

WE RENT TABLE LINENS, APRONS,
TOWELS, MATS, AND WASHABLE
CLOTHING FOR ALL BUSINESSES
AND PROFESSIONS

ESTABLISHED OVER 80 YEARS • PROMPT ECONOMICAL SERVICE

March 13, 2009

Mr. Steven Plunkett
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

SUBJECT: RESPONSE TO COMMENTS IN LETTER DATED JANUARY 30, 2009
CERTIFICATION
Fuel Leak Case RO 337
California Linen Rental Company
989 41st Street
Oakland, CA

RECEIVED
2:26 pm, Mar 23, 2009
Alameda County
Environmental Health

Dear Mr. Plunkett:

You will find enclosed one copy of the following document prepared by RGA Environmental, Inc.

- Response to Comments in Letter Dated January 30, 2009, dated March 13, 2009 (document 0304.L86).

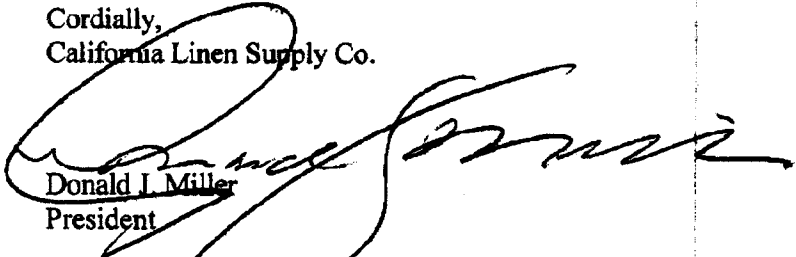
I declare, under penalty of perjury, that the information and/or recommendations contained in the above-mentioned report for the subject site is true and correct to the best of my knowledge.

Please direct all future correspondence to:

California Linen Supply Co., Inc.
c/o Donald J. Miller, President
2104 Magnolia Way
Walnut Creek, CA 94595

Should you have any questions, please do not hesitate to call me at (925) 938-2491.

Cordially,
California Linen Supply Co.


Donald J. Miller
President

cc: LeRoy Griffin, Oakland Fire Department, Office of Emergency Services, 250 Frank Ogawa Plaza, Suite 3341, Oakland, CA 94612

0304.L87



March 13, 2009
Letter 0304.L86

Mr. Steven Plunkett
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

SUBJECT: RESPONSE TO COMMENTS IN LETTER DATED JANUARY 30, 2009
Fuel Leak Case RO 337
California Linen Rental Company
989 41st Street
Oakland, CA

Dear Mr. Plunkett:

In accordance with your letter dated January 30, 2009 this letter provides the requested response to your comments regarding soil excavation and removal. Your January 30, 2009 letter also requested that a work plan be prepared to address the following topics. Each of these topics is addressed under separate cover in the requested work plan.

1. Dissolved Contaminant Plume Migration
2. Post-Remediation Soil Vapor Sampling
3. Down Gradient Soil Contamination

In your January 30, 2009 letter you requested documentation to support the statement that residual arsenic concentrations detected at the site exceeding residential Environmental Screening Levels (ESLs) represent background levels in Bay Area soil. The following information provides the requested documentation.

Both the Department of Toxic Substances Control (DTSC) California Human Health Screening Level (CHHSL) January 2005 user's guide (section 2.7) and the San Francisco Bay Regional Water Quality Control Board (SFRWQCB) ESL May 2008 text (section 6.4) state that naturally occurring background concentrations of arsenic in soil may exceed their respective soil screening levels in California. The SFRWQCB ESL may 2008 text also states that "Ambient background concentrations of arsenic in Bay Area soils typically exceed risk-based screening levels for direct-exposure concerns."

The City of Oakland has published a "Survey of Background Metal Concentrations Studies" authored by the Oakland Urban Land Redevelopment Program. A link to the document is provided as follows: <http://www.oaklandpw.com/Asset1116.aspx> . The document states that "Some naturally-occurring concentrations of metals in Oakland soils are higher than the threshold calculated by risk-based models... In Oakland, this is especially true of arsenic." All of the arsenic concentrations exceed DTSC and SFRWQCB screening levels. The document appears to rely heavily on the 1995 Lawrence Berkeley National Laboratory Environmental Restoration Program study where 500 samples were taken from 71 locations representing five geologic units. Based on discussions with personnel at DTSC, there are concerns that some of

March 13, 2009
Letter 0304.L86

the samples and associated arsenic concentrations in the study may have been affected by anthropogenic arsenic sources.

The DTSC has issued an undated advisory entitled, "Determination of a Southern California Regional Background Arsenic Concentration in Soil." A link to the advisory is as follows: <http://www.oaklandpw.com/Asset1116.aspx> . The advisory states that the 95% confidence limit of the 99th percentile of the arsenic data set (excluding outliers) is a 12 mg/kg arsenic background concentration for soil in Southern California. The advisory states that a similar evaluation is being conducted by DTSC for school sites in Northern California in order to derive arsenic screening levels State-wide. I called one of the authors of the advisory Gerald "Buzz" Chernoff (916-255-6687) and asked when the Northern California evaluation would be completed and if he had any preliminary results. Mr. Chernoff stated that the next publication will be an advisory for a State-wide background arsenic concentration of 12 mg/kg with a 95% confidence limit of the 99th percentile of the arsenic data set and that the advisory should be released by June 2009. Mr. Chernoff also stated that almost invariably DTSC does not require that arsenic concentrations be reduced below 12 mg/kg for soil.

Review of residual arsenic concentrations in soil at the subject site shows that none of the residual concentrations exceed 12 mg/kg.

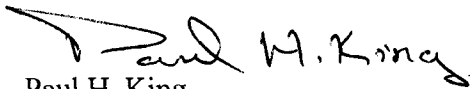
Please let me know if you have any questions or comments. Should you have any questions or comments, please do not hesitate to contact us at (510) 547-7771.

Sincerely,

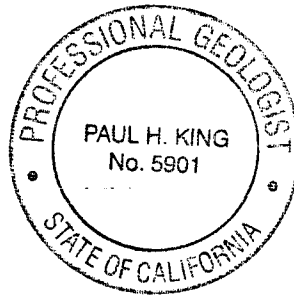
RGA Environmental, Inc.



Karin Schroeter
Project Manager



Paul H. King
California Registered Geologist #5901
Expires: 12/31/09



cc: LeRoy Griffin, Oakland Fire Department, Office of Emergency Services, 250 Frank Ogawa Plaza, Suite 3341, Oakland, CA 94612
Donald J. Miller, California Linen Supply Co.

PHK
0304.L86