These reports were received from Mr. Stevens on June 6, and we have since reviewed them.

In September 1989, Subsurface Consultants (SCI) concluded that contaminated soil and groundwater were present within about 90 feet of El Cerrito Creek, north of the storm drain in Adams Street. This conclusion was based on the results of a soil-gas survey and a video camera survey of the interior of the storm drain. SCI recommended pressure-washing the storm drain and then sealing the joints in the drain pipe with grout to prevent groundwater from entering the pipe through leaking joints. This activity was apparently performed in mid-September. Mr. Wickham's letter referred to a November 1989 report by SCI; however, ESTC did not receive a copy of that report and is uncertain whether it describes the results of the pipe repair activities.

Technical and Ecological Services was called to the site in September 1991 to investigate a second encounter with contaminated soil in Adams Street. This situation developed during the installation of a new gas main by PG&E. Five soil samples and six water samples were collected in September and October and analyzed for Total Petroleum Hydrocarbons as gasoline and diesel, total lead, and volatile aromatic compounds (BTEX). The samples were not analyzed for the chlorinated hydrocarbons that were probably in use at Norge Dry Cleaners. Contaminants were detected in the pipeline trench as far as 60 feet south of the sidewalk at the end of Adams Street. This is about the same distance from the creek as hydrocarbons were detected by SCI in 1989. Because the 1989 storm drain repair did not attempt to remove contaminated soil in the vicinity of the drain, it is possible that the hydrocarbons detected in 1991 were present in the soil during the 1989 work by SCI. Drilling to determine whether contaminants are still present in this area is discussed under item 8 below.

7. Mr. Wickham has requested Kamur Industries to resume monitoring El Cerrito Creek and the storm drain outlet. However, during our site meeting on June 6, 2006, it was apparent that the water depth in the creek is only a few inches at the present time, and that there was very little flow. It was therefore agreed that creek sampling should be deferred until a later time, such as during storm events, when sufficient water is present to allow reliable sampling.

8. Mr. Wickham has provided a copy of a site map that was included in a 1989 report by Subsurface Consultants, and included proposed locations for three test borings in the vicinity of the storm drain and sump manhole behind Norge Dry Cleaners. This is a useful map for determining where additional assessment of the storm drain should take place, but ESTC was unaware of its existence before receiving Mr. Wickham's May 2006 letter. During our June 6 site meeting, we observed that the sump manhole has been removed since the map was prepared, and that the area available for drilling is limited. Based on our discussion at the site, ESTC has revised the proposed drilling locations to assess the storm drain, as illustrated on Figure 1.

One boring will be located in the lawn area north of the street. Due to the presence of the PG&E gas main in this area, the precise location of this boring must be determined after PG&E has visited the site to mark the utility line and approve our proposed location. A second boring will be located in the parking area west of monitoring well MW-3 and east of the storm drain, and the third boring will be located a few feet east of the manhole. No borings will be drilled south of the manhole, because the SCI and IT reports indicated that no contamination was detected there.

9. Mr. Wickham has requested that the sump in Adams Street be sampled during the proposed investigation and in future quarterly groundwater monitoring events. As explained above, the sump is no longer present, so this task cannot be performed.